



U.S. Department
of Transportation
**Federal Aviation
Administration**

Detroit Airports District Office
Metro Airport Center
11677 S. Wayne Road, Ste. 107
Romulus, MI 48174

February 12, 2024

Wayne County Board of Commissioners
Mr. Patrick Herron
428 West Liberty Street
Wooster, OH 44691

Wayne County Airport (BJJ)
Wooster, Ohio
FAA Review Comments – Working Paper #1

Dear Mr. Herron:

The Federal Aviation Administration (FAA) Detroit Airports District Office (DET ADO) has reviewed the Wayne County Airport (BJJ) *Master Plan Update – Working Paper #1* received by our office on December 15, 2023. Based upon our review, we offer the following comments:

Chapter 1 – Airport Inventory

1. Page 1-5. Please clarify the reference to C-II design standards in Table 1-1 and whether this is based upon the previous Master Plan effort.
2. Page 1-6. The Inventory Chapter indicates Runway 28 has a 218-foot displaced threshold due to the proximity of Honeytown Road. It is recommended the Facility Requirements Chapter evaluates whether any adjustment is needed to the length of the displacement based upon current FAA design standards.
3. Page 1-8. The Inventory Chapter notes there are 14 existing tie-down spaces on the apron. Please clarify the type of aircraft which may be accommodated by the existing spaces. It is recommended the Facility Requirements Chapter examines any deficiencies regarding the existing apron space at BJJ.
4. Exhibit 1-5 & Page 1-17. The Inventory Chapter indicates Mid-Ohio is the owner of the existing 28 t-hangar units and serves as the corporate flight department for the Seaman Corporation. Please clarify the use of the t-hangar units and whether the units are available for public use.

5. Page 1-17. The Inventory Chapter contains the following statement, “Most of the hangars at BJJ are privately owned with ground lease agreements in place with the County.” Clarification is needed regarding the total number of public-use hangars available at BJJ.
6. Page 1-20. Please note The Runway Protection Zone (RPZ) guidance contained within Advisory Circular (AC) 150/5190-4B, *Airport Land Use Compatibility Planning*, replaced the FAA Memorandum, “Interim Guidance on Land Uses Within a Runway Protection Zone.” Please update the Inventory Chapter to reference the RPZ guidance under AC 150/5190-4B.
7. Pages 1-23 & 1-24. The Inventory Chapter contains a detailed discussion regarding the presence of wetlands at BJJ and notes a wetland delineation will be conducted before projects are pursued in the future. Based upon the outcome of the Master Plan Update, it is recommended BJJ work closely with the FAA regarding the coordination and timing of any required environmental analysis for future projects.

Chapter 2 – Forecasts of Aviation Demand

8. Page 2-4. The Forecast Chapter indicates the current based aircraft count at BJJ is 45. Please note the number of validated aircraft recorded within the National Based Aircraft Inventory was 52 as of September 2023. Please clarify this discrepancy and confirm whether this increase in the number of based aircraft was taken into account in the forecast projections.
9. Page 2-5. The Forecast Chapter notes historic aircraft operations data was pulled from FlightAware to account for additional operations not previously captured. Please clarify the difference between the historic operations data from FlightAware versus the Traffic Flow Management System Counts (TFMSC) and how it was determined the FlightAware data was more complete.
10. Page 2-7. The Forecast Chapter indicates the population, employment, and income data was obtained from Woods & Poole Economics, Inc. It appears the overall population trend for the BJJ catchment area is projected to increase by 1.8% during the planning horizon. However, Table 2-2 shows significantly higher growth trends for the employment and income factors. Please provide further detail regarding the underlying assumptions which support the employment and income growth projections.
11. Page 2-9, Table 2-3. The growth projections in Table 2-3 do not appear to follow the historic based aircraft data captured in Figure 2-2. Please clarify the underlying statistical analysis used to generate the “historic trend” scenarios reflected in Table 2-3. In addition, please clarify the rationale for evaluating multiple historic trend scenarios based upon 3-year, 5-year, 7-year, and 10-year periods.

12. Page 2-9, Table 2-3. The total “Growth 2022-2024” for the population-based and employment-based forecast scenarios in Table 2-3 do not appear to match the source data for the BJJ Catchment Area under “Growth Rate 2022-2024” in Table 2-2. Please clarify.
13. Page 2-9, Table 2-3. Please provide a more detailed explanation for developing the population-employment-income-based forecast scenario in Table 2-3. This forecast scenario appears to represent an average of the population, employment, and income factors. However, the growth trend for the income factor appears to be an outlier which could skew the projected increase in the number of based aircraft during the planning horizon. Please clarify.
14. Page 2-12. The Forecast Chapter identifies the population-employment-income-based scenario as the preferred forecast for based aircraft and notes the market share and employment-based forecast scenarios were found to be too conservative. Please elaborate as to how this was determined why the population-employment-income-based scenario was selected.
15. Page 2-18, Table 2-10. The most current version of the FAA Terminal Area Forecast (TAF) was issued in January 2024. This version of the TAF shows 45 based aircraft at BJJ in 2022, which will remain constant during the planning horizon. Therefore, it would appear the preferred based aircraft forecast would exceed the TAF at the five-year and ten-year thresholds by 11% and 20%, respectively. As noted in item 8 above, clarification is needed regarding the current number of based aircraft at BJJ.
16. Page 2-18, Table 2-10. The January 2024 TAF shows a total of 18,636 aircraft operations in 2022. However, the Forecast Chapter indicates the TAF data is inaccurate and the actual number of operations at BJJ is in the range of 5,800. Please be advised the baseline operations reported in the TAF are derived from the FAA Airport Master Record 5010, which also shows over 18,000 operations for BJJ. Please submit an update to the Airport Master Record through the Airport Data and Information Portal (ADIP) to correct this discrepancy and provide a copy of the ADIP submittal to the FAA for our records.
17. Page 2-18, Table 2-10. Given the large disparity between the baseline aircraft operations count used in the BJJ forecast versus the January 2024 TAF, the preferred aircraft operations forecast far exceeds the TAF at the five-year and ten-year thresholds. However, if the aircraft operations growth trend from the TAF is applied to the revised baseline of 5,800 operations, it would appear the preferred forecast is consistent with the TAF at the five-year and ten-year thresholds.
18. Page 2-19. The Forecast Chapter identifies the existing and future critical aircraft at BJJ as B-II with the Cessna Citation Excel as the representative aircraft. This appears to be consistent with the data from the FAA Traffic Flow Management Count (TFMSC), which shows over 1,000 operations of B-II aircraft.

Please make the appropriate changes to the Master Plan chapters and provide an electronic copy of the revised chapters to the FAA for review.

Sincerely,

A handwritten signature in black ink that reads "Jana Radtke". The signature is written in a cursive style with a large, prominent 'J' and 'R'.

Jana Radtke
Community Planner
Detroit Airports District Office

Cc: Sue Smail, Wayne County Commissioners
Mark Heckroth, CHA