



City of Santa Barbara
Airport Department

DATE: September 23, 2020
TO: Airport Commission
FROM: Henry Thompson, Airport Director
SUBJECT: FAA Enforcement and Compliance Update

RECOMMENDATION:

That Commission receive a presentation on Federal Aviation Administration (FAA) Enforcement and Compliance efforts underway at the Airport.

BACKGROUND:

The FAA is responsible for ensuring that the Santa Barbara Airport (SBA) is in compliance with various rules and regulations related to the operation of the Airport. Failure to comply with these requirements can affect the Airport's certification and funding, specifically with regard to FAA grant assurances.

Regulatory and compliance oversight from the FAA is a continuous activity which Airport staff manages on a daily basis to ensure the Airport is operating in a safe, secure, and compliant manner.

FAA enforcement activity can be formal or informal as follows:

- Part 13 Complaint – **Informal**
 - Generally initiated by a user or tenant
 - Alleging the Airport is not complying with a rule, requirement, or grant assurance
 - May be written or verbal
 - Generally is a first step to a formal complaint
 - Allows the Airport the opportunity to address the allegation and merit of the complaint
 - FAA reviews the Airport's response in the context of the complaint filed and renders a decision as to its merit.
- Part 16 Complaint – **Formal**
 - More severe complaint and may have progressed from an informal complaint
 - May result from the Airport failing to be responsive to the informal complaint; or the FAA finding cause in the Airport's response to the initial complaint.

- May affect the Airport's compliance with grant assurances and delay grant funding until resolved.

It is important to understand that simply because the FAA issues a letter inquiring about activity at the Airport, it does not mean the complaint or allegation has merit. Instead, the FAA is attempting to make a determination as to the merit of the allegation or complaint and they offer the Airport an opportunity to respond before rendering a decision.

Compliance and Enforcement Activity at SBA

SBA has received three letters issued by the FAA since November 2018 requesting staff to respond to complaints or allegations raised by tenants or users of the Airport related to activity or policies. Each of the complaint letters received by the FAA are in various stages of staff evaluation and resolution. The FAA has voiced they are appreciative of the Airport's attitude toward compliance and resolving each matter.

Summary

Currently no action is required by the Airport Commission in the review or resolution of any Administrative letters from the FAA, but we bring this to you for your awareness. Airport Staff continue to manage these issues and will remain responsive to the FAA.

Should any issue rise to the level or complexity in which Airport Commission action is necessary, staff will take appropriate steps to keep the Commission up-to-date on the matter.

PREPARED BY: Certification and Operations Division