

From: Terry Burnes <tlburnes@charter.net>

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To: JDBaushke@verizon.net, Nancy McDermid <McDermid@charter.net>, david.brady@LPL.com, Doug N Johnson <dougjohnson@prodigy.net>

Cc: Dan Holler <dholler@co.douglas.nv.us>

Subject: Implementing your adopted airport policy

Commissioners,

I am writing to share some thoughts about how you might approach future development of the Minden-Tahoe airport consistent with your Resolution 2007R-041 adopted May 3, 2007. But why should you listen to me?

Well, first, I don't really have a dog in this fight. I don't use nor am I really affected by the airport. Believe it or not, I'm primarily motivated by helping you to understand the options and strategies available to you for achieving your stated goals, because I don't believe you always get the guidance you need from your staff.

Second, while I'm not currently active in aviation, I am a licensed commercial pilot with over 2,500 hours of flying time, primarily in large 4-engine jet transports, as a result of a 5-year stint in the Air Force following my graduation from college in 1968.

Third, I began my 30-year career in county land use planning, the last 15 as a county planning director, in airport planning and continued my involvement in that function throughout much of my career. That was in San Mateo County, California, and included extensive dealings with San Francisco International Airport, which was located in the County's unincorporated area, and two County operated airports similar in various respects to Minden-Tahoe. Not to boast, but my guess is that I may know as much about this topic as anyone else in Douglas County.

I hope those three factors would give you reason to finish reading this and to consider seriously what I have to say.

You are in the same bind as many other airport operators across the country. By accident of history, you have an airport to operate but not the local funds to do that properly. You're dependent on drawing funds from the federal aviation trust fund for any major airport improvement or maintenance project. If you draw on those funds the FAA will insist that any facility constructed or improved with those funds be operated in a non-discriminatory manner. In simple terms, their position is that if a facility is physically capable of accommodating a certain type of aircraft then those aircraft must be allowed to operate there. The net effect of this would appear to remove a great deal of local discretion and control over how you manage the airport you own.

In Resolution 2007R-014 you said ". . . that the future operation of the Airport shall continue to serve the needs of Douglas County residents and businesses through a safe, compatible, and friendly airport with a focus on being a general aviation community orientated airport . . ." and ". . . infrastructure development of the Airport will be appropriate and consistent with maintaining the rural community character of the County

and the general aviation purposes of the Airport . . ." and ". . . it is further the intention of the Board to continue to provide for firefighting and other emergency aviation needs, and to promote various sports aviation activities, particularly soaring . . ." and ". . . that the Airport should continue to remain financially self-sufficient including continued FAA provided grant funding . . ." and ". . . to formulate the forthcoming update of the Airport master plan . . . in a manner consistent with the stated strategic vision of the Board of County Commissioners."

I believe the central dilemma you face is that you inherited an airfield developed by the Army well beyond the parameters stated in your resolution. That is, the facilities at Minden-Tahoe, especially the main runway, go well beyond what is necessary for the type of airport described in your resolution. Furthermore, the County has apparently used aviation trust funds in the past to maintain and improve that runway, to the point where I understand that it has a current physical capacity of something like 110,000 pounds, well beyond the 50,000 pound weight limit adopted by voters in the past. And well beyond what would be consistent with your resolution.

This has left you caught between the FAA and your constituents. The FAA says, "Hey, you've used our money to build a 110,000 pound airport, you have to let 110,000 pound aircraft in." Your citizens on the other hand, have said they want only 50,000 pound aircraft to operate here. So, what are your options?

Well, you could of course simply capitulate to the FAA and those who agree with them and tell the citizens you're sorry but there is little choice but to rescind the weight limit and accept the reality that larger aircraft must be allowed to operate here if they wish to do so. Or, put another way, if there is a market demand for them to do so. But that is not your only option.

I believe you retain great control over the future use of your airport despite the rules related to the aviation trust fund. That is because you retain more or less complete control over how the airport will be developed in the future. So, if Douglas County prefers a certain operational profile for the airport, for instance as described in your resolution, then you simply must be very careful not to develop facilities that would facilitate or encourage use of the airport in other ways. So, for example, although you might be forced to allow 110,000 pound aircraft to use the main runway, you needn't develop the other facilities that would be essential or attractive to those aircraft.

Larger aircraft, particularly those used for commercial purposes, tend to desire and require more extensive facilities. Those include dedicated runways unencumbered by the operation of smaller, slower aircraft; instrument approaches and landing systems; control towers; larger ramp, hanger and maintenance areas; more and larger fueling options; passenger terminals; and other similar facilities. Don't build those and your airport will be less attractive to operations inconsistent with your adopted policies.

But there is more. You are not unique. Many community owned and operated airports across the country face the same dilemma. Some have gone along with the FAA because they don't want a fight or because that takes them where they too want to go, that is to a larger more commercial airport. But others have resisted and found that the FAA position is not as strict as it might at first seem. Under sufficient political pressure the FAA has

tolerated airport use restrictions that it doesn't necessarily like. For instance, if Douglas County were to present a firm position to the FAA that, if the County cannot enforce a reasonable weight limit consistent with the community's vision of its airport, then the airport will be closed, might the FAA position not soften under the usual pressure from the aviation community to keep this and other airports needed by pilots open?

So I do believe you have options for managing your airport consistent with the objectives stated in your Resolution. That brings me to the current work on the master plan.

But before I get to that it is important to state clearly that the greatest enemy of policy and plans is incrementalism. We all make plans but few are achieved because our small day-to-day decisions, seemingly harmless at the time, undercut them. Families make plans to get their budget under control but then defeat that goal by celebrating with a night on the town and a \$50 bottle of champagne. We resolve to lose 20 lbs. but then say that dish of ice cream after dinner won't hurt. You have set a policy for the airport in your resolution. But the only way it will be realized is if you are constantly scrutinizing the smaller decisions you make that, taken together, can completely undercut that policy and prevent it from being realized.

This is actually the experience of many airports in this country, especially those whose future is in doubt because of their adverse effects on the communities in which they are located. The airport gets established through some historic event, like our Army airfield here. Then it gets improved incrementally. A runway here, a taxiway there, bigger runways, an instrument approach or landing system, a terminal, a control tower. Traffic increases slowly as does the size of aircraft operating there and then some airline decides it would make a good stop and suddenly the airport has a major controversy on its hands, with the community in revolt. All despite reassurances along the way that the current project under discussion is of little overall significance and won't change the character of the airport.

My suggestion would be that you must not include anything in the master plan that would encourage or allow use of the airport in a manner inconsistent with your stated objectives. The most immediate problem I see is the call to develop separate light aircraft, and particularly soaring, facilities east of the airport. I believe that would be a fundamental mistake. Your greatest protection against future dominance of the airport by larger aircraft is to assure that your smallest, slowest clients will continue to use your main runway. There has been lots of rhetoric about jets and the airport becoming a jet center, rhetoric to which I have contributed because I feel that is a real risk here and would be contrary to your policy and the desire of County residents. But "jet center" is to some extent simply a euphemism for more operations by larger, faster, noisier aircraft of a more commercial nature. Those aircraft have an inherent conflict with smaller, slower aircraft using the same facilities. You won't see gliders at the typical air carrier airport and if for some reason you did, that airport would quickly fall out of favor with the airlines.

I believe the best way to assure an airport consistent with your objectives is not to segregate soaring operations away to the east side of the airport. Simply say that's not in the cards, that soaring aircraft are favored users at Minden and will continue to have equal access to the main runway. And that you will not authorize facilities that go in the

opposite direction. Do that and you will assure that Minden remains only marginally attractive to operations inconsistent with your policy. Might a local business like Starbuck's continue to operate a larger, faster aircraft here? Yes, and we would want them to be able to do that. Those pilots will understand and respect the situation at Minden and learn to deal with it, as they have in the past. But will some new fleet of jets or other larger, faster aircraft that could be based elsewhere come here? Not likely. Given a choice they will go somewhere that doesn't require sharing the airport with "those damn gliders."

I would have the same advice about instrument landing systems, control towers, passenger terminals, taxiways, fuel facilities, etc. In each case ask, how might this facilitate use of the airport by the aircraft that we would prefer not be here and how can it be modified to discourage that? But mainly, just say no to those types of facilities. I really don't see any way the FAA can force you to build them. But if you do build them, the FAA will increasingly say you must then provide access to the aircraft and operations that desire to use them.

In closing I'd just like to point out that there are many examples of airports that have progressed from something similar to Minden-Tahoe to a full-fledged commercial airport with air carrier operations, and everything in between. Sometimes there was a conscious plan to make that happen but as often as not "it just happened." I don't see any inherent reason why, if the appropriate facilities were developed or "just happened" that couldn't happen here. We have a near-perfect aviation climate. We have a world class destination right next door at Lake Tahoe. Reno airport will grow increasingly crowded and there will be demand to fly elsewhere. I'm sure reservations agents booking flights to Reno for people destined for South Lake Tahoe are routinely asked, isn't there a closer airport? And here are some aircraft in active use by airlines that operate at Reno that could easily be operated at Minden if we lift the weight limit and you provide the facilities they need:

<http://www.crj.bombardier.com/CRJ/en/specifications.jsp?langId=en&crjId=700>

<http://www.q400.com/q400/en/specifications.jsp>

http://www.bombardier.com/index.jsp?id=0_0&lang=en&file=/en/0_0/0_0.jsp

Alaska/Horizon Airlines, which already operates an extensive schedule at Reno, has 71 of the above aircraft in its current fleet

(see <http://www.alaskaair.com/as/www2/company/Fleet/Fleet.asp>)

all of which could already operate here according to the FAA, some actually within the limits of the current weight ordinance. But they wouldn't consider that now because Minden lacks the facilities required for dependable airline operation. But get the gliders out of the way, build an instrument approach, a control tower and a terminal and who knows? Don't and your policy will be safe.

I realize that is an extreme example but it gets me back to incrementalism. You are already in a bind because of a decision to repave and perhaps strengthen the runway here, a decision which I'm sure seemed innocent enough at the time. Keep making those types of decisions and with the right economic circumstances, and the right developments here

and elsewhere, we all could be looking back some day and asking how in the world this happened to us.

The most important step you could take right now is to abandon plans to segregate soaring from other operations at the airport.

As usual, thank you for considering my input.

Sincerely,

Terry Burnes

1209 Sierra Vista Dr.

Gardnerville, NV 89460

775-265-0254

tlburnes@charter.net

p.s. Please share this with Kelly Kite if you wish; I don't have a working e-mail address for him.

cc: Carson Valley Vanguard Coalition (to which I do not belong, but whose goals I share, as I hope you do)