

## The Following is an Itemized List of Significant Proposed Changes to the SBA Minimum Standards

Modifications were incorporated throughout this entire document to better provide a standard use of terminology and consistency following a thorough review. The list below provides a general overview of the most significant changes that will affect business practices at the Santa Barbara Airport. This document is not intended to be an all-inclusive list of changes. Changes can be assessed by comparing the 2017 City Council approved document to the current draft.

### Independent Operators

<b>Change 1:</b>	When services are reasonably available and provided by Commercial Service Operators with a fixed place of business on the Airport, Independent Operators equivalent services will not be permitted.
<b>Rationale:</b>	Legal review discovered that the FAA has determined it is reasonable and, indeed, common industry practice, to require a Commercial Service Operators to have a fixed place of business on Airport. Permitting this activity may expose the Airport to additional unjust discrimination claims.

<b>Change 2:</b>	Commercial Service Operators are subject to the Airport Commercial Operator Permit.
<b>Rationale:</b>	All Commercial Service Operators are required to maintain a Commercial Operating Permit issued by the Airport.

<b>Change 3:</b>	Must be sponsored by a specific tenant and permitted to only operate in that tenant's leasehold space. Operations at City managed facilities or locations must be permitted.
<b>Rationale:</b>	Activity in various areas such as leaseholds, wash rack, hangars needs to be granted by the lessee and/or City, as appropriate, for liability, security, and operational purposes.

<b>Change 4:</b>	Commercial Operator Permit Fee: \$1,200 - Annually; or \$150 - 30 Day Permit/Student.
<b>Rationale:</b>	The Airport is addressing the FAA's request to establish and maintain an equitable competitive environment with based tenants. A monthly permit program was established to meet the request of Independent Flight Training Operators who perform limited instruction.

<b>Change 5:</b>	Meet insurance requirements commensurate with Airport tenant requirements for the type of service being provided.
<b>Rationale:</b>	Airport tenants are required to maintain specific insurance based upon the type of activity they are engaged in. In order to establish and maintain an equitable competitive environment, the level of insurance required must be appropriate based upon the type of operation conducted.

<b>Change 6:</b>	Commercial Service Operators shall provide notice to their customers that identifies the insurance policy limits provided and provide a copy of that notice to the City.
<b>Rationale:</b>	As a permitted Independent Operator, the customer deserves to know what their protections are and the Airport needs to ensure this notification took place for quality assurance.

<b>Change 7:</b>	Independent Operators are prohibited from advertising their services on Airport.
<b>Rationale:</b>	Advertising for services at SBA when an Independent Operator is contracted to perform unique services that are unmet on Airport is not appropriate. The Santa Barbara Airport aviation community is a small group and those based tenants/permittees are generally familiar with the means of obtaining services.

<b>Change 8:</b>	Independent Flight Training Operators may only conduct flight instruction in an aircraft provided by the student. Use of an Instructor's personal aircraft is prohibited.
<b>Rationale:</b>	Should an Independent Flight Training Operator provide instruction in their own aircraft they would effectively be serving as a Flight Training Operator, or Aircraft Rental Operator, which is governed by Section 7-4 and 7-5 of the SBA Minimum Standards.

<b>Change 9:</b>	Independent Flight Training Operators who conduct flight instruction must log all flight and ground instruction activity with the date, duration, and name of student. This log must be provided to the Airport quarterly and/or upon request.
<b>Rationale:</b>	This log will allow the Airport to appropriately audit, monitor, and better understand what services tenant operators with a fixed place of business are not meeting.

<b>Change 10:</b>	Independent Maintenance Operators shall only provide maintenance from an Aircraft Maintenance Operator facility or at locations designated and approved in writing by the Airport Director.
<b>Rationale:</b>	Maintenance activity is controlled by a variety of regulations and permits. Aircraft maintenance facilities are the appropriate location for this activity; however, extenuating circumstances do occur and will be assessed by the Airport Director.

<b>Change 11:</b>	A written plan for adhering to all environmental requirements must be presented to the Airport Director for approval when operations may pose a threat to the environment (e.g. environmental protection actions).
<b>Rationale:</b>	Many operations affect the Airport's regulatory requirements and as a Permittee, the Airport needs assurance there will be no compliance violations.

## Flying Clubs

<b>Change 12:</b>	Permit Fee: \$100 per Member; or \$2000 - Annually (maximum)
<b>Rationale:</b>	Administrative work conducted by Airport Administration related to processing, maintaining, and ensuring compliance is conducted regularly to ensure compliance with FAA Order 5190.6 and the Airport Minimum Standards.

<b>Change 13:</b>	Flying Club members who conduct flight instruction must log all flight and ground instruction activity with the date, duration, and name of student. This log must be provided to the Airport quarterly and/or upon request.
<b>Rationale:</b>	This log will allow the Airport to appropriately audit, monitor, and enforce compliance with FAA Order 5190.6 as well as the SBA Minimum Standards.

<b>Change 14:</b>	Administrative Fee Based Upon Number of Aircraft: \$150 per Aircraft Annually.
<b>Rationale:</b>	Administrative work is required by Airport Administration annually to ensure compliance with all applicable requirements for each aircraft.

<b>Change 15:</b>	Flying Clubs must submit a membership change form and are subjected to a roster change administrative fee of \$25 for each change in membership.
<b>Rationale:</b>	Flying Club membership rotates on a routine basis and must be kept current to ensure appropriate enforcement of FAA Order 5190.6 and SBA Minimum Standards. Administrative work conducted by Airport Administration is required for each change.

<b>Change 16:</b>	Authorized club members or Commercial Service Operators who provide member instruction must be designated on the roster that which must be submitted to the Airport prior to commencing instruction in the club.
<b>Rationale:</b>	Similar to the need for familiarity with the membership roster, the Airport must be knowledgeable of who is providing instruction in each Flying Club and associated level of activity.

<b>Change 17:</b>	A Flying Club must not conduct any commercial activities on the Airport at all; its activities must be limited to the non-for-profit ownership and maintenance of club aircraft for recreation and enjoyment of members, and activities necessarily incident thereto.
<b>Rationale:</b>	Flying Clubs are not intended or permitted to be a Commercial Service Operator per FAA policy.

## Other Business Segments

<b>Change 18:</b>	GSE maintenance is regulated by the Minimum Standards as a commercial activity.
<b>Rationale:</b>	This business segment was not originally part of the document and was added for compliance purposes. Requirements associated will be very similar to that of Aircraft Mechanics.

<b>Change 19:</b>	Aircraft detailing and washing is regulated by the Minimum Standards as a commercial activity.
<b>Rationale:</b>	This business segment was not originally part of the document and was added for compliance purposes. Requirements associated have been outlined in the document.

## **Fee Schedule**

### **Independent Flight Instruction**

- Commercial Operator Permit Fee: \$1,200 Annually; or 30 Day Permit: \$150 per Student.
  - The Airport is addressing the FAA's request to establish and maintain an equitable competitive environment with based tenants. A monthly permit program was established to meet the request of Independent Flight Training Operators who perform limited instruction.
  - Administrative work conducted by Airport Administration related to processing, maintaining, and ensuring compliance is conducted regularly to ensure compliance with FAA Order 5190.6 and the Airport Minimum Standards.

### **Flying Clubs**

- Permit Fee: \$100 per Member; or \$2000 Annually (maximum)
  - Administrative work conducted by Airport Administration related to processing, maintaining, and ensuring compliance is conducted regularly to ensure compliance with FAA Order 5190.6 and the Airport Minimum Standards.
- Administrative Fee Based Upon Number of Aircraft: \$150 per Aircraft Annually.
  - Administrative work is required by Airport Administration annually to ensure compliance with all applicable requirements for each aircraft.
- Flying Clubs must submit a membership change form and are subjected to a roster change administrative fee of \$25 for each change in membership.
  - Flying Club membership rotates on a routine basis and must be kept current to ensure appropriate enforcement of FAA Order 5190.6 and SBA Minimum Standards. Administrative work conducted by Airport Administration is required for each change.

### **Other Commercial Operators**

- Commercial Operator Permit Fee: \$1200 Annually; or \$150 Monthly.
  - The privilege to provide these commercial services is similar to the ability of Independent Flight Training Operators providing instruction and meets the FAA's requirement to establish and maintain an equitable competitive environment with based tenants.