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DRAFT – General Aviation Minimum Standards Comment Compilation and Response

Palm Beach County
Department of Airports

Palm Beach County Park Airport (LNA)

August 19, 2009



COMMENT COMPILATION AND RESPONSE

Palm Beach County (County) believes that the development and implementation of General Aviation Minimum Standards (Minimum Standards) is: (a) consistent with best management (and customer service) practices and (b) necessary to ensure the successful planning, development, operation, and management of general aviation activities at Palm Beach County Park Airport (Airport).

By way of background, when an airport sponsor (in this case, the County) obtains a grant for airport improvements under the Airport Improvement Program (or AIP), the airport sponsor is required to give certain assurances to the Federal Aviation Administration (FAA) known as the Airport (or Sponsor) Assurances.

In the Airport Assurances, the FAA identifies a number of Advisory Circulars (ACs) that, when attached to or incorporated by reference into the grant agreement, become mandatory contractual obligations of the airport sponsor.

In AC 150/5190-7, Minimum Standards for Commercial Aeronautical Activities, the FAA highly recommends the “use and implementation” of minimum standards “as a means to minimize the potential for violations of Federal obligations at federally obligated airports.”

The AC states that “The FAA objective in recommending the development of minimum standards serves to promote safety in all airport activities, protect airport users from unlicensed and unauthorized products and services, maintain and enhance the availability of adequate services for all airport users, promote the orderly development of airport land, and ensure efficiency of operations.”

The AC also suggests that “airport sponsors establish reasonable minimum standards that are relevant to the proposed aeronautical activity with the goal of protecting the level and quality of services offered to the public.”

It is significant to note the AC also states that “The airport sponsor’s purpose in imposing standards is to ensure a safe, efficient and adequate level of operation and services is offered to the public” and that standards should be “relevant to the proposed aeronautical activity with the goal of protecting the level and quality of services offered to the public.” The FAA specifically indicates, in multiple instances throughout the AC, that an airport sponsor should develop minimum standards to address the level and quality of general aviation aeronautical services provided at an airport.



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It is significant to note that several documents provide the foundation for the development and implementation of Minimum Standards including: the Airport (or Sponsor) Assurances, AC 150/5190-6 Exclusive Rights at Federally-Obligated Airports, AC 150/5190-7 Minimum Standards for Commercial Aeronautical Activities, and Order 5190.6A Airport Compliance Requirements. All interested parties are encouraged to thoroughly review and carefully consider each of these documents and to view these Minimum Standards in totality.

Within this context, it is the desire of the County to: (a) ensure that the level and quality of products, services, and facilities desired by aviation consumers are consistently provided at the Airport in a safe, secure, efficient, prompt, and professional manner, (b) ensure the safe, orderly, and efficient operation and use of the Airport, (c) protect the public health, safety, interest, and welfare, and (d) create a “level playing field” (for operators) and “promote fair competition” (between operators).

Beyond being consistent with FAA policies and directives, the County believes that all of these objectives are consistent with best management (and customer service) practices. It is not the desire or the intent of the County to create an undue burden on existing or future operators, tenants, consumers, or users of the Airport.

As such, Aviation Management Consulting Group (AMCG), working closely with the County, has prepared draft Minimum Standards that are: (a) relevant to the current (and/or anticipated) general aviation activities at the Airport, (b) reasonable and appropriate for the Airport and the market, and (c) necessary to meet the type and level of demand that exists (and/or is anticipated) at the Airport and in the market.

During the document development process, AMCG gathered and considered relevant information from interested parties to solicit comments and input as it pertains to the development of Minimum Standards. In addition, AMCG and the County viewed Minimum Standards from a consumer perspective. This information and perspective provided the basis for the draft Minimum Standards document.

The draft Minimum Standards document was made available for public review and comment beginning May 7, 2009. AMCG facilitated a meeting to discuss public comments on June 18, 2009. All of the public comments received through June 12, 2009 were compiled by AMCG. In some cases, comments have been distilled (i.e., the essence of the



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comment has been captured), comments have been paraphrased, and/or typographical errors corrected. Each of the comments submitted have been addressed in this document and/or in the revised Minimum Standards document. Each comment is represented by a “C” and the response to the comment is represented by an “R”. The numbering is utilized only as a method to identify and organize comments. Also, when a respondent has asked the County to delete language from the draft Minimum Standards document, that language has been identified using ~~strikethrough~~ and when a respondent has asked the County to add language, that language has been identified using **red** highlight. Any language identified in *italics* is taken verbatim from the draft Minimum Standards document.

The County wishes to thank those entities that took the time to provide comment on this important draft document.

In addition, AMCG wishes to thank you for your time and efforts to review the above referenced documents. If you have any additional questions pertaining to the documents or to AMCG’s response, please feel free to contact us.



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06/12/09	D. Buchheit – Minimum Standards
C1	Section 1-7 – This Section is too ambiguous. Please specify applicability and scope of fines.
R1	The Minimum Standards is not the location or document to specify the applicability or scope of fines. Rather, the County may develop this on a separate document.
C2	Section 1-8 (b) – <i>The County may shall approve variances to the minimum Leased Premises and vehicle parking requirements for any improvements constructed on or before the effective date of these Minimum Standards.</i>
R2	The County has the authority to approve or disapprove variances to the Minimum Standards (on an individual and case-by-case basis) and therefore utilization of the word “may” is appropriate. As such, this provision of the draft Minimum Standards have not been revised.
C3	Section 1-10 (a) – <i>Throughout these Minimum Standards, the words "standards" or "requirements" shall be understood to be modified by the word "minimum" except where explicitly stated otherwise. Any required determinations, interpretations, or judgments regarding what constitutes an acceptable minimum standard, or regarding compliance with such standard, shall be made by the Department. An adequate form of discussion platform will be provided prior to essential changes to the minimum standards. All Entities are encouraged to exceed the applicable minimum standards. No Entity shall be allowed to engage in Aeronautical Activities at the Airport under conditions that do not, in the County's discretion, meet these Minimum Standards. The AAAB will be consulted in these matters.</i>
R3	All Minimum Standards are revised by the AAAB and approved by the County Commission. As such, this provision of the draft Minimum Standards has not been revised.
C4	Section 1-10 (b) – <i>The County may shall grant variances to the provisions of these Minimum Standards relating to the size of an Operator's Leased premises and/or parking requirements for Improvements constructed on or before the effective date of these Minimum Standards in accordance with Section 1.8.</i>
R4	Please reference R2.
C5	Section 1-12 (3) – Too vague! – <i>The Department or County would be required to expend funds and/or supply labor and/or materials in connection with the proposed Activities and/or Improvements that the Department or County is unwilling and/or unable to spend and/or will result in a financial loss or hardship to the County.</i>
R5	The Department or County may reject any proposal or Application in the event the Department or County would be required to expend funds or supply labor and/or materials for which the Department or County is unwilling and/or unable to spend. However, to reduce/eliminate vagueness, Section 1-12 (3) of the draft Minimum Standards has been revised as follows: <i>The Department or County would be required to expend funds and/or supply labor and/or materials in connection with the proposed Activities and/or Improvements.</i>
C6	Section 1-12 (5) – <i>The proposed Activities and/or Improvements do not comply with the Master Plan of the Airport or the ALP then in effect or anticipated to be in effect within the time frame proposed by the Entity.</i>
R6	The County believes the Master Plan and ALP provide the greatest opportunity to ensure safety, utility, and efficiency of the Airport. More specifically and in accordance with FAA Airport Assurances #29 Airport Layout Plan, “The sponsor will not make or permit any changes or alterations in the airport or any of its facilities which are not in conformity with the airport layout plan as approved by the Secretary and which might, in the opinion of the Secretary, adversely affect the safety, utility or efficiency of the airport.”
C7	Section 1-12 (12) – Please specify “Performance Bonds” – <i>The Entity cannot provide a performance bond or applicable insurance in the type and amounts required by the County for the proposed Activity.</i>
R7	Performance bonds are a surety bond issued by an insurance company or bank to guarantee satisfactory completion of a project by the entity. The County reserves the right to determine the adequate level of each performance bond predicated upon the individual proposed Activity.
C8	Section 1-12 (13) – <i>The Entity or an officer, director, or shareholder of Entity has been convicted of a felony within the last year.</i>



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R8	<p>Section 1-12 (13) of the draft Minimum Standards has been revised as follows:</p> <p><i>The Entity or an officer, director, or shareholder of Entity is unable to clear a criminal history check in accordance with the County's Critical Facilities Criminal History Check policy has been convicted of a felony.</i></p>
C9	<p>Section 1-12 (14) – Please clarify. – <i>The Entity's proposed Activity has been or could be detrimental to the Airport.</i></p>
R9	<p>The County may reject any proposal or Application for an Activity that has been or could be detrimental to the efficient and safe utilization of the Airport.</p>
C10	<p>Section 1-12 (16) – Too vague! – <i>The Entity's interests and/or the proposed Activity or use is inconsistent with the Airport's mission (purpose), vision, values, goals, or objectives; the best interest of the County; or, any Airport Assurances.</i></p>
R10	<p>If a proposed Activity is inconsistent with the Department's and/or County's objectives for the Airport, the Department or County may reject any proposal or Application. However, to reduce/eliminate vagueness, Section 1-12 (16) of the draft Minimum Standards has been revised as follows:</p> <p><i>The Entity's interests and/or the proposed Activity or use is inconsistent with the Airport's mission (purpose), and vision; values, goals, or objectives consistent with the Airport's Master Plan; the best interest of the County; or, any Airport Assurances.</i></p>
C11	<p>Section 2-2 (a) – <i>Operator shall, in the judgment of the County, demonstrate before and during the term of the Agreement the capability of providing the proposed products, services, and facilities and engaging in these Activities in a good, prompt, and workmanlike workpersonlike manner and to the benefit of the public.</i></p>
R11	<p>"Workpersonlike" is not a defined word in the dictionary. However, Section 2-2 (a) of the draft Minimum Standards has been revised as follows:</p> <p><i>Operator shall, in the judgment of the County, demonstrate before and during the term of the Agreement the capability of providing the proposed products, services, and facilities and engaging in these Activities in a prompt, courteous, and professional manner and to the benefit of the public.</i></p>
C12	<p>Section 2-2 (b) – <i>Operator shall, in the judgment of the County, demonstrate before and during the term of the Agreement the financial responsibility and technical capability to develop and maintain Improvements; procure and maintain required Vehicles, Equipment, and/or Aircraft; employ proper level of personnel; and engage in the Activity.</i></p>
R12	<p>The County does not believe the deletion of this section is prudent. However, Section 2-2 (b) of the draft Minimum Standards has been revised as follows:</p> <p><i>Operator shall, in the judgment of the County, demonstrate before and during the term of the Agreement the financial responsibility and technical capability to develop and maintain Improvements; procure and maintain required Vehicles, Equipment, and/or Aircraft; employ proper level of personnel; and engage in the Activity.</i></p>
C13	<p>Section 2-4 (a) (1) a. – <i>Leased Premises, existing and currently utilized for commercial purposes as of the effective date of these Minimum Standards may, in the County's sole discretion, will be granted the right to use utilize indirect public streetside access.</i></p>
R13	<p>Please reference R2. In addition, the County believes that direct public streetside access is consistent with best management practices.</p>
C14	<p>Section 2-4 (a) (2) – <i>Each building used on the Airport in conjunction with the Commercial Activity shall bear the Operator's identification in the form of a company logo, sign, emblem, or other means to designate the operator to whom the building is assigned. Identification shall be legible on a contrasting background and shall be displayed in a manner that is acceptable to the Department. current County Code.</i></p>



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<p>R14</p>	<p>Section 2-4 (a) (2) of the draft Minimum Standards has been revised as follows:</p> <p><i>Each building used on the Airport in conjunction with the Commercial Activity shall bear the Operator's identification in the form of a company logo, sign, emblem, or other means to designate the operator to whom the building is assigned. Identification shall be legible on a contrasting background and shall be displayed consistent with applicable Regulatory Measures in a manner that is acceptable to the Department.</i></p>
<p>C15</p>	<p>Section 2-4 (b) (2) – Aprons associated with hangars shall be equal to one times the hangar square footage or adequate to accommodate the movement of Aircraft into and out of the hangar, staging, and parking of customer and/or Operator Aircraft without interfering with the movement of Aircraft in and out of other facilities and Aircraft operating in taxilanes or taxiways, whichever is greater.</p>
<p>R15</p>	<p>The County believes <i>one times the hangar square footage</i> is the minimum safe apron size to accommodate movement of Aircraft into and out of the hangar, staging, and parking of customer and/or Operator Aircraft without interfering with any other activities occurring on the Airport. Not having adequate room to maneuver aircraft could cause safety issues for not only the entity maneuvering the Airport, but for the other entity's utilizing the Airport as well.</p>
<p>C16</p>	<p>Section 2-4 (b) (2) (a) – Aprons, associated with hangars, existing, and currently utilized for commercial purposes as of the effective date of these Minimum Standards, may, in the County's sole discretion, shall be less than one times the hangar square footage.</p>
<p>R16</p>	<p>Please reference R2 and R15. Further, Section 2-4 (b) (2) (a) of the draft Minimum Standards has been revised as follows:</p> <p><i>Aprons, associated with hangars, existing, and currently utilized for commercial purposes as of the effective date of these Minimum Standards, may, in the County's sole discretion, be less than one times the hangar square footage. However, the Apron area must be adequate to if the apron can accommodate the movement of Aircraft into and out of the hangar, staging, and parking of customer and/or Operator Aircraft without interfering with the any movement of Aircraft in and out of other facilities and Aircraft operating in taxilanes or taxiways.</i></p>
<p>C17</p>	<p>Section 2-4 (c) – Current parking at this time is inadequate does not allow compliance with this paragraph.</p>
<p>R17</p>	<p>If an entity's current parking situation at the Airport is currently inadequate or does not fully comply with the draft Minimum Standards, an entity may request a variance from the County. Please reference Section 1-8 (b) of the Minimum Standards – <i>The County may approve variances to the minimum Leased Premises and vehicle parking requirements for any improvements constructed on or before the effective date of these Minimum Standards.</i></p> <p>However, the parking must accommodate movement of Aircraft and Vehicles without interfering with any movement of Aircraft or Vehicles in and out of other facilities, Aircraft operating in taxilanes or taxiways, and Vehicles operating on the apron or roadways.</p>
<p>C18</p>	<p>Section 2-9 (b) – <i>Identification shall be legible on a contrasting background and shall be displayed in a manner that is acceptable to the Department.</i> accordance with current county code.</p>
<p>R18</p>	<p>Section 2-9 (b) of the draft Minimum Standards has been revised as follows:</p> <p><i>Each Vehicle and piece of mobile Equipment used on the Airport by the Operator in conjunction with the Commercial Activity shall bear the Operator's identification in the form of a company logo, sign, emblem, or other means to designate the Operator to whom the Vehicle or Equipment is assigned. Identification shall be legible on a contrasting background and shall be displayed in a manner that is acceptable to the Department consistent with applicable Regulatory Measures.</i></p>
<p>C19</p>	<p>Section 2-10 – Please provide a source for a guideline as to the scope and criteria of "security"</p>



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<p>R19</p>	<p>Section 2-10 (c) has been added to the draft Minimum Standards as follows:</p> <p>Operators Security Plan may include any of the following elements (as appropriate):</p> <ol style="list-style-type: none"> (1) Procedures on securing facilities, Vehicles, Equipment, and Aircraft during hours of operation and after hours. (2) Employee background checks and security awareness training including procedures to use to report suspicious personnel or situations to the proper law enforcement agencies. (3) Customer and baggage identification. (4) Procedures to prevent tampering of Aircraft. (5) Procedures for handling threats by phone and in person. (6) Procedures to control access to Operator's Leased Premises and ensure Vehicles and personnel allowed to access through Operator's access point(s) are under escort or other approved method of control, as established by the Airport Manager. (7) Procedures for positive key control and Apron access procedures. (8) Procedures for securing unattended Aircraft. (9) Procedures prohibiting passengers or baggage from being left unattended in the Aircraft or on the Apron. (10) Procedures to positively identify aircraft renters and students. (11) Procedures to verify identity of customers utilizing chartered Aircraft. (12) Procedures for transient flight crew members and passengers including: <ol style="list-style-type: none"> a. Ensuring proper escort or other Airport Manager approved method of control. b. Crew member contact information and verification procedures. c. Verification of pilot's certificate and government-issued photo ID for flight crew members. (13) Vendor procedures including: <ol style="list-style-type: none"> a. Positive identification of all vendors having access to the Leased Premises. b. Security check-in procedures for all vendors. c. Procedures for ensuring all vendors are aware of security requirements for the Operator's facility.
<p>C20</p>	<p>Section 2-13 (a) – <i>When more than one (1) Activity is conducted, the minimum requirements shall vary depending upon the nature of each Activity and/or combination of Activities, but shall not necessarily be cumulative.</i></p>
<p>R20</p>	<p>The Section 2-13 (a) of the draft Minimum Standards has been revised to the following:</p> <p><i>When more than one (1) Activity is conducted, the minimum requirements shall vary depending upon the nature of each Activity and/or combination of Activities, but shall may not necessarily be cumulative.</i></p>
<p>C21</p>	<p>Section 4-2 (a) – Current leases include Footprint of the Hangar only. – <i>Contiguous Land (Lessee Only) 21,780 SF 43,560 SF</i></p>
<p>R21</p>	<p>The County, in conjunction with AMCG, believes structuring the Airport with Leased Premises, including Contiguous Land, is the most efficient and effective land use planning. As such, this provision has not been modified.</p>
<p>C22</p>	<p>Section 4-2 (a) – <i>Administrative Area 500SF100 SF 500SF100SF</i></p>
<p>R22</p>	<p>The Administrative Area requirements in the draft Minimum Standards have been revised to 100 SF.</p>
<p>C23</p>	<p>Section 4-2 (a) – <i>Hangar 3,000SF2,000 SF 6,000SF3,000 SF</i></p>
<p>R23</p>	<p>The County does not believe 2,000 SF of hangar is sufficient to support Group I Piston and Turboprop Aircraft which can have a wingspan ranging up to 49 feet. Group II Piston and Turboprop Aircraft wingspans range from 50 feet to 79 feet, which the County does not believe 3,000 SF of hangar would be sufficient. As such, this provision has not been modified.</p>
<p>C24</p>	<p>Section 4-2 (a) (2) (d) – <i>Hangar shall have a door height of at least 48 12 feet and a door width of at least 45 40 feet.</i></p>
<p>R24</p>	<p>The County does not believe a door height of 12 feet and door width of 40 feet is sufficient to support Group I Piston and Turboprop Aircraft which can have a wingspan ranging up to 49 feet. As such, this provision has not been modified.</p>



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C25	Section 4-3 (a) – <i>All Operators' personnel that returns aircraft to service shall be properly certificated by the FAA, current, and hold the appropriate ratings for the work being performed.</i>
R25	This recommended change has been accepted.
C26	Section 4-3 – (b) <i>The employment of uncertified helpers and apprentices is acceptable as long as sufficient supervision is provided for the current task at hand.</i>
R26	Predicated upon R25, the County does not believe this provision needs to be added to the draft Minimum Standards. As such, this provision has not been added.
C27	Section 4-6 (a) – <i>Operator shall be continuously offered and available to meet reasonable demands of the public for this Activity, five (5) days a week, eight (8) hours a day and available after hours, on-call, with response time not to exceed sixty (60) minutes.</i>
R27	The County believes that 60 minutes to respond to an after hours call is a reasonable response time. It is important to note that the 60 minute response time does not mean the Activity must be performed within 60 minutes, rather someone must be available to respond to the request and determine the ability to assist/rectify the request.
C28	Section 5-2 (a) (1) – <i>Contiguous Land (Lessee Only) 40,890 SF 40,890 SF</i>
R28	Please reference R21.
C29	Section 5-2 (a) (1) – <i>Administrative Area 500SF100 SF 500SF100SF</i>
R29	Please reference R22.
C30	Section 5-2 (a) (2) – <i>Contiguous Land (Lessee Only) 21,780 SF 43,560 SF</i>
R30	Please reference R21.
C31	Section 5-2 (a) (2) – <i>Administrative Area 500SF100 SF 500SF100SF</i>
R31	Please reference R22.
C32	Section 5-2 (a) (2) – <i>Hangar 3,000SF2,000 SF 6,000SF3,000 SF</i>
R32	Please reference R23.
C33	Section 7-2 (a) – <i>Contiguous Land without Hangar (Lessee Only) 40,890 SF</i>
R33	Please reference R21.
C34	Section 7-2 (a) – <i>Contiguous Land with Hangar (Lessee Only) 21,780 SF</i>
R34	Please reference R21.
C35	Section 7-2 (a) – <i>Administrative Area 500SF100 SF</i>
R35	Please reference R22.
C36	Section 7-2 (a) – <i>Hangar, if required (Lessee) 3,000SF2,000 SF</i>
R36	Please reference R23.
C37	Section 9-2 (a) – <i>Contiguous Land (Lessee Only) 40,890 SF 21,780 SF</i>
R37	Please reference R21.
C38	Section 9-2 (a) – <i>Administrative Area 500SF100 SF 500SF100SF</i>
R38	Please reference R22.
C39	Section 9-2 (a) – <i>Hangar 3,000SF2,000 SF 6,000SF3,000 SF</i>
R39	Please reference R23.
C40	Section 9-3 (a) – <i>All Aircraft handling personnel shall be trained in the safe and proper handling of Aircraft towing and movement. Acceptable training shall be NATA Safety 1st or an equivalent training program. SASO shall have at least one (1) trained employee on duty at all times.</i>
R40	The County believes utilizing a structured and recurrent training program, such as NATA Safety 1 st or an equivalent training program, will ensure safe and proper handling of Aircraft.
C41	Section 9-4 (a) – <i>Operator shall have facilities available for sublessees' Aircraft removal and storage five (5) days a week (including holidays) eight (8) hours a day and available after hours, on-call, with a response time not to exceed sixty (60) minutes.</i>
R41	Please reference R27.
C42	Section 10-2 (a) (1) – <i>Contiguous Land (Lessee only) – 40,890 square feet (for Group I Piston and Turboprop Aircraft) and 21,780 square feet (for Group II Piston and Turboprop Aircraft) upon which all required Improvements including Apron, facilities, and Vehicle parking shall be located.</i>
R42	Please reference R21.
C43	Section 10-2 (a) (2) – <i>Apron/paved Tiedowns (Lessee only) shall be adequate to accommodate three (3) Aircraft having a minimum wingspan of forty (40) feet. 30ft.</i>



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R43	Modifying the above provision to a Tiedown with a 30 foot wingspan would not be able to accommodate the aircraft normally frequenting the Airport. More specifically, a Tiedown with a 30 foot wingspan will not accommodate a Cessna 172 (wingspan of 36 feet).
C44	Section 10-2 (a) (3) (c) – <i>Administrative area (if appropriate) shall be at least 500 square feet 100SF or sufficient to accommodate the administrative functions associated with the Activity, whichever is greater, and shall include adequate space for employee offices, work areas, and storage.</i>
R44	Please reference R22.
C45	Section 10-2 (a) (3) (d) – <i>Hangar area (Lessee), if required, shall be at least 3,000 square feet 2,000SF (for Group I Piston and Turboprop Aircraft) and 6,000 square feet 3,000SF (for Group II Piston and Turboprop Aircraft) or large enough to accommodate the largest Aircraft in Operator's fleet at the Airport maintained by Operator, whichever is greater.</i>
R45	Please reference R23.
C46	ARTICLE 14. ATTACHMENT A
R46	Department – please provide direction.
06/12/09	M. Sugimoto
C47	Section 1-6 – <i>(b) Such services not available from any entity on the airport shall be conducted by the contracted service provider selected by the entity on the airport within the leased premises of itself.</i>
R47	<p>As identified in Section 2 Definitions of the draft Minimum Standards, <i>Through-the-Fence is defined as the right to have direct access to the Airport from private property located contiguous to the Airport. Through-the-Fence Operators, while being located off Airport property, have access to the Airport's runway and Taxiway system.</i></p> <p>Permitting Through-the-Fence access to the Airport is problematic from multiple perspectives. Although the FAA does not have an “official” position on the issue, it is clear that the FAA does not (by any means) encourage Through-the-Fence operations and it is fair to say that the FAA “discourages” Through-the-Fence operations for a number of good and justifiable reasons. First, the Through-the-Fence operator owns the land and any improvements made to (or situated on) the land into perpetuity. As a result, the Airport sponsor (in this case, the County) loses the opportunity to generate rental income (revenue) from the leasing of airport land and/or Improvements. Secondly, the Through-the-Fence operator who engages in Commercial Aeronautical Activities off-Airport (without paying rent to the County) gains a competitive economic advantage over the aviation businesses located on the Airport (who are required to pay rent to the County). In turn, this diminishes the economic viability of the aviation businesses located on the Airport. Thirdly, the Through-the-Fence operators are not constrained by lease terms and conditions including the length of lease and reversionary clauses giving the Through-the-Fence operator the ability to amortize any improvements made over a longer period of time providing the ability to generate a better or higher rate of return than aviation business located on the Airport. Additionally, Non-Commercial Through-the-Fence operators can have an adverse impact to the development of the Airport particularly if the Non-Commercial Through-the-Fence operator develops Self-Fueling facilities.</p> <p>Generally, if an airport allows Through-the-Fence access, the airport loses some ability to control the activities occurring on the land. Safety and security may be jeopardized as well in addition to competitive economic advantages.</p> <p>As such, Through-the-Fence Activities are prohibited at the Airport (as identified in Section 1-6 (a)) and this provision has not been added to the draft Minimum Standards.</p>
C48	Section 1-6 – <i>(c) Though-the-Fence Activities shall be patrolled by county officials at all times to protect legal entities on the airport.</i>
R48	Please reference R47.
C49	Section 1-7 – This Section is too ambiguous and needs to be more specific, please.
R49	Please reference R1.



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C50	Section 1-8 (b) – <i>The County may shall approve variances to the minimum Leased Premises and vehicle parking requirements for any improvements constructed on or before the effective date of these Minimum Standards.</i>
R50	Please reference R2.
C51	Section 1-10 (a) – <i>Throughout these Minimum Standards, the words "standards" or "requirements" shall be understood to be modified by the word "minimum" except where explicitly stated otherwise. Any required determinations, interpretations, or judgments regarding what constitutes an acceptable minimum standard, or regarding compliance with such standard, shall be made by the Department. An adequate form of discussion platform shall be provided prior to any changes to the minimum standards.</i>
R51	Please reference R3.
C52	Section 1-10 (b) – <i>The County may shall grant variances to the provisions of these Minimum Standards relating to the size of an Operator's Leased premises and/or parking requirements for Improvements constructed on or before the effective date of these Minimum Standards in accordance with Section 1.8.</i>
R52	Please reference R4.
C53	Section 1-12 (5) – <i>The proposed Activities and/or Improvements do not comply with the Master Plan of the Airport or the ALP then in effect or anticipated to be in effect within the time frame proposed by the Entity.</i>
R53	Please reference R6.
C54	Section 1-12 (12) – <i>What is "a performance bond"? – The Entity cannot provide a performance bond or applicable insurance in the type and amounts required by the County for the proposed Activity.</i>
R54	Please reference R7.
C55	Section 1-12 (16) – <i>Please be more specific about Airport's mission. – The Entity's interests and/or the proposed Activity or use is inconsistent with the Airport's mission (purpose), vision, values, goals, or objectives; the best interest of the County; or, any Airport Assurances.</i>
R55	Please reference R10.
C56	Section 2-2 (b) – <i>Operator shall, in the judgment of the County, demonstrate before and during the term of the Agreement the financial responsibility and technical capability to develop and maintain Improvements; procure and maintain required Vehicles, Equipment, and/or Aircraft; employ proper level of personnel; and engage in the Activity.</i>
R56	Please reference R12.
C57	Section 3-2 (b) (2) – <i>(k) FBO shall provide restrooms accessible for flight crews, passengers and maintenance personnel available at all time.</i>
R57	The above referenced provision is identified in Section 3-3 <i>Leased Premises</i> of the Minimum Standards. Section 3-3 (a) (4) a. – <i>Customer area shall be at least 2,000 dedicated square feet to include adequate space for crew and passenger lounge(s), flight planning room, vending area, public use telephones, and restrooms.</i>
C58	Section 4-2 (a) – <i>Current leases include Footprint of the Hangar only. – Contiguous Land (Lessee Only) 21,780 SF 43,560 SF</i>
R58	Please reference R21.
C59	Section 4-2 (a) – <i>Administrative Area 500SF100 SF 500SF100SF</i>
R59	Please reference R22.
C60	Section 4-2 (a) – <i>Hangar 3,000SF2,500 SF 6,000SF5,000 SF</i>
R60	Please reference R23.
C61	Section 4-2 (a) (2) (d) – <i>Hangar shall have a door height of at least 18 feet and a door width of at least 45 feet. adequate size for the aircraft that the entity is maintaining.</i>
R61	Please reference R24.
C62	Section 4-3 (a) – <i>All Operators' personnel who return aircraft to service shall be properly certificated by the FAA, current, and hold the appropriate ratings for the work being performed.</i>
R62	Please reference R25.
C63	Section 4-4 (a) (1) – <i>Operator shall may employ one (1) FAA licensed Airframe and Powerplant Mechanic and one (1) customer service representative.</i>



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R63	Please reference R25. Additionally, this provision has not been revised in the draft Minimum Standards.
C64	Section 4-4 (a) (2) – <i>An Airframe and Powerplant Mechanic may fulfill the responsibilities of the aircraft maintenance and customer service if customer service representative unless performing duties is off the Airport.</i>
R64	The Section 4-4 (a) (2) of the draft Minimum Standards has been revised to the following: <i>An Airframe and Powerplant Mechanic may fulfill the responsibilities of the maintenance customer service representative unless the Airframe and Powerplant Mechanic is performing duties off Airport.</i>
C65	Section 4-4 (a) (3) – <i>Operators providing 100 hour, annual, or phase inspections on Aircraft not listed on Operator’s FAA Repair Station shall employ an FAA licensed Airframe and Powerplant Mechanics certified as an IA (Inspection Authority). 100 hour inspection can be performed by an Airframe and Power Plant rated mechanic.</i>
R65	Section 4-4 (a) (3) of the draft Minimum Standards has been revised as follows: <i>Operators providing 100-hour, annual, or phase inspections on Aircraft not listed on Operator’s FAA Repair Station shall employ an FAA licensed Airframe and Powerplant Mechanics certified as an IA (Inspection Authority).</i>
C66	Section 4-6 (a) – <i>Operator shall be continuously offered and available to meet reasonable demands of the public for this Activity, five (5) days a week, eight (8) hours a day. Operator may offer an and available after hours service and on-call service with response time. not to exceed sixty (60) minutes.</i>
R66	Please reference R27.
C67	Section 5-2 (a) (1) – <i>Contiguous Land (Lessee Only) 40,890 SF 40,890 SF</i>
R67	Please reference R21.
C68	Section 5-2 (a) (1) – <i>Administrative Area 500SF100 SF 500SF100SF</i>
R68	Please reference R22.
C69	Section 5-2 (a) (2) – <i>Contiguous Land (Lessee Only) 21,780 SF 43,560 SF</i>
R69	Please reference R21.
C70	Section 5-2 (a) (2) – <i>Administrative Area 500SF100 SF 500SF100SF</i>
R70	Please reference R22.
C71	Section 5-2 (a) (2) – <i>Hangar 3,000SF2,500 SF 6,000SF5,000 SF</i>
R71	Please reference R23.
C72	Section 7-2 (a) – <i>Contiguous Land without Hangar (Lessee Only) 40,890 SF</i>
R72	Please reference R21.
C73	Section 7-2 (a) – <i>Contiguous Land with Hangar (Lessee Only) 21,780 SF</i>
R73	Please reference R21.
C74	Section 7-2 (a) – <i>Administrative Area 500SF100 SF</i>
R74	Please reference R22.
C75	Section 7-2 (a) – <i>Hangar, if required (Lessee) 3,000SF2,500 SF</i>
R75	Please reference R23.
C76	Section 7-2 (a) (2) – <i>Apron/paved Tiedowns (Lessee only) shall be adequate to accommodate three (3) one (1) Aircraft having a minimum wingspan of forty (40) feet. thirty (30) feet.</i>
R76	Please reference R43. Additionally the County believes that a Charter or Management Operator with only one Tiedown would be insufficient.
C77	Section 9-2 (a) – <i>Contiguous Land (Lessee Only) 40,890 SF 21,780 SF</i>
R77	Please reference R21.
C78	Section 9-2 (a) – <i>Administrative Area 500SF100 SF 500SF100SF</i>
R78	Please reference R22.
C79	Section 9-2 (a) – <i>Hangar 3,000SF2,500 SF 6,000SF5,000 SF</i>
R79	Please reference R23.



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C80	Section 9-3 (a) – <i>All Aircraft handling personnel shall be trained in the safe and proper handling of Aircraft towing and movement. Acceptable training shall be NATA Safety 1st or an equivalent training program provided by the entity. SASO shall have at least one (1) trained employee on duty at all times during normal business hours.</i>
R80	Please reference R40.
C81	Section 9-4 (a) – <i>Operator shall have facilities available for sublessees' Aircraft removal and storage five (5) days a week (including holidays) eight (8) hours a day and available after hours, on-call, with a reasonable response time. not to exceed sixty (60) minutes.</i>
R81	Please reference R27.
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C82	Section 1-7 – It is understood these standards are by agreement therefore no fines.
R82	Please reference R1.
C83	Section 1-8 (a) – <i>The County may approve variances to these Minimum Standards when a specific clause, section, or provision does not seem justified in a particular case because of special conditions and unique circumstances, variances will not be unreasonably denied.</i>
R83	Please reference R2.
C84	Section 1-8 (b) – <i>The County may will approve variances to the minimum Leased Premises and vehicle parking requirements for any improvements constructed on or before the effective date of these Minimum Standards.</i>
R84	Please reference R2.
C85	Section 1-8 (d) – <i>When a specific product, service, or facility is not currently being provided at the Airport, the County may enter into an Agreement with an FBO or SASO (with the approval of the FBO) with terms and conditions that are less than those outlined in these Minimum Standards (e.g., lower minimum standards, etc.), only for a limited period of time (i.e., pioneering period). The duration of the pioneering period shall be specified in the Agreement and shall only be valid during that specific period of time.</i>
R85	The County, as the Airport Sponsor, has the ability to enter into an Agreement with an FBO or SASO without the approval of the FBO.
C86	Section 1-9 (a) – <i>The granting of rights and/or privileges to engage in Commercial Aeronautical Activities shall not be construed in any manner as affording an Operator any Exclusive Right, other than the exclusive use of the land and/or Improvements that may be leased or licensed to the Operator, and then only to the extent provided in an Agreement (any and all obligations the County/DOA may have entered into prior to this agreement shall remain in effect as it applies to this section).</i>
R86	This language is addressed in Section 1-10 Applicability. As such, this provision has not been modified.
C87	Section 1-12 (5) – <i>The proposed Activities and/or Improvements do not comply with the Master Plan of the Airport or the ALP then in effect or anticipated to be in effect within the time frame proposed by the Entity and denied by the AAAB.</i>
R87	Please reference R6. The draft Minimum Standards have not been modified.
C88	Section 1-12 (12) – <i>The Entity cannot provide a performance bond or applicable insurance in the type and amounts required by the County for the proposed Activity, if the insurance is available.</i>
R88	Please reference R7. This language is addressed in Section 2-11 (a) (1).
C89	Section 1-12 (13) – <i>The Entity or an officer, director, or shareholder or employees of Entity has been convicted of a felony can not comply with the County's Critical Facilities are Criminal History Check.</i>
R89	Please reference R8.
C90	Section 1-12 (16) – <i>The Entity's interests and/or the proposed Activity or use is inconsistent with the Airport's mission (purpose), vision, values, goals, or objectives; the best interest of the County; or, any Airport Assurances. The County's Airports Mission, Vision, Goals, and Objectives as attached</i>
R90	Please reference R10.
C91	Section 2-2 (b) – <i>Operator shall, in the judgment of the County, demonstrate before and during the term of the Agreement the financial responsibility and technical capability to develop and maintain Improvements; procure and maintain required Vehicles, Equipment, and/or Aircraft; employ proper level of personnel; and engage in the Activity.</i>



COMMENT COMPILATION AND RESPONSE

R91	Please reference R12.
C92	Section 2-4 (a) (1) a. – <i>Leased Premises, existing and currently utilized for commercial purposes as of the effective date of these Minimum Standards may, in the County's sole discretion, utilize indirect public streetside access.</i>
R92	Please reference R13.
C93	Section 2-4 (a) (2) – <i>Each building used on the Airport in conjunction with the Commercial Activity shall bear the building number as required by fire Codes other optional Operator's identification in the form of a company logo, sign, emblem, or other means to designate the operator to whom the building is assigned. Identification shall be legible on a contrasting background and shall be displayed in a manner that is acceptable to the Department and other County Codes.</i>
R93	Please reference R14.
C94	Section 2-4 (b) (2) (a) – <i>Aprons, associated with hangars, existing, and currently utilized for commercial purposes as of the effective date of these Minimum Standards, may, in the County's sole discretion, be less than one times the hangar square footage.</i>
R94	Please reference R16.
C95	Section 2-4 (c) (1) – <i>Paved Vehicle parking shall be sufficient to accommodate all Operator's and Operator's sublessees' (if subleasing facilities) customers, employees, visitors, vendors, and suppliers Vehicles on a daily basis and be provided by the County.</i>
R95	Please reference R16. The draft Minimum Standards have not been modified.
C96	Section 2-8 (a) (1) – <i>Operator will provide to the Department a current written statement of point-of-contact with phone numbers for emergency situations – the names, addresses, telephone numbers and other necessary contact information for all personnel responsible for the operation and management of the Operator of the Entity.</i>
R96	The above changes have been incorporated into the draft Minimum Standards.
C97	Section 2-8 (d) – <i>All personnel employed by the Operator to perform Aeronautical Activities on the Airport are required to be appropriately dressed and identifiable while on duty. Identification shall include the name of the Operator and name of the employee.</i>
R97	Section 2-8 (d) of the draft Minimum Standards has been revised as follows: <i>All personnel employed by the Operator to perform Aeronautical Activities on the Airport are required to be appropriately dressed and identifiable while on duty. Personnel shall wear an identification badge at all times while on duty. Identification shall include the name of the Operator and name of the employee.</i>
C98	Section 2-9 (a) – <i>All required Equipment and Vehicles of the Operator must be fully operational and functional at all times or be under expedited repairs.</i>
R98	Section 2-9 (a) (1) will be added as follows: <i>Aircraft, Equipment, and Vehicles may be unavailable, from time to time, on a temporary basis, due to routine or emergency maintenance as long as: (a) appropriate measures are being taken to return the Aircraft, Equipment, or Vehicle to service as soon as possible and (b) fully operational back-up Aircraft, Equipment, and Vehicles are available at all times.</i>
C99	Section 2-9 (b) – <i>Identification shall be legible on a contrasting background and shall be displayed in a manner that is acceptable to the Department easily visible.</i>
R99	Please reference R18.
C100	Section 2-10 – <i>The County/DOA is responsible for the airport's perimeter security and shall provide a copy of its Security Plan to the FBO or SASO.</i>
R100	Please reference R19. Additionally, the above recommended changes have not been incorporated into the draft Minimum Standards.
C101	Section 2-10 (b) – <i>Operator shall develop and maintain a Security Plan. Operator's Security Plan shall be submitted to the Department within 30 days of the Department's request. Operator is solely responsible for implementation of and compliance with Operator's Security Plan. The Airport being the County's shall have the County's Sheriff enforce the property security.</i>



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R101	The above recommended changes have not been incorporated into the draft Minimum Standards. Section 2-10 is specifically discussing the Operator's Security Plan for their Leased Premises.
C102	Section 2-12 (a) – <i>Operator shall protect, defend, reimburse, indemnify, and hold County, its agents, employees and elected officers as provided in an Agreement from direct cost. Operator will not be responsible for County contractors of subcontractors that have not been bid through the RFP process and long as the issue is within the Operators control. If a dispute between the Operator and County, its agents, employees or elected officers occurs the prevailing party shall not have to incur legal or court cost. The losing party will incur all cost and fees.</i>
R102	Section 2-12 has been removed from the draft Minimum Standards.
C103	Section 2-13 (a) – Operator shall, at its sole cost and expense, pay all taxes, fees, and other charges that may be levied, assessed, or charged by any duly authorized Agency associated with Operator's Leased Premises (land and/or Improvements), Operator's Improvements on Leased Premises, and/or Operator's Activities.
R103	Section 2-13 (a) has not been modified in the draft Minimum Standards..
C104	Section 2-14 (a) – <i>When more than one (1) Activity is conducted, the minimum requirements shall vary depending upon the nature of each Activity and/or combination of Activities, but shall not necessarily be cumulative.</i>
R104	Please reference R20.
C105	Section 3-2 (b) (1) (a) – <i>FBO shall deliver and dispense Jet Fuel and Avgas, and Aircraft lubricants into for all General Aviation Aircraft normally frequenting the Airport.</i>
R105	Section 3-2 (b) (1) (a) of the draft Minimum Standards has been revised to the following: <i>FBO shall deliver and dispense Jet Fuel, Avgas, and Aircraft lubricants into for all General Aviation Aircraft normally frequenting the Airport.</i>
C106	Section 3-2 (b) (1) (b) – <i>FBO shall provide a reasonable response time of no more than fifteen (15) minutes for fueling during required hours of activity (excepting situations beyond the control of the FBO).</i>
R106	The County believes 15 minutes to respond is a reasonable response time.
C107	Section 3-2 (b) (2) (a) – <i>FBO shall meet, direct, and direct and provide parking for all transient Aircraft arriving on Operator's Leased Premises.</i>
R107	Section 3-2 (b) (2) (a) of the draft Minimum Standards has been revised to the following: <i>FBO shall meet, and direct, and park to parking all transient Aircraft arriving on Operator's Leased Premises.</i>
C108	Section 3-2 (b) (2) (c) – <i>FBO shall provide self parking and self Tiedown of Aircraft upon the Operator's Leased Premises.</i>
R108	Section 3-2 (b) (2) (c) has been revised as recommended.
C109	Section 3-2 (b) (2) (d) – <i>FBO shall provide hangar storage of Aircraft as available, to include in-out service.</i>
R119	Section 3-2 (b) (2) (d) has been revised as recommended.
C110	Section 3-2 (b) (2) (g) – <i>FBO shall may provide courtesy transportation, utilizing Operator's Vehicles, for passengers, crew, and baggage, as necessary if available and/or appropriate.</i>
R110	Section 3-2 (b) (2) (g) has been removed from the draft Minimum Standards.
C111	Section 3-2 (b) (2) (h) – <i>FBO shall may make available crew and passenger ground transportation arrangements if possible (Limousine, shuttle, and rental car) and accommodation arrangements.</i>
R111	The County believes passenger ground transportation arrangements should be provided by the FBO.
C112	Section 3-2 (b) (3) (a) – <i>FBO or SASO shall provide Aircraft Maintenance on the airframe, powerplants, and associated systems of General Aviation Aircraft Group I Piston Aircraft normally frequenting the Airport.</i>



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R112	AMCG believes the FBO should provide aircraft maintenance or the FBO may use an authorized sublessee(s) identified in Section 3-2 (b) (3) (c) of the draft Minimum Standards <i>FBO can meet these Minimum Standards for the provision of Aircraft Maintenance by and through authorized sublessee(s) who meet(s) the minimum standards established for an Aircraft Maintenance Operator and operates from the FBO's Leased Premises.</i>
C113	Section 3-2 (b) (3) (b) – FBO or SASO shall provide supplies and parts required for Aircraft airframe, powerplant, and other routine Aircraft maintenance functions appropriate for the type of Aircraft serviced.
R113	Please reference R112.
C114	Section 3-2 (b) (4) (a) – FBOs may also provide optional services as approved by the County, which may include, but are not limited to: Flight Training, Aircraft Rental, Aircraft Sales, Air Charter or Air Taxi, Aircraft Management Operations, and Avionics Sales and Maintenance.
R114	AMCG believes all operations and services must be approved by the County. This may include approvals provided for within the FBOs agreement.
C115	Section 3-3 (a) (2) – Apron – 65,340 square feet with sufficient weight bearing capacity for a B-2 airport.
R115	Section 3-3 (a) (2) of the draft Minimum Standards has been revised to the following: <i>Apron – 65,340 square feet with sufficient weight bearing capacity to accommodate the aircraft normally frequenting the Airport.</i>
C116	Section 3-3 (a) (3) – Paved Tiedown – adequate to accommodate the number, type, and size of based and transient Aircraft requiring Tiedown space at the FBO's Leased Premises, but not less than twenty (20) fifty (50) paved Tiedown spaces.
R116	The County believes twenty (20) Tiedowns is sufficient.
C117	Section 3-3 (a) (4) – Facilities – 48,000 28,000 square feet (total) consisting of the following:
R117	The County believes the facility requirements outlined in the draft Minimum Standards are sufficient. As such, this provision has not been revised.
C118	Section 3-3 (a) (4) (a) – Terminal space – 3,500 6,000 square feet <i>Customer area shall be at least 2,000 dedicated square feet to include adequate space for crew and passenger lounge(s), flight planning room, vending area, public use telephones, and restrooms.</i>
R118	Please reference R117. Additionally, the County believes the FBO shall provide public use telephones.
C119	Section 3-3 (a) (4) (b) – Maintenance area – 4,500 10,000 square feet including management, record keeping, and reception areas
R119	Please reference R117.
C120	Section 3-3 (a) (4) (c) – Hangar space – At least 3,000 10,000 square feet shall be dedicated to the provision of Aircraft Maintenance with a door height of at least 18 feet and a door width of at least 45 feet. At least 40,000 12,000 square feet shall be dedicated to Aircraft storage.
R120	Please reference R117.
C121	Section 3-4 (c) (3) – 500 gallons for Mogas storage (for ground support equipment)
R121	The County believes the FBO shall have fuel storage for Mogas. As such, Section 3-4 (c) (3) of the draft Minimum Standards has not been revised.
C122	Section 3-5 (d) (a) – A fixed Avgas refueling (self-fueling) system constructed or installed and maintained by an FBO for public commercial use shall be in a location specified by the Department approved by the County and current codes.
R122	Section 3-5 (d) (a) of the draft Minimum Standards has been revised to the following: <i>A fixed Avgas refueling (self-fueling) system constructed or installed and maintained by an FBO for public commercial use shall be in a location specified by the Department approved by the County and consistent with applicable Regulatory Measures.</i>
C123	Section 3-6 (a) (2) – One (1) courtesy Vehicle (capable of accommodating four (4) passengers) to provide transportation of passengers, crews, and baggage to and from destinations on the Airport and local area hotels and restaurants in close proximity



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R123	In accordance with R110, Section 3-6 (a) (2) has been removed from the draft Minimum Standards.
C124	Section 3-7 (b) – <i>FBO's SOP shall be submitted to the Airport no later than thirty (30) days before the FBO commences Activities at the Airport</i> checked quarterly during the County's Fire Inspection.
R124	The County believes the FBO's SOP shall be submitted to the Airport in accordance with Section 3-7 (b). As such, this provision has not been modified in the draft Minimum Standards.
C125	Section 3-7 (c) – <i>FBO shall have two (2) properly trained and qualified employees, on each shift,</i> at least one providing appropriate Aircraft fueling, parking, and ground services support.
R125	The County believes two (2) properly trained and qualified employees shall provide Aircraft fueling, parking, and ground services support. As such, this provision has not been modified in the draft Minimum Standards.
C126	Section 3-8 (a) – <i>Aircraft fueling and passenger, crew, and Aircraft ground handling services, support and amenities shall be continuously offered and available to meet reasonable demands of the public for this Activity seven (7) days a week (including holidays except Christmas), between the hours of 7:00 8:00 am and 8:00 6:00 pm (local time). These services shall be available after hours, on-call, with a response time not to exceed 30</i> 120 minutes.
R126	Section 3-8 (a) in the draft Minimum Standards has been revised to the following: <i>Aircraft fueling and passenger, crew, and Aircraft ground handling services, support, and amenities shall be continuously offered and available to meet reasonable demands of the public for this Activity seven (7) days a week (including holidays with the exception of Christmas), between the hours of 7:00-8:00 am and 8:00-6:30 pm (local time). These services shall be available after hours, on-call, with a response time not to exceed 30-60 minutes.</i>
C127	Section 3-8 (b) – <i>Aircraft Maintenance shall be continuously offered and available to meet reasonable demand of the public for this Activity five (5) days a week, eight (8) hours a day.</i> Every effort to provide Aircraft Maintenance shall be made available after hours, on-call, with minimum response time not to exceed sixty (60) minutes.
R127	Please reference R27.
C128	Section 3-9 (a) – <i>Recognizing that Aircraft removal is the responsibility of the Aircraft owner/operator, the FBO shall be prepared to lend assistance when available within thirty (30) minutes upon request in order to maintain the operational readiness of the Airport. The FBO County shall prepare an Aircraft removal plan and have the Equipment Readily Available that is necessary to remove the General Aviation Aircraft from normally frequenting the Airport. The Sheriff shall enforce the aircraft removal as applies to the Rules and Regulations.</i>
R128	The County believes the FBO shall be prepared to lend assistance for Aircraft removal and the FBO shall prepare an Aircraft removal plan. As such, this provision has not been modified in the draft Minimum Standards.
C129	Section 4-2 (a) – Current leases include Footprint of the Hangar only. – <i>Contiguous Land (Lessee Only) 21,780 SF</i> N/A 43,560 SF N/A
R129	Please reference R21.
C130	Section 4-2 (a) – <i>Administrative Area 500SF</i> 100 SF 500SF 100SF
R130	Please reference R22.
C131	Section 4-2 (a) – <i>Hangar 3,000SF</i> 2,000 SF 6,000SF 3,000 SF
R131	Please reference R23.
C132	Section 4-3 (a) – <i>All Operators' personnel that return aircraft to service shall be properly certificated by the FAA, current, and hold the appropriate ratings for the work being performed.</i>
R132	Please reference R25.
C133	Section 4-6 (a) – <i>Operator shall be continuously offered and available to meet reasonable demands of the public for this Activity, five (5) days a week, eight (8) hours a day and available after hours, on-call, with response time not to exceed sixty (60) minutes.</i>
R133	Please reference R27.
C134	Section 5-2 (a) (1) – <i>Contiguous Land (Lessee Only) 10,890 SF</i> 10,890 SF
R134	Please reference R21.
C135	Section 5-2 (a) (1) – <i>Administrative Area 500SF</i> 100 SF 500SF 100SF
R135	Please reference R22.



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C136	Section 5-2 (a) (2) – <i>Contiguous Land (Lessee Only)</i> 21,780 SF 43,560 SF
R136	Please reference R21.
C137	Section 5-2 (a) (2) – <i>Administrative Area</i> 500SF100 SF 500SF100SF
R137	Please reference R22.
C138	Section 5-2 (a) (2) – <i>Hangar</i> 3,000SF2,000 SF 6,000SF3,000 SF
R138	Please reference R23.
C139	Section 5-2 (c) (1) – <i>Customer area shall include adequate space for customer lounge, public use telephone, and restrooms.</i>
R139	Please reference R118.
C140	Section 5-6 (a) – <i>Operator shall be open and services shall be available to meet the reasonable demands of the public for this Activity five (5) days a week, eight (8) hours a day and available after hours, on-call, with a response time not to exceed sixty (60) minutes.</i>
R140	Please reference R27.
C141	Section 6-2 (a) – <i>Administrative Area</i> 500SF100 SF
R141	Please reference R22.
C142	Section 6-2 (a) – <i>Hangar, if required (Lessee)</i> 3,000SF2,000 SF
R142	Please reference R23.
C143	Section 6-2 (a) (3) c. – <i>Administrative area shall be at least 500 100 square feet to include adequate space for employee offices, work areas, and storage.</i>
R143	Please reference R22.
C144	Section 6-4 (a) (2) – <i>Flight Training Operators shall employ two (2) FAA certified flight instructors and or contractors as needed (total) and one (1) customer service representative (on each shift).</i>
R144	The County believes an Aircraft Rental or Flight Training Operator (SASO) shall employ two (2) FAA certified flight instructors. As such, this provision has not been modified in the draft Minimum Standards.
C145	Section 6-5 (a) – <i>Operator shall have available for rental or use in flight training, either owned by or under written lease to Operator and under the exclusive control of Operator, no less than two (2) properly certified and currently airworthy Aircraft, at least one (1) of which shall be equipped for and fully capable of flight under instrument conditions and/or one (1) of which shall be a four-place Aircraft. Light Sport Aircraft or helicopter may be substituted.</i>
R145	Section 6-5 (a) (1) has been added to the draft Minimum Standards as follows: <i>If an Operator is only providing Light Sport Aircraft rental and/or flight training, two (2) Light Sport Aircraft may be substituted for the Aircraft requirements in Section 6-5(a).</i>
C146	Section 6-6 (a) – <i>An Aircraft Rental Operator and a Flight Training Operator shall be open and services shall be available to meet the reasonable demands of the public estimated for this Activity six (6) days a week, eight (8) hours a day.</i>
R146	The County believes an Aircraft Rental or Flight Training Operator (SASO) shall be available six (6) days a week, eight (8) hours a day. As such, this provision has not been modified in the draft Minimum Standards.
C147	Section 7-2 (a) – <i>Administrative Area</i> 500SF100 SF
R147	Please reference R22.
C148	Section 7-2 (a) – <i>Hangar, if required (Lessee)</i> 3,000SF2,000 SF
R148	Please reference R23.
C149	Section 7-2 (a) (3) c. – <i>Administrative area shall be at least 500 100 square feet to include adequate space for employee offices, work areas, and storage.</i>
R149	Please reference R22.
C150	Section 8-2 (a) – <i>Administrative Area</i> 500SF100 SF
R150	Please reference R22.
C151	Section 8-2 (a) – <i>Hangar, if required (Lessee)</i> 3,000SF2,000 SF
R151	Please reference R23.



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C152	Section 9-1 (a) (2) – <i>Aircraft Storage Operator shall ensure that hangar tenants only perform preventive Aircraft maintenance within the hangar on their own Aircraft to the extent permitted in 14 CFR Part 43, as now or hereafter amended. Painting, welding, and any type of Hazardous Material storage shall not be permitted within Aircraft hangars unless appropriately permitted. authorized by the Department in writing. The piling and storage of crates, boxes, barrels, containers, refuse, and surplus property shall not be permitted.</i>
R152	The County (Department) has the authority to authorize this type of Activity in the Hangars (in compliance with all applicable Regulatory Measures) Additionally, the County does not believe storage of crates, boxes, barrels, containers, refuse, and surplus property should be permitted on the Airport. As such, this provision has not been modified in the draft Minimum Standards.
C153	Section 9-1 (a) (3) – Aircraft Storage Operator shall provide a waste oil receptacle within the immediate vicinity of the hangar(s). This receptacle shall be capable of holding a minimum of fifty (50) gallons, have secondary containment protection, and be emptied at regular intervals, and be in compliance with all Regulatory Measures.
R153	Section 9-1 (a) (3) of the draft Minimum Standards has been removed.
C154	Section 9-2 (a) – <i>Administrative Area</i> 500SF 100 SF 500SF 100SF
R154	Please reference R22.
C155	Section 9-2 (a) – <i>Hangar</i> 3,000SF 1,500 SF 6,000SF 3,000 SF
R155	Please reference R23.
C156	Section 9-4 (a) – <i>Operator shall have facilities available for sublessees' Aircraft removal and storage five (5) days a week (including holidays) eight (8) hours a day and available after hours, on-call, with a response time not to exceed sixty (60) minutes</i> or prearranged.
R156	Please reference R27.
C157	ARTICLE 14. ATTACHMENT A (MINIMUM INSURANCE REQUIREMENTS) – Insurance To Be determined: All Rates are being reviewed by a qualified professional as to being reasonable and appropriate and available for these operations.
R157	Please reference R46.