



## CITY OF BATTLE CREEK W.K. KELLOGG AIRPORT

March 13, 2013

The Honorable Michael Huerta  
Administrator  
Federal Aviation Administration  
800 Independence Avenue SW  
Washington, DC 20591

Dear Administrator Huerta:

The City of Battle Creek is in receipt of your letter dated March 5, 2013 wherein we were informed of the FAA's decision to substantially reduce funding for the Federal Contract Tower (FCT) program and the possibility that this decision could result in the closure of the FCT at the WK Kellogg Airport. It is imperative that you understand the great consternation and overriding concern for the safety of the flying public this decision has brought about on a national basis. The City of Battle Creek strongly believes that our nation must work together in order to reduce federal spending. However, our concern regarding this proposal and its significant impact to the national interest is far greater.

In the few days we have had to absorb and think about the possible ramifications of the FAA's proposed actions we have received a tremendous amount of feedback that overwhelmingly suggests the FAA needs to step back and re-evaluate this decision. To that end, this correspondence is intended to directly respond to your call for comments from airport sponsors as instructed in the March 5, 2013 letter. We truly appreciate the opportunity to provide FAA with this information and trust that it will be of great value to the agency as it further considers any action that may result in the closure of the WK Kellogg Airport (KBTL) air traffic control tower (ATCT).

The WK Kellogg Airport is a large general aviation joint use military airport with a 10,003' x 150' primary runway, a 4,100' x 75' parallel runway and a 4,835' x 100' crosswind runway situated on more than 1500 acres. The parallel runway was just opened in July of 2011 and represents our continued partnership with the FAA to increase capacity and grow the WK Kellogg Airport. The airport is operated as a Class VI airport under 14 CFR Part 139, serves as a GA reliever airport and serves a very unique tenant base which has allowed the airport to be consistently ranked as one of the top five busiest airports in Michigan. Our unique base of tenants includes an Air National Guard presence, higher aeronautical post-secondary education, aircraft manufacturing, aircraft maintenance/refurbishment/modifications, corporate and government flight operations as well as recreational flyers. In fact, a recent study by the Michigan Department of Transportation, Office of Aeronautics, in conjunction with Economic Development Research Group, Inc., Boston, MA indicates that during federal fiscal year 2012 an estimated 233,353 people entered the National Airspace System via the WK Kellogg Airport.

The information below lists the areas of national interest as defined or provided by the FAA and the specific existence of that interest at the WK Kellogg Airport (KBTL).

**1. Significant threats to the national security.**

Battle Creek Air National Guard 110<sup>th</sup> Airlift Wing – closing the tower will have immediate and long term adverse effects on the national interest. The immediate effects are as follows:

- The closure will not allow air operations that are essential in supporting the Special Mission (MSN) of the Battle Creek ANG.
- The closure will negatively impact the safe ground movements of military assets operating in a complex operating environment that consists of parallel runways, a crosswind runway and multiple taxiway/runway crossings.
- The closure will have a negative impact on the ability of military aircraft to operate in a safe and controlled environment which is necessary to de-conflict more than 82,000 annual civilian/military operations where approximately 60,000 of those operations are considered by the military to be high risk and conducted by the Western Michigan University College of Aviation.
- The closure will have a negative impact by impeding military DV airlift operations.

Possible long term negative effects.

- Loss of future manned/unmanned MSN due to increased hazards in a high traffic operating environment without air traffic control services.
- The closure and resulting reduction in capacity may result in a loss of justifiable runway length with respect to the 10,003' x 150' runway. Such results would have the following negative impacts.
- Restrictions on the type of military aircraft and MSN's that could be assigned to KBTL such as tanker operations and F-35's.
- Negative impact on UAS LRE operations.

**Closing the KBTL ATCT will have a critical impact on the Battle Creek Air National Guard 110<sup>th</sup> Airlift Wing and the positive impact it currently has on national security.**

**2. Significant, adverse economic impact that is beyond the impact on a local community.**

A. KBTL is home to Duncan Aviation, one of the largest business jet maintenance, refurbishment and modification centers in the world. Duncan employs more than 650 people that are working on approximately 40 business jets at any one time. Duncan's customer base is approximately 20-25% internationally based and represents companies from Canada, Europe, South America and the Middle East. The aircraft from these countries are operated by foreign pilots.

Duncan also has an agreement with Dassault Aviation out of France to complete the aircraft interior and paint on the Dassault Falcon 7X. As per the agreement Duncan finishes approximately three to six Falcon 7X aircraft each year. The baseline price for one of these aircraft is approximately \$50 million.

The maintenance activities at Duncan necessitate a high amount of ground movements for high performance engine tests, avionics tests, as well as flight testing in the local traffic patterns.

Duncan Aviation and the City of Battle Creek believe that the closure of the tower will adversely impact the safe and efficient operating environment of the airport and could potentially result in a significant loss of business, specifically international business, and jobs.

**Closing the KBTL ATCT will have a critical impact on Duncan Aviation and the positive impact it currently has on national interest as it relates to economic impact that is beyond the impact on a local community.**

- B. KBTL is home to WACO Classic Aircraft. WACO Aircraft, a family owned American company, is the only FAA approved manufacturer of 1930's sport biplanes in the world. The WACO dream is to revive the Golden Era's open cockpit flying experience. WACO currently has sale offices around the world to service the following markets; North and South America, Europe, Middle East, Africa, East Asia, Australia and Southeast Asia, Greenland and Iceland. WACO currently manufactures the WACO WMF and assembles the Great Lakes 2T-1A biplane. WACO completes all of the post production testing and flying at KBTL under the watchful eye of the KBTL ATCT. The owner of WACO is extremely concerned about the potential closure of the tower and the negative impact it will have on the safety and efficiency of KBTL due to the complex operating environment and diverse fleet mix.

**Closing the KBTL ATCT will have a critical impact on WACO Classic Aircraft and the positive impact it currently has on national interest as it relates to economic impact that is beyond the impact on a local community.**

**3. Significant impact on multi-state transportation.**

- A. Duncan Aviation also provides significant maintenance and refurbishment support for about 6% of the active national and international business jet fleet. More than 90% of the business jet traffic in and out of Duncan comes across state and national borders. The loss of the ATCT in Battle Creek and the resulting reduction in safety will have a negative impact on the inter-state movements of these aircraft and the support they rely on from Duncan to fly safely and conduct business across the United States and internationally.

**Closing the KBTL ATCT will have a critical impact on the Duncan Aviation and the positive impact it currently has on national interest as it relates to multi-state transportation.**

- B. KBTL is home to the Western Michigan University, College of Aviation (COA). The COA is the largest higher aeronautical post-secondary education operation in Michigan and the arguably the third largest in the United States. As such, this not-for-profit public institution provides real and tangible benefits to US civil aviation. The loss of ATCT services at the W.K. Kellogg Airport would have a profoundly adverse effect on the COA that would result in an equally negative impact on national interest.

The looming pilot shortage predicted by industry experts has been exacerbated by the combination of the fifth year anniversary of the FAA's age 65 mandatory retirement as well as changes, taking effect later this year, to the required rest rules and Public Law 111-216 requiring an Air Transport Pilot (ATP) to occupy the first officer pilot seat. Additionally, FAA requires a student pilot to perform certain solo flights at towered airports. Not having the ability to conduct such solo operations at KBTL will result in an increased cost to the student which will deter an increased number of student pilots from attempting to enter the US air carrier industry further exacerbating the pilot shortage. Without ATCT services to separate student aircraft from other users of the airport, which include military, corporate and international jet flights, the college will be compelled to dramatically slow its tempo of operation in order to preserve the necessary level of safety.

Even with a significantly reduced tempo of flight training, the large number of student pilot operations combined with the complex mix of itinerant jet traffic is a very serious risk element without the presence of ATCT services. Should the FAA chose to close the ATCT there is significant doubt that the level of protection from a mid-air collision between this dangerous mix of dissimilar aircraft could be preserved at a level of safety that would be acceptable to the flying public. Such conditions could financially undermine the COA causing further negative impact by reducing or eliminating the other areas of human capital it contributes to civil aviation – Airframe and Power Plant mechanics, Airport Managers, Airline Managers Fixed Base Operator and Air Traffic Controllers.

**Closing the KBTL ATCT will have a critical impact on the WMU COA and the positive impact it currently has on national interest as it relates to multi-state transportation.**

C. KBTL is home to the FAA's Flight Inspection group that serves the FAA Great Lakes Region. FAA Flight Inspection ensures the integrity of instrument approaches and airway procedures that constitute our National Airspace System infrastructure. They accomplish this through the airborne inspection of all space and ground-based instrument flight procedures and the validation of electronic signals in space that are transmitted from thousands of various navigation systems. Airborne inspection of navigational aids is a two-part operation, requiring the skills of highly trained flight crews. The first part is an evaluation of the "signal in space and the second part is to certify the instrument approach procedures that are designed to allow pilots to safely use airport runways in adverse weather.

The Battle Creek Flight Inspection Field Office (FIFO) currently services Illinois, Indiana, Iowa, Michigan, Minnesota, Ohio and Wisconsin with four Beech King Air 300's. The Battle Creek FIFO is one of six FIFO's strategically located across the US in order to quickly respond to infrastructure needs of the National Airspace System (NAS). The FIFO flight crews rely on ATCT services to maintain separation from the numerous other aircraft in the operating environment particularly low time student pilots from the Western Michigan University College of Aviation. The KBTL controllers recognize the critical mission of the FIFO and work to provide them with priority sequencing. Without ATCT services FIFO flight crews will sustain delays resulting in further delays to the repair of critical NAS equipment.

**Closing the KBTL ATCT will have a critical impact on the FAA Battle Creek Flight Inspection Office and the extensive positive impact it currently has on national interest as it relates to multi-state transportation.**

4. **The extent to which an airport currently served by a contract tower is a critical diversionary airport to a large hub.**

The WK Kellogg Airport is a unique airport due to its size of 1500 acres, extensive runway/taxiway infrastructure, ATCT presence, US Customs Service and tenant base. Strategically located in southwest Michigan KBTL is 85 nautical miles west of the Detroit Metro Airport and 120 nautical miles east of Chicago O'Hare airport. The location along with its 10,003' x 150' wide primary runway and the fact that the Battle Creek Air National Guard base provides state of the art Airport Rescue & Firefighting (ARFF) services up to index E upon emergency notice makes KBTL a critical diversionary airport.

Until 2011, KBTL was listed as a diversionary airport for the NASA Space Shuttle program. These same unique features of KBTL have made it a frequent airport of choice for the President of the United States when traveling in the Presidential 747. Again, the unique combination of heavy infrastructure, excellent ARFF services and an operating air traffic control tower are what make KBTL a critical diversionary airport.

**Closing the KBTL ATCT will have a critical impact on the airports ability to remain available as a critical diversionary airport.**

In addition to the points of national interest offered by the FAA the City of Battle Creek would like point out other areas national interest that we believe could be impacted by a closure of the KBTL tower. The airport is home to several corporate flight departments including the following:

**The Kellogg Company**

Headquartered in Battle Creek Michigan, Kellogg Company is the largest manufacturer of breakfast cereal in the world. Chad Piper, Director of Aviation for the Kellogg Aviation Department offered the following comments regarding the potential closure of the KBTL ATCT.

*"Since the ATCT transition from FAA to private in 1997, Kellogg's Aviation Department has transported over 75,000 passengers and generated almost 41,000,000 passenger seat miles that in most cases departed and arrived out of KBTL. This was all completed without accident or incident thanks in part to having an active ATCT serving our department and passenger's needs.*

*With very few choices and reliability issues with the local airline service our corporate aircraft have been an essential business tool in our company's ongoing growth both domestically and internationally. The closure of the KBTL ATCT will hamper and curtail some of the productivity efficiencies we garner from these essential business aircraft.*

*KBTL is a very unique airport both state wide but also nationally in the very diverse mixture of aircraft utilization. Without an ATCT actively participating in the separation of these very dissimilar aircraft safety and risk will reach a level that will make it difficult to mitigate the potential for an accident or incident." Chad Piper, Director of Aviation, Kellogg Aviation Department*

Lastly, as per your letter dated March 5, 2013, we share your endeavor to "*minimize the impact to the greatest number of passengers.*" Your letter continued to say "*FAA's initial plans unfortunately affect smaller airports with fewer operations and lower passenger counts more significantly than locations serving larger blocks of passengers.*" On the contrary, the FAA plan affects several large GA airports that serve large numbers of the flying public. Our point of disagreement stems from the fact that the FAA reference to "passengers" refers exclusively to air carrier passengers versus all passengers that make up the flying public. While we realize that there are certain cases where this type of definition may be the norm and has previously been accepted, we cannot in good conscience support such a definition of the flying public as it relates to this issue.

In the 2009-2013 FAA Flight Plan, page 9, the FAA states, "*Even though commercial aviation (air carrier industry) draws most of the headlines, we remain diligent in our effort to work with the pilots who form the backbone of General Aviation (GA).*" Furthermore, in the same document, the FAA shared its "Vision" which is "*We continue to improve the safety and efficiency of flight. We are responsive to our customers and are accountable to the taxpayer and the flying public.*"

As previously stated in this letter, a recent study commissioned by the Michigan Department of Transportation, Office of Aeronautics, in conjunction with Economic Development Research Group, Inc., Boston, MA indicates that during federal fiscal year 2012 an estimated 233,353 people entered the National Airspace System via the WK Kellogg Airport. (See attachment A) We would assert that the 233,353 people that operated out of the WK Kellogg Airport in FY 2012 are exactly that; your customer, tax payers and the flying public and consequently deserve your agency's best efforts in providing each of them with a safe and efficient airspace system.

So it is with great concern that the City of Battle Creek requests that the FAA step back and re-evaluate its proposed ATCT closure list. Again, we understand and agree that spending cuts must be made. However, we insist that such spending cuts be led by prudent analysis of the total impact on the entire flying public that has come to respect the National Airspace System as the safest and most efficient transportation network in the world. FAA played a major role in establishing that reputation and should be a leader in preserving it.

In closing, the City of Battle Creek truly does appreciate the partnership we have enjoyed with the FAA for so many years. We trust that you will seriously consider our comments regarding the impacts to national interest as well as the safety of the flying public. Please do not hesitate to contact us should have questions or require clarification of our positions.

Respectfully,



Lawrence C. Bowron  
Transportation Director  
City of Battle Creek, MI

Attachments

## Attachment A

## Michigan Department of Transportation - Bureau of Aeronautics

## CBA Community Benefits Assessment

## Airport Role in Economy

Airport:	W. K. Kellogg	Current	MASP Ultimate	Evaluated for Year:	2013
City:	Battle Creek	D-III	C-II		
County:	Calhoun				
Ownership:	Public				
Scenario:	Current				
Service Area:	Calhoun				
Run Date:	3/7/2013 7:24:13 AM				
<b>Airport Features</b>				<b>Activity Data</b>	
Runway Type	Paved	Paved		Total Operations:	80,181
Primary Runway Length	10,003	5,000		Total Aircraft:	100
Primary Runway Width	150	100		Total Passengers:	233,353
Lighting System	HIRL	MIRL		Total Cargo Tons:	0
All Weather Access	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
Snow Removal	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
Fuel Service	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
REIL	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
Rotating Beacon	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
Seg Cndl	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
Lighted Wind Indicator	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
Instrument Approach	Precision	Precision			

## On-going Contribution to the County Economy

<b>Direct Effect</b>	Jobs		Income (\$)		Output (\$)	
	Local	State	Local	State	Local	State
1. Airport (incl. FBO and air related tenants)	1,067	1,067	\$37,390,459	\$37,390,459	\$118,587,765	\$118,587,765
2. Airport Tenants: non-air related	2	2	\$88,314	\$88,314	\$192,150	\$192,150
3. Off-Site: Supported by Visitor Spending	30	30	\$607,340	\$607,340	\$1,698,900	\$1,698,900
4. Off-Site: Staff or Cargo Reliant	17	17	\$252,960	\$252,960	\$798,133	\$798,133
<u>Supplier and income re-spending effects*</u>						
5. -due to Airport and Related Activities**	843	1,451	\$1,654,161	\$1,740,945	\$61,673,892	\$106,423,628
6. -due to Visitor Spending	8	11	\$305,321	\$459,349	\$743,878	\$1,395,589
7. -due to Reliance on Air Transport	0	0	\$0	\$0	\$0	\$0
<b>8. Total Impact from Airport Activities</b>	<b>1,967</b>	<b>2,578</b>	<b>\$40,298,555</b>	<b>\$40,539,367</b>	<b>\$183,694,718</b>	<b>\$229,096,166</b>

<u>Tax Generated by Aviation-Related Activity</u>	At-Airport	Off-Site
9. State Income Tax	\$1,007,947	\$33,915
10. State Sales Tax	\$13,512,213	\$233,557

Annual Capital Expenditures (if known)			
	Total	Federal \$	State \$
2013	Budget:	0	0

<b>Transportation Value</b>							
<i>MASP 2000 System Goals</i>							
Serve Significant Population Centers (C-II)							
Serve Significant Business Centers (C-II)							
Serve Significant Tourism/Convention Centers (B-II)							
Provide Access to the General Population (B-II)							
Provide Adequate Land Area Coverage (B-I)							
Preserve Regional Capacity (B-I)							
Serve Seasonally Isolated Areas (B-I)							
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\* on the Service-area economy as defined by the user

\*\* Supplier and income re-spending effects pertain only to air-related and air support activities