



## AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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November 27, 2007

The Honorable Richard Bloom  
Mayor, City of Santa Monica  
1685 Main Street  
Santa Monica, CA 90401

Dear Mr. Mayor and Members of the City Council:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of nearly 415,000 members, more than two-thirds of the nation's pilots, including more than 50,000 residing in California. AOPA is committed to ensuring the future viability of general aviation airports and their facilities as part of the national transportation system. On behalf of our membership, we are writing to you concerning a proposed ordinance affecting operations at Santa Monica Municipal Airport, which we understand will be introduced for First Reading at the Council's meeting on Tuesday, November 27, 2007.

We have carefully reviewed the staff report which accompanied the draft ordinance, which would attempt to restrict operations at the airport by banning all Category C and D aircraft from landing or taking off. We can appreciate the concerns for safety that may have prompted this legislation. Even so, as the sponsor of the airport, the City of Santa Monica must understand that it has certain obligations that it agreed to, both from participating in various federal grant programs and as operator of a surplus property airport. These obligations include making the airport available:

*"...as an airport for public use on reasonable terms, and, without unjust discrimination to all types, kinds, and classes of aeronautical activities, including commercial aeronautical activities offering services to the public at the airport." (Federal Aviation Administration Grant Assurance 22a)*

In suggesting that category C and D aircraft should be banned from the airport because they are inherently unsafe on Santa Monica's runways, City staff has drawn the erroneous conclusion that aircraft design categories are inextricably linked to the design of an airport. This issue was addressed in a letter to the City in 2002, when David Bennett, the FAA's Director of Airport Safety and Standards wrote:

*"The Airport Reference Code design category of an airport is not intended, and cannot be used, to limit operations of an airport. While the design category and geometry of an airport are useful in airport planning, the FAA does not consider it inherently unsafe for an aircraft of a larger design category to utilize an airport that has been designed to accommodate a lesser design category of aircraft. It is incorrect to assume that aircraft operating at SMO that are larger or faster than B-II aircraft are not compatible with the airport's Airport Reference Code."*

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Santa Monica Airport has been plagued in recent years with any number of proposed ordinances, amendments, and environmental studies designed to restrict operations at this vital general aviation airport. Rather than continue these efforts, we urge the City and airport neighbors to sit down with the aviation community, discuss their respective needs and concerns, and seek some agreement that would address both. AOPA would welcome the opportunity to participate in any such dialogue.

Thank you for your attention to this matter. If you have any questions, or would like additional information, please do not hesitate to contact me at your convenience. You may also want to contact our California Regional Representative, Mr. John Pfeiffer, who can be reached at [john.pfeiffer@aopa.org](mailto:john.pfeiffer@aopa.org), or 530-226-5117.

Sincerely,



Gregory Pecoraro  
Vice President  
Regional Affairs