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February 10, 2011

Gary Herbert, Mayor
City of Greensburg
314 W. Washington
Greensburg, IN 47240

Re: Greensburg Airport Site

Dear Mayor Herbert:

As you are aware, I represent the Greensburg Board of Aviation Commissioners. I am writing in response to your recent inquiry to the Board asking if it would be appropriate for the Board to appoint a committee to determine if there is another suitable site available for an expanded airport, specifically one where use of the power of eminent domain would not be necessary.

In my opinion, it is not appropriate for the BOAC to engage in further site exploration, at least not at this time. Let me explain the rationale behind my conclusion.

When a city decides to operate and maintain an airport, Chapter 2 of Article 22 of Title 8 of the Indiana Code establishes a board of aviation commissioners as an executive department of the city and commits to that board decision-making responsibility for the airport. Included in the board's functions are decisions regarding the nature, scope, and location of airport improvements. The Code requires city council concurrence with regard to certain financial decisions. Otherwise, the Code contains no provision authorizing the board of aviation commissioners to delegate its decision-making responsibility to other persons or entities.

In spite of the statutory directives, a site selection committee was formed in 2006 to evaluate the appropriate site for the Greensburg Airport. After numerous meetings and the expenditure of over 200 hours of volunteer time, the committee unanimously recommended that the Greensburg Airport remain and be improved at its current location. Since that time, literally thousands of man-hours and hundreds of thousands

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of dollars have been invested in the preparation and presentation of proposed plans for the modernization of the Greensburg Airport at its current location.

Interestingly, one of the members of the site selection committee has flip-flopped and is now actively opposing the current site and is requesting the formation of yet another site selection committee. In the legislative process, one of the most common ways to kill proposed action is to study it again and again, *ad infinitum*. While those opposing the current site suggest further site studies, they also suggest that there is no need in Greensburg for a modern airport in compliance with FAA standards. These alternative positions are inherently contradictory. I suspect that the requests for further site studies are merely the means by which to achieve a different goal—stopping all efforts to modernize the Greensburg Airport.

One of the interesting aspects of the insistence on further site studies is the obvious inability of anyone to identify a single site which would meet necessary criteria, *i.e.* a suitable strip of land over 1 mile long owned by a landowner willing to part with that land for a fair market value price. Your local news media has been inundated with editorial comments regarding the need to find an alternative site owned by a property owner willing to part with his or her land. If that property owner truly exists, he/she would have come forward by now. My experience dealing with government projects and land acquisitions leads me to conclude that such a landowner doesn't exist. It's analogous to the Land of Oz—existing only in someone's imagination. The pressure exerted on you and the BOAC to form a committee to look for an imaginary landowner serves only the purpose of delay.

My impression is that the delay in modernizing the Greensburg Airport has already cost the community dearly. As you are well aware, NTN-BCA no longer has facilities in Greensburg, and Delta Faucet has reduced its workforce to what could be called a "skeleton crew" consisting of roughly 50 employees; Print Pack is on its way out as well. The community can debate the reasons for these employment losses, but one salient fact speaks volumes. All three companies have relocated, or are in the process of relocating, to communities with modern airports and are frequent users of those airports. NTN-BCA relocated its operations to within roughly 3 ½ miles of a Lancaster, Pennsylvania airport with a primary runway of 6934 feet by 150 feet and a cross-wind runway of 4101 feet by 100 feet. Print Pack is relocating to three locations, all of which are in close proximity to modern airports: Bloomington, Indiana has runways of 6500 feet by 150 feet and 3798 feet by 100 feet; New Castle, Delaware is within approximately 3 ½ miles of three runways of 7275 feet, 7102 feet, and 4602 feet, respectively; and Prescott Valley, Arizona also has access to three runways of 7616 feet, 4848 feet, and 4408 feet, respectively. Delta Faucet's distribution warehouse is now located in Jackson, Tennessee with a primary runway of 6006 feet by 150 feet and a cross-wind runway of 3538 feet by 100 feet. How many more missed or lost

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opportunities must the Greensburg community experience before those opposing airport expansion acknowledge that Greensburg's "postage stamp" runway of 3433 feet by 40 feet does not place the community in a favorable position to compete with other communities that can offer businesses a good facility for air transportation?

More importantly, further site studies could jeopardize the economic development tool which you have acknowledged on numerous occasions as critical to the future of Greensburg. Past airport management had the foresight to construct considerable revenue-producing infrastructure, placing the Greensburg Airport in a rather unique position. Few general aviation airports in this country are self-sustaining. Due largely to revenue from hangar rent and fuel sales, the Greensburg Airport is among the elite few of those airports that do not depend on tax revenue for its operations. This fact seems to have been lost on airport opponents. Numerous times, I've assisted the BOAC in responding to questions which assumed that the Greensburg Airport is and has been a drain on the local taxpayers. It has been frustrating to be asked to respond to what I've viewed as nonsensical questions that assumed facts that simply are not true.

Despite the self-sustaining position of the BOAC, no significant capital airport project is realistically achievable without participation by the FAA. For its part, the FAA is primarily concerned with "airside" matters because those matters relate directly to the focus of the FAA, which is safe arrival and departure of aircraft. Runways, taxiways, lighting, fencing, and clearance zones are directly related to safety. While hangars and fuel farms are a convenience and provide a stream of revenue, they are not directly related to the safe use of an airport. Should the airport be relocated to a new site, that new airport would not have the benefit of the infrastructure that has kept the Greensburg Airport out of the pockets of the local taxpayers. In my opinion, it would be unlikely that the FAA would participate in the cost of construction of new hangars and a new fuel farm to replace the ones left at the old site, so any attempt to recreate the revenue stream currently existing would fall entirely on the local taxpayers. Those costs would then have to be absorbed without the benefit of the current revenue stream. This is more than a bit like the old adage about killing the goose that lays the golden egg. Even were the FAA to participate in those expenses, the funding would likely come from non-primary entitlement money, which, in layman's terms, means that the local taxpayer would have to "front" the costs and then recoup the money over many, many years.

Furthermore, the FAA might not participate in even the cost of airside projects for an airport at a new location. Understandably, the FAA could, and should, be more than a little reluctant to abandon a site at which it has already incurred and paid significant costs and expend vast sums to construct an airport at a new site simply because a couple of landowners prefer not to lose a portion of their land to an expanded airport. In April 2009, Jim Keefer, Manager of the Chicago Airports District Office of the FAA, advised BOAC that "it will be much harder to build an expanded airport at a new

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location than to expand at the existing location.” The first step to relocating, according to Mr. Keefer, would be for the local community “to show a compelling reason that you cannot expand at the current location, based on federal regulation and/or guidance. In other words, you would have to show from a financial and environmental standpoint that a new location was necessary.”

I hope that you and your constituents appreciate the significance of the last quote from Mr. Keefer’s correspondence. We know for a fact that Greensburg cannot establish that the current airport is not financially feasible—the current site is operating in the black and has been doing so for years. The environmental analysis is more open. As you know, the Environmental Assessment of the current site is presently under review by the FAA. Were that assessment to determine that environmental concerns prevent the expansion of the airport at its current site, then and only then would a site study commissioned by the BOAC be appropriate. Until that time, any discussion about moving the airport to a new site is premature and fiscally irresponsible.

In conclusion, it is my recommendation to the Greensburg Board of Aviation Commissioners that it not participate in any manner in further studies geared toward the potential relocation of the Greensburg Airport unless the current site fails to meet environmental requirements. Lest the FAA question the board’s commitment to its current plans, I do not believe that further discussion of this subject is warranted, and a board vote to continue the current course is unnecessary.

I have sincerely appreciated your past support for the expansion of the airport at its current location, and I hope you appreciate why I am making this recommendation to the BOAC. Should you care to discuss this matter further, please contact me.

Very truly yours,



Donald J. Tribbett

DJT/eb

cc: Members, Greensburg Board of Aviation Commissioners
Mr. Donald Manley
Mr. Timothy Coriden
Mr. James Keefer
Mr. Jack Delaney
Mr. Bobb Beauchamp
Ms. Melanie Myers