



# City of Lawrence

## PUBLIC WORKS

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### CITY COMMISSION

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June 11, 2010

Nicoletta S. Oliver  
Airports Compliance Specialist  
U. S. Department of Transportation  
Federal Aviation Administration  
901 Locust  
Kansas City, MO 64106-2325

RE: Lawrence Municipal Airport  
Informal Complaint  
Response to March 23, 2010 Correspondence

Dear Ms. Oliver:

The City of Lawrence received correspondence from the FAA dated March 23, 2010 requesting two items:

- A plan of action consistent with FSDO's safety review as referenced in a February 3, 2010 memorandum from Mr. Behrends, "to substantiate whether it will be feasible to reasonably accommodate skydiving activities at the Airport or not"; and
- Revisions to the Lawrence Municipal Airport's minimum standards related to insurance requirements for skydiving operators.

With respect to the first request, the City awaits additional information from the Wichita FSDO. Mr. Behrends' February 3, 2010 memorandum preliminarily determined that the Lawrence Municipal Airport could, with conditions, support the proposed skydiving operation. Those conditions identified operational issues, briefly summarized:

- Weather conditions must be VFR
- USPA safety regulations should be followed
- A NOTAM must be posted
- Communications with Kansas City Center and LWC
- Airport Management will advise operators based at the airport and the Airport Facility Directory that a parachute drop zone has been established.

On April 5, 2010, the City requested a copy of Mr. Behrend's safety study referenced in his February 3, 2010 memorandum. I received a call from Mr. Behrends on April 6, 2010 regarding what the City had requested. We discussed the City's uncertainty as to where the FSDO found sufficient/adequate area on airport property to support a drop zone as enumerated in his correspondence, specifically Item C: "numerous areas on the field comply with USPA Safety Regulations". At that time Mr. Behrends disclosed that he had not developed a map identifying



an area sufficient to be designated as a drop zone. I committed to sending aerial photography and the Airport ALP to Mr. Behrends to assist in identifying areas sufficient for skydiving operations at the Airport. On April 13, 2010, I sent Mr. Behrends the maps (both hard copy and electronically). Mr. Behrends confirmed receipt of the materials on April 27, 2010.

On April 20, 2010 Richard Haig, Airport Board Chairman, visited the Wichita FSDO and discussed with Mr. Behrends the minimum area the FAA would allow for a drop zone. According to the USPA publication, Size and Definition of Landing Areas, Section 7 of the Skydivers Information Manual, the size for an open field is no less than 500,000 sq. ft. (400 ft. radius circle). Mr. Haig and Mr. Behrends also discussed other minimum requirements for a drop zone. Those items included:

- 1) A drop zone could not be located on runways, taxiways, or aprons,
- 2) A drop zone could not be located in the identified object/obstacle free areas, runway protection zone and their associated safety areas,
- 3) A safety buffer of 100 yards minimum from the areas identified in items 1) and 2), and also away from roads, streets, power lines and buildings,
- 4) A drop zone could not be located in an area that contains water.

On May 11, 2010 you informed me that the Wichita FSDO requested the City submit a written request to review city owned property at the airport for the purpose of identifying an acceptable drop zone. On May 28, 2010, the City submitted a written request to the FSDO, as requested. As of the date of this letter, the City has not received additional information from the FSDO.

While we agree with the FSDO operational conditions set forth in Mr. Behrends' February 3 memorandum, based upon the information that the City has received, the attached map has been developed and there does not appear to physically be an area of sufficient size at our Airport to safely accommodate a drop zone for this activity. However, we will certainly consider any area identified by the FSDO.

The identification of an area or areas at the Airport suitable to accommodate skydiving activities is not the only issue of concern for the City. Mr. McCauley's proposal to the City contained a number of other deficiencies that greatly concern the City. The issues identified in correspondence dated July 20, 2009 from the City to the FAA have not been addressed. Briefly those included:

- 1) Failure to comply with the minimum standards for:
  - I. Insurance,
  - II. Insufficient information regarding/addressing operational issues, equipment, aircraft communication,
  - III. Qualified instructors, pilots and personnel,
  - IV. Financial plan including operational costs, start-up capital costs, and budgets,
  - V. Experience,
  - VI. Facility – where would the business be conducted and equipment stored.
- 2) Non-compliance with City's zoning regulations which would include a special use permit, zoning application, site plan, plat, facility/building layout.

All businesses at the Lawrence Municipal Airport have met/complied with the minimum standards and City zoning regulations.

With respect to your second request concerning the Airport's minimum standards, we report that on June 8, 2010, the City Commission approved changes to the minimum standards concerning

insurance requirements for skydiving operations. The proposed changes were previously reviewed and approved by the FAA. The revised Minimum Standards are enclosed.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles F. Soules". The signature is fluid and cursive, with the first name "Charles" being the most prominent part.

Charles F. Soules, P.E.  
Director of Public Works

CFS/je

Encl.: Insurance Requirements/Skydiving Operations  
Map

cc: David L. Corliss, City Manager  
Toni Ramirez Wheeler, Director of Legal Services