



APR 1 2022

1 April 2022

Members of the City Council, City Manager and Airport Director:

Venice Municipal Airport Needs a Control Tower. Americans are divided on many issues but in Venice, FL the issue upon which most residents could agree is the proliferation of vehicle traffic. The City Manager and the Police Chief agree, we have more traffic (Venice Gondolier 16 March). Venice is a great destination in any case but the explosion in housing construction seems to be the major reason. There is heavy traffic on Interstate 75, U.S. 41, Tamiami Trail, Venice Avenue, Center Road, Laurel Road, and River Road (to name several). A few new and some wider roads and traffic control devices have been constructed or installed because the traffic increased on its own, not the other way around. Traffic lights, stop signs, roundabouts and roads did not encourage more traffic, they responded to it by regulating it to better manage congestion.

Airplane traffic has increased at the Venice Municipal Airport for many of the same reasons. Plus, since Venice does not have a control tower to regulate traffic it is popular destination for airplanes flights from other airports with control towers. Just like the roads we now see a lot more congestion in our airspace. Like a traffic signal to control a busy intersection, many in the Venice Airport aviation community say it is time for an Air Traffic Control Tower. The Venice Aviation Society, Inc. (VASI), the organization dedicated to supporting safe and modern airport operations, polled its members with an 83% response in favor of a control tower. With an operating control tower airplanes cannot independently decide which of our 4 runways they will use for landing or takeoff- the tower decides.

Runway 23, our noise mitigation runway, departs over the Gulf of Mexico. Flights from the other runways depart over land. Several factors determine which runway to use, but when conditions permit, airplanes would more frequently depart or land over the Gulf. A control tower regulates and sequences the arriving, departing and transient air traffic. Without a control tower the inbound, outbound, and transient aircraft sort this out on their own. Please see the attached VASI information paper. We realize this is a significant undertaking, but we believe it's time to consider a control tower for the Venice Airport.

A handwritten signature in black ink, appearing to read "David T. Wimberly".

David T. Wimberly
President

Attach, Point Paper

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Venice Municipal Airport Air Traffic Control Tower (ATCT)

28 March 2022

The Venice area has seen substantial development over the recent years with a corresponding increase in traffic and road congestion year-round. A similar situation exists in the air at the Venice Airport. In March of 2008, a member of the local aviation community spoke before the Venice City Council requesting that the city apply to the Federal Aviation Administration (FAA) for the establishment of an Air Traffic Control Tower (ATCT) at the Venice Municipal Airport. The 2008 request was made in anticipation of continued aviation growth throughout the United States and the subsequent increase in air traffic. This growth would impact all airports including municipal non-air carrier/General Aviation Airports such as Venice. It was suggested that the city apply for this tower under the provisions of the FAA Contract Tower Program. The request was not acted on by Council.

As predicted, since 2008 commercial and general aviation have continued to grow in the United States. Much like the local roads and highways the Venice Airport has experienced increased air traffic on a yearly level. Whereas airport traffic in previous years had experienced a seasonal increase during the winter months the airport is now busy year-round. The Venice airport has accomplished significant work on the runways, taxiways, ramps, and other airport areas to maintain the airport as a safe and modern general aviation airport. Funding has been principally from the FAA Airport Improvement Program.

The Venice Airport has always experienced a mix of aircraft types. But there are now significant increases in both the volume of and kinds or types, or mix, of aircraft using the airport. At any given time during the day both private jets and small piston aircraft with typical airspeeds ranging from 50 to 120 miles an hour are in the traffic pattern preparing to land or depart. These aircraft in the traffic pattern whether landing, departing or in the closed traffic pattern are flown by pilots of all experience levels from beginners to many thousands of hours.

The number of businesses on the airport has not changed though these businesses have seen added activity, with both the FBO and flight school busy.

Since Venice does not have an ATCT it is a popular destination for helicopter and airplanes from other airports, once again for pilots of all experience levels. A non-towered airport is easier to access and allows for less control. The extensive transient traffic is in addition to the regular tenants.

The FAA provides suggested guidelines or procedures for air traffic operations at non-towered airports like Venice (FAA AC 90-66B). The suggested procedures are not always followed. Generally, arriving aircraft will join the existing traffic pattern which is most usually selected based on the prevailing winds. However, the absence of an ATCT means that aircraft enter the area from many different directions and can land on any runway they choose. The only regulatory requirement for air traffic patterns at non-towered airports is that all turns in the air must be to the left unless otherwise specified for the airport. Right turns in the traffic pattern are required for the Venice Airport Runway 13, all other runway turns are to the left. This regulatory requirement is frequently violated generally by transient pilots. Venice's Florida Flight Training Center emphasizes correct Traffic Pattern Procedures for their instructors and students.

This increase in the density and mix of traffic has changed the airport airspace to a more complex and congested operating environment. To add to the airport traffic congestion, it is not uncommon for aircraft going north or south along the shoreline (as an example from Tampa to Naples) to conflict with the airport traffic pattern for Venice Airport Runways 13 and 31 which are just off the shoreline of the Gulf or Mexico. One of the bedrocks of aviation is for pilots to "See and Avoid" other aircraft and obstructions to ensure safety. Today's complex mix of aircraft has resulted in a more challenging "See and Avoid" environment for pilots taking off or preparing to land at the airport.

The answer to this is an ATCT at our Airport. An operating control tower for an airport like Venice could typically manage the airspace within 4 statute miles of the center of the airport, up to 2,500 ft, above Ground Level (AGL). This particular option is called Class D airspace and aircraft flying in the Venice airspace would be required to contact the tower to enter that airspace for example to transit/overfly the airport, depart, or land. Regardless of the airspace designation the tower controls the departure and landing of aircraft in a more orderly manner than currently experienced while balancing the needs of the pilots. In the past discussions about a tower for Venice have raised concerns that it would increase air traffic.

That misguided assertion is simply not the case since as previously mentioned many students and pilots from other airports purposely come to Venice to train because Venice Airport does not have a tower. A tower would regulate and manage the flow of traffic. Red lights are not installed at dangerous road intersections to increase traffic they are installed to control traffic. More specific benefits of a tower are included in attachment 1. Contract tower operations are funded by the FAA.

ATCT options include an FAA Control Tower, a Contract Control Tower, and possibly a Remote-Control Tower, of which there are two remote control towers operating in the U.S. While a Remote-Control Tower is an option an FAA Contract Tower seems more likely for Venice. If a tower was approved the FAA would decide which option was appropriate. Attachment 2 provides details on the FAA Contract Tower program as well as the administrative processes that must take place before an airport can be approved for a Contract Tower.

The ATCT Contract program was designed to meet the needs of small non-towered airports and provide for an increased margin of safety and security for users of the airport as well as the adjoining communities. Attachment 3 is an announcement of a new grant program which suggests funding is available for airports like Venice to make terminal improvements and possible ATCT construction. Other options for initial funding are also possible. From Everglades City Airport south of Marco Island to Brooksville, FL Airport north of Tampa only 3 coastal cities are without Control Towers, Everglades City (very small GA Airport), Marco Island Airport and Venice (very busy GA Airport). Air Traffic Control Personnel from both Tampa Approach Control and Punta Gorda Airport have commented on the desirability of a tower in Venice. The Venice Aviation Society, Inc. (VASI) polled its membership and 83% supported an ATCT for Venice. VASI recommends that the City of Venice and Venice Municipal Airport add an ATCT to the Airport's Capital Improvements Plan and begin efforts for FAA approval.

VASI.

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Attachment 1

Benefits of a FAA Contract Tower at Venice Airport

An FAA ATCT will have positive benefits for both the community as well as the users of the airport. As previously stated, pilots and air traffic controllers are taught at the beginning of their training to “see and avoid” and maintain situational awareness of other aircraft whether taxiing on the airport surface (watching for ground vehicles or other obstructions) or flying. At a non-towered airport, pilots become their own air traffic control by looking and listening on a common radio frequency for other aircraft in the traffic pattern or vehicles operating on airport surfaces. This is a multi-task operation where there is little to no room for mistakes. The task becomes more challenging when dealing with other aircraft which may have different operational characteristics. This doesn’t necessarily mean that this is an unsafe situation. This system has worked for years due to the training and professionalism of pilots. Conversely, the system is not a forgiving one if an error occurs.

A control tower provides another “set of eyes” that can observe and provide for a safe and efficient movement of aircraft in the traffic pattern and on the ground. Some areas on the airport grounds are designated as non-movement areas (a seeming misnomer) not controlled by the tower. This allows aircraft to move in these areas without tower control, as an example to and from t-hangars.

With a control tower at Venice, a “Class D Airspace” will also be established. Class D airspace creates what could be called a airspace bubble over the airport. The airspace area will be customized for the Venice Airport, and it would extend several miles from the center of the airport, (typically 4 miles). The bubble would be as high as 2,500 ft Above Ground Level (AGL). Aircraft wishing to land or take off or transit the airspace must establish radio contact with the control tower before entering the airport’s airspace and are controlled while in the airspace. Class D

Airspace is in effect when the tower is in operation. Tower operating hours are determined by the flow of traffic. Typical operating hours might be from 7 in the morning until 8 pm in the evening.

A control tower can also make pilots aware of local noise mitigation procedures and normally only one runway at a time is in use. A tower in addition to controlling and sequencing traffic in the air offers other advantages such as managing traffic on airport grounds (except for non-movement areas). There should be fewer delays and less problems with sequencing-plus controllers are trained to be able to foresee and avoid problems. Once established the tower will be a beneficial conduit for critical information ranging from weather conditions, communications, and airfield conditions.

Attachment 2:

What is an FAA Contract Tower and how does a community acquire one?

The following document has been copied in part from the official FAA web page. It specifies the requirements and procedures to follow.

FAA Contract Tower Program

About the FAA Contract Tower Program

Contract towers are air traffic control towers that are staffed by employees of private companies rather than by Federal Aviation Administration (FAA) employees. The FAA Contract Tower (FCT) Program was established in 1982 to allow the agency to contract out the operation of certain towers.

Congress has directed the FAA to assess current and prospective program applicants and award limited grants to plan and develop additional contract towers.

To be admitted into the FCT Program, the safety and efficiency benefits of a tower must exceed its costs. The FAA is required to perform benefit-cost analysis (BCA) to determine eligibility for participation in the FCT program.

Program Status:

- The FCT Program is administered by the FAA's Air Traffic Organization. The BCA assessments are conducted by the FAA's Office of Aviation Policy and Plans.
- The FCT Program provides air traffic control services at towers throughout the United States (including Hawaii), Guam, Puerto Rico, Saipan in the Northern Mariana Islands, and the U.S. Virgin Islands.

- The current contracts, which cover the costs of air traffic control services, cover a five-year period, beginning July 2015.
- 250 contract towers are operated under national contracts awarded to Midwest Air Traffic Control Services, Serco Management Services Inc., and Robinson Aviation (RVA) Inc.
- Six FCTs are operated under an Interagency Agreement with the Air National Guard.
- There are approximately 1,400 contract controllers, all of whom meet the same qualification and training requirements as FAA air traffic controllers.
- FCTs provided service for more than 15 million operations in FY18.
- FCTs represent 49 percent of all the Federal air traffic control towers in the United States.

Program Eligibility:

Contract Tower Program:

To participate in the FCT Program and be eligible to receive Federal contract funds, an airport must, among other requirements, have an approved operational tower and receive a benefit-cost ratio of at least 1.0 from the FAA.

- The contract covers the costs of air traffic services.
- The individual airports are responsible for funding capital expenses, including construction and maintenance of towers.
- Partial funding may be available under the Airport Improvement Program statute (Title 49 U.S.C. § 47124) for the portion of tower improvements that have been determined to be grant eligible.
 - This provision allows the FAA to consider AIP grant funding to help an airport with construction or equipment for a tower that is approved to enter the FCT program.

Cost Share Program:

- If costs exceed benefits for certain towers already in the FCT program, the local tower sponsor is provided the opportunity to remain in the FCT program as part of the Cost Share Program, paying a pro-rata share of the tower operating cost.
- For airports currently participating in the Cost Share Program, the FAA will conduct BCA annually.
- For airports with towers that are currently fully funded participants in the FCT program, the FAA will conduct BCA if operations at that facility drop by 25 percent in a single year or 55 percent over a three-year period.
- The local proportion of the cost share is capped at 20 percent.
- Airport sponsors have a 12-month grace period before being required to assume the local cost share.

How to Apply:

- **Program Participation Review Process & Timeline:**
Benefit Cost (BC) ratios for conditional approval of new applicants/candidates will be good for 5 years.
- **Application Package Request to Project Implementation Manager (PIM)**
Airport Sponsors should express interest in the FCT Program to the Service Area PIM. Upon notification of an Airport Sponsor's interest in participating in the FCT program, the FCT PIM will send the Airport Sponsor an FCT application package.
- **Benefit Cost Analysis (BCA)**
How is the BC ratio developed?
The BC ratio is developed by using airport-specific information to estimate the benefits of establishing and operating a tower and comparing those to the airport-specific costs of having tower services. Total benefits are the sum of benefits from safety (avoided accidents) and efficiency (avoided aircraft operating cost and passenger value of flight time savings). Costs reflect the capital investment costs for establishing a tower (when these are paid by the

FAA) and the annual operating and maintenance costs paid by the FAA. Both benefits and costs are projected for 15 years and discounted. The BC ratio equals discounted benefits divided by discounted costs.

How often does the FAA recalculate the BC for FCTs?

- In the case of an air traffic control tower that is operated under the Cost-Share Program, the FAA calculates the BC ratio on an annual basis.
- In the case of an air traffic control tower that is operating in the FCT program, the FAA shall only calculate if traffic at the airport decreases by:
 - More than 25 percent from the previous year; or
 - By more than 55 percent cumulatively in the preceding 3-year period.
- **AIP funds**
 - Airport sponsors will follow the procedures for AIP grants
 - Contract tower projects can be funded with AIP Small Airport Fund, state apportionment, or entitlement funding.

Current Towers

There are currently 256 contract towers, for which the FAA pays for air traffic control services on a contract basis.

- [List of all FAA contract tower locations](#) (MS Excel)
- [View a map of all contract tower locations](#) (PDF)

Contact Information

[Email us](#)

[FCT Program Implementation Managers \(PIMs\)](#)

- Eastern Service Area (ESA): 404-305-7153
- Central Service Area (CSA): 817-222-4261
- Western Service Area (WSA): 206-231-2892

Additional Resources

- [Establishment and Discontinuance Criteria for Airport Traffic Control Towers \(APO-90-7\) \(PDF\)](#)
- [U.S. Contract Tower Association](#)
- [Federal Contract Tower Minimum Equipment List \(JO 7210.78 Appendix A\)](#)
- [New Starts Order JO 7210.78](#)
- [FAA Order 5100.38D, Change 1 \(PDF\)](#) – Airport Improvement Program Handbook.

Bipartisan Infrastructure Law - Airport Terminals Program



Through the Bipartisan Infrastructure Law, **\$5 billion has been granted** to provide competitive grants for airport terminal development projects that address the aging infrastructure of the nation's airports. These grants will fund safe, sustainable and accessible airport terminals, on-airport rail access projects and airport-owned airport traffic control towers. Projects may also include multimodal development.

We have a once-in-a-generation opportunity to not just build new airport terminals, but build them in a way that brings opportunity to forgotten communities, increases competition and reduces environmental impact.

– U.S. Transportation Secretary Pete Buttigieg

APPLICATION PERIOD NOW OPEN

The first **\$1 billion in grants** can fund projects that will improve airfield safety through terminal relocation, replace aging facilities, increase capacity, encourage competition, improve energy efficiency (including LEED accreditation standards) and increase or improve access to passengers with disabilities and historically disadvantaged populations. Projects that relocate, reconstruct, repair or improve an airport-owned air traffic control tower are also eligible.

Is my airport eligible for this program?

Eligible airports include those operated by authorities, cities, territories and tribes within the national air transportation system. If your airport is normally eligible for Airport Improvement Program (AIP) grants, you're eligible for this program too.

How to apply

1. Read the [Notice of Funding Opportunity](#) to learn about the program and the terms and conditions of the grant awards.
2. Ensure you're registered with [System for Award Management](#) (SAM) and you have a unique entity identifier. You must continue to maintain an active SAM registration with current information while the FAA is reviewing your application.
3. Complete and submit [FAA Form 5100-144](#), Bipartisan Infrastructure Law, Airport Terminal and Tower Project Information. Instructions are included with the form. As part of your submission, you will need to prepare short summaries of your project and its program considerations and benefits.
4. The [form](#) can be completed and submitted electronically. Save your work as you complete the application. Use the "Submit by Email" button at the bottom of the form when complete.
5. Your complete, electronic application **must be submitted by Monday, March 28, 2022.**

How will my application be evaluated?

Applications will be evaluated based on criteria found in the [Notice of Funding Opportunity](#), Section E. Projects for consideration should:

- Increase capacity and passenger access
- Replace aging infrastructure
- Achieve compliance with the Americans with Disabilities Act (ADA), including expand accessibility for persons with disabilities
- Improve airport access for historically disadvantaged populations
- Improve energy efficiency including upgrading environmental systems, upgrading plant facilities, and achieving Leadership in Energy and Environmental Design (LEED) accreditation standards
- Improve airfield safety through terminal relocation
- Encourage actual and potential competition
- Create good paying jobs

Applicants are encouraged to submit projects that meet as many of these criteria as possible, but do not need to meet all criteria to be considered. The FAA will also consider projects that advance the goals of the following Executive Orders:

- [Executive Order 13990](#), “Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis”
- [Executive Order 13985](#), “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government”
- [Executive Order 14008](#), “Tackling the Climate Crisis at Home and Abroad”
- [Executive Order 14036](#), “Promoting Competition in the American Economy”

Distribution of funds

Large hub airports will receive up to 55 percent of the total funding; medium hub airports will receive up to 15 percent of the total funding; and small hub airports will receive up to 20 percent of the total funding. At least 10 percent of the total funding will go to non-hub and non-primary airports.

When will I hear if I received a grant?

Applicants will be notified either in writing or electronically. The Secretary of Transportation will announce a Notice of Intent to fund selected projects for Fiscal Year 2022 by July 2022.

I still have questions, who do I contact?

Direct all inquiries regarding applications to the appropriate Regional Office (RO) or Airports District Office (ADO). RO/ADO [contact information can be found here](#). Or you can contact the FAA BIL Team at 9-ARP-BILAirports@faa.gov.

More Information

- Review the full [Notice of Funding Opportunity](#).
- Have questions about completing your application? Detailed [Frequently Asked Questions \(FAQs\)](#) are available.
- Review the full [Bipartisan Infrastructure Law site](#) and see what other opportunities may be eligible to you.

Find out [how to get started](#), and stay tuned for more information or [subscribe for the latest updates](#).