

Attachment #2



U.S. Department
of Transportation
**Federal Aviation
Administration**

Western-Pacific Region
Office of Airports
Safety and Standards Branch

777 S. Aviation Blvd., Suite 150
El Segundo, CA 90245

November 7, 2019

Henry Thompson
Airport Director
Santa Barbara Airport
601 Firestone Road
Santa Barbara, CA 93117

Dear Mr. Thompson,

On November 20, 2018, the Federal Aviation Administration (FAA) notified Santa Barbara Airport (SBA or Airport) of a potential violation of Federal Grant Assurance 22, *Economic Nondiscrimination*, involving the Airport's policy pertaining to Independent Flight Instruction. This potential violation came to the FAA's attention as the result of a verbal complaint received from an Airport tenant.

Grant Assurance 22 requires the airport to make aeronautical facilities available to its tenants and the public at terms that are reasonable and without unjust discrimination. Compliance with this Grant Assurance is normally accomplished through the formulation and implementation of rules and standards which serve to "even the economic playing field" between airport tenants and other commercial service providers offering similar aeronautical activities.

Airport staff has acknowledged FAA concerns, and agreed to resolve the matter through the implementation of revised Airport policy. In recent discussions with the Airport, we have become aware that Airport policy is being drafted that includes the following:

- All flight instruction activity will be directed to approved flight schools at SBA,
- Flying clubs will continue to provide flight instruction to its members only,
- Flight instruction and aircraft rental rates will be assessed by flight schools on a market rate and competitive basis,
- Any independent flight activity will comply with Airport policy guidelines or risk Airport access privileges being revoked,
- Additional policy will be drafted and implemented, addressing independent commercial service providers operating on the Airport in competition with brick and mortar tenants offering the same or similar services.

The Airport appears to have done its due diligence and is prepared to implement a proposed policy that would meet its federal obligations. Given the nature of the verbal complaint and alleged damages by existing tenants, we urge the Airport to take prompt action to implement the new policy.

Should a written complaint be submitted to FAA regarding allegations of violation of Grant Assurance 22, or any other Federal Grant Assurance, the FAA will open an investigation.

We appreciate the Airport's effort in working toward a solution, ensuring all of its tenants are treated fairly and equally. I am available to support your effort as you move this complex issue forward.

Sincerely,



George E. Aiken
Airports Compliance Program Manager
Western-Pacific Region

cc: Aaron Keller, Airport Operations Manager