

[REDACTED]

From: richard marasse [REDACTED]
Sent: Wednesday, April 20, 2016 12:20 PM
To: RegReform (ANF)
Subject: keep the state regs

I strongly oppose scrapping the Massachusetts state regulations which have been targeted for elimination. These regulations should be retained and, in the absence of meaningful federal regulation, enforced so as to enhance the safety and quality of life of Commonwealth residents. Specifically, I urge the retention of 702CMR 4.16, which provides the ONLY effective current safety regulation regarding the size of skydiving landing areas.

Richard L. Marasse
[REDACTED]

[REDACTED]

From: Heather MacKenzie [REDACTED]
Sent: Wednesday, April 20, 2016 12:48 PM
To: RegReform (ANF)
Subject: preserve Regulation 702 CMR 4.16

To Whom to May Concern;

I wish to express my wishes for you to PRESERVE Regulation 702 CMR 4.16 as it maintains the ability to legally enforce and define skydiving in the state of Massachusetts.

Yours truly,

Heather MacKenzie
[REDACTED]
[REDACTED]

Heather MacKenzie
[REDACTED]
[REDACTED]

From: Michael Tompsett <[REDACTED]>
Sent: Wednesday, April 20, 2016 3:09 PM
To: RegReform (ANF)
Subject: MassDOT Regulatory Review 702 CMR 4.16

Suggestion for MassDOT Regulatory Review re 702 CMR 4.16

My comments concern the 702 CMR 4.16 (1) (b) 1, which defines the requirements for a skydiving drop-zone. The regulation reads

“The area used as a drop zone shall be unobstructed and with a distance of at least 150 yds (450ft) from the target to the nearest obstruction or hazard.”

This is not even a large area in comparison to those of other countries such as Britain which requires a 1640 ft diameter area. The FAA has **no** specific regulation with regard to the dimensions of a landing area and instead defers to the United States Parachute Association, which is a lobbying group for skydiving. In the latest FAA Advisory Circular AC105-2E reads

“The FAA **recommends**” (not requires) “that areas used as parachute landing areas remain unobstructed, with **sufficient**” (unspecified) “minimum radial distances to the nearest hazard. **The USPA has defined such distances and hazards in their BSRs.**”

The BSRs of the USPA read

“the minimum radial distances to the nearest hazard...for B- and C-license holders and all tandem skydives should be 165 feet”.

Unfortunately their definition allows certain hazards such as taxiways in the landing area, and does not include a safety distance to physical hazards such as buildings, and doesn't make any allowance for wind turbulence.

An FAA Study AR-11/30 Development of Criteria for Parachute Landing Areas on Airports - May 2012 stated that hazards include

“Telephone and power lines

Towers

Buildings

Open bodies of water

Clusters of trees covering more than 3000 square meters (9840 ft)

Fencing

Paved surfaces including ramps/aprons, runways, and taxiways)

Aircraft tie-down areas”

This report also recommended that the edge of the PLA be a minimum distance of 40ft from any hazard.

The results of this study by FAA experts were not adopted because of lobbying by the USPA.

Another reason for introducing a safety margin into the size of the landing area is the weather. The FAA Advisory Circular AC 105-2D 5 e. states

“Strong or gusty winds can be dangerous, especially to student jumpers. The

USPA recommends that the maximum winds for students be 14 (mph) for ram-air canopies”

A year later in AC-105-2E e. states

“Strong or gusty winds can be dangerous, especially to student jumpers.” There is no maximum wind-speed specified. Ie the FAA further abrogates its responsibility.

Jim Crouch the USPA Director of Safety & Training writes that
"Turbulence close to the ground is the skydiver's enemy. ... Turbulence occurs:

- Downwind of trees, buildings and other tall obstacles.
- Above areas where two different surfaces are next to each other, such as grass next to asphalt" (taxiways).

"You can expect to feel the effects of turbulence at a distance as far as 10 to 20 times the height of the obstacle that the wind is blowing across. So wind coming across 50-foot-tall trees" (or hangars) "might cause turbulence as far as 500 to 1,000 feet downwind."

The conclusion is that the size of a skydiving landing area cannot be left to the FAA to define, because they have denied the evidence of their own experts and abrogated responsibility for the safety of skydivers. A woman was very seriously injured at Chatham Airport possibly caused by wind turbulence, and 2 people were killed flying into a shed at Marstons Mills. Failing a much more responsible approach by the FAA, we respectfully suggest that Mass State keep the 450ft radius drop zone, as one way of maintaining the recommended 40ft to the nearest hazard and mitigating the worst effects of wind turbulence from neighboring buildings and trees.

Although the FAA designated skydiving as an aeronautical activity, it is much more allied to being an entertainment or a sport and should be regulated by Massachusetts with that in mind.

Dr Michael F. Tompsett F.IEEE, NAE Member

[REDACTED]
[REDACTED]
[REDACTED]
home tel: [REDACTED]
mobile: [REDACTED]

[REDACTED]

From: Denis Glover [REDACTED]
Sent: Wednesday, April 20, 2016 4:12 PM
To: RegReform (ANF)
Subject: Maintain Regulation 702 CMR4.16

I strongly urge you to keep Regulation 702 CMR4.16. Only dangerous special interests would have you desert it. But it's vital to maintaining the Commonwealth's power to keep skydiving safe and properly regulated. Please do not abandon any provisions of that Regulation. It's vitally important.

Best wishes,
J. Denis Glover

[REDACTED]

From: Christopher Ely [REDACTED]
Sent: Wednesday, April 20, 2016 4:22 PM
To: RegReform (ANF)
Subject: Aeronautical Division Regulation 702 CMR 4.16

To the Massachusetts Department of Transportation:

My wife and I are writing to urge you to preserve Aeronautical Division Regulation 702 CMR 4.16.

This regulation is a key measure for protecting the safety of life and property in our community.

In Chatham, we have a situation where an airport is located in the middle of a town.

If this Aeronautical Division regulation, which maintain the Commonwealth's ability not just to delineate but also to legally enforce skydiving were to be eliminated, the negative consequences are clear and numerous. They include the following:

There would no longer exist a 450-foot-diameter parachute landing area. With residential houses bordering the airport, this is a key safety provision.

The Commonwealth would no longer be able to exercise controls on the operations and safety of parachute jump centers. Given a number of incidents involving jump centers at the Chatham and Mashpee airports, including a crash landing in a Chatham lake, removing such control and oversight this would be of great potential risk.

Finally, the Regulation provides clear and unambiguous directives regarding skydiving in "congested areas." Eliminating these directives would cede the Commonwealth's ability to protect its citizens in non-rural skydiving situations such as ours.

We trust that MassDOT will preserve the current Regulation 702 CMR 4.16, as a necessary public health and safety provision.

Thank you very much,

Christopher M. Ely
Sujka K. Ely

[REDACTED]

From: Ken Arnold <[REDACTED]>
Sent: Wednesday, April 20, 2016 6:15 PM
To: RegReform (ANF)
Subject: 702CMR4.16

I write to implore you to maintain, not eliminate, Commonwealth regulation over skydiving at Massachusetts airports.

In Chatham, the Federal Aviation Administration (FAA) has taken irresponsible positions and actively pressured local officials to issue requests for proposals from skydiving operators. I call the positions irresponsible not merely because I disagree with them; a clear example is the FAA "determination" that Chatham is not congested. The federal official who reached that conclusion can not have ever visited Chatham Airport in the summer, which is skydiving season. Every casual visitor will confirm that Chatham is congested. The Town has erected signs in many parts of Chatham, and most pointedly near the airport, warning automobile drivers that the neighborhoods are "thickly settled." The federal government should not be making determinations about such local conditions.

The only reason for skydiving in Chatham is money. The money paid by skydivers goes to the skydiving concessionaire, who in turn pays the third-party airport manager. The airport itself, as well as the Town and its citizens, obtains absolutely no benefit whatever from the activity. The FAA "determined" that disallowing skydiving was discriminatory on the part of the Town. In fact, the Town "discriminated" in favor of the safety of its citizens and against the vendors of skydiving but the federal government told them this was improper.

The real issue at hand is safety. Those who skydive assume risk, which is their right. They sign waivers absolving the airport operator and skydiving concessionaire from liability, which is their right. But they skydive over an area that is highly congested, has mercurial winds, and experiences sudden appearances of fog and clouds. The parachute planning area in Chatham is far smaller than state regulation allows, and the FAA has ignored this important fact. After the skydiving vendor in Marstons Mills crashed an airplane, the Marstons Mills airport ejected his company. He moved his operation to Chatham. Skydiving was allowed for nearly two summers in Chatham. The concessionaire crashed an airplane into a pond which is frequented by swimmers, fishermen, and people in kayaks and canoes. The FAA was nowhere to be seen. The Town of Chatham then wanted to prevent skydiving, and testified in Massachusetts Superior Court that Chatham is congested and that skydiving should not be allowed. The next year, the FAA threatened to withhold capital money from the airport and required the Town to invite skydiving, and the Town now finds itself about to testify in a civil case in contradiction to its testimony last year, now having to argue that Chatham is not congested. This is only about money, not about safety, and the federal government has demonstrated that it is unconcerned with, or does not value, the safety issues in our town. We need the Commonwealth to be available to Massachusetts citizens.

Please, retain some control over the regulation of this important safety issue by retaining the DOT regulations over skydiving. Abdicating the Commonwealth's authority to the FAA will perpetuate decisions that are not in the public interest and are inconsistent with the public safety.

Kenneth E. Arnold
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Thursday, April 21, 2016 11:56 AM
To: RegReform (ANF)
Subject: Maintaining Regulation 702CMR4.16

Dear Mass DOT:

I am writing to urge you to maintain the current regulation, 702CMR4.16, which maintains the state's ability to clearly define and legally enforce laws around skydiving activity in the state. I'm concerned that the FAA regulations are not sufficient to protect the citizens of the Commonwealth and want to go on record asking that you preserve your oversight and enforcement of such activities.

Thank you very much.

Helene Tischler

From: David Burns <[REDACTED]>
Sent: Friday, April 22, 2016 10:35 AM
To: RegReform (ANF)
Subject: Please retain control over airports

MassDOT:

Please preserve Regulation 702 CMR 4.16, the regulations that controls skydiving.

Safety is important to the surrounding residents and the safety of participants 'lured' into the thrill of sky-diving.

David E Burns, MD

[REDACTED]

From: Judy Patterson [REDACTED]
Sent: Friday, April 22, 2016 10:41 AM
To: RegReform (ANF)
Subject: Skydiving in Massachusetts

To Whom it May Concern:

Please preserve Regulation 702 CMR 4.16 as it maintains the state's ability to clearly define and legally enforce skyding in the state of Massachusetts.

Judy L. Patterson



[REDACTED]

From: Stfullilove [REDACTED]
Sent: Friday, April 22, 2016 11:32 AM
To: RegReform (ANF)
Subject: Do not change regulation please

Please preserve regulation 702 CMR 4.16.

Thank you,
Sarah Fullilove

[REDACTED]

From: [REDACTED]
Sent: Friday, April 22, 2016 11:52 AM
To: RegReform (ANF)
Subject: Skydiving Regulations

Ladies & Gentlemen:

Please do NOT eliminate the MA Aeronautical Division regulations as they currently stand.

Instead, please preserve Regulation 702 CMR 4.16 as it maintains the state's ability to clearly define and legally enforce skydiving in the state.

Thank you,
Ann Jenness

[REDACTED]

From: Norm Pacun <[REDACTED]>
Sent: Friday, April 22, 2016 12:16 PM
To: RegReform (ANF)
Subject: Elimination of State Aeronautical Division Regulations

To the Massachusetts Department of Transportation:

My wife and I have just learned that you are planning to eliminate the existing Aeronautical Division Regulations and in their place "substitute" the FAA Regulations.

What this would mean would be to effectively remove local control and enforcement from such matters as skydiving in congested areas where population is such that FAA Regulations do not adequately provide for appropriate protection. For example, it would be my understanding that the present maximum 450 foot diameter parachute landing area would no longer be required. Nor would there be sufficient controls on skydiving in congested areas, such as those that we now have in Chatham.

Please do not take this draconian step without careful and further review of what is a serious and definite problem. We are now seeing what could happen with respect to the use of drones in areas that abut airports. A similar situation exists with respect to skydiving near and over population centers that still needs to be addressed by state regulations.

Thank you for your consideration of our comments.

Sincerely,

Norman and Carol Pacun
[REDACTED]

[REDACTED]

From: Bill Tuxbury [REDACTED]
Sent: Friday, April 22, 2016 12:42 PM
To: RegReform (ANF)
Subject: Maintain Regulation 702 CMR 4.16

I am writing to ask that you preserve State Regulation 702 CMR 4.16. It is the reg that addresses/regulates sky-diving. By keeping this regulation in effect, it will maintain the state's ability to define and enforce skydiving in Massachusetts.

Without that regulation, no longer would there be a 450' diameter parachute landing zone; no longer would there be controls on sky-diving jump centers; and no longer unambiguous directives on sky-diving in congested areas.

Please maintain the current Regulation 702 CMR 4.16.

Thank you.

Bill Tuxbury
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Friday, April 22, 2016 1:42 PM
To: RegReform (ANF)
Cc: [REDACTED]
Subject: Regulation 702 CMR 4.16

Gentlemen:

Please keep and preserve Regulation 702 CMR 4.16 because it maintains the state's ability to clearly define and legally enforce skydiving in the state.

Thank you.

Scott Daniels
[REDACTED]

[REDACTED]

From: Zaleznik, Ira <[REDACTED]>
Sent: Friday, April 22, 2016 1:43 PM
To: RegReform (ANF)
Subject: Elimination of 702 CMR 4.00 is not a Reform

Sir or Madam,

Please accept this email as a further elaboration on my comments at the hearing before MassDOT on April 20. I represent the non-profit organization, Citizens for a Safe Chatham Airport ("CSCA"), and I write in opposition to the proposed changes to 702 CMR. The proposed changes are, for the most part, not a reform of the current system but an abandonment of local and state control of many aviation activities that should be subject to local supervision.

Of particular concern to CSCA is the proposed change to 702 CMR Section 4.15 and Section 4.16, pertaining to parachute jumps and parachute jump centers. These sections contain many specific regulations that are carefully designed to promote parachute jumping as a safe activity. Many of the regulations, such as Section 4.16(b) contain many objective standards, that can be easily understood and applied by operators and enforcement authorities alike. The specificity also assists members of the public in understanding what the requirements are to operate a business of this type in conformity with law.

What is proposed would substitute these specific regulatory requirements with a single requirement to conform to Federal law and regulations. However, the FAA regulations in this area are notoriously broad, and capable of numerous interpretations. For example, 14 CFR Section 105.21 provides that "No person may conduct a parachute operation. . . over or into a congested area of a city, town or settlement, or an open-air assembly of persons unless a certificate of authorization for that parachute operation has been issued under this section." The term "congested area" is not defined in the regulations, and there is scant case authority that assists in the interpretation of this phrase. However, a Senior Counsel to the FAA in this area has stated, in writing, that he believes that the parachute landing area proposed for the Chatham airport does not violate this provision because "parachute operations have a substantial vertical component, and, therefore, can be performed over a relatively small surface area. Thus, when viewed from the standpoint of a pilot or a parachutist performing parachute operations in an area that has no structures or just one or two structures within a larger open area will adequately serve to meet the requirements of the regulation. **As long as the surface area directly under the parachute operation is not "congested," the flight will generally not violate the FARs.**" (Emphasis added). See page 13 of 1/14/16 letter from FAA to David Bixby in response to complaints regarding operations at the Chatham Airport.

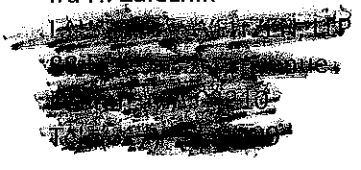
This constricted interpretation of the regulation is ludicrous and strips the regulation of all rational meaning. Skydivers do not jump from a plane directly over the landing zone and then fall vertically to the spot. Instead, he must compensate for any number of factors so that the flight path eventually ends in the parachute drop zone. These factors include canopy size and design, a forward throw component due to momentum when leaving the plane, vertical free fall altitude and time, parachute opening altitude, and wind velocity throughout the drop column and at ground level. If these complicated factors did not come into play, there would never be off-site landings and other times when parachutists miss the mark.

Contrast the generality of this regulation with the objective and specific requirements found in 702 CMR Section 4.16(b). A parachute landing area of at least 150 yards from any obstruction or hazard (see 702 CMR Section 4.16(b)(1)) is a requirement that promotes safety, and is readily measurable and enforceable by everyone involved. Moreover, if a specific case were to arise in which an operator would seek a waiver of this requirement, this procedure would be streamlined by the proposed new regulation in Section 2.00 (an amendment that we do not oppose). The wholesale elimination of the many specific safety requirements contained in the current regulations would not be a reform, but

would be a step back from laws to protect the public to laws that allow operators to test the limits of vague and unenforceable lines. Implementing these new amendments would represent a serious step backwards, and is not in the interests of public safety. We urge the Department to reject these proposals and leave the existing regulations found in Sections 3.00 et seq. and 4.00 et seq. in place.

Thank you for your consideration. Please consider these views carefully before taking the drastic steps proposed.

Ira H. Zaleznik



[REDACTED]

From: Nicole Stern [REDACTED]
Sent: Friday, April 22, 2016 2:56 PM
To: RegReform (ANF)
Subject: Regulation 702 CMR 4.16

MassDOT - Please preserve Regulation 702 CMR 4.16 to maintain the state's ability to clearly define and legally enforce skydiving in the state. Thank you.

Nicole Stern
[REDACTED]

Sent from my iPhone

[REDACTED]

From: Jan Fields [REDACTED]
Sent: Friday, April 22, 2016 3:12 PM
To: RegReform (ANF)
Subject: Regulation 702 CMR 4.16

Please take the confusion out of MassDot regulations and do away with the above mentioned regulation. FAA regulations are clear and bringing us in line with the FAA would be beneficial to all.

Thank you.

Janet Fields
[REDACTED]

[REDACTED]

From: Steve Furlong [REDACTED]
Sent: Friday, April 22, 2016 4:50 PM
To: RegReform (ANF)
Subject: Please eliminate 702 CMR 4.16

This message is to express my support for eliminating Regulation **702 CMR 4.16**

Stephen Furlong
[REDACTED]

Sent from my iPhone

From: Ward Brown <[REDACTED]>
Sent: Sunday, April 24, 2016 9:16 PM
To: RegReform (ANF)
Subject: Regulation 702 CMR 4.16

To MassDoT,

please preserve Regulation 702 CMR 4.16. I am a Massachusetts resident. I have a house in Chatham MA. We live near the Chatham airport. Skydiving was allowed at this airport four years ago. This is completely unsafe because they are skydiving over a heavily populated area. Two years ago the skydiving was suspended because a skydiving plane crashed into the lake where my house is located. Fortunately in this instance no-one was hurt. However, I believe there are very few people looking out for the safety of the residents of this area. I believe Regulation 702 CMR 4.16. is very important to our safety. Without it I worry skydiving will return to Chatham airport and the operators will have even less incentive to consider the safety concerns of residents. I fear there will be another skydiving accident. Please preserve Regulation 702 CMR 4.16.

Sincerely,

Ward Brown
[REDACTED]

From: Kahn, C. Ronald <[REDACTED]>
Sent: Wednesday, April 20, 2016 12:46 PM
To: RegReform (ANF)
Subject: Comments regarding Mass DOT 702 CMR
Attachments: CR Kahn Comments on DOT Regulations 702 CRM 1.00-7.00.pdf

See attached comments as a follow-up to live testimony today at the public hearing.

Best Regards,

Ron

C. Ronald Kahn, M.D.
[REDACTED]

Testimony of C. Ronald Kahn, MD, regarding changes to Mass DOT regulations 702 CMR 1.00-7.00

I am writing to express my strong disagreement with the idea of Massachusetts dropping state regulations 702 CMR 1.00-7.00 which are related to airport safety and skydiving. I do not believe that the federal regulations are adequate to protect the State and its citizens and believe that continued State oversight is important for both safety and environmental reasons.

In the way of introduction, although I am not an aviation expert, I am a medical scientist who has lots of experience dealing with data and regulations, and I think that the data are pretty conclusive that we need the State's continued protection in this area, since those interested in running general aviation airports and skydiving concessions present extremely one-sided and inaccurate assessments of the risks and dangers of these activities if they would be allowed to go unregulated or follow only the very general federal guidelines.

Since I have a home in Chatham, I have specifically studied the issue of skydiving safety, since this activity has been allowed in a largely unregulated fashion at Chatham Airport, and there are a number of important safety and environmental issues which would be left to user desire if the existing regulations were abandoned. Here are some facts that Mass DoT needs to consider:

1. There are 6 general aviation airports in Massachusetts that have allowed skydiving operations at some time over the past 10 years.
 - 4 of these 6 (i.e., two-thirds) have had a publicly disclosed major skydiving accident (sometimes multiple accidents) over the past 5-10 years (see Table at end of this testimony).
 - At least 2 of these accidents have resulted in serious injury to the skydiver or his/her tandem partner.
 - Two other accidents have resulted in deaths (in one case both the skydiver and his tandem partner died, making a total of 3 deaths), so these are hardly trivial accidents.
 - In addition, 5 of the 6 airports have had airplane crashes (several involving aircraft used for skydiving), and one of these also involved a death. On the Cape, for example, a plane ran out of gas and "landed" in a small lake in Chatham surrounded by a residential neighborhood, and in Marstons Mills, a plane crashed into a private home near the airport.
 - These statistics are not unique to Massachusetts. There have also been skydiving deaths in the past 5-10 years in most nearby states including Vermont, Connecticut, Maine, New York, and New Jersey. These deaths and major injuries do not include such less life-threatening issues such as off-site landings and less serious injuries that may not have made public news

Thus, thinking skydiving and the airport activity related to it does not need regulation would be akin to thinking we don't need any state or local inspection of restaurants because the Department of Agriculture and FDA regulate food safety at a national level.

2. Skydiving in Chatham and on Cape Cod is particularly problematic and provides many examples of issues where State guidance and regulation is so important, since Federal regulators are not familiar with the exact conditions or circumstances of these airports, and rarely if ever come to these sites.

- a. Chatham airport has already been the site of one serious skydive passenger injury, as well as one incident of a skydiving aircraft landing in a nearby lake. The skydive injury was attributed to “a gust of wind that upended the parachute just before it landed.” Unpredictable winds are going to be an issue if one skydives in areas such as Chatham. Landing in the lake is also predictable when the airport is almost surrounded by ocean and lakes. This also brings up the issue of whether skydivers and small aircraft passengers in these areas need to be supplied with floatation devices, something which only a thoughtful state study and ruling should decide.
- b. Skydiving is not allowed by federal rules in congested areas, but who decides what is congested if Mass DoT does not. The town of Chatham has recognized the area around the airport as a “thickly settled”, and posts road signs on many of the streets surrounding Chatham airport designating the area as such. Yet the town does not seem to want to recognize its designation and says that thickly settled is not congested.

While the winter population density of Chatham (based on US census data) is only about 628 inhabitant/mi², this increases during the summer to over 3000 people/mi². This is higher than the population density of most of suburban Boston towns like Wellesley, Needham, Winchester, etc., where it would be unlikely one would allow skydiving within 2 miles of the town center. Previous FAA rulings have considered a seaside area where 200 to 300 persons were sitting on the beach or bathing in the water as congested, but Chatham does not consider 10 times as many people as congested.

- c. Chatham Airport is also congested based on airport usage relative to size. If one calculates the number of flights per day per acre of area occupied by the airport (see Table below), Chatham Airport is 3 to 7 times more congested than any of the other airports in Massachusetts that currently allow skydiving. In fact, by this measure, Chatham Airport (CQX) has a 32% higher flight density than Barnstable Airport in Hyannis, which has both commercial and general aviation flights! Thus, CQX is not a sleepy little airport in a quaint Cape Cod town. For its size, Chatham Airport is already significantly busier than any other airport to which it is being compared, and if skydiving were to return to Chatham due to loss of State regulations, this would further increase flight density by 25-50%.

Even Pepperell airport, which actually has the lowest level of airport usage for its size of any of the airports allowing skydiving, states on its website that due to heavy skydiving activity on Saturday & Sunday, general aviation plans should “NOT FLY OVER THE AIRPORT WITHOUT CALLING.. IT COULD BE VERY DANGEROUS” (Their caps, not mine).

Finally, there are many additional points unrelated to skydiving which speak to the need for continued State regulation. For example, Chatham airport has allowed two planes to take off side-by-side simultaneously from a single runway. This activity does not appear to be prohibited by FAA rules, but certainly increases the risks of a serious airport mishap that could not only be dangerous to those in the plane, but also those on the ground. For all of these issues, it is important to keep in mind that Chatham Airport is in a residential district, next to a highly used bicycle/running path and also houses a very busy restaurant, with people often waiting outside next to taxi and fueling area.

Taken together, it should be clear that skydiving and unregulated airport activity pose clear risks to the participants and clear risks and impacts on individuals living in areas where these are allowed. There is no way that Federal regulations will comprehend or cover these safety and environmental issues, any more than they can cover all food safety issues without additional State oversight.

We, the citizens of Massachusetts, therefore need State help and oversight to be sure these activities are not only performed safely, but also in a way that does not impact on the environment or quality of life in the state which we all value so greatly. I hope that the State will not abandon its role in Airport regulation and help preserve the charm, beauty and safety of our state.

Respectively Submitted,



C. Ronald Kahn, MD



Table of Airport Usage and Accidents for Airports Which Have Hosted Sky Diving

| Airport | Flights or operations/day | Airport size (acres) | Usage (flights/day/10 acres) | Plane Crash in past 10 years | Skydive Injury or Death in past 10 years |
|--------------------|---------------------------|----------------------|------------------------------|------------------------------|--|
| Chatham | 69 | 105 | 6.6 | Yes | Yes |
| Cranland | 14 | 100 | 1.4 | Yes | |
| Marstons Mills | 10.5 | 80 | 1.3 | Yes | Yes |
| Orange | 137 | 580 | 2.4 | Yes | Yes |
| Pepperell | 14 | 163 | 0.9 | | Yes |
| Taunton | 92 | 256 | 3.6 | Yes | |
| | | | | | |
| Barnstable Airport | 322 | 639 | 5.0 | | Does not allow |