



September 25, 2026

Matt Brown
Director of Operations
Salt Lake City Department of Airports
P.O. Box 145550
Salt Lake City, UT 84114-5550

TRANSMITTED VIA ELECTRONIC SUBMISSION

Re: 9/17/2026 Notice of Light General Aviation Hangar Rate Increases

Dear Matt:

On behalf of our over 3,000 members in Utah and more specifically, the over 500 members and over 50 GA hangar tenants who associate with Salt Lake City International Airport, we are writing to formally express concern regarding the September 17, 2026, memorandum from SLCDA Airport Property Office indicating enormous hangar rent increases throughout 2027 as follows:

Effective **January 1, 2027**, the new monthly rental rates will be as follows:

- | | |
|---------------------|-------|
| • Shade Hangar | \$206 |
| • Single Hangar | \$628 |
| • Single End Hangar | \$653 |
| • Twin Hangar | \$837 |
| • Twin End Hangar | \$861 |

Effective **July 1, 2027**, the new monthly rental rates will be as follows:

- | | |
|---------------------|--------|
| • Shade Hangar | \$300 |
| • Single Hangar | \$914 |
| • Single End Hangar | \$951 |
| • Twin Hangar | \$1219 |
| • Twin End Hangar | \$1254 |

As a representative example, the current rate for a single hangar is \$341/month. Effective January 1, that charge increases to \$628 (an **84%** increase) and subsequently on July 1st, that rate increases to \$914 (an astounding **168%** jump from the 2026 rate). We respectfully request your assistance in ensuring these increases align with FAA Grant Assurances 22, 24, and 25, as well as the Federal Aviation Administration (FAA) Policy Regarding Airport Rates and Charges.

Key Areas of Concern

- **Insufficient Justification:** The September 17 memorandum fails to meet the transparency and stakeholder engagement expectations outlined in the FAA Rates and Charges Policy, Appendix 1 expectations.
- **Lack Of Detail Regarding Valuation Methodology:** The September 17 memorandum goes on to state "*The City recently undertook market analysis for several areas of SLCDA, including hangars, and found that the current rental rates are well below market rates*" appreciation as justification," yet fails to provide the market analysis itself. For reference, the Airport Cooperative Research Program (ACRP) report number 47 (Guidebook for Developing and Leasing Airport Property) para 4.5.1 (Appraisal) states "*The appraisal process for airport property should consider comparable land and facilities at airports of similar size throughout the region.*" ACRP report number 213 (Estimating Market Value and Establishing Market Rent at Small Airports) also provides information you may find helpful in assisting establish fair and reasonable leases/rents.
- **Reasonableness Standards:** FAA Order 5190.6B (17.9) dictates that the requirement for "reasonable" aeronautical charges takes precedence over a "self-sustaining" rate structure. The FAA does not require sponsors to charge fair market value to aeronautical users, particularly when it threatens the accessibility of the airport to general aviation.
- **Disproportional Overhead:** The September 17 memo goes on to provide justification for increases as required "*To continue supporting necessary maintenance and improvements*" rising operating costs," yet fails to provide any details about what exactly these maintenance and improvements are. Rate increases should be tied strictly to hangar maintenance, comparable aeronautical facilities, and equitably distributed overhead.

Specific Requests for Rates and Charges Appendix 1-Related Transparency

The September 17 notice states that SLCDA performed a market analysis, concluded that existing hangar rents are well below market rates, and is increasing rents to support necessary maintenance and improvements. It establishes two rate adjustments in 2027 and provides for annual CPI adjustments thereafter. However, the notice does not provide the underlying financial, market, operational, traffic, forecasting, or cost data contemplated by Appendix 1. Accordingly, please provide the following information sufficiently in advance of implementation of the new rates to permit review and meaningful consultation.

1. Historic Financial Information

- For each of the two fiscal years preceding the current year, the SLCDA profit and loss statement, balance sheet, and cash flow statement, including sufficient detail to identify revenues and expenses attributable to general aviation facilities and hangars.
- Any financial reports prepared by the airport sponsor to satisfy 49 U.S.C. 47107(a)(19) and 47107(k), to the extent applicable to the proposed charges.

- A schedule identifying historic revenues, operating expenses, maintenance expenses, capital expenses, debt service, and reserve contributions associated with the general aviation hangar facilities affected by the proposed increases.

2. Economic, Financial, Legal, and Rate-Setting Justification

- The complete economic, financial, and/or legal justification for changing both the methodology and level of general aviation hangar rents.
- The complete market analysis referenced in the September 17 notice, including the date of the analysis, author or consultant, methodology, assumptions, comparable airports/properties, individual comparables, adjustments, source data, and conclusions.
- An explanation of how “market rate” was defined and how each proposed hangar rate was calculated from the market analysis.
- A detailed identification of all aeronautical costs included in the rate base for these hangars, together with allocation methodology, quantities, unit costs, depreciation assumptions, and any overhead or indirect-cost allocations.
- An explanation reconciling the stated market-based rationale with the separate statement that higher rents are needed to support maintenance and improvements, including the amount of anticipated additional revenue and the specific uses for that revenue.

3. Traffic and Utilization Information

- For the light general aviation hangar inventory affected by the increase: total number of hangars by type, number occupied, number vacant, occupancy rate, and waiting-list count, shown monthly for at least the preceding 24 months if available.
- Average time between a hangar becoming vacant and being offered to and occupied by the next eligible aircraft-storage tenant.

4. Planning, Budget, Forecasting, and Capital Information

- The current and proposed budgets relevant to general aviation hangar facilities and the proposed rates.
- Forecast revenues from the proposed hangar charges for the current and forecast year, including the incremental revenue attributable to the increases.
- Expected operating and capital expenditures, debt service, reserve contributions, and other required accounts associated with the affected facilities.
- The airport’s applicable long-term financial and traffic forecasts, major capital projects, capital expenditure plans, demand/capacity analyses, and expenditure estimates that bear on these rates.
- To the extent a residual or hybrid methodology is used, the key assumptions affecting commercial or other nonaeronautical revenues and operating costs in the current and following years.

5. Vacant Hangars and Non-Aircraft Use

- The current number of vacant light general aviation hangars at SLC, broken out by hangar category, together with the number that are physically available for aircraft storage and the number unavailable for assignment.
- For each vacant or unavailable hangar, the length of time it has remained vacant/unavailable and the reason it has not been offered to an eligible aircraft storage tenant.
- The number and percentage of light general aviation hangars used, in whole or in material part, for purposes other than aircraft storage during the preceding 24 months, including use by FBOs, airport contractors, airport departments, commercial operators, maintenance providers, or other entities.
- For hangars used by FBOs or other non-aircraft-storage users, identify the number of units, general purpose of use, duration of that use, whether that use is temporary or recurring, and whether the hangars are counted as “occupied” in SLC occupancy or market-demand analyses.
- An explanation of SLCDA’s policy and process for determining when a light GA hangar may be diverted from aircraft storage, how frequently such diversions occur, and how those decisions affect the waiting list and the market analysis used to support the proposed rates.

6. Consultation Process

Please identify the process and schedule by which SLCDA intends to consult with affected aeronautical users before the new rates take effect. Because the new leases are scheduled to be distributed on or about November 2, 2026, must be signed by December 3, 2026, and the first rate increase is scheduled for January 1, 2027, users need adequate time to review the supporting data, submit questions, and receive substantive responses before being required to decide whether to execute a replacement lease.

Request for Action

As the airport sponsor, we ask that you intervene to facilitate a thorough and open review of these rates. Although my discussion with Ms. Rudd earlier in the week was greatly appreciated, it was not clear that she understood airport obligations for stakeholder consultations prior to rates and charges changes nor FAA policy regarding rates and charges as a whole. Moreover, the suggestion that Tooele Valley airport is a reasonable substitute for current SLC GA tenants also raises concern given its distance from SLC and the majority of these pilots’ homes.

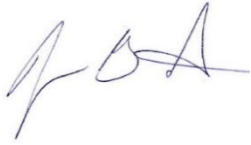
Our goal is to ensure that SLC airport remains accessible to *all* pilots, including those operating light piston-powered aircraft. This request is intended to facilitate a documented, informed, and constructive user consultation. It is not a request merely for restatement of the announced rates. Our objective here is to obtain the underlying information necessary to evaluate the proposed rates and the assumptions supporting them *before* implementation.

Specifically, please provide the requested materials electronically---preferably in their native spreadsheet or searchable format where available---and identify any requested item that SLCDA believes is not applicable, does not exist, or will not be provided, together with the reason. If any

responsive material is already publicly available, a direct link to the specific document would be sufficient.

Finally, as [this](#) recent article highlights, subject proposed rate increase is significant and particularly as there is not currently a graduated schedule of increases, it is devastating to many forms of GA aviation including public benefit flying such as Desert Dog Aviation LLC. We look forward to developing a better understanding of if/what justification(s) exist for this extraordinary rate increase and ensure these charges remain fair, reasonable, and compliant with federal obligations now and into the future.

Sincerely,

A handwritten signature in blue ink, appearing to read 'BS', is positioned above the typed name.

Brad Schuster, C.M.
Northwest Mountain Region Manager
Aircraft Owners and Pilots Association

CC:

Shane Andreasen, SLCD A Director of Real Estate & Commercial Development
Michelle Andreadakis Rudd, SLCD A Airport Property Specialist
Utah Department of Transportation, Aeronautics Division
FAA Airports District Office – Denver
AOPA General Counsel