

# City of Vero Beach

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OFFICE OF THE  
AIRPORT DIRECTOR

August 11, 2021

Mr. Jonathan Husband  
FAA Regional Airports Compliance Specialist  
Southern Region Airports Division  
1701 Columbia Avenue  
Atlanta, GA 30337-2747

RE: July 14, 2021 Letter of Inquiry, Non-Aeronautical use of Airport Property

Dear Mr. Husband:

This letter is written in response to your communication referenced above, in which you notified us that an inquiry had been opened to determine whether the City of Vero Beach is operating Vero Beach Regional Airport in accordance with Federal Obligations, specifically relating to the existence of the mobile home park, Citrus Park Village (CPV). In your letter, you requested our response to seven (7) items related to the inquiry. Our responses are incorporated in this letter and the attached documentation.

Please note that, in some cases, the extent of the requested documentation is lacking, due to the fact that there was residential use of that property by the US Navy from 1942 until 1947, and has been since the US Government conveyed the property to the City in 1947. CPV, the mobile home park referenced in your letter, has been in existence in its current state for at least 50 years, based on historical aerial photos.

Our responses to your questions are listed below:

1. **Current Status of Residential Use; Date of Execution of First Leases:** The residential use of airport property is ongoing, in the form of our mobile home park known as Citrus Park Village (CPV). Information regarding the date of first execution of leases on the property is minimal, and we generally only maintain current and most recent leases in our files. However, we have discovered a lease-related document executed in 1975 for property at the CPV.
2. **Reason Residential Leases were entered into:** Specific information as to why the leases were first entered into is not available, due to the CPV being in operation for at least 50 years. However, it is worth considering that the revenue derived from CPV leases has continuously contributed to airport revenues for many years, and helped the airport remain financially self-sufficient.
3. **Provide a copy of any and all Residential Leases:** All current residential property leases have been uploaded to a portal provided by the FAA for that express purpose.
4. **Provide a copy of Fair Market Value appraisal(s):** Information regarding a Fair Market Value appraisal is attached.

5. **Provide a copy of the Airport's Land Use/Zoning:** A copy of the official Airport Zoning Districts is attached.
6. **Provide a copy of releases authorizing residential use:** As previously stated herein, there has been long-term residential use of the subject property since it was deeded to the City in 1947, and by the US Navy prior to that.
7. **Provide a copy of the underlying land deed:** The property was not purchased by the City; but rather deeded to the City when Naval Air Station Vero Beach was decommissioned in 1947. The 1947 Quitclaim Deed, by which the City became owners of the property, is attached.

For your consideration, we are also including the following additional relevant information:

- A 1945 depiction of Naval Air Station Vero Beach, which shows "trailer units" in the vicinity of the current CPV.
- A 1970 aerial photograph of the airport, which includes CPV in its current configuration.
- Excerpts from a 1976 Master Plan Airport Layout Plan, with CPV delineated and identified.
- Excerpts from our Approved 2000 Master Plan Airport Layout Plan, which includes CPV.
- Excerpts from our Approved 2007 Master Plan Airport Layout Plan, which also includes CPV.
- Information from a 2011 FAA Land Use Inspection, which identifies several areas of concern, but does not mention an issue with CPV.
- Excerpts from our Approved 2016 Master Plan Airport Layout Plan, which also includes CPV.

Your July 14, 2021 letter was the first time the Airport was advised by the FAA that there was a concern over the existence of CPV. It is clear and unequivocal that FAA had actual knowledge of the existence of CPV for at least 50 years, and on four occasions approved the ALPs which specifically designated the location of CPV as residential property. The Airport has acted in good faith in permitting the use of the location of housing and in reliance on the FAA's approvals of such property for residential land uses. We are requesting the FAA accommodate the non-aeronautical use of the property for the continued use as a mobile home development.

Thank you for your consideration of our responses and documentation. Please advise me should you require additional information or have any questions.

Respectfully,



Todd Scher, Director  
Vero Beach Regional Airport

Attachments

x/c Monte K. Falls, Vero Beach City Manager  
John S. Turner, Vero Beach City Attorney