

FRIEDMAN MEMORIAL AIRPORT AIRPORT MINIMUM STANDARDS FOR COMMERCIAL AERONAUTICAL SERVICE PROVIDERS PUBLIC FEEDBACK AND RESPONSES

This table provides responses to feedback received from the public submitted on or prior to January 11, 2022 related to the Friedman Memorial Airport Authority's draft Minimum Standards for Commercial Aeronautical Service Providers.

No.			Party
1.	Question	What is driving the need for this document – did something particular happen driving the creation of this document? The FAA Advisory Circular calls Minimum Standards optional, so SUN probably has a particular reason or event happen that caused it to propose to implement this.	Joost Vlek, Airport Affairs Director, Alaska Airlines
	Response	As noted in FAA Advisory Circular (AC) 150/5190-7, Minimum Standards for Commercial Aeronautical Activities, dated August 28, 2006 (FAA Advisory Circular 150/5190-7) "Minimum standards can be modified to reflect the airport's experience and to be watchful for new opportunities (i.e. such as Specialized Aviation Service Operations (SASOs)). Minimum standards should be updated to reflect current conditions that exist at the airport and not those that existed in the past." The current Friedman Memorial Airport (Airport) Minimum Standards (Minimum Standards) were adopted by the Friedman Memorial Airport Authority (Authority) in 1997. Consistent with best management practices in this industry, with almost 25 years having elapsed since the Minimum Standards were last revised, the Authority determined that the Minimum Standards should be updated to reflect current as well as anticipated future conditions at the Airport and address the potential land uses resulting from potential future expansion of Authority property serving the Airport.	
2.	Question	What is the current Minimum Standards document missing that a new one is needed?	Joost Vlek, Airport Affairs Director, Alaska Airlines
	Response	See Response to Question #1.	
3.	Question	Is this copied and tweaked from another airport's Minimum Standards?	Joost Vlek, Airport Affairs Director, Alaska Airlines

No.			Party
	Response	The Airport Minimum Standards were developed in accordance with current industry best practices, including FAA Advisory Circular 150/5190-7, and are tailored to align with the specific needs and environment of the Airport. The Airport Minimum Standards have not been 'copied and tweaked' from another airport.	
4.	Question	To whom does this apply? Section 2.A suggests Commercial Aeronautical Service Providers, a term, though capitalized, not defined... This document does not seem to apply to airlines – could you please confirm?	Joost Vlek, Airport Affairs Director, Alaska Airlines
	Response	See Sections 3.A. and 3.P., Definitions. Minimum Standards do not apply to the commercial air carriers (i.e., Alaska, United, Delta). Airline activities at the Airport are governed by the Airline Operating Agreement and Terminal Building Lease, not these Minimum Standards.	
5.	Question	Does this apply to 3rd parties that provide services to the airlines? If so, could this document result in higher cost of services provided by an "Operator" that they may try to recoup from airlines? For example, I see this document detail minimum dimensions, minimum hours, requiring full-time staff, etc.	Joost Vlek, Airport Affairs Director, Alaska Airlines
	Response	See Response to Question #4. The Airport Minimum Standards do apply to service providers other than the airlines. We have no reason to believe that compliance with the Airport Minimum Standards will result in a higher cost of services.	
6.	Question	How have the dimensions been established in 11.A and would that result in having fewer vendors/companies?	Joost Vlek, Airport Affairs Director, Alaska Airlines
	Response	See the attached Memorandum dated June 10, 2021 that analyzes potential development options for a 10-acre tract of land located south of the existing Airport fixed base operation (FBO) being considered for acquisition by the Authority. The Authority used this analysis, the adopted Airport Layout Plan, and current land uses by existing Commercial Aeronautical Activity Service providers to guide the dimensions established in Paragraph 11.A. The minimum threshold standards for Space contained in Paragraph 11.A do not result in having "fewer vendors/companies." Quite the contrary, the minimum space requirements are designed to promote competition.	

No.			Party
7.	Question	Hello. I applaud the airport for undertaking this process. It is an effective way to raise service standards and protect the investment of vendors at the airport. My feedback is regarding Section 11 REQUIREMENTS AND STANDARDS FOR FIXED BASE OPERATORS. My feedback is focused on the lens of a potential Second FBO, as envisioned in the ALP. My comments are focused on bringing these requirements back down to fair minimum standards, rather maximum standards to protect the current single source FBO. For section (i) rather than a prescriptive requirement for a 150-foot by 260-foot building I would recommend to break this out into total SF amounts for customer lounge/office area and hangar area specifically. This will support flexibility in any future development to maximize the efficiency of a plot rather than limiting the layout with a fixed width and length of buildings. I would recommend this to be 2,500 SF for lounge/office and 20,000 SF of contiguous hangar space. Regarding the required ramp we would suggest it to be 100,000 SF rather than 150,000 SF to ensure site planning flexibility within the 4 acres / 174,000 SF that are suggested to be the minimum required leased area. Additionally, I would recommend revising the fuel storage requirements from 80,000 gallons for Jet-A fuel to 40,000 gallons for Jet-A fuel.	Daniel Larsen, Jet Aviation
	Response	See Response to Question #6. While some other airports' minimum standards are highly prescriptive in terms of precise square footage for each space or function within an FBO's leasehold, we believe that the marketplace at this airport will dictate what is needed for our users. This is an airport with a highly demanding, sophisticated clientele and we believe that competition is the best way to accommodate our users.	
8.	Question	1. "The Authority reserves the right to amend these Minimum Standards as may be necessary or desirable to improve the quality of services at the Airport, to enhance competition, when deemed to be in the Authority's best interest" q. Standards may be waived at any time, without restriction, if deemed in the best interest of the Authority?	Brian Blackburn, Atlantic Aviation - SUN
	Response	See Response to Question #1 above regarding the Authority's ability/rationale for amending the Minimum Standards. This policy statement affirms the Authority's intent to amend its Minimum Standards as needed or required.	
9.	Question	2. "FBOs shall further have available, either within its Premises or for its continuous use, a contiguous minimum 150,000-square-foot aircraft apron with taxiway access to accommodate the parking, staging, and maneuvering of based and transient aircraft." q. Will this require Atlantic Aviation to lease additional ground from the Authority?	Brian Blackburn, Atlantic Aviation - SUN

No.			Party
	Response	See Section 2.I., General Statement of Policy, regarding the applicability of the Airport Minimum Standards on existing Commercial Aeronautical Activity Service providers. While compliance with the Airport Minimum Standards will not compel existing tenants to comply with these new provisions, nothing will preclude an existing operator from submitting a proposal to the Authority to expand facilities or operations. Such requests will be considered in the context of the provisions of the Airport Minimum Standards.	
10.	Question	3. "Provide escorts for flight crews to and from all aircraft parking aprons" q. Is the expectation that an FBOs to provide all escort services to all flight crews regardless of patronage and without the ability to charge for the workforce/equipment/risk inherently involved?	Brian Blackburn, Atlantic Aviation - SUN
	Response	The intent of this section is to reiterate a FBO's obligation to comply with the Airport Security Program and is not intended to restrict an FBO's ability to recoup its reasonable cost of providing this service. The unescorted access to the airfield could pose a serious security concern for the airport and could violate federal security requirements and therefore escorts are essential. Therefore, it is essential that unbadged persons be escorted, regardless of whether the FBO is providing any other services to the particular user. The Airport Security Program as well as lease agreements obligate tenants to prevent unauthorized access to restricted areas of the Airport; therefore, FBOs are expected to be diligent in providing escorts as required by the Airport Security Program, including providing escorts regardless of whether the individual(s) are patrons of the FBO. FBOs can charge a reasonable fee for escort services just as FBOs can charge for other services.	
11.	Question	4. "FBOs shall provide the following aircraft ground handling services during the required hours of operation specified in Section 11.B.a: (i) aircraft apron/tiedown parking assistance for any aircraft occupying or using the aircraft apron/tiedown area used by the FBO (even if such area is not with the Premises), including ramp Personnel and vehicles as needed; (ii) tiedown anchors and ropes/chains; (iii) mobile forced air engine preheat." q. Aircraft Parking is on Airport apron/tiedown with collected fees for the spaces. Why is the FBO responsible for tiedown areas and that are not part of the contiguous apron that the FBO operates on within its premises	Brian Blackburn, Atlantic Aviation - SUN
	Response	This provision would apply when an FBO's aircraft apron/tiedown parking area or an Authority controlled aircraft apron/tiedown parking area is fully occupied and cannot accommodate additional aircraft such as during Special Events.	

No.			Party
12.	Question	<p>5. "(iii) discrete flight planning area properly equipped with desks and chairs and containing appropriate wall charts, a current FAA Aeronautical Information Manual, a listing of current and applicable Notice(s) to Airmen, direct communication link with the FAA Automated Flight Service Station, and a monitor for the Automatic Terminal Information Service.</p> <p>q. Is AIM, NOTAM listings, FAA AFSS, and ATIS standard? Most of these services are accessed through pilot computers with internet. Most of the information systems are streamlined with the simplification of Internet based flight planning portals.</p>	Brian Blackburn, Atlantic Aviation - SUN
	Response	This provision allows those pilots that may not have "internet-based flight planning portals" to access necessary data and information for purposes of planning his/her flight.	
13.	Question	<p>6. "the collection and remittance to the Authority of all general aviation landing fees, parking fees, and international facilities user fees, as applicable should the Authority so request."</p> <p>q. Is this intended to allow the Authority the capacity to use FBO's for collections and administration services without compensation?</p>	Brian Blackburn, Atlantic Aviation - SUN
	Response	This section will not allow the Authority to exploit the capacity to use FBO's for collections and administration services without reasonable compensation.	
14.	Question	<p>7. "FBOs shall provide no fewer than two airworthy aircraft suitably equipped for and meeting all the requirements of the FAA with respect to the type of operation to be performed."</p> <p>q. Most flight training is conducted in customer aircraft at this location. Can we continue with our current practice?</p>	Brian Blackburn, Atlantic Aviation - SUN
	Response	See Section 2.I., General Statement of Policy, regarding the applicability of the Airport Minimum Standards on existing Commercial Aeronautical Activity Service providers.	
15.	Question	<p>8. "FBOs shall offer the rental of aircraft to the public and shall have available for rental, either owned or under written lease to the FBO, a minimum of three aircraft to handle the proposed scope of the operation and be sufficient to provide for the public demand"</p> <p>q. This requirement far exceeds the demand at this location. This can be an overly burdensome obligation at this time.</p>	Brian Blackburn, Atlantic Aviation - SUN
	Response	See Section 2.I., General Statement of Policy, regarding the applicability of the Airport Minimum Standards on existing Commercial Aeronautical Activity Service providers.	

No.			Party
16.	Question	<p>9. "SASOs may provide one or more of the following commercial aeronautical activities and shall comply with the Minimum Standards described herein. SASOs are encouraged to sublet Premises from an FBO if required; however, if suitable land or Premises are not available or cannot be obtained from an FBO, then SASOs may sublease Premises from either another SASO or lease directly from the Authority land or existing facilities, if available."</p> <p>q. If SASO's can sublease premises other than providing 3rd party services to fulfil FBO section 11 requirements, will FBO's continue to be required to provide such service requirements?</p>	Brian Blackburn, Atlantic Aviation - SUN
	Response	Yes.	
17.	Question	<p>10. "Any violation of these Minimum Standards may result in the loss of the right to operate at the Airport or termination of an Agreement. In addition, any violation of these Minimum Standards may result in the imposition of criminal penalties pursuant to Ordinance No. 534 of the City of Hailey, Idaho. These Minimum Standards shall be in full force and effect from and after their passage and adoption."</p> <p>q. "Any" violation without a process to remediate a perceived infringement seems inequitable without an opportunity for due process.</p>	Brian Blackburn, Atlantic Aviation - SUN
	Response	This section reserves the Authority's right to terminate an Agreement for violations. Notices of default and corresponding cure periods for such defaults are addressed in individual lease and use agreements by and between the Authority and the entity engaged in providing commercial aeronautical services. Nothing in the Airport Minimum Standards supersedes or is intended to contradict language in an existing agreement.	

No.			Party
18.	Question	<p>Did I hear correctly that the new minimum standards will NOT apply retroactively to existing operators? If that is true, doesn't it discourage competition/actually promote "exclusive rights" since the new standards are much higher than the level of service currently being provided by the existing FBO and Flight School?</p> <p>My question mainly applies to the existing flight school, if the minimum standards are adopted as written, would they be required to operate two instructional aircraft, three rental aircraft, a flight simulator (AATD?), pilot shop and provide multiple readily available flight instructors? I do agree with John Strauss that would be an "onerous" change and perhaps financially unsustainable given the local market. However, some standards for flight training are necessary. Perhaps two IFR-capable aircraft that can be used for instruction and/or rental, an AATD, available instructors and access to pilot supplies (is a shop really necessary?) would suffice?</p> <p>Finally, independent flight instructors should not be discouraged from plying their trade at the airport provided they are documented and insured as laid out in the draft minimum standards. Prohibiting them gives exclusive rights to the flight school(s).</p>	Caitlin McCarthy

No.			Party
	Response	<p>See Section 2.I., General Statement of Policy, regarding the applicability of the Airport Minimum Standards on existing Commercial Aeronautical Activity Service providers. Although existing operators will not be required to retroactively comply with the Airport Minimum Standards, competition is not thwarted especially if the Authority acquires land on the south end of the Airport and another FBO or facilities to support SASOs comes to fruition. The Airport Minimum Standards provide the necessary foundational requirements for such operators to provide commercial aeronautical services to the public from this land area. As a policy document, the Minimum Standards not only look at what kind of operating environment currently exists at the Airport, but also establishes a framework to enhance the safety, equitably and high-quality aeronautical products & services the Airport offers. Given these standards, as well as the Airport's unique geographic location, those individuals learning to fly, furthering their existing flight capabilities and those instructing said students need to be held to the same safety and high-quality standards. The Airport Minimum Standards will further provide the basis for re-establishing minimum operating requirements for existing operators as their lease and use agreements expire.</p> <p>As a point of clarification to the number of aircraft referenced in Section 11.E. - an FBOs shall offer the rental of aircraft to the public and shall have available for rental, either owned or under written lease to the FBO, a minimum of three aircraft to handle the proposed scope of the operation and be sufficient to provide for the public demand. The FBO would be required to operate two (of the three aircraft) as instructional aircraft. The Authority, as it pertains to the Minimum Standards, does not intent for an FBO to own/operate/lease five aircraft.</p> <p>Section 12.B., Independent Flight Instructor, establishes minimum threshold requirements for independent flight instructors, such as Certified Flight Instructors (CFI) not affiliated with a FBO providing Flight Instruction Services directly, or indirectly through a SASO as described in Section 11,. Providing minimum standards for part-time independent flight instructors allows pilots requiring flight instruction services the flexibility to use a CFI of his/her own preference and offers a basis for such CFIs to provide limited, part-time flight instruction services.</p>	

No.			Party
19.	Question	The requirements include things like there must be two aircraft available for flight instruction and I believe I read there should be three aircraft available through any FBO. I can tell you from historical purposes, although the flight school started out with two aircraft, it did not justify the use of aircraft that much and I have gone down to one. So we have a discussion to be made as to the appropriateness of more additional aircraft to be ordered, to be purchased, and therefore to be operated. Also, for historical purposes, I am operating through the agreement of Atlanta Aviation, not directly as a SASO's since that term was not in existence when I bought this flight school 10 years ago. So some of my comments are on behalf of what I have adopted in terms of what I consider the flight schools actions.	John Strauss, Glass Cockpit Aviation
	Response	The intent of the Airport Minimum Standards is to maintain a professional environment for businesses providing aeronautical services. It is reasonable to expect a full-time entity engaged in the business of providing aircraft rental and flight instruction to have more than one aircraft available, either owned or under written lease with an aircraft owner, to meet demand or position the entity to respond to demand during periods when that sole aircraft is not available due to use by another student, renter, or is undergoing scheduled/unscheduled maintenance or repair. The Airport Minimum Standards are specifically written with the intent to avoid casual, informal, occasional, or unprofessional service providers. It is our judgment that this provision is designed to further that policy. The Airport has evolved and is expected to continue to evolve, especially if the Authority acquires land on the south end of the Airport and another FBO or facilities to support SASOs comes to fruition.	
20.	Question	SASO's section: What is independent flight instructor? Acknowledging the requirement of not creating any monopoly or prohibiting competition, the insertion of an independent flight instructor, without office space, without meeting any of the other requirements I've had to do to operate here as a flight school would put me a distinct disadvantage if anybody decided to simply perform "independent flight instructor activity" without a definition or without any historical benefit for that. Asking for this entire paragraph to be reviewed and discussed.	John Strauss, Glass Cockpit Aviation
	Response	See the response to Question 19. Section 12.B., Independent Flight Instructor, establishes minimum threshold requirements for independent flight instructors, such as Certified Flight Instructors (CFI) not affiliated with a FBO providing Flight Instruction Services directly, or indirectly through a SASO as described in Section 11,. Providing minimum standards for part-time independent flight instructors allows pilots requiring flight instruction services the flexibility to use a CFI of his/her own preference and offers a basis for such CFIs to provide limited, part-time flight instruction services.	

No.			Party
21.	Question	There are some provisions of other minimum standards that talk about large flight schools and small flight schools. I noticed we did not do that here. I ask for some consideration as to how we came up with, for example, number of airplanes, number of hours. I found no authority in my web search for written assurances that not more than 40 hours of flight instruction would be given in a month period (I believe it said) by any independent flight instructor. I liked to discuss the logic of how that was developed and why.	John Strauss, Glass Cockpit Aviation
	Response	Section 11.E.g., Flight Instruction, provides that an FBO can provide flight instruction services pursuant to either 14 CFR Part 61 (small flight schools) or 14 CFR Part 141 (large flight schools). Flight instructors operating under Section 12.B. of the Airport Minimum Standards are "part-time" entities; hence, the limit of 40 hours per month or approximately 10 hours per week. We believe that the provisions are appropriately drafted to provide a wide range of flight school business models without allowing for the undesirable consequences discussed in response to Question 19.	
22.	Question	The Airport Authority reserves its rights to perform any of the services of themselves. I would certainly like to know if the Airport intends to pursue flight instruction independent of any FBO or authorized flight school. I believe the paragraph that would be controlling that is that one that said "and the Airport Board may consider" I would certainly suggest that the Airport Board it be included "the Airport Board shall consider" requesting proposals before it entertains becoming, in essence, a competitor with any of the activities on the Airport.	John Strauss, Glass Cockpit Aviation
	Response	The FAA allows the sponsor of a public-use airport to provide any or all of the aeronautical services needed by the public at the airport (a) on a proprietary exclusive basis; (b) on a competitive basis between the sponsor and the private sector; or (c) entirely through private entities. See Paragraph 1.3.a.1. of FAA AC 150/5190-6, Exclusive Rights at Federally-Obligated Airports, dated January 4, 2007. The Airport Minimum Standards have been drafted to allow any of these models to exist at this airport, though today the Authority does not provide any of the traditional commercial aeronautical services itself. The Authority Board has not discussed providing any commercial aeronautical services.	

No.			Party
23.	Question	It seems as if by the review of those (other airport minimum standards) that I have been able to find that this document seems to be the leader in terms of requirements and obligations of SASOs to performing any services. I would welcome any discussion where any of the paragraphs come from or any of the requirements of the details of the operation be revealed and discussed. For example, there is not even a pilot shop on the Boise airport. And yet, according to this document, the FBO would be required to operate a pilot shop and include charts, etc. for sale. So the reasonableness of that obligation would certainly need to be discussed and reviewed since a) we've never had one and b) we've never had the business calling for that and to impose that upon the FBO like the imposition of three aircraft for rental purposes with their own flight instructor to review any applicant renting them seem to be on onerous side.	John Strauss, Glass Cockpit Aviation
	Response	See Response to Question #1. While there may be provisions of the Airport Minimum Standards that are similar to specific provisions at other airports, the Airport Minimum Standards have been drafted exclusively in light of the needs of this airport and its users. The consultant team has seen other airport minimum standards that are both much less, and much more prescriptive than these.	
24.	Question	Although I agreed to participate as a committee member of the committee considering these items, apparently neither the existing flight school nor the FBO had any representation or contact with the selected committee prior to two virtual stakeholder outreach meetings.	John Strauss, Glass Cockpit Aviation
	Response	Although no interviews were conducted with existing FBOs or SASOs, all existing Authority lease and use agreements with such providers were reviewed and considered in the drafting of the Airport Minimum Standards. The effort to engage stakeholders was comprehensive and supplemented the committee. All stakeholders – both users and commercial service providers – were offered the opportunity to participate in the process and some stakeholders did elect to participate.	
25.	Question	Before considering submitting any draft to the FAA, I would request responses to all stakeholder input(s) and comments received including those voiced at the two outreach virtual meetings be provided. The optics of one way communications and two minimally attended virtual meetings do not appear to bode well for the public's perception of whether these very important items are considered "objective".	John Strauss, Glass Cockpit Aviation
	Response	The Airport Minimum Standards, along with all public comments, were submitted to the FAA for review and consideration by the Authority on January 11, 2022. While neither FAA requirements nor even industry practice requires that the sponsor respond to each written comment on a draft set of minimum standards, the Authority has elected to be transparent and candid by providing responses to all comments.	

No.			Party
26.	Question	In drafting new standards, one consideration is to ensure that the sponsor "is not applying unreasonable standards or creating a situation that will unjustly discriminate against other similarly situated aeronautical service providers." Perhaps waivers of selected standards for existing business(es) needs to be considered. How are the existing lease agreements affected by the proposed? See, AC 150/5190-7.	John Strauss, Glass Cockpit Aviation
	Response	See Response to Question #4. Every possible permutation cannot be anticipated, and the Airport Minimum Standards provide for appropriate exceptions in unusual unanticipated circumstances.	
27.	Question	In particular, I previously mentioned the unreasonableness of requiring FBOs to be "certified by the FAA" to supply on-demand ground school, two aircraft (one of which must be IFR), an IFR simulator, plus have a pilot shop for pilot supplies. Section 11, E, g	John Strauss, Glass Cockpit Aviation
	Response	See Response to Question #19. It is industry standard for FBOs to carry various different FBO certifications for the services they provide. These certifications are intended to provide the public with the assurance that services are professional and are in accord with best industry standards. The users of this airport would, we believe, not accept substandard FBO practices or service.	
28.	Question	In addition, I furthermore mentioned the unfairly burdensome requirements of compelling FBOs to offer three additional rental aircraft. Section 11, E, h	John Strauss, Glass Cockpit Aviation
	Response	See Response to Question #19.	
29.	Question	Unlike any other airport's minimum standards I have been able to locate, this proposal creates an entirely new category of "Independent Flight Instructor". Section 12, B. Really? Is it in the airport community's best interest to enlarge the size of the existing flight training aircraft fleet plus create an entirely new opportunity for multiple independent flight instructors without meeting the same requirements of existing "flight school(s)"? Where might they find adequate Permitted Areas, how financially realistic is it for them to provide an unspecified amount of insurance by working no more than 40 hours on a part-time basis in any month? How and why was this unique category created. Wow! I struggle desperately to minimize the number of noise complaints current flight training activities seem to attract creating such a negative public image to (SOME!) local residents as we have already experienced. Before necessitating enlarging flight training activities perhaps some effort should be expended to determine the communities' need and desire for increasing the volume necessitated by these proposed minimum standards. Has anyone proposed such an activity? How might the existing entities not be unjustly discriminated against?	John Strauss, Glass Cockpit Aviation

No.			Party
	Response	See Response to Question #20. Independent flight instructors are common at many general aviation airports and at some airports have been a serious safety hazard. Therefore, in an effort to balance between prohibiting such operators entirely (an approach taken at many airports) and allowing completely unregulated access to the airport from persons without the professional qualifications that our users expect, the Airport Minimum Standards have been drafted to allow independent flight instructors but also to impose requirements to provide the public with the assurance that these service providers are providing instruction in accordance with established industry practices.	
30.	Question	And despite a review of similarly situated mountain resort airports' minimum standards, I cannot locate a single one which obligates the Authority to determine the fairness, reasonableness, and potentially discriminatory price of services. What happened to the previous 1997 standard specifically indicating the rates or charges "shall be determined by the Service Provider"?	John Strauss, Glass Cockpit Aviation
	Response	Section 5.B., General Requirements and Section 13.E., Federal Aviation Administration Required Agreement Provisions, which address fair, reasonable, and not unjustly discriminatory prices for services are included to ensure the Authority's compliance with FAA Airport Improvement Program Grant Assurance 22, Economic Nondiscrimination. The Authority has an affirmative legal obligation to ensure that its commercial service providers are charging reasonable and not unjustly discriminatory rates to their customers.	
31.	Question	I think all the operations are currently on/within the City limits of Hailey. I think the acquisitions that the Airport Authority has made is more for, on the property to the south, was for safety purposes but it only brings up my question do you think that are any consideration to be considered for County regulations in addition to the City of Hailey ordinances. And corollary to that we know that along the east boundary and north boundary we are bounded by state highway 75. I don't think we have any issues there either, but I just wanted to know that we are covering all the bases.	Dick Fosbury
	Response	This is a very useful comment. The Airport Minimum Standards will be revised to reflect the possibility that portions of the airport lie within unincorporated Blaine County.	



MEMORANDUM

Date: June 10, 2021

To: Chris Pomeroy, Airport Manager
Friedman Memorial Airport

From: Bryan O. Elliott *Bryan O. Elliott*

Subject: FRIEDMAN MEMORIAL AIRPORT – SOUTH GENERAL AVIATION DEVELOPMENT OPTIONS

This memorandum summarizes potential development options for a 10-acre tract of land located south of the existing Friedman Memorial Airport (Airport) fixed base operation (FBO) being considered for acquisition by the Friedman Memorial Airport Authority (Authority). The alternatives for use of this 10-acre parcel are based on the attached May 2021 concepts developed by TO Engineers for the Authority and include:

- SUN Development Alternative I – No FBO facilities. A mix of nested T-hangars and box hangars for storage of Aircraft Design Group (ADG)¹ I and III aircraft
- SUN Development Alternative II – one 150' x 260' building for FBO use; one 40' x 315' nested T-hangar for storage of Aircraft Design Group (ADG) I aircraft; and three 120' x 100' box hangars for storage of ADG III aircraft
- SUN Development Alternative III - one 150' x 260' building for FBO use; three 40' x 315' T-hangars for storage of ADG I aircraft.

Ricondo recommends that the Authority consider the findings and recommendations of the 2018 Airport Master Plan, to inform its evaluation of the highest and best use for this 10-acre parcel. Specifically the 2018 Airport Master Plan indicates that approximately 150,000 SF of apron space and associated aircraft parking was lost as part of the 2015 Runway Safety Area (RSA) project. Further, the 2018 Airport Master Plan recommends that the Authority replace this lost 150,000 SF of apron space and associated aircraft parking area and construct an additional 225,000 SF of apron space to meet the forecast demand for apron space and associated aircraft parking area. It should be noted that this 10-acre tract of land represents approximately 115,000 SF of additional apron space, or only 42%, of the total 275,000 SF of additional future apron space recommended in the 2018 Airport Master Plan.

The Alternatives Analysis Chapter of the 2018 Airport Master Plan addresses additional hangar space that is forecast to be required during the next 20-year planning period. While the Alternatives Analysis Chapter

¹ Airplane Design Group (ADG) means a Federal Aviation Administration (FAA)-designated grouping of aircraft based upon wingspan. The following ADG groups used in this memorandum include Group I-up to but not including 49 feet; and Group III-79 feet up to but not including 118 feet.



of the 2018 Airport Master Plan does not make a specific recommendation for the number of future hangars that should be developed, it states:

“...Projected growth in based aircraft presented in Chapter B indicates that continued strong demand for hangar space is expected in the future... However, there is little available land for construction of new hangars within the current Airport boundary, and the ability of the Airport to acquire land for hangar construction or relocation is uncertain...”

On June 2, 2021, Authority staff, Ricondo, and Kaplan Kirsch Rockwell, LLP conducted a teleconference to review the above alternatives as well as associated potential uses of these facilities. Following is a summary of the uses discussed during this call:

AIRCRAFT STORAGE ONLY

This option entails construction of hangar facilities solely for the storage of general aviation aircraft with no commercial (FBO or specialized FBOs) activity on the 10-acre site. The 150' x 260' FBO building in both Alternative II and Alternative III would be repurposed for additional box hangars to provide aircraft storage capacity. This option would maximize the Authority's ability to provide aircraft storage capacity lost as the result of the 2015 Airport RSA project and some of the forecast demand for aircraft storage as projected in the Airport Master Plan. While aircraft hangar storage is maximized as the result of this option, no facilities are provided to accommodate new/additional commercial aeronautical activities or services.

FULL SERVICE FBO

For this option, the Authority would seek competitive proposals or consider unsolicited proposals for a second full-service FBO to be operated from the 150' x 260' building and adjoining aircraft parking apron north of this facility. The T-hangar/box hangars depicted in Alternative II and Alternative III would be constructed by entities (condominium association(s) or private aircraft owner(s)) for aircraft storage. The entity selected by the Authority for this second full-service FBO would enter into a long-term lease and use agreement with the Authority and be required to finance/construct the 150' x 260' building, adjoining aircraft parking apron, automobile parking, and fuel farm facility. In addition, the selected entity would be required to meet the then current Authority promulgated Airport Minimum Standards. The 150' x 260' building would accommodate a mix of uses including public lobby/customer service area, pilot lounge, flight planning area, public restrooms, conference room, offices, and aircraft hangar bays for storage/maintenance.

Depending on the requirements of the then current Airport Minimum Standards, the selected entity could be required by the Authority to allocate a portion of the 150' x 260' building for Specialized Aviation Service Operators (SASOS) - flight instruction, aircraft rental, charter, and/or maintenance. This alternative would provide the ability to accommodate a second full-service FBO at the Airport; however, since the 150' x 260' building would be utilized for commercial aeronautical services, it does not provide the ability to maximize aircraft storage described in the "Aircraft Storage Only" option described above.



SPECIALIZED AVIATION SERVICE OPERATORS (SASOS)

Through this option, the Authority would seek competitive proposals, or consider unsolicited proposals, from SASOS – 100 LL fuel sales, flight instruction, aircraft rental, charter and/or maintenance services for lease and use of the land area constituting the 150' x 250' building area depicted on Alternative II and Alternative III. As with the Full Service FBO option, the T-hangar/box hangars would be constructed by entities (condominium association(s) or private aircraft owner(s)) for aircraft storage. Given the limited scope of services to be offered by SASOS, it is probable that 2-3 smaller buildings would be developed in lieu of one 150' x 260' building and that the entities selected would not be required to construct the entire aircraft parking apron north of this building area given the limited scope of their operations. These entities would enter into a long-term lease and use agreement with the Authority, be required to finance/construct construction of their respective facilities, and comply with the then current Authority promulgated Airport Minimum Standards.

This alternative would provide the ability to accommodate niche, smaller providers of aeronautical services; however, since the 150' x 260' building area would be utilized for commercial aeronautical services, this option does not provide the ability to maximize aircraft storage described in the "Aircraft Storage Only" option described above. In addition, while the Authority can ensure that smaller, niche operators will be accommodated with this option, the ability of these operators to generate sufficient revenue streams to remain financially viable as well as provide sufficient cashflow to retire any debt obligations for construction of facilities may be limited due to the specialized nature of their operation and focus on service to smaller general aviation aircraft.

While this 10-acre site falls short of providing the full amount of additional aircraft parking apron as identified in the Airport Master Plan, Ricondo understands that you believe the above-described alternatives represent reasonable options to address the shortage of both aircraft parking space and hangars at the Airport based on historical high demand should the land be acquired.

Please feel free to contact me if you have any questions concerning this summary of the proposed development and use of this 10-acre parcel.

ATTACHMENTS

cc: 21011210.01

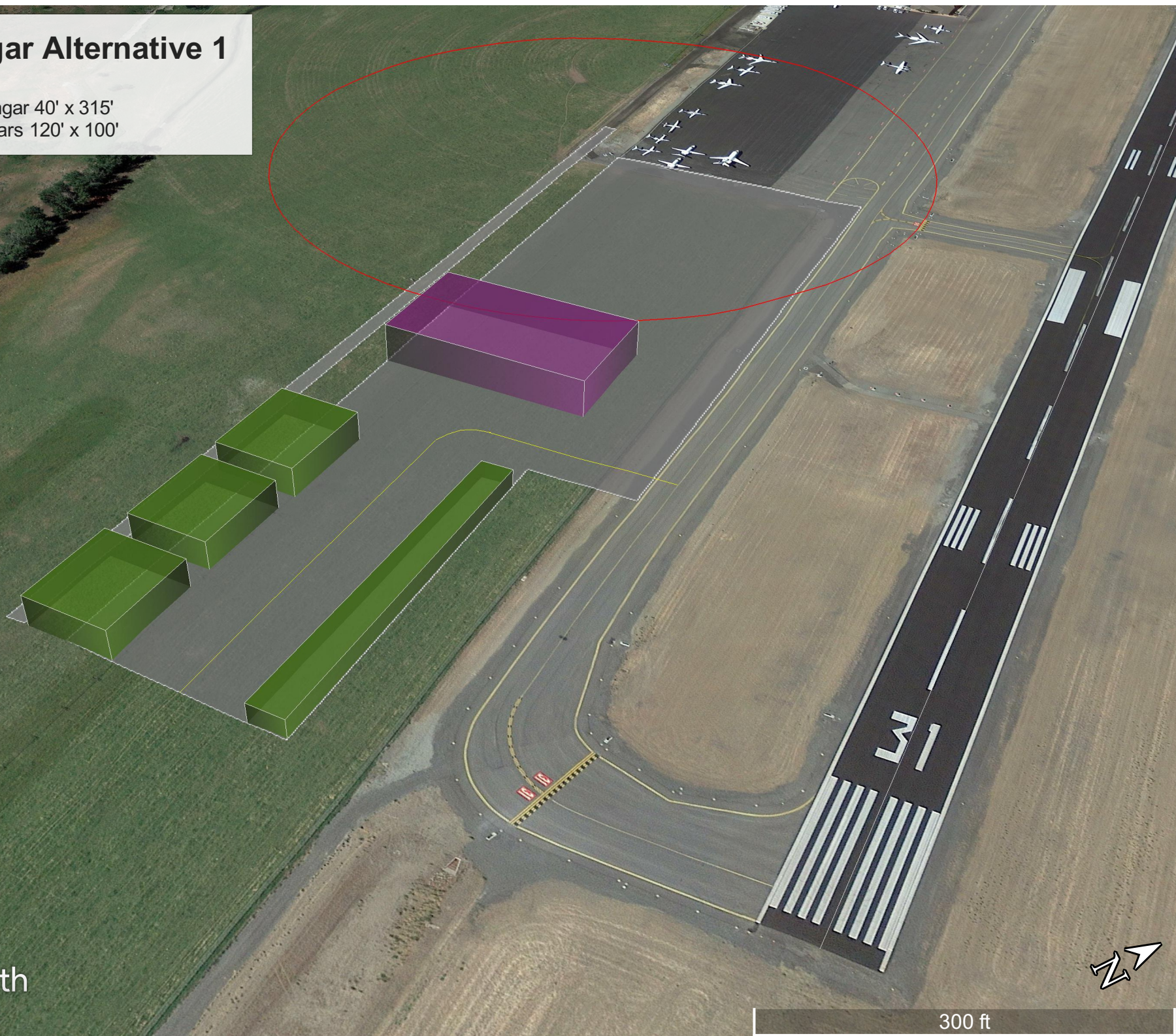
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SUN Hangar Alternative 1

FBO 150' x 260'

ADG I Condo Hangar 40' x 315'

ADG III Box Hangars 120' x 100'



Google Earth

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300 ft

SUN Hangar Alternative 2

FBO 150' x 260'

ADG I Nested T Hangars 40' x 315'

