



City of Santa Barbara
Airport Department

DATE: May 3, 2017
TO: General Aviation Subcommittee Working Group
FROM: Hazel Johns, Airport Director
SUBJECT: Revisions to Minimum Standards of Aeronautical Activities at Santa Barbara Airport

BACKGROUND:

The Federal Aviation Administration (FAA) published a Final Policy in the Federal Register dated March 15, 2016 and effective April 4, 2016, which amended FAA Order 6190.B, FAA Airport Compliance Manual. The amendment was related to the flying clubs and Airport Commercial Minimum Standards. In response, Santa Barbara Airport (SBA) has proposed to modify the “Minimum Standard Requirements for Aeronautical Activities at the Santa Barbara Municipal Airport” (“Minimum Standards”). A meeting with a Working Group of Airport stakeholders was held on April 18, 2017, where proposed changes were presented and discussed. Another meeting of the Working Group is scheduled for May 3, 2017 to further discuss the proposed changes.

DISCUSSION OF PROPOSED CHANGES:

The proposed changes to the Minimum Standards are included as Attachment 3. Red-lined changes were presented to the Working Group on April 18, 2017. Blue-lined changes were made based upon comments at the April 18, 2017 meeting. The following chart describes the proposed changes:

Page(s)	Proposed Change	Reason for Change
6	“Fixed Place of Business”	A fixed place of business is only occupied by virtue of a lease agreement.
6	“Flying Club”	Align definition of flying club to FAA definition.
7	“Ground School”	Create a definition of ground school activities. Related to Article 8- Independent Operators.
7	“Lessee”	To create a definition of “lessee”, which is included in the FAA’s Final Policy language.
37	“Independent Operator is not considered an Airport lessee”	Since an Independent Operator does not operate out of owned or leased property on the Airport, it is not considered a lessee.
37	“lease”	An Independent Operator does not operate through a lease.

Page(s)	Proposed Change	Reason for Change
37	"Tenant Lessee"	To ensure an Independent Operator has appropriate facilities as needed, and a party responsible for ensuring compliance with Airport rules and regulations.
37	"Ground School"	To ensure that ground school activities occur in an appropriate facility.
39-43	"Flying Clubs"	<p>To align Flying Club Minimum Standards with FAA Order 5190.6B, as amended. Language from the amended order was included in the proposed Minimum Standards revisions, with a number of exceptions, described below:</p> <p>10(c)4. Additional language to ensure maintenance activities carried out by a flying club are performed in appropriate maintenance facilities.</p> <p>10(c)7. Specifies the types of documents and frequency of filing from a flying club to the Airport. This language was carried forward from the current Minimum Standards.</p> <p>10(c)10. Per FAA Order 6190.6B, Airport may require insurance documents from a flying club. This language was carried forward from the current Minimum Standards.</p> <p>10(d). To specify a timeline for remedying violations. This language was carried forward from the current Minimum Standards.</p>

ATTACHMENTS:

- 1) FAA Order 5190.6B, Section 10.6 Flying Clubs
- 2) "Petition of the Aircraft Owner and Pilots Associations (AOPA) To Amend FAA Policy Concerning Flying Club Operations at Federally Obligated Airports", published in the Federal Register March 15, 2016 and effective April 4, 2016
- 3) Draft Minimum Standards, dated April 26, 2017
- 4) Santa Barbara Flying Club Correspondence
 - a. Clarification of the FAA's policy interpretation regarding the operation of flying clubs at federally-obligated airports from Hazel Johns (Airport Director) to Vince Mrstik (Santa Barbara Flying Club President), dated April 4, 2017
 - b. Feedback Related to Santa Barbara Flying Club from Tony Garcia (FAA) to Hazel Johns (Airport Director), dated April 17, 2017
 - c. Statement from Santa Barbara Flying Club to Santa Barbara Airport Administration, dated April 18, 2018