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January 9, 2020

Paul Casey  
Administrator, City of Santa Barbara  
735 Anacapa Street  
Santa Barbara, CA 93101

**TRANSMITTED VIA ELECTRONIC MAIL TO:**

[pcasey@santabarbaraca.gov](mailto:pcasey@santabarbaraca.gov)

Re: General Aviation Concerns at Santa Barbara Municipal Airport.

Dear Mr. Casey,

It is the Aircraft Owners and Pilots Association's (AOPA) understanding that the Santa Barbara (SBA) Airport Director is considering lease extensions for Signature Flight Support and Atlantic Aviation, the two Fixed Base Operators (FBO) at the airport, and that the Airport Commission voted on October 16, 2019 to accept the study presented by the Airport Director regarding airport controlled transient parking. It is also our understanding that the Airport Commission has directed the Airport Administration to update the Santa Barbara Airport Minimum Standards to address, and potentially limit, Independent Commercial Activity. As the world's largest General Aviation (GA) organization representing over 36,000 members in California and almost 300 members at SBA, we have serious concerns regarding the Airport Directors approach to accommodating GA users at the airport. The Airport Director has been unresponsive to multiple phone calls and requests for discussion on these topics. Therefore, we write today to raise these issues to your attention and to provide the City of Santa Barbara the following recommendations.

1. **Direct the Airport Director to provide sponsor-controlled transient GA aircraft parking by retaining control of a portion of the large parking ramp on the northwest corner of the airport (currently leased to commercial entities).** Many airports like Santa Barbara have provided transient GA parking space for visiting aircraft without incurring undue risk or expense and without economically injuring the commercial FBOs. While FBOs are integral to effective GA operations, a few commercial FBO service providers have imposed unreasonable parking fees that result in less GA traffic at airports. Santa Barbara airport could attract more GA aircraft that do not require these additional services while allowing commercial FBOs to retain the business of those that do. Our analysis of FAA airport data shows that there are four California airports with locally based GA aircraft (piston and jet) and more than 7,000 commercial operations per year. SBA ranks the lowest of these four California airports in each of the categories listed in the Table below and has enough

publicly funded ramp space to accommodate more of the GA community without impacting commercial service capacity. AOPA is encouraging airports nationwide to establish and clearly label transient GA parking areas. Once the sponsor-controlled transient GA parking areas are provided, the process to include this parking area on the Airport Diagram is simple and costs nothing.

Airport Name	Total based GA aircraft (Jet / Piston)	Rank by based GA aircraft	Annual Commercial Ops	Rank by Commercial Ops	GA annual Ops (Local and Itinerant)	Rank by GA Ops
Oakland Int'l (OAK)	257	3	132865	1	80,497	3
John Wayne-Orange Co (SNA)	529	1	93660	2	203,942	2
Long Beach (LGB)	297	2	36252	3	221,793	1
Santa Barbara Muni (SBA)	144	4	7243	4	74,170	4

*Data source: FAA NFDC facilities data for California public use airports.*

- 2. Incorporate a provision in the FBO lease agreements that require both FBOs to make their ramp fees transparent to pilots, including parking, infrastructure, handling, and security fees.** The fees aircraft owners pay for FBO ramp access are often obfuscated from the customer until they are charged. AOPA and five other aviation organizations have recently published “Know Before You Go” guidelines which encourage FBOs to make their fees available online, allowing pilots to make informed decisions prior to flight. Additionally, it is the airport sponsor’s responsibility to comply with FAA Grant Assurance 22(b) (*Economic Nondiscrimination*) which requires the sponsor to insert and enforce provisions requiring the contractor (FBO) to 1) furnish services on a reasonable, and not unjustly discriminatory basis to all users thereof, and 2) charge reasonable, and not unjustly discriminatory, prices for services. By requiring the FBOs to make their fees transparently available to pilots and aircraft owners online, the City of Santa Barbara would enable its ability to oversee and enforce the establishment of reasonable fees in accordance with the Grant Assurances.
- 3. Require the Airport Director to update the Airport Minimum Standards, in an open and transparent negotiation with all airport stakeholders, to ensure Independent Commercial Activities are not unjustly discriminated against.** The Airport Commission passed a motion on November 20, 2019 that directed the Airport Director, by January 2020, “to create a policy that protects the Airport Improvement Grant Funding and updates the SBA Minimum Standards accordingly to address Independent Commercial Activity”. Ostensibly, this update is intended to satisfy the FAA’s grant assurance requirement concerning economic nondiscrimination in order to preserve AIP funding. We agree with the FAA’s assertion in their letter to the Airport Director dated November 7, 2019, that “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." The FAA letter additionally recommends that "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". It is our opinion that imposing any prohibition in the minimum standards on independent commercial activity, in this case, independent Certified Flight Instructors (CFI), would be a form of economic discrimination and potentially result in complaints to the FAA and possible loss of AIP funding. Airports across the nation have implemented Minimum Standards which provide independent CFIs and other independent service providers reasonable and nondiscriminatory access to engage in their commercial activities. It is common for independent CFIs and 'brick and mortar' flight schools to profitably coexist at airports, especially in the current economic expansion of the GA industry. Because of the enormous demand for pilots over the next two decades, many flight schools are so busy they have a waiting list for new students.

In closing, AOPA is committed to general aviation and ensuring the community's access to publicly funded airports which includes options for sponsor controlled transient parking and the ability of all operators, regardless of size, to utilize the airport. We welcome the opportunity to assist the City of Santa Barbara in finding equitable solutions to these issues and would be happy to schedule a visit to discuss these matters in more detail. I can be reached at (703) 656-6977 or [mike.ginter@aopa.org](mailto:mike.ginter@aopa.org).

Sincerely,



Mike Ginter  
V.P. Airports and State Advocacy, AOPA

Cc:

Henry Thompson, Airport Director, City of Santa Barbara ([hthompson@santabarbaraca.gov](mailto:hthompson@santabarbaraca.gov))  
Craig Arcuri, Chairman, City of Santa Barbara Airport Commission ([craigarcuri@yahoo.com](mailto:craigarcuri@yahoo.com))