



ENGINEERING, REIMAGINED

SUPPLEMENTAL AIRPORT PLANNING NARRATIVE REPORT

Terry Airport (8U6)
Terry, Montana

December 2023

This project was funded by the Prairie County Airport Authority and the Federal Aviation Administration (FAA) through Airport Improvement Program (AIP) grant number 3-30-0075-012-2022.

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CHAPTER 1: OVERVIEW

Purpose and Scope

The information presented in this report represents the study findings for the 2023 Supplemental Airport Planning study prepared for the Prairie County Airport Authority, the airport owner. Airport Plans are prepared in accordance with Federal Aviation Administration (FAA) Advisory Circulars. This project was funded in part by the FAA under grant number AIP 3-30-0075-012-2022.

This study for the Terry Airport (8U6) will serve to update components of the 2018 Airport Planning study and answer questions to facilitate future development. The airport sponsor and Kadmas, Lee & Jackson (KLJ) developed the scope for the project in cooperation with FAA Airports District Office and MT Aeronautics officials to identify the specific needs and objectives of the airport owner. The project received notice to proceed in May 2022 from the airport sponsor.

Issues for Supplemental Planning Study

The purpose of this supplemental planning work is in recognition that a wildlife fence is proposed around the airport to protect aircraft using the airport from wildlife. A wildlife fence is taller than the existing perimeter fence, and thus if the 10 foot tall fence were placed where the existing barbed wire fence is located, it would become an obstruction. The fence location also has a cascading effect to a residential road on the west side of the airport and an irrigation ditch on the north side of the airport. Because of the new fence, the existing residential road will need to be relocated around the new fence alignment. In addition, the new fence alignment may require realignment of the irrigation ditch along the north boundary of the airport. This supplemental planning will examine the road alignment and the drainage ditch alignment which also has a historic designation.

Future Wildlife Fence is taller and requires a wider separation from the Runway which impacts these facilities:

- Irrigation Ditch (north side)
- Residential Road (west side)

Study Documentation & Approvals

The Supplemental Planning Study is divided into chapters to document airport planning data, analysis, findings, and recommendation of the study. The following sections are included in the narrative report:

- Chapter 1 – Overview
- Chapter 2 - Environmental
- Chapter 3 – Alternatives Analysis
- Chapter 4 – Implementation
- Appendix A – Glossary of Terms
- Appendix B – General Aviation Airports 101
- Appendix C – Meetings & Public Involvement
- Detail Report – Cultural Resources
- Detail Report – Aquatic Resources Delineation

Each chapter was prepared separately and distributed to the airport owner for review and comment. After the airport owner’s review, each draft chapter findings were made available to key airport

stakeholders including the State and FAA for input prior to a final review and approval by the airport owner. Each approved final draft chapter was then published on the airport’s website for public viewing.

The completed Supplemental Planning Study was accepted by the Prairie County Airport Authority in August 2023. The ALP update was submitted to the State and FAA for review and approval in December 2023.

Public Involvement

Public involvement is a key component to the successful development of a Planning study. The purpose is to encourage information sharing and feedback from airport stakeholders including the airport owner, airport users/tenants, local government officials, resource agencies, elected and appointed officials and the public. Public involvement provides valuable input to assist the airport owner in decision making and develop consensus on study conclusions. The reports from the study will be maintained on the project website **TerryAirportPlan.net** throughout the planning process. A means to contact the planning team is also made available on the website for comments to be submitted to the consultant. See **Appendix A: Public Involvement** for other information including copies of meeting agendas, attendees, presentations, and summaries.

Background

The Airport Layout Plan report was completed in 2018 with the primary focus being the implementation of instrument approach capabilities at 8U6 as well as adding wildlife fencing. The next steps after the 2018 study were to complete an environmental review in anticipation of a road relocation and wildlife fence. Upon closer review by the FAA and other options for a different road alignment, it was determined that some supplemental planning was needed to look closer at the road options and at the same time complete specific major environmental elements first.

Findings from 2018 Study

The 2018 Study reviewed the forecast of activity, wind conditions and existing airfield at 8U6. In addition, a wildlife hazard assessment was completed. The wildlife hazard assessment recommended the following items:

1. *Follow the grass habitat management guidelines in this report (maintaining grass height between six and twelve inches) and work towards establishing a dense grass habitat on the airfield that contains minimal non-grass species (i.e. alfalfa, shrubs, weeds)*
2. *Continue to mow alfalfa in the fall, as needed, until it is eliminated from the airport.*
3. *Enclose the airfield with an effective deer proof perimeter fence.*
4. *Clean up any unnecessary storage piles.*
5. *Enclose the open hangar.*

The study noted that the recommended wildlife fence will need placement outside the applicable safety surfaces to not impede the ultimate needs of the airport. This will require land acquisition and a relocation of the residential road west of the airport. A Runway Protection Zone (RPZ) Analysis was completed as a part of the 2018 Study and the FAA concurred that the road could remain inside the Runway 8 RPZ if necessary. It is important to point out that even though it would remain inside the RPZ, the road would still be located further west than the current location 470 feet from the runway end.

From the study, the Critical Design Aircraft was determined to be the Beech King Air 250, a B-II(S) aircraft requiring a 2A Taxiway Design Group. The details of this turboprop aircraft are provided in **Table 1-1 Critical Design Aircraft**.

Table 1-1 – Critical Design Aircraft

Design Characteristics	Existing	Ultimate
Aircraft Make/Model	Beech King Air 250	Beech King Air 250
Airplane Approach Category	B	B
Airplane Design Group	II	II
Taxiway Design Group	2A	2A
Wingspan	57' 11"	57' 11"
Length	43' 10"	43' 10"
Height	14' 10"	14' 10"
Cockpit to Main Gear	8' 5"	8' 5"
Main Gear Width	18' 7"	18' 7"
Approach Speed (1.3 x Stall)	103 knots	103 knots
Maximum Takeoff Weight	12,500 pounds	12,500 pounds
Landing Gear Configuration	Dual Wheel	Dual Wheel

Source: KLJ Analysis

The existing and ultimate approaches were evaluated to change from visual approaches to 1-mile instrument approach capabilities. This results in changes in the Approach/Departure Surfaces as detailed in **Table 1-2 Approach/Departure Surface Requirements** and in changes to the FAR Part 77 Surfaces as detailed in **Table 1-3 Part 77 Approach Airspace Requirements**.

Table 1-2 – Approach/Departure Surface Requirements 150/5300-13A Table 3-2

Runway End(s)	Table 3-2 Surface	Description	Dimensions	Slope
Existing				
8, 26	2	Approach end of runways expected to serve small airplanes with approach speeds of 50 knots or more (visual, day/night)	250 x 700 x 2,250 + 2,750 Start at Threshold	20:1
Future & Ultimate				
8, 26	3	Approach end of runways expected to serve large planes (Visual day/night); or instrument approaches greater than or equal to 1 mile (day only)	400 x 1,000 x 1,500 + 8,500 Start at Threshold	20:1
8, 26	8	Approach end of runways expected to accommodate instrument approaches with vertical guidance	275 x 1,520 x 10,000 Start at Threshold	30:1
8, 26	9	Departure runway ends used for any instrument operations	1,000 x 6,466 x 10,000 Start at Threshold	40:1

Source: FAA AC 150/5300-13A, KLJ Analysis

Table 1-3 – Part 77 Approach Airspace Requirements

Runway End	Approach Standards	Part 77 Code	Inner Width*	Outer Width	Length	Slope
Existing						
8, 26	Visual Utility	A	250'	1,250'	5,000'	20:1
Ultimate						
8, 26	Non-Precision Utility As low as ¾ mile	A	500'	2,000'	5,000'	20:1

Source: [Title 14 CFR Part 77](#), KLJ Analysis *Inner width is also the Primary Surface width driven by the most demanding approach to a runway. **Bold** indicates change from existing standard.

However, it is very important to note that the change to instrument approach capabilities with the previous planning work were based on Table 3-2 of FAA AC 150/5300-13A. A new FAA Advisory Circular is now in effect and the criteria is in Paragraph 3.6 of AC 150/5300-13B. This now provides the guidance for creating instrument approaches at airports. The notable changes are shown by comparing **Table 1-2** with **Table 1-4**. What was a Type 3 surface in **Table 1-2** began at the runway threshold, but this is now a Type 5 surface in **Table 1-4** and begins 200 feet from the threshold. See **Appendix B – General Aviation Airports 101** for more information on approach surfaces and airport design standards. The other notable item is the departure surface Type 9 and 7 respectively from **Tables 1-2** and **1-4** has changed so that the sides now slope up from the runway width out. These changes will affect the fence and road relocation on the west end and the new standards will be included in the alternatives analysis in **Chapter 3**.

Table 1-4 – Approach/Departure Surface Requirements 150/5300-13B Para. 3.6

Runway End(s)	Par. 3.6 Surface	Description	Dimensions	Slope
Existing				
8, 26	2	Approach end of runways expected to serve small airplanes with approach speeds of 50 knots or more (visual, day/night)	250 x 700 x 2,250 + 2,750 Start at Threshold	20:1
Future & Ultimate				
8, 26	5	Approach end of runways expected to accommodate instrument approaches having visibility minimums greater than or equal to ¾ mile	400 x 3,400 x 10,000 Start 200' from Threshold	20:1
8, 26	6	Approach end of runways expected to accommodate instrument approaches with vertical guidance	275 x 1,520 x 10,200 Start at Threshold	30:1
8, 26	7	Departure runway ends used for any instrument operations	1,000* x 6,466 x 10,000 Start at Threshold	40:1

Source: FAA AC 150/5300-13B, KLJ Analysis

Note: The beginning of the departure surface starts at the runway elevation at the width of the runway then slope up to 150' above runway elevation to the outer edges. See Appendix B for details.

Based on the Critical Design Aircraft and the planned 1-mile approach minimums, the design standards for Runway 8/26 are provided in detail in **Table 1-5 Runway 8/26 Design Standard Matrix**.

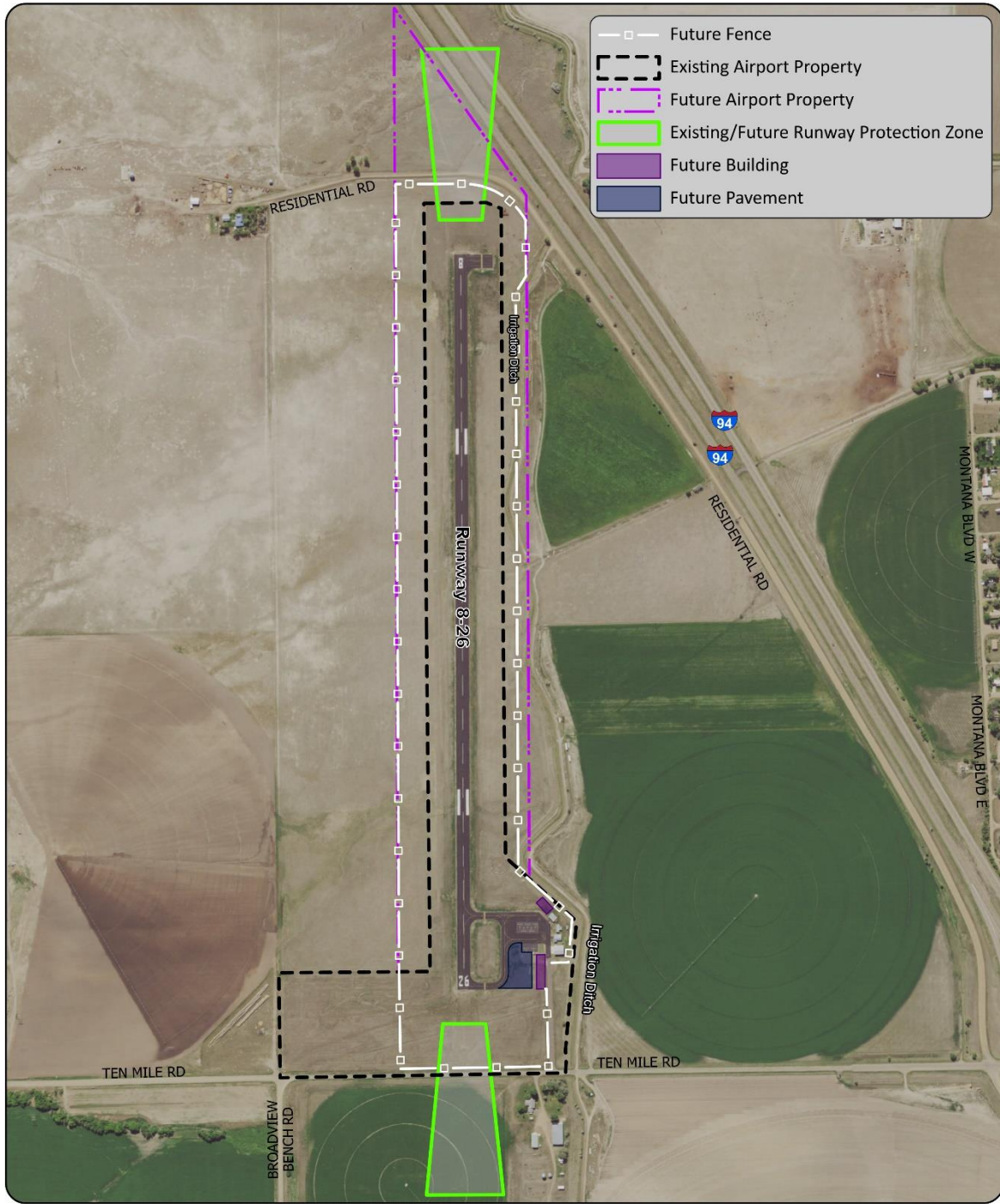
Table 1-5 – Runway 8/26 Design Standard Matrix

Design Standard	Facility Requirement or Recommendation	
	Existing	Future
Runway Classification	Utility	Utility
Runway Design Code (RDC)	B-II(S)-Visual	B-II(S)-5000
Approach Reference Code (APRC)	B-II-4000	B-II-4000
Departure Reference Code (DPRC)	B-II	B-II
Pavement Strength (Wheel Loading)	12,500 (DW)	12,500 (DW)
Runway Width	75'	75'
Runway Length	4,300'	4,300'
Runway Safety Area (RSA)		
RSA Width	150'	150'
RSA Length Past Departure End	300'	300'
RSA Length Prior to Threshold	300'	300'
Runway Object Free Area (ROFA)		
ROFA Width	500'	500'
ROFA Length Past Departure End	300'	300'
ROFA Length Prior to Threshold	300'	300'
Runway Object Free Zone (ROFZ)		
ROFZ Width	250'	400'
ROFZ Prior/Past Threshold	200'	200'
Runway Protection Zone (RPZ)		
RPZ Start from Runway	200'	200'
RPZ Length	1,000'	1,000'
RPZ Inner Width	250'	250'
RPZ Outer Width	450'	450'
Parallel Taxiway Centerline	240'	240'
Hold Position	125'	200'
Runway Lighting Type	MIRL	MIRL
Runway Marking Type	-	Non-Precision
Approach Type / Minimums	Visual / na	NPI / 1-mile
14 CFR Part 77 Approach Surface	250' x 1,250' x 5,000' 20:1 Slope	500' x 2,000' x 5,000' 20:1 Slope
Par. 3.6 Approach Surface	Type 2 250' x 700' x 2,250' (+2,750') 20:1 Slope	Type 5 400' x 3,400' x 10,000' 20:1 Slope
Par. 3.6 Approach Surface Starting Position	At Threshold	200' from Threshold

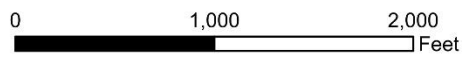
Source: FAA AC 150/5300-13B, KLJ Analysis

The existing and ultimate airfield from the 2018 Study are provided in **Figure 1-1 Existing/Ulimate Airfield**. The location of the irrigation ditch and residential road are noted.

Figure 1-1 – Existing/Ultimate Airfield (2018 Study)



*Intended for Planning Purposes Only



Terry Airport
Existing/Ultimate
2018 ALP

Road Alignment/Location Issues

The existing residential road goes around the west end of the airport approximately 470 feet from the threshold to Runway 8 and is within the Runway Protection Zone (RPZ) for Runway 8. The road also currently penetrates the FAR Part 77 approach surface by as much as 7 feet for the ultimate instrument approach requirements. The wildlife fence location is depicted on **Figure 1-1** and shows that on the west end it would be moved out to the western edge of airport property, according to the 2018 ALP, because of how close the northern portion of Interstate 94 is to airport property.

While the FAA recognized the limited use of the residential road, which would allow it to be relocated and remain in the RPZ, other alternatives will be analyzed in this supplemental planning.

Wildlife Fence Location

Fences around airports must be placed so that the height of the fence does not impede any safety surfaces based on the future airport reference code. Terry is needing both a new taller wildlife fence and needs to accommodate larger safety surfaces to accommodate instrument approaches in the future. For Terry the airport reference code in **Table 1-5** shows a change from B-II(S)-Visual to B-II(S)-5000. This change recognizes the plans to add instrument approach capabilities. The 10-foot-tall wildlife fence will need to be placed at least 320 feet from the runway centerline. This location is feasible around the airport with some amount of land acquisition but on the north side, it will also require the relocation of portion of a historic irrigation ditch which is currently 245 feet from the centerline of the runway. There are environmental considerations to factor into this analysis and alternatives will be evaluated in this supplemental planning.

CHAPTER 2: ENVIRONMENTAL

Introduction

The Environmental elements of this Supplemental Planning Study will focus on two specific areas required by National Environmental Policy Act (NEPA). These are specific studies of Wetlands and Cultural Resources that are affected by the alternatives being examined in this planning study. Appropriate environmental documentation in accordance with FAA Order 5050.4B, *NEPA Instructions for Airport Actions* and FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures* is required to be completed prior to commencing with project actions.

Key environmental resources are described for the existing airport area. **Figure 2-1: Environmental Overview Map** provides a graphical depiction of the existing environmental conditions described in this chapter.

Historical, Architectural, Archaeological, and Cultural Resources

Section 106 of the National Historic Preservation Act of 1966, as amended, requires that federally funded projects be evaluated for the effects on historic and cultural properties included in, or eligible for listing in, the National Register of Historic Places (NRHP). The Archaeological and Historic Preservation Act of 1974 provides for the survey, recovery, and preservation of significant scientific, prehistoric, archaeological, or paleontological data when such data may be destroyed or irreparably lost due to a federal, federally licensed, or federally funded project.

The airport was reviewed during an April 2023 Class III cultural resource inventory that included a file search of the Montana SHPO files for a one-mile radius around the study area. The file search indicated that there were nine previously recorded cultural resources. One of these, 24PE0267, a historic irrigation system, is in the study area and was revisited during Class III inventory. All previously recorded resources are historical era sites and include bridges, irrigation systems, schools, roads, and commercial developments. One resource, a historic school (24PE0268), is listed on the National Register. Two other resources (24PE0845 and 24PE0846), both commercial developments, are recommended Eligible for National Register listing. The six remaining resources are *Unevaluated* or recommended *Not Eligible* for the NRHP. There were three new cultural resources, and four new isolated finds encountered and recorded during the inventory. One site (24PE0855) is a historical era foundation. One site (24PE0856) is a historical material scatter, and the last site (24PE0857) is a prehistoric lithic material scatter. All of the new sites, and all of the isolates, are recommended Not Eligible for listing on the National register of Historic Places. The revisited resource, 24PE0267, is previously recommended Eligible for the National Register of Historic Places. A full copy of the Class III Inventory is available in **Detail Report Cultural Resources**.

Before a project that involves land disturbance is implemented, an analysis to identify the potential for cultural resources would need to be conducted for the project. Coordination with the State Historic Preservation Office (SHPO) will be necessary for projects involving land disturbance. Additionally, any project affecting buildings that have the potential to be listed in the NRHP would require coordination with SHPO. Further analysis is required prior to project implementation.

Water Resources

Wetlands

Wetlands are defined in Executive Order 11990, Protection of Wetlands, as those areas that are inundated by surface or groundwater with a frequency to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Three parameters that define a wetland as outlined in the US Army Corps of Engineers Wetland Delineation Manual are hydric soils, hydrophytic vegetation, and hydrology.

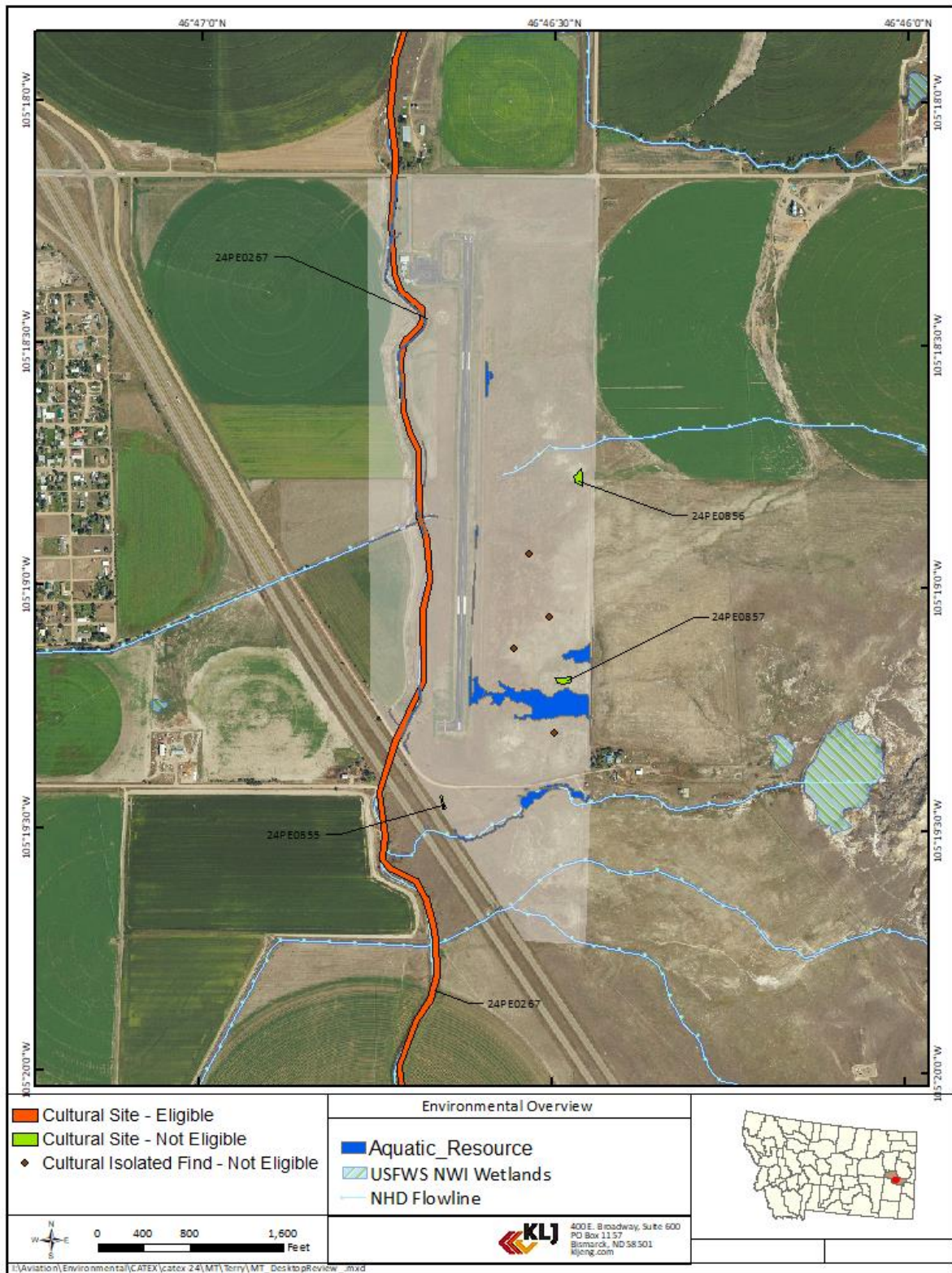
Wetlands in the area would serve a variety of functions, including groundwater recharge, flood control, sediment removal, and nutrient cycling. A wetland delineation was conducted in May 2023, please refer to **Exhibit 2-1: Environmental Overview Map** that illustrates the results of this delineation. Eleven wetlands totaling approximately 5.90 acres were delineated within the 550-acre study area. In addition, four ditches were identified within the study area. Coordination with applicable resource agencies would be necessary prior to project implementation for projects affecting the identified resources. Information from this delineation would be incorporated into future environmental determination documents during project implementation.

A full copy of the Aquatic Resource Delineation Report is in **Detail Report – Aquatic Resources Delineation** for further details.

Conclusion

The information collected and documented in this Inventory chapter provides a baseline foundation to update the Terry Airport long-range plan. This information will feed into future sections to determine how facilities will meet the projected airport needs based on aviation activity forecasts.

Figure 2-1: Environmental Overview Map



CHAPTER 3: ALTERNATIVES ANALYSIS

Introduction

This chapter of this Supplemental Airport Plan discusses airport development alternatives to accommodate the long-term development needs for Terry Airport (8U6). The objective of this chapter is to clearly document the recommended airport development that meets the needs of airport users, City of Terry, Prairie County and surrounding neighbors.

Alternatives evaluated for this study are based on comparing existing conditions with facility requirements reviewed in detail in the previous chapters. Potential impacts of each alternative considered are discussed and used to help the airport select a preferred alternative(s) to be shown on the Airport Layout Plan.

A Preferred Development Strategy based on the selected alternative(s) is summarized after the analysis. This preliminary plan provides a guideline for implementation based on identified needs and priorities. The recommended plan to implement the proposed development is outlined in **Chapter 4: Implementation**.

Evaluation Process

The alternatives evaluation process is the most collaborative portion of the planning study. The alternatives were reviewed and refined through meetings with agency representatives and the study's advisory group. Evaluation used to compare the alternatives. The alternative evaluation criteria utilized for this study is as follows:

Operational Performance - How does each alternative allow the airport to operate as a functional system, meet design standards, and meet the needs of the community.

Best Planning Tenets – What are the strengths and weaknesses of the alternatives as it relates to 1) flexibility to meet demand and react to unforeseen changes; 2) highest and best on- and off-airport land use; 3) feasibility to implement politically and within practical phases; and 4) ability to satisfy airport user needs.

Environmental Factors – What are the potential effects of the alternatives upon the natural and built environment.

Fiscal Factors – How much will the options cost as compared to each other, while making the most use of federal, state and local resources.

Needs Summary

The airfield is vital to the airport's core infrastructure for accommodating aircraft operations. The following section summarizes key airfield facility requirement findings:

Runway 8/26: 75' x 4,300' for ARC B-II (small) aircraft with 1-mile instrument approach

Other: 10' Wildlife fence around the airport per the Wildlife Hazard Management Plan

Development Alternatives

North Wildlife Fence and Irrigation Ditch

The 10 foot wildlife fence will need to be constructed at least 320' from the centerline of the runway. The edge of the irrigation ditch on the north side of the airport is currently between 240' and 550' from the centerline of the runway so all of the irrigation ditch is not required to be relocated. Several alternatives will be examined including an alternative that realigns the entire ditch allowing use of an uneconomic remnant of land and removing a bridge that must be maintained to access this property. During the project an effort was also coordinated with the Buffalo Rapids Irrigation District No. 2 to determine their position on the alternatives. See **Figure 3-1 North Wildlife Fence and Irrigation Ditch Alternatives**.

No Change: The irrigation ditch will remain in its current location and the wildlife fence will be constructed along the north side of the runway 330' from the centerline Runway length except near the ditch portion at 240' from the centerline.

Advantages:

- No capital costs except for fence and small portion of land (5.8 acres north portion)
- No cost to relocate/realign the ditch
- Meets current FAR Part 77 surface requirements for visual approaches

Disadvantages:

- Does not meet future FAR Part 77 surface requirements for instrument approaches. Fence penetrates the primary surface and transitional surface each by as much as a 10'

Alternative 1 – Wildlife Fence with Ditch Crossing: The wildlife fence is constructed 330' north of the centerline of the runway for the full length except for approximately 650' of fence that must cross the irrigation ditch to the north then re-cross the ditch back to the south. The bridge remains to access the uneconomic remnant of property.

Advantages:

- No cost to relocate/realign the ditch.
- Meets future FAR Part 77 surface requirements for instrument approaches

Disadvantages:

- Need to maintain two fence crossings of the ditch from access by wildlife
- Most Land Acquisition (6.4 acres north portion)
- Uneconomic remnant of property is 4.4 acres with small bridge to access
- Irrigation District will not accept a fence across the ditch

Alternative 2 – Wildlife Fence with Short Ditch Realignment: The wildlife fence is constructed along the north side of the runway for the full length 330’ from the runway centerline. A 680’ portion of the irrigation ditch is realigned but the bridge remains across the ditch to access the uneconomic remnant of property.

Advantages:

- Minimal Land Acquisition (5.7 acres north portion)
- Meets future FAR Part 77 surface requirements for instrument approaches
- No fence ditch crossings to maintain
- The Irrigation District prefers this Alternative

Disadvantages:

- Cost to realign 680’ of irrigation ditch
- Uneconomic remnant of property is 4.4 acres with small bridge to access

Alternative 3 – Wildlife Fence with Long Ditch Realignment: The wildlife fence is constructed along the north side of the runway for the full length, 330’ from the runway centerline. The irrigation ditch is realigned for 2,400’ and the bridge is removed. The uneconomic remnant of property is joined together for the property owner to the north.

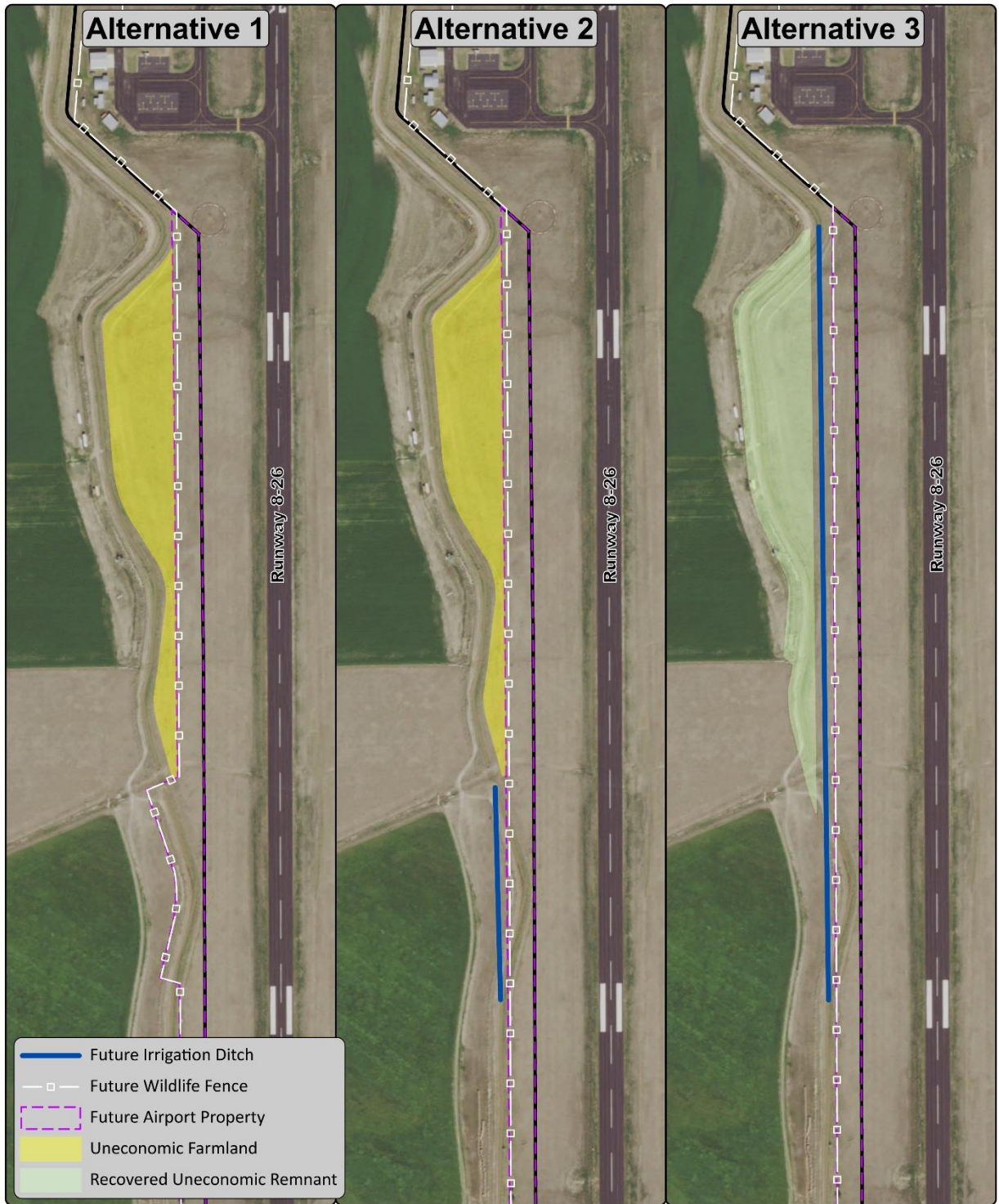
Advantages:

- Meets future FAR Part 77 surface requirements for instrument approaches
- No fence ditch crossings to maintain
- Minimal Land Acquisition (5.7 acres north portion)
- No bridge to remain and 5.9 acres are added to north property owner
- The Irrigation District has not dismissed this Alternative, but prefers Alternative 2 since it is less disruptive than Alternative 3

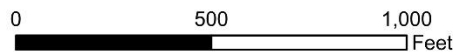
Disadvantages:

- Cost to realign entire irrigation ditch which is 2,400’

Figure 3-1 – North Wildlife Fence and Irrigation Ditch Alternatives



*Intended for Planning Purposes Only



Terry Airport
Ditch Relocation

Table 3-1 – North Wildlife Fence and Irrigation Ditch Alternatives Summary

Factor	No Change	1	2	3
Proposed Action	Wildlife Fence Installed at existing property line	Wildlife Fence at 330' with 2 ditch crossings	Wildlife Fence at 330' with shortest ditch realignment	Wildlife Fence at 330' with longest ditch realignment
Part 77 Obstruction (Existing)	No	No	No	No
Part 77 Obstruction (Future)	Yes	No	No	No
Ditch Realignment	none	None Not accepted by Irrigation District	680' Preferred by Irrigation District	2,400'
Land Acquisition*	none	6.4 acres	5.7 acres	5.7 acres
Uneconomic Remnant	7.8 acres	4.4 acres	4.4 acres	0 acres

Source: KLJ Analysis; * There is an additional 18.3 acres to be acquired south of the airport and an undetermined acreage west of the airport which are not included with this land acquisition that is north of the airport.

Preferred Alternative – Following a review of the alternatives, completion of the wetlands inventory and cultural inventory and feedback from the Buffalo Rapids Irrigation District No. 2, the preferred alternative for the ditch realignment was Alternative 2.

West Wildlife Fence and Residence Road

The wildlife fence when constructed will be 10 feet tall and will need to be located further west than the current barbed wire fence so that the fence does not penetrate the future Part 77 Approach Surface or Paragraph 3.6 Approach Surface for Runway 8. **Table 3-2 Approach Surfaces Impact** provides a summary that is explained later regarding the alternatives. The calculations for the residential road are based on a 10-foot vehicle which is the FAA standard for a private road.

Interstate Right of Way Fence – The fence along I-94 is currently 40 feet from the south drive lane running parallel to the existing residential road. The fence is then 60 feet from the south drive lane leaving less room currently for extending the residential road. There may be issues with trying to reduce the interstate right of way but those issues can be resolved in the project design for the road and fence.

Survey Data – It is important to point out that at the time the previous ALP was prepared, there was not an aeronautical survey completed. The land area is generally flat but the topography to the west of the Runway 8 approach was not surveyed. Therefore, the elevation of objects as compared to the approach surface is expected to vary by 1 to 2 feet and a penetration of about 1 foot should be able to be mitigated in the project design for the road and fence.

Table 3-2 – Approach Surfaces Impact

Alternative	No Change	1	2	3
Part 77 (20:1) 500' x 2,000' x 5,000'				
Wildlife Fence	10' to 5'	1' to (47')	1' to (10')	(13' to 50')
Road	1' to (5')	(1' to 49')	(1' to 12')	-
Paragraph 3.6 (20:1) 400' x 3,400' x 10,000'				
Wildlife Fence	5'	(2' to 44')	(2' to 10')	(16' to 52')
Road	(1' to 5')	(4' to 47')	(4' to 12')	-

Source: KLJ Analysis Notes: **Red** is Above Surface, **(Negative Number)** is Below Surface

No Change: The current fence location remains the same and the existing barbed wire fence is replaced with a 10-foot tall wildlife fence.

Advantages:

- No cost for additional land
- No cost to relocate residential road
- Road will be 1 foot above to 5 feet below the Part 77 approach surface
- Road will be 1 to 5 feet below the Paragraph 3.6 Approach Surface

Disadvantages:

- Wildlife fence would penetrate the Part 77 Approach Surface by 5 to 10 feet
- Wildlife fence would penetrate the Paragraph 3.6 Approach Surface by 5 feet
- Road will remain inside the RPZ

Alternative 1 – Wildlife Fence parallel to I-94 and Road around Fence: The wildlife fence would be constructed to the west and parallel to I-94 but leaving room for a road. The residential road would be constructed by extending the existing road west along the Interstate until reaching the end of the fence. The road would then turn directly south until intersecting the N-S section line, then east to connect to the existing residential road. Road Construction would be 3,100 linear feet. See **Figure 3-2 Wildlife Fence and Residential Road Alternatives** for all three alternatives.

Advantages:

- Wildlife fence would be 1 foot above to 47 feet below the Part 77 Approach Surface
- Wildlife fence would be 2 to 44 feet below the Paragraph 3.6 Approach Surface
- Road would be 1 to 49 feet below the Part 77 Approach Surface
- Road would be 4 to 47 feet below the Paragraph 3.6 Approach Surface

Disadvantages:

- Road will remain inside the RPZ

Alternative 2 – Wildlife Fence minimal to west and Road minimal to west: The wildlife fence would be constructed to the west only as far as necessary to keep the fence and road clear of the Part 77 and Paragraph 3.6 Approach Surfaces. Road Construction would be 1,300 linear feet.

Advantages:

- Wildlife fence would be 1 foot above to 10 feet below the Part 77 Approach Surface
- Wildlife fence would be 2 to 10 feet below the Paragraph 3.6 Approach Surface
- Road would be 1 to 12 feet below the Part 77 Approach Surface
- Road would be 4 to 12 feet below the Paragraph 3.6 Approach Surface
- Least amount of road construction of any alternative

Disadvantages:

- Road will remain inside the RPZ

Alternative 3 – Wildlife Fence furthest west with Road on E-W Section Line: The wildlife fence would be constructed along the I-94 right of way which is the furthest to the west possible. The road would be relocated along the E-W section line right of way south of the airport. Road construction would be 5,100 linear feet.

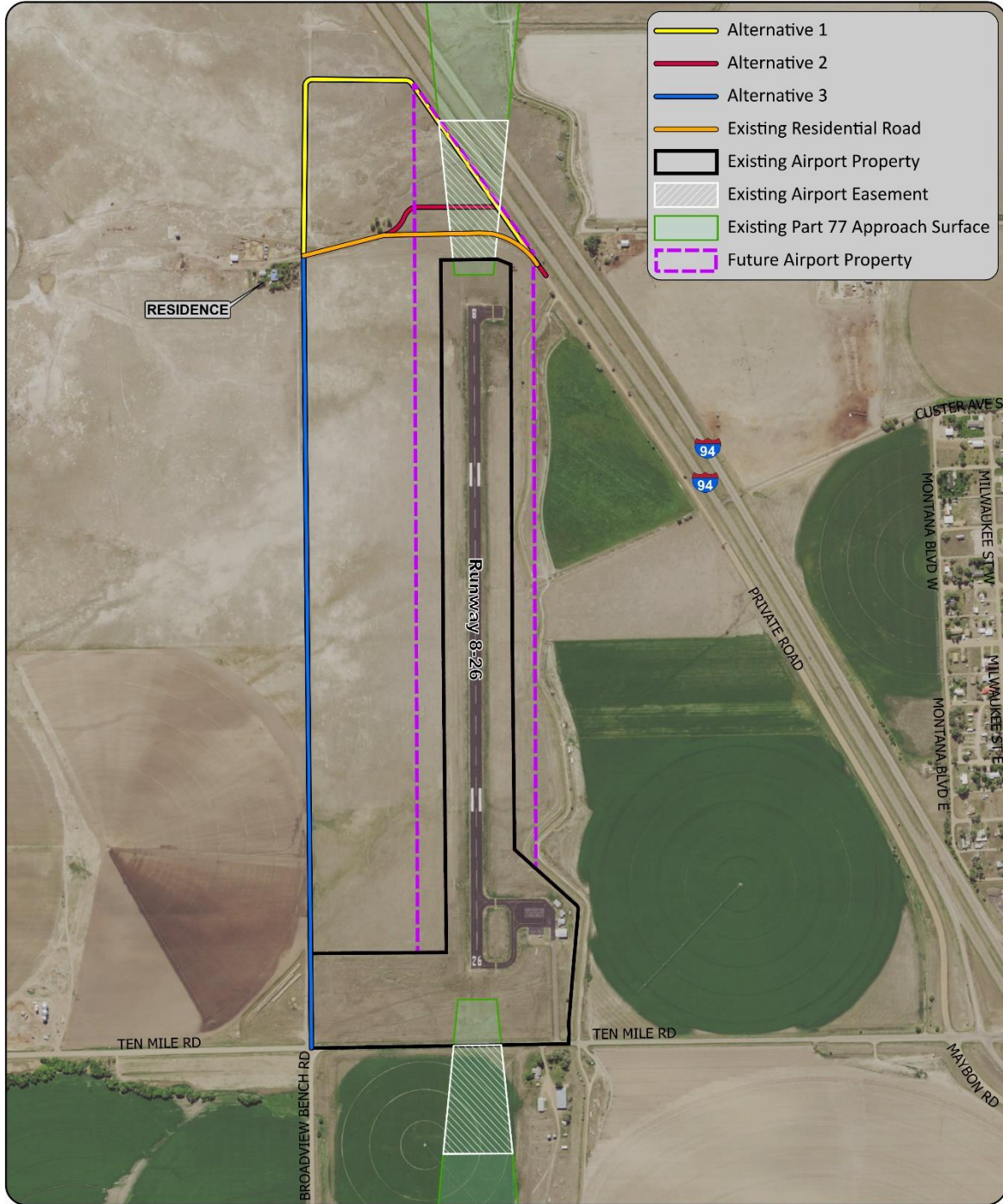
Advantages:

- Wildlife fence will be 13 to 50 feet below the Part 77 Approach Surface
- Wildlife fence will be 16 to 52 feet below the Paragraph 3.6 Approach Surface
- Road will be outside the RPZ

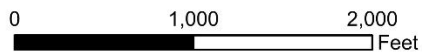
Disadvantages:

- Requires the largest amount of road construction of any alternative

Figure 3-2 – Wildlife Fence and Residential Road Alternatives



*Intended for Planning Purposes Only



Terry Airport
Road Relocation
Alternatives

Table 3-3 – Road Location Alternatives Summary

Factor	No Change	1	2	3
Proposed Action	Wildlife Fence Constructed at Existing Location	Relocate the existing road west along the I-94 right of way	Relocate the existing road west around the furthest distance needed for the Wildlife Fence	New Road along Section Line south of the Airport
Part 77 Obstruction (Existing)	Yes	Minimal 1'	Minimal 1'	No
Part 77 Obstruction (Future)	Yes	No	No	No
Road Length	none	3,100'	1,300'	5,100'
Land Acquisition*	0	12.9 acres	6.9 acres	12.9 acres

Source: KLJ Analysis; * There is an additional 18.3 acres to be acquired south of the airport and an undetermined acreage of land north of the airport which are not included with this land acquisition that is west of the airport.

Preferred Alternative - Following a review of the alternatives, completion of the wetlands inventory and cultural inventory, the preferred alternative for the road realignment was Alternative 2.

Preferred Development Strategy

The preferred development strategy identified in **Table 3-4** below outlines the overall development sequence for the preferred alternatives based on airport sponsor priorities. These elements are shown graphically in **Figure 3-3**. The implementation plan in **Chapter 4** will identify a realistic project sequencing based on available funding.

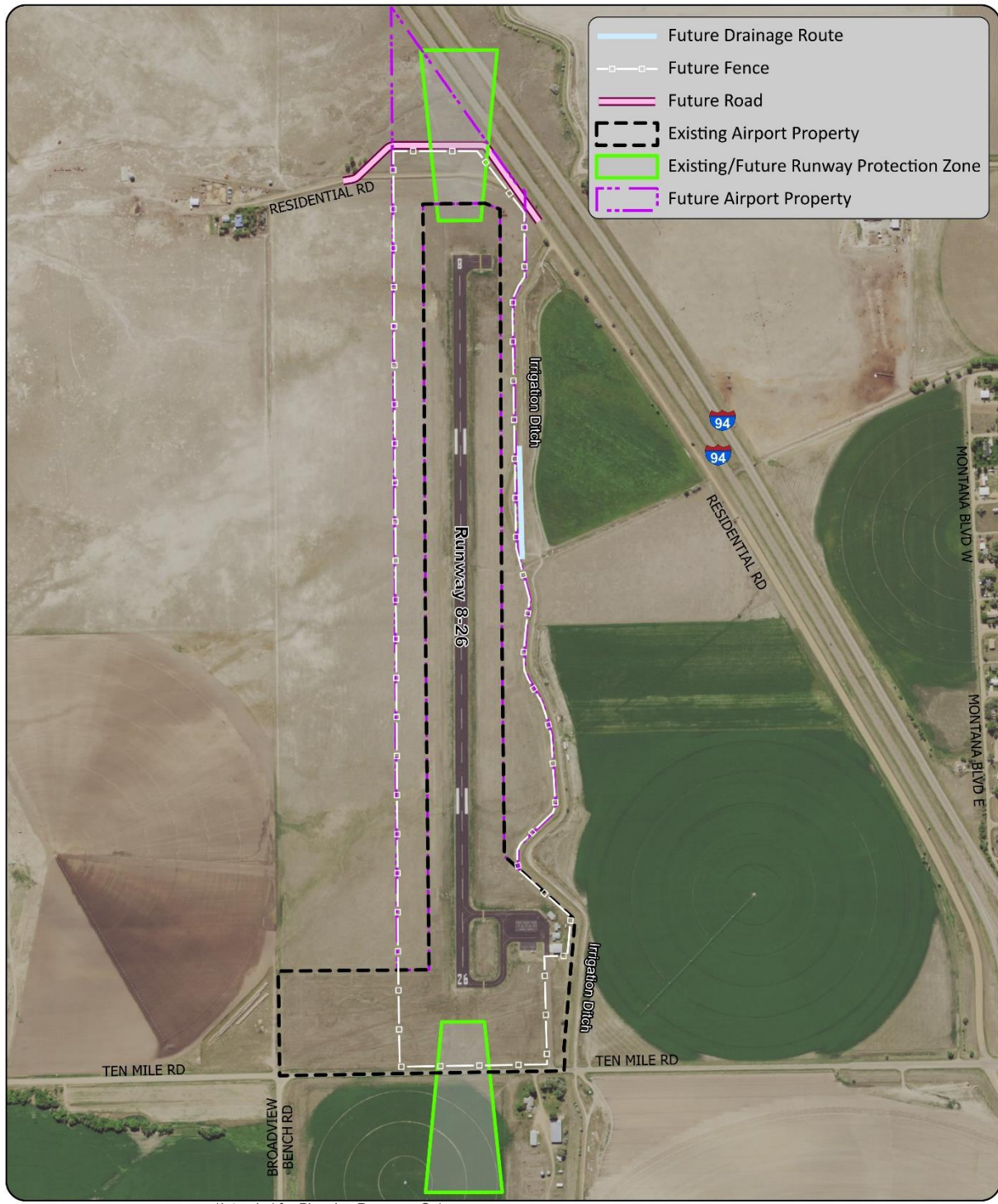
Table 3-4 – Preferred Development Strategy

	Near-Term 0-5 Years PAL 1	Mid-Term 6-10 Years PAL 2	Long-Term 11-20 Years PAL 3 & 4
Runway 8-26	<ul style="list-style-type: none"> • Pavement Maintenance • Aeronautical Survey for Approaches 	<ul style="list-style-type: none"> • Pavement Maintenance 	<ul style="list-style-type: none"> • Pavement Maintenance
Terminal & Hangar	<ul style="list-style-type: none"> • AWOS-III 	<ul style="list-style-type: none"> • Terminal • Hangars on Demand 	<ul style="list-style-type: none"> • Hangars on Demand
Support & Other	<ul style="list-style-type: none"> • Land Acquisition for Fencing and Instrument Approach • Relocate Irrigation Ditch • Relocate Residential Road • Wildlife Fence 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Replace SRE

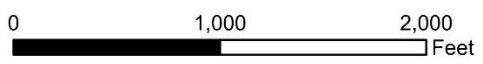
Source: KLJ Analysis

NOTE: Scope and timing of airport improvements depends on available funding and demand thresholds being met.

Figure 3-3 – Preferred Development



*Intended for Planning Purposes Only



Terry Airport Preferred Alternative

CHAPTER 4: IMPLEMENTATION

Introduction

The implementation and compatibility plan provides guidance on how to carry out the preferred development recommendations identified in **Chapter 3: Alternatives Analysis**. Based on the preferred development plan, the improvement projects needed at the Terry Airport (8U6) over the planning period can be formulated. This chapter includes the following sections:

- Project Sequence
- Financial
- Compatibility

Background

Each project is sequenced to balance demand, schedule, other projects, environmental/agency approval, funding, and financial constraints. The project plan may change over time to react to changing conditions but is flexible so that the airport can react to change and re-prioritize projects based on actual demand.

All planning-level project costs developed are in 2023 dollars. Final project costs are subject to change based on actual construction and project formulation needs.

Many of the projects identified are demand-driven based on the Planning Activity Levels (PALs) established in the approved aviation forecasts. The timing of implementation is estimated from the FAA-approved activity forecasts.

Implementing a Project

The airport must go through an established process to receive the federal funds to complete an airport development project. FAA requires long lead times to complete all project steps and incorporate projects into federal funding plans. Additional coordination is required to prepare National Environmental Policy Act (NEPA) environmental documentation. Common steps in the project implementation process for a complex project include (steps may be shorter or longer based on complexity):

Professional Services: Select a qualified consultant for the project planning, environmental reviews, survey, engineering design, and construction administration for the project. The FAA recommends a distinct selection process for both planning and engineering services.

Five (5) Years Prior to Construction: Identify the project on the Airport Layout Plan, complete necessary airport planning studies and collect supporting documentation to demonstrate the project is justified for AIP funding, and is compatible with the Airport Layout Plan.

Four (4) Years Prior to Construction: Update the Capital Improvement Plan (CIP) to identify the project scope, eligibility, justification, and funding. Close coordination with FAA is required.

Three (3) Years Prior to Construction: Initiate any aeronautical surveys, navigational aid agreements (reimbursable agreements) or special FAA coordination for flight procedures which may be necessary prior to construction. Solidify project funding plan and final justification with FAA.

Two (2) Years Prior to Construction: Complete required NEPA environmental documentation and analysis for the proposed action. Prepare 30 percent project design, refine cost estimates, and prepare benefit/cost analysis as necessary. Acquire land for project and initiate airspace studies.

One (1) Year Prior to Construction: Obtain environmental clearance and permits for the proposed action. Prepare funding pre-application, detailed project plans and specifications including design report, airspace studies, Safety Management Systems (SMS) and construction safety/phasing plan. Finalize project schedule.

Year of Construction: Complete final design. Solicit bid proposals from companies engaged in the project construction. Prepare grant application and accept Federal grant. Issue notice to proceed and monitor construction. Maintain FAA grant compliance and payments.

After Construction: Submit final report and close out the AIP grant.

For complex projects requiring federal discretionary funding such as runway extensions, these steps may take up to five years prior to the issuance of an AIP grant for construction. Less complex projects using entitlements such as pavement rehabilitation will require less lead times, typically no less than three years prior to grant issuance.

Capital Improvement Plan (CIP)

The CIP is a key element in the implementation plan. The CIP identifies the project title, year, estimated costs, and anticipated funding for airport improvements. Larger projects are often divided into smaller elements that reflect how projects are approved, designed, and constructed. Each project is requested through the CIP project programming and grant application process. The CIP is updated and submitted to the FAA annually to program Federal and State grant funding. The proposed Terry CIP identifies over \$2 million in airport improvements over the next 10 years see **Table 4-3 Capital Improvement Plan**.

Table 4-3 – Capital Improvement Plan

Year	Project	Scope	Estimated Cost	FAA Funds	State Funds	Local Funds	Other
2024	Land	Land Acquisition for RPZ and Wildlife Fence	325,000	292,500		32,500	
2024	Pavement	Pavement Maintenance	250,000	225,000		25,000	
2025	Irrigation Ditch	Relocate 660 LF of Irrigation Ditch	200,000	180,000		20,000	
2025	Access Road	Relocate 1300 LF of Residential Road	100,000	90,000		10,000	
2025	Wildlife Fence	Construct Wildlife Fence	500,000	450,000		50,000	
2026	Instrument Approach	Aeronautical Survey	157,500	157,500		17,500	
2026	AWOS III		300,000	270,000		30,000	
2026	Windcones	Segmented Circle and Windcones	55,000	49,500		5,500	
2028	Pavement	Pavement Maintenance	275,000	247,500		27,500	
TOTAL			\$ 2,180,000	\$ 1,962,000	\$ -	\$ 218,000	\$ -

Source: KLJ Analysis; values rounded to nearest 100.

Financial

The implementation plan considers the airport’s ability to fund the projects identified in this planning study. Projects in the short-term and mid-term are discussed in more detail for realistic project sequencing based on identified needs, airport priorities and available funding. Financial feasibility is a major consideration in developing the implementation plan and Capital Improvement Plan (CIP).

Airport funding for projects is derived from many sources. Funding sources can be categorized into three main categories:

- Federal funding
- State funding
- Local or Private funding

Detailed information about these funding programs can be found in **Appendix B – General Aviation Airports 101 (Airport Funding)**. A realistic project implementation plan must consider financial resources. The financing strategy for the Terry Airport provides sufficient federal, state, and local funding for future airport improvements. Projected funding sources are based on existing legislation.

Federal Funding

Federal Airport Improvement Program (AIP) funding provides financing for most of the improvements proposed at the Terry Airport. While maximizing the projected entitlement funding available to Terry (\$150,000/year), these entitlements will only finance a portion of the proposed improvements through the 20-year period. Entitlements will be used to fund AIP-eligible projects, particularly critical maintenance, safety, and capacity enhancements.

Discretionary or State Apportionment funding is anticipated to fund about 10 percent of the cost of airport improvement projects through the next 10 years. This funding will be needed to complete these projects in 2025 for the Wildlife Fence.

COVID-19 Relief

During the Coronavirus Disease 2019 Pandemic (COVID-19), the United States government signed three laws for economic assistance to eligible U.S. airports through 2020 and 2021. These funds were to be used to prevent, prepare for, and respond to COVID-19.

The first law, the Coronavirus Aid, Relief, and Economic Security (CARES) Act was signed on March 27, 2020, for \$2.3 trillion dedicated towards combatting the effects of COVID-19. Of this, \$10 billion were to keep airports in operation to serve the industry, traveling public and to support the economy, along with keeping airports credited ratings stable, and to keep airport and aviation workers employed. These funds could be used for any purpose for which airport revenues may be lawfully used.

Then on December 27, 2020, the Coronavirus Response and Relief Supplemental Appropriation Act (CRRSAA) was the second law signed including \$900 billion in supplemental appropriation for COVID-19 relief. The FAA established the Airport Coronavirus Response Grant Program (ACRGP) which included \$2 billion of the act.

Finally, the American Rescue Plan Act of 2021 was signed into law on March 11, 2021, which included \$1.9 trillion to address the ongoing health crisis and spur a strong economic recovery. The FAA established the Airport Rescue Grants which is how \$8 billion of those funds.

Terry Airport was granted \$20,000 under the CARES Act as a general aviation airport. \$9,000 was granted from the ACRGP as a non-primary allocation for a basic general aviation airport. Then, \$22,000 was granted from the Airport Rescue Grants as a non-primary allocation. In total \$51,000 has been awarded to combat the effects of COVID-19.

Bipartisan Infrastructure Law

On November 6, 2021, the Bipartisan Infrastructure Law (Infrastructure Investment and Jobs Act) was passed. This included \$ 1 trillion for improvements to highways, bridges, roads, passenger and freight rail, airports, water and wastewater treatment, internet access and modernizing the electric grid. The FAA awarded the \$25 billion received from the law to 3,075 airports and divided it into three grant groups:

-
1. \$5 billion for airport terminals to replace aging terminals, increase energy efficiency and accessibility.
 2. \$5 billion for air traffic facilities to update and upgrade equipment to improve safety, security and environmental standards and replace necessary facilities.
 3. \$15 billion for airport infrastructure for projects as defined under the existing Airport Improvement Grant and Passenger Facility Charge criteria including runways, taxiways, safety and sustainability projects, terminal, airport-transit, and roadway.

\$110,000 was allocated in 2022 and \$113,000 was allocated in 2023 from the Bipartisan Infrastructure Law to Terry Airport along for future improvements. The remaining three years of allocations are expected to be similar but will fluctuate some as the number of airports in each category change.

State Funding

State funding will primarily be used to provide a match for Federal AIP funding. This is expected to be as much as 10% in the planning period. Terry should stay apprised of the State's funding programs and funding programs and funding levels to determine the impact of that funding on the projects planned for the Terry Airport. The state of Montana offers various project funding for an airport that is publicly owned and is public-use.

- Grants: Up to 100% of the airport's share of federal NPIAS project costs.
- Loans: Up to 100% of the airport's shares of any airport project. These loans are low-interest and can be repaid in equal annual installments with a division loan over a ten-year period or paid in full at any time without incurring additional interest or penalty charges.
- Non-Federal Aid Projects: NPIAS and Non-NPIAS airports are eligible for grants or loans up to 100% of the project cost for non-FAA eligible projects.

Local Funding

A local match will be needed for the AIP funded projects. This requirement will be as much as 10% of the project cost but could vary depending on project eligibility and the structure of the State and Federal funding programs. The Terry Airport has a slate of projects planned and should assure that it has adequate funding sources for operating expenses as well as project funding. See **Appendix B – General Aviation Airports 101 (Airport Funding)** for further details on airport funding options.

Compatibility

Overview

Airports are community assets providing significant benefits. They facilitate the movement of people, goods, and services, promote tourism and trade, stimulate business development, and support a variety of jobs.

The objective of land use planning is to guide on-airport and off-airport land use development to be compatible with airport operations. The airport directly controls on-airport compatible land uses to primarily serve aeronautical activities. The airport does not directly control off-airport land uses. Surrounding land uses compatible with airports typically include those uses that can co-exist with a

nearby airport without either constraining the safe and efficient operation of the airport or exposing people working or living nearby to unacceptable levels of noise or safety hazards. Compatible land use also considers minimizing potential hazards to aircraft and the flying public. The impact of airport planning decisions extending well beyond the airport property line must be considered.

Land use planning around airports is important to airports and communities for several reasons:

- **Safety** - Compatibility is needed to maintain safety of the general and flying public. Risk should be reduced to an acceptable level. The airport must also maintain operational utility within identified safety and risk criteria.
- **Airport Utility** - Land uses around airport should provide the airport so that there are not undue restrictions placed on the airport's existing or planned future arrival and departure procedures. Opportunities for future development identified in the Airport Master Plan and shown on the Federally (FAA) approved Airport Layout Plan should be considered.
- **Human Environment** - Balancing the human environment with airport operations is important to maintain an acceptable level of airport impacts (i.e. noise and visual exposure) with the surrounding community.
- **Economic Development** – Operational restrictions placed on the airport because of land use compatibilities have the potential to have a trickle-down effect on the community. This reduces the community's ability to accommodate the aviation needs of the public and local businesses, thus limiting economic development opportunities.

Incompatible land uses are one of the largest issues facing airports today, often resulting in conflicts between airports and their communities. They also may result in airport operational and grant project funding implications in certain situations. Building consistency between the recommendations in this study with airport land use compatibility standards and area-wide planning is vital for maintaining compatible land use.

The objective of this section is to assist the Terry Airport in identifying land use standards compatible with the development plan and provide recommendations so that the airport can continue to meet safety and compatibility criteria. This chapter should become the framework to future land use planning efforts between Airport and Prairie County.

Roles and Responsibilities

AIRPORT SPONSOR

As the airport sponsor, the Prairie County Airport Authority, applies and receives federal grants. These federal grants require the city to develop and maintain the airport compatible with FAA rules and regulations through FAA Grant Assurances (obligations). There are currently 39 grant assurances which an airport sponsor assumes as a contractual obligation with the Federal Government when the sponsor accepts federal funds for airport development. FAA has published Order 5190.6B *Airport Compliance Manual* to assist FAA personnel and airport sponsors to maintain compliance with grant and land obligations. These grant assurances describe how the sponsor must operate the airport and serve the needs of the flying public. Grant assurances 20 and 21 pertain to compatible land use around airports.

20. Hazard Removal and Mitigation. It will take appropriate action to assure that such terminal airspace as is required to protect instrument and visual operations to the airport (including established minimum flight altitudes) will be adequately cleared and protected by removing, lowering, relocating, marking, or lighting or otherwise mitigating existing airport hazards and by preventing the establishment or creation of future airport hazards.

21. Compatible Land Use. It will take appropriate action, to the extent reasonable, including the adoption of zoning laws, to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with normal airport operations, including landing and takeoff of aircraft. In addition, if the project is for noise compatibility program implementation, it will not cause or permit any change in land use, within its jurisdiction, that will reduce its compatibility, with respect to the airport, of the noise compatibility program measures upon which Federal funds have been expended.

FAA grant assurances require airports take appropriate action to protect airspace and restrict land uses in the immediate vicinity to those compatible with airport operations. Compatible land use control for the Terry Airport is the responsibility of the airport sponsor.

FEDERAL AVIATION ADMINISTRATION

The FAA can provide guidance and funding to promote compatible land development around airports; however, it has no regulatory authority for controlling land uses. State and local governments are responsible for land use planning, zoning, and regulations. The FAA develops grant assurances to protect federal investments in airports but are the responsibility of the airport sponsor to maintain.

The FAA monitors all obligated airports to ensure they comply with the requirements of the grant assurances through its Compliance Program. If the sponsor fails to take the necessary corrective action, the FAA can legally impose penalties on the sponsor, including the loss of federal funding.

As defined by law, the FAA's authority to enforce most regulations and grant assurances is limited to within the airport boundaries. The FAA's only authority on compatible land use planning is through the grant assurances airport sponsors must adhere to in order to obtain federal funding for airport improvements. In most cases, the most practical and cost-effective method for a sponsor to affect compatible land use outside of the airport's property is through zoning or easements rather than through land acquisition.

STATE OF MONTANA

Montana Code Annotated Title 67, Chapter 7, allows counties and cities of the state to designate Airport Affected Areas to control height and land use around airports.

South Dakota Codified Laws allow counties and cities of the state to enter into joint planning and zoning agreements. Municipalities may also exercise zoning powers within three miles of their corporate limits subject to county approval. There are no minimum land use development and airspace standards around airports. Additional State regulations and laws in place under Chapter 50-9 concern structures affecting aviation in South Dakota. Under Chapter 50-9-1, South Dakota Aeronautics Commission approval is required for any new or altered structure greater than 200 feet above the terrain, and for any new or altered structure within a 100:1 slope from the runway at a public airport with a runway length of 3,200 feet or greater.

SURROUNDING JURISDICTIONS

Local jurisdictions are responsible for developing and enforcing land use planning, zoning, and regulations. Development proposals are reviewed and approved at this local level through an established process. The local authority enforces multi-jurisdictional airport zoning regulations for proposed development. For the Terry Airport, surrounding jurisdictions affected by the airport includes the Town of Terry and Prairie County.

Land Use Compatibility Elements

Four key elements should be considered to achieve land use compatibility at any airport.

- Airspace
- Safety
- Compliance

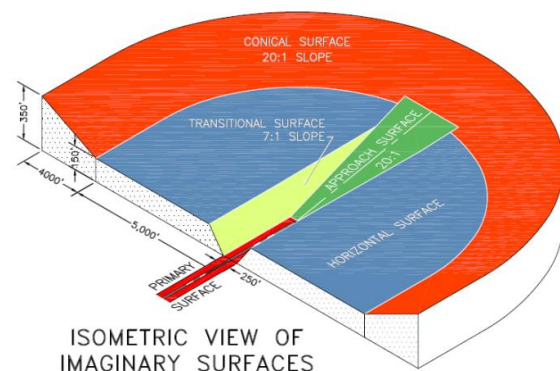
A general description of each element is provided based on criteria developed by the FAA and the State of Montana, if applicable.

AIRSPACE

Guidelines & Evaluation

Airspace compatibility includes avoiding vertical development that reduces the level of safety, increases risks of aircraft accidents, or measurably reduces the operational utility of airports. 14 CFR Part 77, *Objects Affecting Navigable Airspace* defines obstructions to air navigation. Other airspace requirements are defined in FAA Advisory Circulars and Orders. All Part 77 obstructions are a hazard to air navigation unless an aeronautical study concludes otherwise.

It is important to acknowledge that the FAA's role is limited to evaluating the aeronautical effects of proposed structures; the FAA has no legal authority to stop the construction of any proposed structure.



However, FAA grant assurance obligations require sponsors to take reasonable action to prevent and remove hazards to air navigation. Montana state law requiring airport zoning and other regulations be consistent with the Airport Layout Plan.

Recommendations

It is recommended that the airport consider provisions in building codes to require FAA Form 7460-1 *Notice of Proposed Construction or Alterations* to be submitted and reviewed by the Airport as part of the local building permit approval process.



SAFETY

FAA design standards and regulations prescribe several zones and imaginary surfaces intended to protect aircraft and their occupants while landing or taking off. However, the safety element primarily associated with compatible land use is focused on minimizing risks to persons and property on the ground.

FAA Runway Protection Zones

To reduce the public safety risk associated with aircraft operations, communities typically use FAA airport design standards and safety compatibility guidelines developed by state aeronautical agencies to formulate safety policies. The safety element primarily associated with compatible land use is focused on minimizing risks to the flying public, as well as persons and property on the ground. FAA has defined minimum land use standards in the form of a Runway Protection Zone (RPZ) in FAA AC 150/5300-13A *Airport Design*. See **Chapter 4: Facility Requirements** for definitions. Existing RPZs are either owned in fee or by aviation easement. There are no incompatible land uses inside the existing RPZs at Ekalaka. For future RPZs it is recommended that the City acquire necessary property interest to insure no incompatible land uses.



Wildlife Hazards

FAA is also focused on minimizing safety risks associated with wildlife near an airport. Hazardous wildlife use natural or artificial habitats on or near an airport for food, water, or cover. Wildlife near airport operations may result in an aircraft-wildlife strike. The FAA recommends that airport sponsors implement the standards and practices contained in FAA AC 150/5200-33, *Hazardous Wildlife Attractants On or Near Airports* to mitigate wildlife risks. The airport has an existing deer-proof perimeter fence and it is recommended to maintain that fence and extend it to encompass any new airfield improvements.



Recommendations

It is recommended that the airport install the wildlife fence as recommended in the Wildlife Hazard Management Plan.

COMPLIANCE

As noted before, airports that do not abide by grant assurances are subject to withholding of FAA grant funding. Common airport compliance issues include non-aeronautical use of airport property, land releases, and through-the-fence operations.

Non-Aeronautical Use of Airport Property

Airport property is to be used for aeronautical purposes. For an airport to develop land for non-aeronautical use, the FAA must first approve of the change in airport property use from aeronautical to non-aeronautical. All airport property is identified in the Exhibit "A"/Airport Property Map.

Land Releases

When requested, the FAA will consider a release, modification, reform, or amendment of any airport agreement to the extent that such action has the potential to protect, advance, or benefit the public interest in civil aviation. Such action may involve only relief from specific limitations or covenants of an agreement, or it may involve a complete and total release that authorizes subsequent disposal of federally obligated airport property. Common types of release requests include concurrent use, request for change in use or the sale/disposal of airport property. No land has been released from federal obligations or sold at 8U6.

Through-the-fence Operations

Agreements that permit access to the airfield by aircraft based on land adjacent to, but not a part of, the airport property are commonly referred to as a "through-the-fence" operation (even though a perimeter fence may not be visible). "Through-the-fence" arrangements can encumber the airport property and reduce an airport's ability to meet its federal obligations. There are no documented through-the-fence operations at 8U6.

Action Plan & Recommendations

It is recommended that the airport continue to control development and leasing that occurs on airport and consult with FAA as needed to verify compliance with FAA rules and regulations.