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To: Delta County Finance Committee  
From: Robert C. Ranstadler, Airport Manager, Delta County

Date: May 17, 2024

**Re: Complete Airport Security Plan Proposal**

Encl: Mead & Hunt Complete Airport Security Plan Proposal

Dear Members of the Committee:

I am writing on behalf of the Delta County Airport Advisory Board to ask that you please consider and forward for approval, to the Delta County Board of Commissioners, the enclosed proposal. The Delta County Airport (herein referred to as “ESC”) anticipates its current commercial airline operator, SkyWest Airlines, to permanently up-gauge aircraft to capacity larger than 61 seats, which will require the development of a complete Airport Security Plan (ASP). Although a temporary agreement is in place, which permits ESC to service aircraft of a greater seating capacity, it is set to expire on January 1, 2025. This will leave ESC in a disadvantaged position compared to that of its peers

Federal regulations require that airports servicing scheduled air carrier operations adhere to specific security requirements as outlined in 49 CFR Part 1542 and 49 CFR Part 1544. All airports governed under these regulations must have a designated Airport Security Coordinator (ASC) who is responsible for implementing and updating the airport’s ASP. The ASC at our airport is the Airport Manager. Two alternates, Assistant Airport Manager Robyn Morrison and Delta County Emergency Management Coordinator Paul Geyer, assist the ASC with his duties.

Airports across the country employ several different types, or “levels,” of security programs. Specific requirements are dictated by the type and origin (foreign or domestic) of the aircraft serviced by the airport, including the passenger capacity of the serviced aircraft. The program presently in use at ESC is considered a “partial” (Category IV) ASP, which permits the airport to service scheduled passenger or public charter passenger operations with an aircraft having passenger seating configurations of 31 or more, but no more than 60 seats.

The partial ASP proved sufficient at our airport until last year when SkyWest Airlines began transitioning from using aircraft that only seated up to 50 passengers (the CRJ 200) to more efficient aircraft that seat a greater number of passengers. These include the CRJ 700 and CRJ 900, which seat 66-78 passengers and 76-90 passengers, respectively. Since these aircraft are not permitted to operate at ESC under the current program, airport staff and the TSA worked quickly to implement a temporary Alternative Method of Compliance (AMOC) at ESC.

The AMOC is a temporary agreement that permits a portion of the airport to operate at a higher security threshold than what it what presently permitted by the ASP. Thus, ESC is temporarily permitted to service jets with passenger capacities exceeding 60 seats. The AMOC, however, is a temporary, one-time agreement that cannot be renewed or extended beyond its expiration date of January 1, 2025. Once the AMOC expires, ESC will once again be restricted to servicing jets with a passenger capacity of no more than 60 seats. This will preclude the servicing of SkyWest’s main fleet of CRJ 700s and CRJ 900s. In the

interim, SkyWest has promised to bring a jet into service, the CRJ 550, which is limited to 50 seats. Numerous logistical complications, however, have delayed these plans.

The above dilemma is not something unique to ESC; other airports of comparable size in the Great Lakes Region are facing similar challenges. Most commercial air carriers are in the process of replacing their large, wide-bodied aircraft with smaller, narrow-bodied planes. The most economical solution for the nation's major airlines is thus to use high-capacity narrow jets, such as the CRJ 700 and CRJ 900, which can fill multiple roles.

Industry experts speculate that many more of these narrow-body, high-passenger-capacity-type jets will enter service over the coming years. It is therefore imperative that ESC make investments and take the steps necessary to accommodate for their service in the future. SkyWest will likely discontinue using smaller capacity jets sometime in the future and the TSA will not grant an extension to the airport's AMOC. Thus, the only viable solution is to upgrade the partial program currently in place at ESC to a full (Category III) ASP.

Airport staff have been collaborating closely with our Consultant to proactively meet federal regulatory requirements and the above goals. As detailed in the enclosed letter, the Mead & Hunt team is proposing to help ESC develop and implement a Complete ASP for scheduled passenger or public charter passenger operation with aircraft having a passenger seating configuration of 61 or more seats.

A major benefit of servicing larger capacity aircraft would be increased fuel sales, which presently constitute the majority of revenue generated by ESC. Ultimately, upgrading to a full ASP would provide the airport greater flexibility in servicing a wider variety of aircraft and air carriers, which would provide Delta County more latitude in negotiating future Essential Air Service (EAS) contracts.

Unlike many of the mandated projects that routinely take place at airport, upgrading to a full ASP is not a federal requirement and thus is ineligible for federal grants or future reimbursement. In addition to the \$37,616 price tag for the services and support provided as part of the attached proposal, Airport Management anticipates needing to spend an additional \$65K-\$75K in material costs over the next 10-14 months. This money would be spent procuring and installing equipment necessary to comply with the procedures outlined in the full ASP, including electronic access controls (door locks), increased closed-circuit television camera coverage, badging equipment, and subscription fees for criminal background check and investigation services.

Although all of the above improvements come at a significant price, the cost of these upgrades should not be viewed as simple expenditures but rather as valuable investments. In addition to the direct services provided at ESC, our airport bears the potential of improving and stimulating economic conditions across all of Delta County. In order for such a sea change to take place, ESC must grow beyond its present limitations, which are directly tied to the number, size, and type of aircraft the airport can service. Upgrading the airport's ASP is the first step in providing a brighter future for the people of Delta County.

Respectfully submitted,



Robert C. Ranstadler  
Airport Manager  
Delta County Airport