



Lynchburg Regional Airport

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March 13, 2013

Mr. J. David Grizzle
Chief Operating Officer
Air Traffic Organization
ATO-Terminal Services
Federal Aviation Administration
800 Independence Avenue
Washington, D.C. 20591

Re: LYH Contract Tower Closure
Supplemental Information

Dear Mr. Grizzle:

As director of the Lynchburg Regional Airport, I am writing to provide supplemental information related to certain national interest considerations specific to Lynchburg Regional Airport as required in your letter of March 5, 2013. Accordingly, I am requesting that the contract air traffic control tower (ATCT) at Lynchburg Regional Airport (LYH) remain open and not be slated for closure as of April 7, 2013 based on the information as more fully described below.

Overview of LYH Aircraft and ATCT Operations

As an FAA-designated primary, commercial service airport, LYH is a full-service airport providing a wide range of aeronautical activities, including two fixed base operators, on-demand air charter, a university flight training program, specialty flight school, emergency air medical helicopter services, a state police aviation unit, and numerous hangar facilities for based aircraft. Serving a four-county service area surrounding the City of Lynchburg with a combined population of some 251,000, scheduled airline service has been available continuously at LYH since the early 1940s, with passenger traffic remaining relatively stable throughout the modern era of air travel. In 2012, LYH generated a total of 157,517 airline passengers, finishing the year with an increase of some 7.6 percent over 2011.

Aircraft operations experienced an even more impressive growth rate in 2012, rising by more than 15 percent over the prior year to 105,316 take-offs and landings. Overall, 2012 recorded the highest number of aircraft operations in the airport's history, with operations over the last two years alone up by an impressive 25 percent. Much of this increase is attributable to the very rapid growth of nearby Liberty University and its School of Aeronautics flight training program based at LYH. In fact, based on Liberty projections, total flight student enrollment is expected to reach over 260 by 2014, with total airport operations swelling to approximately 150,000 during the same period.

Local air traffic control services have been maintained continuously since the early days of the Federal Aviation Administration, with air traffic services initially provided by FAA controllers until transitioning to contract tower personnel with the creation of the FAA's Contract Tower Program in 1995. More recently, in coordination with the FAA, the airport has completed the site selection process for a new ATCT scheduled for construction in CY 2014. What's more, the environmental assessment process has just begun and all funding, including extensive commitments of passenger facility charges (PFCs) and other local funding sources, has been identified and programmed into the airport's FAA-approved ACIP.

National Interest Considerations

Overall, national interest considerations as related to the closure of the Lynchburg Regional Airport Contract Air Traffic Control Tower would generally include the following areas of activity as outlined in the FAA's March 8, 2013 email clarification.

- *Nuclear Interests.* A major contributor, these interests would include industries in our community that represent the nuclear fuels servicing, maintenance, military support, and nuclear research and development sectors that rely upon essential aviation services from Lynchburg Regional Airport and the added oversight that our contract air traffic control tower provides. And while not all of these local nuclear facilities are directly related to defense or homeland security, the very nature of the business of these industries clearly has national security implications and/or would represent an adverse economic impact that will be beyond the impact on the local community.
- *Military Training.* Due in part to its location in the west-central portion of the state and its proximity to rural and mountainous terrain, LYH has for years been a preferred location for the military to support training missions, and to obtain fuel and other necessary aeronautical services. In fact, overall military operations at LYH in CY 2012 were up by 34 percent over the same period last year.
- *Federal Executive Airlift Group.* This elite group of the U.S. Air Force 89th Airlift Wing operates and maintains special air transportation globally for the president, vice president, cabinet members and other senior military and elected leaders in the government. Since LYH's main runway was extended to 7,100 feet in 2006, our airport has been one of a select group of airports that regularly accommodates training missions to support these specialized military aircraft, including the C-32A (Boeing 757), C-40B (Boeing 737) and C20B, C-37A and C-37B (Gulfstream III, IV, 550).
- *Defense Intelligence Agency - Air Operations/Embassy Executive Transport.* Supporting U.S. Embassies around the world, this air operations group provides critical air transportation services to support U.S. Embassy officials and visiting high ranking U.S. government officials, cabinet secretaries, members of Congress and host country officials. As related by the Chief of the Air Operations Division regarding LYH, "Lynchburg is one of two airports near us with good, short runways conducive to training our pilots prior to sending them to US Embassies around the world. It is the only one with an operable control tower, which would be essential for us due to the high volume of training aircraft operating in your local area. Should the tower close, we would have to give serious consideration to finding other, less optimal training locations."
- *Economic Impact beyond Local.* As you know, with the closure of the LYH contract tower the Class D airspace assigned to our tower will revert to Class E airspace. In addition, the terminal radar approach control facility (TRACON) at the Roanoke ATCT (which mans the ASR-9 radar facility at LYH) will be responsible for many operations normally worked by the LYH contract tower. At the same time, workloads for Roanoke will already have increased as that facility faces its own reduced staffing levels due to sequestration. And with a greater demand for radar approach control services to support Liberty University's flight training program, along with our regular traffic demand, an even higher workload will be generated for those remaining Roanoke controllers. This, in turn, will create delays for the entire expanded region to include air traffic operating to and from Roanoke Regional Airport and therefore will result in an adverse economic impact that is beyond the impact on the local community.


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Finally, it is apparent that the April 7, 2013 planned closure of some 75 percent of the nation's contract towers amounts to a very unbalanced and unfairly disproportionate cut to this essential and successful FAA program. And while the rest of the FAA's budget faces a 5 to 8 percent reduction, a cut of this magnitude for contract towers is highly disproportionate compared to other FAA programs, and unjustly discriminates against a program that the DOT Inspector General has repeatedly said is a cost-effective program for taxpayers.

Certainly, the long-term impacts created by this plan if implemented will be very real as time goes on, and include the possibility of loss of scheduled airline service to our region. At the least, such a loss will create a major impediment to recruiting a second airline to replace Delta Air Lines which discontinued service to LYH in 2011 due to industry consolidation.

In light of the above information, your careful consideration of this request to permit the LYH contract ATCT to remain open would be appreciated. If you have any questions or would like to discuss this request further, please contact me at (434) 455-6089.

Very truly yours,



Mark F. Courtney, A.A.E.
Airport Director

cc: The Hon. Mark Warner, United States Senate
The Hon. Tim Kaine, United States Senate
The Hon. Bob Goodlatte, United States House of Representatives
The Hon. Robert Hurt, United States House of Representatives
Chairman and Members, Lynchburg Regional Airport Commission
L. Kimball Payne III, City Manager
David Young, Virginia Aviation Board
Randall Burdette, Virginia Department of Transportation
Rex Hammond, Lynchburg Regional Chamber of Commerce
Spencer Dickerson, U.S. Contract Tower Association
Randy Walls, Midwest ATC Service