

September 14, 2020

By Electronic Mail

Hall of Administration
ATTN: Clerk of the Board of Supervisors
333 W. Santa Ana Blvd.
Santa Ana, CA 92701
response@ocgov.com

**RE: General Aviation Improvement Program - Board of Supervisors Sept. 15, 2020
Meeting Agenda Item # S21A**

Dear Board of Supervisors:

The National Business Aviation Association (NBAA) represents the interests of over 11,000 member companies that rely on general aviation (GA) aircraft to help make their businesses more efficient, productive and successful. Those members include numerous tenants and users of the John Wayne Airport (SNA) who continue to be strongly interested in the airport's future accessibility and viability.

In advance of tomorrow's Board meeting, and the Board's consideration of two leases for Fixed-Based Operators (FBOs) at SNA, I am writing, first, to emphasize the value of the General Aviation Improvement Program (GAIP) the county has undertaken. As you recognize, GA has a significant economic impact in Orange County, provides valuable services to the region and sustains many jobs directly at John Wayne Airport and throughout the area at businesses that depend on general aviation. It is imperative to allow GA to continue to thrive at SNA without additional limitations, beyond the airport's established access and noise regulations, which are already among the most restrictive in the country.

NBAA supports the county's efforts to modernize GA facilities and to improve services to GA users of John Wayne Airport. We also see the authorization of an U.S. Customs and Border Protection (CBP) general aviation facility to be an asset to the airport with positive effects that will propagate beyond Orange County and benefit the greater Los Angeles region. The CBP services will allow SNA's vital GA component to operate more efficiently and with less impact on the environment while benefiting the local economy.

However, NBAA is concerned to learn that the FBO leases prohibit scheduled charters from operating at those facilities, and that the Board of Supervisors has provided direction to no longer allow scheduled charters to operate at FBOs. More specifically, even though NBAA member JetSuiteX has been provided a seat allocation pursuant to the airport's access restrictions, John Wayne Airport has not offered alternative facilities at the air carrier terminal that would actually allow JetSuiteX to continue to conduct its operations at SNA.

We understand that JetSuiteX would work with SNA to transition to the main terminal if given the ability to operate external to the TSA "sterile" security area. JetSuiteX interprets the airport's insistence that it operate only from within that area to be not only incompatible with its business model, but in direct conflict with TSA regulations for JetSuiteX arrivals from airports where their

passengers are not screened, effectively denying JetSuiteX access to SNA. The airport's position appears to comprise a violation of the airport's obligations to the FAA (i.e., the assurances which accompany federal airport grants), and to endanger the airport's future entitlement to federal funding. We encourage the Board of Supervisors to reconsider the proposed lease terms or to ensure that the airport designates an area of the terminal for use by scheduled charter operators to enplane and deplane passengers that are not subject to TSA security screening, to ensure that SNA continues to be accessible to all types of aeronautical activities.

Once again, we applaud the county's leadership for recognizing the benefits improvements to the general aviation facilities would bring to securing a strong, sustainable future for John Wayne Airport and for everyone's efforts to date. We look forward to jointly working with the County Board of Supervisors, John Wayne Airport staff, GA users and tenants and the greater community to ensure that all users can benefit from our collective efforts as part of the GAIP program.

Please do not hesitate to contact me if NBAA can be of assistance.

Sincerely,



Alex Gertsen, C.M.
Director, Airports and Ground Infrastructure

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