

Patrick,

I took a quick look at your proposed standards and have a few comments:

1. Do you have a set of Rules and Regulations in addition to the minimum standards? That's where you would typically address non-commercial issues, such as self-fueling regulations.

2. Page 13, para D4. Use caution in denying an application based on lack of available space, particularly if the airport has allowed nonaeronautical use of aeronautical property.

3. Numerous inconsistencies on leased space requirements. Some requirements are for XX square feet (land?), some are for a building of XX sq ft, with no hangar area requirement, and some require XX sq ft of hangar space in addition to office space, etc. Beyond that, I think you could run into problems with the different space requirements, unless you have a good rationale for the requirement:

SSO - Airframe or Powerplant - requires 5000 feet of building.

Hangar space?

SSO - Aerial Applicator - requires 7000 feet of building, incl 500' of offices, etc. Hangar space?

SSO - Air Taxi/Charter - requires 4000 feet, incl 3600' of hangar

SSO - Aircraft Storage - requires 2500 feet of hangar.

MSO - in theory, could do everything but sell fuel - required 6400 feet with 4800 hangar. With Airframe/powerplant 8100' and 6500' hangar.

FSO - 16000' plus 14000' hangar.

As an example, if I'm a charter operator with one aircraft, why would I need 3600 feet of hangar, when a SSO for aircraft storage only needs 2500?

4. Most of the categories attempt to address the issue of residences or long term quarters in the facilities. Again, I would think this issue could be handled through the Rules and Regulations as well as the actual lease documents.

5. Flight Instruction - have you considered a permitting process for someone who wants to do parttime instruction, or only does flight instruction on a specific aircraft.

6. Aerial applicator - you may want to consider limiting the amount of chemicals to be stored or limiting the use of the chemicals. We've found that many applicators also have ground-based operations and want to store chemicals and equipment for the ground operation with the aerial facility.

We've also found applicators that run a chemical sales operation out of their airport business.

7. There are numerous references to proper heating and lighting, restrooms, etc. Most of these issues can be addressed by requiring the building, parking lot, offices, restrooms, etc, to meet all appropriate building codes.

8. Most of the different categories require the operator to have the tools, equipment, and capability to efficiently and safely move aircraft.

However, there is no such requirement for the SSO - Aircraft Storage. Was that intentional?

9. These standards require at least 5000 gallon storage capacity for noncommercial operators storing their own fuel. That may be considered unreasonable for a private individual or company desiring to do self fueling.

10. Long discussion on insurance requirements, but nowhere did I see a dollar amount or type of insurance (liability, comprehensive, etc.)

Steve Obenauer, Manager  
Bismarck Airports District Office  
701-323-7380