



Mohave County Airport Authority
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Comment Compilation and Response

Mohave County Airport Authority

Laughlin Bullhead International Airport

April 18, 2022

This report conveys public/stakeholder comments and the related Authority responses regarding draft Rules and Regulations for the Laughlin Bullhead International Airport (Airport). The Mohave County Airport Authority (Authority) believes that the development and implementation of revised Rules and Regulations are:

- 1) consistent with best management (and customer service) practices, and
- 2) necessary to ensure the successful planning, development, operation, and management of general aviation activities at the Airport.

By way of background, when an airport sponsor (in this case, Mohave County Airport Authority) obtains a grant for airport improvements under the Airport Improvement Program, the airport sponsor is required to give certain assurances to the Federal Aviation Administration (FAA) known as the Airport Sponsor Assurances. Airport Sponsor Assurance #22, *Economic Nondiscrimination*, states “The sponsor may establish such reasonable, and not unjustly discriminatory, conditions to be met by all users of the airport as may be necessary for the safe and efficient operation of the airport.”

Order 5190.6B Airport Compliance Manual further states that “Grant Assurance [Airport Sponsor Assurance] 19, *Operations and Maintenance*, requires the sponsor to protect the public using the airport by adopting and enforcing rules, regulations, and ordinances as necessary to ensure safe and efficient flight operations.”

Within this context, it is the desire of the Authority to:

- 1) ensure the safe, orderly, and efficient operation and use of the Airport, and
- 2) protect the public health, safety, interest, and general welfare of the operators, tenants, and users of the Airport.

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

The purpose of rules and regulations is to protect the public health, safety, interest, and welfare on the Airport and to restrict any activity or action that would interfere with the safe, orderly, and efficient operation and use of an airport. Additionally, policymakers, management, and staff utilize rules and regulations to educate and inform Airport users about the requirements for using the Airport and/or engaging in activities at the Airport.

As such, the Authority and Aviation Management Consulting Group (AMCG) have prepared draft Rules and Regulations that are: (1) relevant to the current (and/or anticipated) aviation activities at the Airport, (2) reasonable and appropriate for the Airport and the market, and (3) protects the public health, safety, interest, and general welfare of all users of the Airport.

The draft Rules and regulations were made available made available for public/stakeholder review and comment for a thirty-one day period that began on March 1, 2022 and ended on April 1, 2022.



COMMENT COMPILATION AND RESPONSE

Attached is a compilation of the stakeholder comments submitted. All comments have been reviewed and addressed in this 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 and responses.

Also, if a respondent has requested to delete language from the draft documents, that language has been identified using ~~striketrough~~ and when a respondent has requested to add language, or alternative language is proposed by Authority, that language has been identified using **red** highlight. Any language identified in *italics* is taken verbatim from the draft documents.

The Authority wishes to thank all stakeholders who took the time to review the draft document and especially the individuals who provided comments for consideration.

03/01/2022	Jordan Floyd
C1	Section# 3.15, Page# 14 With regards to section 3.15 of the R&R I am curious if you would consider granting us approval to fuel with rotors turning. Our GOM has a well-defined section to ensure that our operations are safe, and risk is mitigated to an acceptable level prior to commencing fueling operation with the rotors turning. While this is not the standard, we find it useful at times. When a patient is onboard this will expedite the fueling process and will allow us to continue flow of oxygen to the patient without depending on the battery. Additionally, when returning from a flight refueling with the rotors turning can allow us to return to base and be prepare for the next request in a more rapid timeline.
R1	This Section permits the Airport Director to approve the refueling of rotorcraft while rotors are turning once the operator has proven to the Airport Director that such practices are done safely and conform with industry best practices to ensure the safety of the rotorcraft, its passenger, crew, and personnel involved in the refueling operation.
03/14/2022	Mike Salas, Terry Young, Rich Estep, Larry Murphy
C2	Section# 3.10, Page 12 This rule states that engine run-ups are prohibited in non-movement areas. However, runway 34 does not have a designated run-area, so you would need to do a run-up on the taxiway and that could result in costly delays to commercial operators if there are stuck behind aircraft doing run-ups on the taxiway. The alternative is to be able to run-up in safe area prior to entering the taxiway.
R2	Section# 3.10 has been modified as follows: Engine Runups are prohibited on the Air Carrier Ramp(s) or in Non-Movement Areas within 150' of any hangar or aircraft tiedown or where such activity may injure persons or damage property. Aircraft maintenance runups shall only occur in areas designated by the Airport Director or on the Air Carrier Ramp(s).
03/15/2022	Terry Young
C3	Section# 3.10, Page 12 Jeremy this is in conjunction with Mike Salas comment when we do maintenance on our aircraft we normally have to run the aircraft with the engine cowl off or open in order to check for leaks or any issues prior to taking the airplane out for a flight after any engine maintenance it is necessary to do a run up to inspect for any issues that might cause the airplane to be un-airworthy it's not feasible to do these types of run ups on the taxiway or at the end of the taxi way if there was a run up area at the end of the taxiway We need to be able to perform Run ups on the ramp to confirm the aircraft is ready to return to service after maintenance and or even for pre flight
R3	See R2
04/12/2022	Ray Winslow
C4	Section 1.7, Page #2 Last sentence: "not withstanding.....shall remain enforceable." This impossible for any user to keep track of all previous rules. Therefore, should be removed. I believe this to only be a catch-all for anything missed in the rewrite.
R4	The current Rules and Regulations and Minimum Standards adopted in May 2008 (referred to as "Prior Rules and Regulations" in this Section), contain provisions that will remain in effect following the adoption of these updated Rules and Regulation. These provisions include Airport Development Standards, Specific Requirements / Fixed Base Operators, Ground Support Activities, Tenant Application, etc. For clarification purposes, the last sentence of Section 1.7 has been modified as follows: The last sentence has been deleted in its entirety: "The rest of this Section 1.7 notwithstanding, any other portion of the Prior Rules and Regulations purporting to govern the minimum standards for the conduct of Commercial Aeronautical Activities at the Airport shall remain enforceable." And replaced with the following sentence: All other provisions of the Prior Rules and Regulations remain in full force and effect.