



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Office of Airport Planning  
and Programming

800 Independence Ave., SW.  
Washington, DC 20591

May 24, 2022

Ms. Rebecca Hupp  
Airport Director  
Boise Air Terminal/Gowen Field  
3201 Airport Way, Suite 1000  
Boise, ID 83705

**Subject: Boise Air Terminal/Gowen Field  
FAA Review of FY 2022 Competition Plan**

Dear Ms. Hupp:

Thank you for submitting the first Competition Plan for Boise Air Terminal/Gowen Field (BOI). This Competition Plan was required because BOI is now a Covered Airport.<sup>1</sup>

The Federal Aviation Administration (FAA) has reviewed the FY 2022 BOI Competition Plan and generally finds it to be in accordance with the applicable statutory requirements. Our review of the Competition Plan found the following pro-competitive policies and practices at the airport:

- Accommodating two new entrant air carriers in 2021, both low-cost carriers;
- Facilitating new nonstop air service from BOI to two additional destinations;
- Transitioning from managing gates manually to deploying a gate management software platform for the airport's common-use gates; and
- Planning a new phased terminal development project beginning in 2023 that will add 5 new gates at BOI by 2025 and 5 more gates upon completion for a total of 10 new gates.<sup>2</sup>

We commend BOI for its pro-competitive efforts, but we still have some concerns about the current Airline Use and Lease Agreement (as amended) ("Agreement") at the airport. In your Competition Plan, you state the current Agreement contains provisions that could potentially restrict airline competition such as majority-in-interest (MII) language. You indicate, however, that the Agreement expires on September 30, 2022, and the City of Boise

---

<sup>1</sup> As defined in FAA Order 5100.38D, Change 1 ("Airport Improvement Program Handbook," Appendix W), Covered Airports are those where one or two air carriers control more than 50 percent of the passenger boardings. Based on calendar year 2020 data, two air carriers accounted for more than 50 percent of enplanements at BOI.

<sup>2</sup> The Competition Plan did not include an estimated completion date for the phased terminal development project and the total of 10 new gates.

(“the City”) is currently negotiating a new agreement with the airlines. You anticipate a new agreement effective on October 1, 2022, and state the City will “strive to ensure that the new agreement will incorporate industry ‘best practices’ and maximize flexibility in terms of airline competition and ease of adding air service.” To that end, you advise the FAA that some provisions of the current Agreement may be materially different from any successor Agreement.

In addition, the Competition Plan contains excerpts of provisions within the Agreement. We direct BOI to submit a complete copy of its current Agreement within 30 days of receipt of this letter.

In consideration of the pro-competitive policies and practices described in the Competition Plan, and in view of the circumstances described above, the FAA approves BOI’s FY 2022 Competition Plan. We suggest, however, that the City consider the recommendations below during its ongoing negotiations for a new agreement.

First, we recommend that you designate a Competitive Access Liaison. We understand that new entrants and existing air carriers may contact your Airport Business Development Office for assistance in gaining access to facilities, but with a designated Competitive Access Liaison, new entrants and existing air carriers clearly understand whom to contact when seeking competitive access at BOI.

Second, while we applaud BOI for deploying its gate management software, we also recommend that you develop a formal policy for announcing gate and remain-over-night (RON) availability. We also suggest that you consider posting current gate availability in a readily accessible place and format on BOI’s website, on a regular basis, for the benefit of new entrants that may not have access to BOI’s gate management software outputs, as well as existing tenants wishing to expand service.

Third, we recommend that you establish formal dispute resolution procedures. We understand that you currently have gates available for potential new entrants and/or existing air carriers wishing to expand service, and you have not had any recent disputes. Our experience, though, shows that proactive establishment of dispute resolution procedures provides a defined means for air carriers to seek redress. We recommend implementing such procedures, rather than waiting until a dispute arises.

Fourth, as mentioned above, BOI’s Agreement contains potentially restrictive MII language. We remind you to ensure that BOI’s ability to impose a Passenger Facility Charge (PFC) or use PFC revenue is not impaired by MII language or the MII deferral process described in the Competition Plan. See 49 U.S.C. 40117(f)(1) & (3) and 14 CFR § 158.7(b).

Finally, we note that Covered Airports are required to make their Competition Plans available to the public.<sup>3</sup> We recommend that you place a copy of BOI’s Competition Plan and this letter on the airport’s Internet website.

---

<sup>3</sup> 49 U.S.C. 47107(a)(15).

As you are aware, after approval of an initial Competition Plan, two Plan Updates for BOI must be submitted if it remains a Covered Airport. Generally, the first Plan Update is due 18 months from the date of the initial approval letter, but a Plan Update may be due sooner if one of two conditions are met. The conditions, which are identified in the Airport Improvement Program Handbook, Order 5100.38D, Change 1, Appendix W, require the filing of a Plan Update under the following circumstances:

- An airport files a competitive access report as required by 49 U.S.C. 47107(r) stating it had denied access to an air carrier for gates or facilities within the last six months. Section 47107(r) requires any medium hub or large airport that has denied a carrier's request or requests for access to file a report with the FAA describing the carrier's requests, providing an explanation as to why the requests could not be accommodated, and providing a time frame within which, if any, the airport will be able to accommodate the requests.
- An airport executes a new lease and use agreement, or significantly amends a lease and use agreement, including an amendment due to use of Passenger Facility Charge financing for gates, in which case, a plan update is due within 60 days of execution.

Since you expect the City to execute a new agreement before the next Plan Update would be due in 18 months, such action would meet one of the above conditions. In this instance, a Plan Update for BOI would be due within 60 days of execution, provided BOI continues to remain a Covered Airport.

As a reminder, the FAA's ability to issue Airport Improvement Program grants or approve Passenger Facility Charge applications is impacted by the Competition Plan and Plan Update submission and approval requirements.<sup>4</sup> We suggest forwarding the City's draft agreement to FAA for review and comment prior to execution to minimize this impact.

Please also note that, under Section 134 of the FAA Modernization and Reform Act of 2012, Pub. L. No. 112-95 (Feb.14, 2012), Congress eliminated the need for airports to include data on airfare levels and patterns of air service in Competition Plans. Thus, we will no longer require this information in any further updates to the BOI Competition Plan.

Please be aware this letter does not constitute the FAA's approval of BOI's Agreement or any specific provisions thereof, which remain subject to all applicable Federal law and regulations.

As you may know, the Secretary of Transportation is required by law<sup>5</sup> to review implementation of Competition Plans from time to time, to verify each Covered Airport implements its Plan successfully. In connection with our review, we may determine that it would be useful to visit your airport or hold a teleconference with airport officials. We will contact you if we decide to visit BOI in connection with its Competition Plan.

---

<sup>4</sup> 49 U.S.C. 40117(k) and 47106(f); *see also* FAA Order 5100.38D, Change 1 ("Airport Improvement Program Handbook," Appendix W).

<sup>5</sup> 49 U.S.C. 40117(k).

If you have any questions regarding this letter or the FAA's review of your Competition Plan, please contact Julieann Dwyer, Manager, Airport Financial Policy and Special Programs Branch at (202) 267-8375 or [julieann.dwyer@faa.gov](mailto:julieann.dwyer@faa.gov).

Sincerely,

Robert J. Craven  
Director, Office of Airports Planning  
and Programming

cc: Heather Fernuik, Director, FAA Airports Division, Northwest Mountain Region  
Chris Schaffer, Manager, FAA Airports Planning and Programming Branch,  
Northwest Mountain Region  
William Garrison, Manager, FAA Helena Airports District Office

# AIRPORT COMPETITION PLAN

## BOISE AIRPORT



Prepared for: **Federal Aviation Administration**

**February 10, 2022**



## CONTENTS

	<u>Page</u>
Overview.....	2
I.    Availability of Gates and Related Facilities .....	6
II.   Arrangements for Leasing and Subleasing.....	12
III.  Patterns of Air Service.....	14
IV.  Gate Assignment Policy.....	16
V.   Gate Use Requirements.....	18
VI.  Financial Constraints.....	22
VII. Airport Controls Over Airside and Groundside Capacity.....	25
VIII. Airport Intentions to Build or Acquire Gates to be Used as Common Facilities.....	27
IX.  Airfare Levels as Compared to Other Large Airports.....	30
Appendices	
A.   Sample Output from "GoApron" Software.....	35
B.   Airline Agreement Section on Non-Exclusive Gate Assignments.....	39

## OVERVIEW

### Boise Airport Summary

Located in the southwest portion of the State of Idaho, the City of Boise City (the "City") is located in Ada County and is Idaho's capital and largest metropolitan area. The City is governed by a mayor and six City Council members.

Since 1939, Boise Airport (the "Airport") has been owned and operated by the City. The Airport is operated as an economically self-sustaining enterprise fund of the City. The Airport Director manages the day-to-day operations of the Airport and is advised by an eight-member Airport Commission. With consent of the City Council, the Mayor appoints up to eight members of the Commission to serve in an advisory function.

The Airport is located about five road miles south of downtown Boise, and is the principal air carrier airport serving southwestern Idaho. The Airport occupies about 5,000 acres and has two east-west parallel runways. Runway 10R-28L is 9,763 feet long and Runway 10L-28R is 10,000 feet long. Both runways are 150 feet wide and, together with all associated approach surfaces and runway protection zones, meet all FAA standards. A lighted taxiway system connects the runway to the passenger terminal building.

The terminal was expanded in 2003 to provide a new elevated roadway system, ticket lobby, baggage claim, concessions, conference center, security checkpoint, and gates for use by smaller aircraft on Concourse C. Concourse B provides 11 gates with passenger boarding bridges. Two of the Concourse B gates are two-position gates. The terminal and concourses encompass 415,054 square feet of space and provide a total of 21 gates, with an additional six remote parking positions.

Vehicle parking for the passenger terminal complex includes public, employee and rental car space. A total of 3,551 public parking spaces are provided at the Airport. A short-term parking facility provides 274 spaces. The four level parking garage includes 2,097 spaces for long term parking. A surface parking lot provides an additional 190 long-term spaces. A surface economy parking lot, which is located approximately 1.5 miles from the Airport terminal, has 990 spaces. The rental car ready return lot is a canopy-covered surface parking lot with 363 canopy covered spaces and an overflow lot of 95 uncovered spaces. There is also employee parking consisting of 609 spaces.

Air cargo, general aviation, and support facilities are provided at the Airport. The Idaho National Guard has significant operations at the Airport, and the Air Force and Army Corp of Engineers lease approximately 550 acres of the Airport.

During the Airport's fiscal year (FY) 2019 – the year ending September 30, 2019, and the last full FY prior to the onset of the Covid-19 pandemic – 2,025,960 passengers were enplaned at the Airport. During FY 2020, enplaned passengers totaled 1,253,602, a reduction of 31.0%, which is attributable to the impact of Covid-19. Aviation activity at the Airport rebounded strongly during FY 2021, with enplanements totaling 1,568,474, which was 22.6% lower than FY



2019. The rebound has continued in the early months of FY 2022. During the first three months of FY 2022 (October through December 2021), passenger traffic exceeded the same period in FY 2019 by 1.5%.

### **Requirement for an Airport Competition Plan**

49 USC § 47106(f) requires commercial service airports that meet certain criteria to submit a competition plan to the U.S. Secretary of Transportation in order to obtain FAA approval of a Passenger Facility Charge (PFC) application or an Airport Improvement Program (AIP) grant. The purpose of the competition plan is to highlight actions of the Airport to reduce barriers to entry and enhance competitive access to the Airport for the airline industry.

Airports covered under 49 USC § 47106(f) include commercial service airports that:

- Account for more than 0.25% of the total number of passenger boardings each year at such airports (i.e., medium- and large-hub airports); and
- Are served by one or two airlines that control more than 50% of passenger boardings.

For calendar year 2020, Boise Airport was classified as a medium-hub airport accounting for between 0.25% to 1.0% of total annual U.S. commercial enplanements, a change from its 2019 ranking as a small-hub airport. Additionally, Alaska and Southwest airlines together accounted for 51.2% of the Airport's enplaned passengers during the Airport's Fiscal Year 2020, ending on September 30, 2020. Therefore, Boise is now considered a covered airport pursuant to 49 USC § 47106(f)(4).

Accordingly, this is the first competition plan prepared for and by Boise Airport ("Competition Plan").

When this Competition Plan is approved by the FAA, the Plan and the FAA's approval letter will be available on the Airport's website at [www.iflyboise.com](http://www.iflyboise.com).

### **Summary of the Key Initiatives to Foster Airline Competition at the Airport**

The City recognizes that providing the necessary facilities, equipment, and operational arrangements at the Airport is vital to foster airline competition and enhance air service at the Airport. This will increase the connectivity of Boise to the rest of the country and lead to significant economic benefits for the Boise area.

The City has taken, and is in the process of taking, several key actions at the Airport which already have, or will, enhance the competitive landscape for airline service at the Airport, and ease the ability of both new entrant airlines and current airline tenants/partners to grow service. These are summarized as follows, and described in more detail later in this document:

***New Airline Agreement.*** The current Airline Use and Lease Agreement (as amended) expires on September 30, 2022 (the "Airline Agreement"). The City has initiated negotiations with its airline partners for a new successor agreement and will be continuing these negotiations during



the course of the next year, with the goal of a new successor agreement that will come into effect on October 1, 2022.

Certain key provisions of the current Airline Agreement are potentially restrictive from an airline competition viewpoint, such as:

- The Majority-In-Interest (MII) provision related to implementing capital improvements, which can potentially impede the Airport's ability to speedily implement capital projects that are needed to enhance airline competition.
- The current Airline Agreement does not provide the City with the right to recapture underutilized gates from signatory carriers. The new Airline Agreement is expected to remedy that via setting certain minimum gate utilization thresholds which will give the City the right (but not the obligation) to recapture such gates for common use or assignment to a new entrant carrier.
- The current Airline Agreement provides the Airport with certain rights to assign flights to preferential gates, however, those provisions will be updated to provide greater Airport control and lower barriers, by, for example, eliminating the right of the existing carrier to charge the new carrier for use of the gate and replacing it with the Airport simply charging the then-applicable per turn fee. The City recognizes that the existing right for an airline to charge a new entrant carrier for use of their gate is a potential barrier to competition and it will be removed in the upcoming new Airline Agreement.

The City's intent is to negotiate a successor agreement that does not contain such provisions that could potentially limit competition.

As a part of the Airline Agreement negotiation process, the City will be evaluating what the ideal number of minimum City gates (i.e., common use gates) is to foster competition and expansion of service.

The City intends to set rates and charges under the new Airline Agreement in such a way that is reasonable and not unjustly discriminatory to all existing carriers, as well as carriers that may seek to provide air services at the Airport.

***Gate Monitoring and Management Software.*** In April 2021, the Airport installed and is currently using the "GoApron" software platform for gate use monitoring and management, which makes the process of Airport staff oversight of gate usage much more streamlined and efficient. The purchase of this software is one of the projects approved for PFCs as part of the Airport's most recent PFC approval from the FAA.

**Construction of New Gates.** The City has evaluated the future needs of the Airport and the region and it appears that the Airport will soon become gate and/or space constrained (i.e., demand may exceed supply). To that end, the City is planning a concourse development project in order to ensure that an adequate supply of gates and support space are available for existing and new entrant carriers.

Construction of the first phase of a new Concourse A should be completed by 2025, which will expand the number of gates at the Airport from 21 to 26 (with an additional six remote parking positions). This project is expected to be undertaken during 2023 and 2024, with the first phase of Concourse A open for service by 2025.

## I. AVAILABILITY OF GATES AND RELATED FACILITIES

This section summarizes the current availability of aircraft gates at Boise Airport.

### 1. Number of gates available at the airport by lease arrangement

There are a total of 29 gates at the Airport, including 23 gates adjacent to the terminal concourses and six remote gates, as follows:

	Total gates	Passenger Boarding Bridge equipped
Concourse B	11	11
Concourse C	12	2
	23	13
Remote	6	--
	29	13

Of the 23 gates adjacent to the concourses, 14 are capable of accommodating narrowbody jets, and one of those can also accommodate widebody jets such as the Boeing 767 aircraft.

All leased holdrooms and gates at the Airport are considered non-exclusive. Some are preferentially leased but not exclusive. The Airport also currently has some common use gates (not currently preferentially leased). Those are entirely under the control of the City with regard to scheduling.

Of the 23 gates adjacent to the concourses, 14 are leased on a preferential-use basis in accordance with the Airline Agreement currently in effect at the Airport, while nine gates are common-use gates. All six of the remote apron parking positions are common-use positions.

All 11 gates in Concourse B are equipped with passenger boarding bridges ("PBBs"). Two gates in Concourse C (Gates C11 and C8) were recently equipped with PBBs to accommodate additional large aircraft by Alaska and to provide flexibility for other carriers.

Table 1 summarizes the gate status at the Airport, including the airlines currently using each gate and the type of aircraft each gate is capable of accommodating.

The location of the gates is shown graphically in Figure 1.

Of the carriers that have served the Airport for more than three years, none relies exclusively on common use gates.

**Table 1**  
**SUMMARY OF AIRCRAFT GATES**  
 Boise Airport  
 January 2022

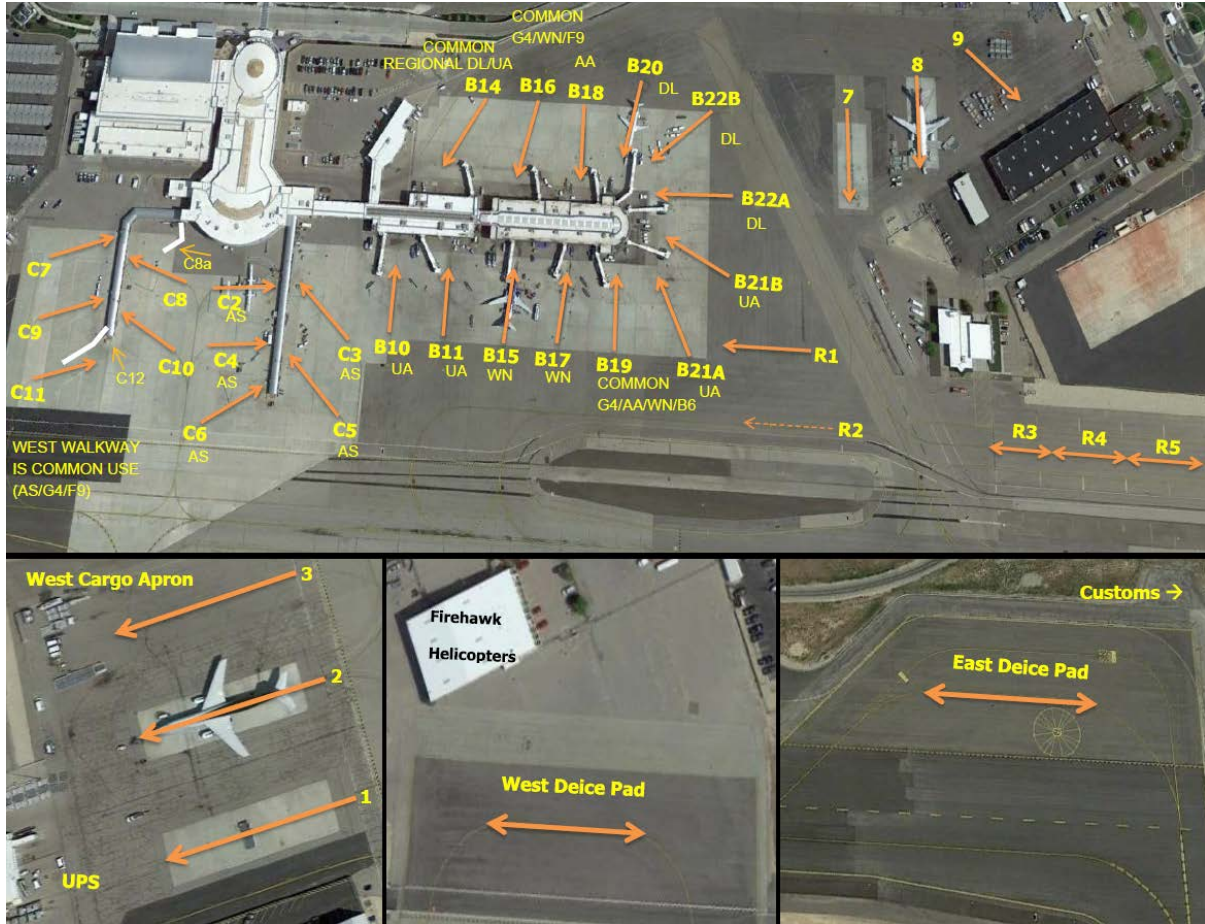
Concourse	Gate	Gate category	Airlines using	Passenger boarding bridge equipped	Aircraft Type Capability
Concourse B	B10	Preferential	United	Yes	Narrowbody, RJs, Turboprops
	B11	Preferential	United	Yes	Narrowbody, RJs, Turboprops
	B14	Preferential	United/Delta	Yes	Narrowbody, RJs, Turboprops
	B15	Preferential	Southwest	Yes	Narrowbody, RJs, Turboprops
	B16	Common	Allegiant/Southwest	Yes	Narrowbody, RJs, Turboprops
	B17	Preferential	Southwest	Yes	Narrowbody, RJs, Turboprops
	B18	Preferential	American	Yes	Narrowbody, RJs, Turboprops
	B19	Common	American/JetBlue	Yes	Narrowbody, RJs, Turboprops
	B20	Preferential	Delta	Yes	Narrowbody, RJs, Turboprops
	B21A/B	Preferential	United	Yes	Narrowbody, RJs, Turboprops
B22A/B	Preferential	Delta	Yes	Widebody, Narrowbody, RJs, Turboprops	
Concourse C	C2	Preferential	Alaska	No	RJs, Turboprops
	C3	Preferential	Alaska	No	RJs, Turboprops
	C4	Preferential	Alaska	No	RJs, Turboprops
	C5	Preferential	Alaska	No	RJs, Turboprops
	C6	Preferential	Alaska	No	RJs, Turboprops
	C7	Common	Alaska	No	RJs, Turboprops
	C8	Common	Alaska	No	RJs, Turboprops
	C8a	Common	Alaska	Yes	Narrowbody, RJs, Turboprops
	C9	Common	Alaska	No	RJs, Turboprops
	C10	Common	Alaska	No	RJs, Turboprops
	C11	Common	Alaska	Yes	Narrowbody, RJs, Turboprops
	C12	Common	Unused	No	Narrowbody, RJs, Turboprops
Remote gates (apron loaded)	R1	Common			Narrowbody, RJs, Turboprops
	R3	Common			Narrowbody, RJs, Turboprops
	R4	Common			Narrowbody, RJs, Turboprops
	R5	Common			Narrowbody, RJs, Turboprops
	East Deice	Common			Widebody, Narrowbody, RJs, Turboprops
West Deice	Common			Widebody, Narrowbody, RJs, Turboprops	

Notes:

- Gate B21A/B is considered a single gate with two parking positions.
- Gate B22A/B is considered a single gate with two parking positions.
- Gate C1 is used for ramp storage only, and is not used for aircraft parking.
- Gate R1 is restricted if Gate 21A/B is being used.
- Gates C8 and C10 cannot be used if Gate C8a is in use.

Source: Boise Airport records, January 2022.

Figure 1  
OVERVIEW OF AIRCRAFT GATES  
Boise Airport



## 2. Samples of gate use monitoring charts

In April 2021, Boise Airport licensed and started using a gate monitoring and management software platform known as "GoApron". Each airline is required to input its future flight schedules into the software, and common-use gate assignments at any particular time are allocated based on underlying analysis and output provided by GoApron. Airport staff are automatically notified via text or email by GoApron when a gate request is made by an airline.

Prior to the adoption of GoApron, Airport staff used a manual system, including airline self-reporting, for managing the Airport's common-use gates. According to GoApron, its software helps to streamline manual workflows, identify availability and capacity with gates, and improves an airport's relationship with its air carriers.

While GoApron has a short history of use at Boise Airport, the software was selected based on its apparent successful adoption at a number of other airports around the U.S. (including Wichita and Spokane). Airport operations staff have indicated that, to date, the carriers have been positive about transitioning from outdated spreadsheets to the automated platform.

A sample selection of diagrams and schematics produced by the GoApron software for Boise Airport is shown in Appendix A.

## 3. Description of the process for accommodating new service and for service by a new entrant

Requests from an airline to add or expand service from the Airport is coordinated through the Airport Business Development Office. Once the needs of the requesting airline for additional facilities have been identified, and the anticipated level of additional flight activity is known (e.g., flights per day, aircraft type, etc.), the Airport will work with the airline to ensure that the carrier's needs will be met. The GoApron software will be used to identify specific gates for accommodating flight operations.

## 4. Description of any instances in which the PFC competitive assurance #7 operated to convert previously exclusive-use gates to preferential-use gates or has it caused such gates to become available to others

Not applicable.

## 5. Policy regarding "recapturing" gates that are not being fully used

Article XVII of the Airline Agreement identifies the terms under which the Airport can temporarily reassign preferential-use gates that are not being adequately utilized.

While an airline has the priority right to use its non-exclusively leased premises and equipment (including gates, as applicable), the Airport is able to assign that premises or equipment to another airline when it is not being actively used by the preferentially occupying airline. In this context "actively being used" means the period from 45 minutes prior to a scheduled aircraft arrival time, or thirty (30) minutes after a scheduled departure time.

For preferentially lease gates, the airlines have their own computer equipment and gate podiums on Concourse B gates, and their own computer equipment at Concourse C gates in the Airport-owned podiums, so putting another carrier on those gates can only be done on an emergency basis.

Article XVII of the current Airline Agreement, which governs procedures for assigning preferentially leased gates, is included in Appendix B.

The City intends to revisit accommodation, reassignment, and recapture provisions in the new Airline Agreement taking into consideration the anticipated growth in air service at the Airport.

#### **6. Resolution of any access complaints during the 12 months preceding the filing**

There have been no access complaints from the airlines during the last 12 months. All gate accommodation needs of the airlines have been met.

#### **7. Use/lose or use/share policies for gates and other facilities**

As noted above in Item 5, the current Airline Agreement (Article XVII) describes the policies and conditions under which the Airport can reassign preferential-use gates and other facilities and equipment that are being underutilized from the preferentially occupying carrier to another carrier seeking to expand service at the Airport.

#### **8. Plans to make gates and related facilities available to new entrants or to air carriers that want to expand service at the airport**

The current Capital Improvement Program (CIP) for the Airport includes a \$46 million project to build a new Concourse A during the 2023-24 period. While the project size, scope, and timing have not been completely finalized, initially, Concourse A would provide five gates in Phase 1 (all of which would be PBB equipped) to accommodate new entrant carriers at the Airport and expanded service by existing carriers, likely including common use gate and ticket counter equipment.

The Concourse A development project was identified as part of the Master Plan update for Boise Airport that was finalized in December 2019, and is a significant part of the Airport's ability to accommodate anticipated aviation activity growth in the future.

As part of the negotiation process for a new Airline Agreement, the City will evaluate the optimal split between preferential use gates and common use gates at the Airport, so as to ensure sufficient gate availability and flexibility for new entrant carriers or existing carriers wishing to expand service at the Airport.



**9. Availability of an airport competitive access liaison for requesting carriers, including new entrants**

As described under Item 2 above, GoApron software is now the key tool for managing gates usage at Boise Airport. Any existing carrier seeking to add service at the Airport adds its proposed service additions to the GoApron interface and associated gate assignments are identified using the software. The signatory airlines have preferential use of their leased gates.

Any new carrier wishing to initiate service at the Airport initially contacts the Airport, and is subsequently referred to the Airport Business Development Office for identification of the specific logistics – date service is to be initiated, destinations, number of flights per day/week, type of aircraft to be used, etc. This information is then communicated to and coordinated with the Airport Operations Division and fed into GoApron for specific initial gate assignments. The airline is then responsible for adding its schedule into GoApron.

Additionally, the Airport Business Development Office will work with new entrant carriers to identify other facility requirements – ticket counters, baggage arrangements, office space needs, etc.

As an example, when JetBlue recently initiate service at the Airport, the time between when JetBlue first contacted the Airport and the initiation of service was approximately five (5) months. JetBlue started service on July 2, 2021.

**10. The resolution of any complaints of denial of reasonable access by a new entrant or an air carrier seeking to expand service in the 12 months preceding the filing of the plan**

There have been no complaints regarding denial of reasonable access by a new entrant or an air carrier seeking to expand service in the last 12 months.

## II. ARRANGEMENTS FOR LEASING AND SUBLEASING

This section summarizes leasing and subleasing arrangements at Boise Airport. As noted above, the current Airline Agreement, as amended, expires on September 30, 2022, and the City intends to negotiate a successor agreement with the airlines over the course of the next year. The specific lease clauses described in the subsections below may be amended or updated as part of the negotiation process. It is the intention of the City to negotiate a successor agreement that will provide the City with significant flexibility in accommodating new entrant service or expanded service by airline currently serving the Airport, thereby fostering enhanced competition.

### 1. Whether a subleasing or handling arrangement with incumbent carrier is necessary

At Boise Airport, the following are the arrangements for handling by the commercial carriers:

	<b>Above Wing</b>	<b>Below Wing</b>
Southwest	Internal	Internal
Delta	Internal	DGS (subsidiary of Delta)
Alaska	Horizon Air Industries	Horizon Air Industries
American	Internal	Piedmont
JetBlue	G2 Secure Staff	G2 Secure Staff
Allegiant	Internal	Internal
United	G2 Secure Staff	G2 Secure Staff

The FBO, Jackson Jet Center, provides deicing services for Allegiant.

The current Airline Agreement (Article XIV) provides for contract assignments, subletting, and handling agreements, as well as airline affiliates operating on behalf of mainline carriers.

New entrant airlines are not required to enter into subleasing or handling agreement with any incumbent carriers at the Airport.

### 2. How the airport assists requesting airlines to obtain a sublease or handling arrangement

While there are no formal arrangements for the Airport to assist a requesting airline to sublease space or enter into a handling arrangement, the Airport Business Development Office, in coordination with Airport Operations Division would be available to assist on a case by case bases if any airline were to request assistance. All such arrangements would need to adhere to Article XIV of the Airline Agreement.

Pursuant to the Boise Airport Rules and Regulations, any airline starting service at the Airport that subleases space or is handled by another airline would need to have a Business Activity Permit from the Airport and would need to demonstrate evidence of insurance.

### **3. Airport oversight policies for sublease fees**

Article XIV of the Airline Agreement provides that in the case of subleases, the sublessee airline should not pay space rentals that exceed the rental rate paid by the leasing airline to the Airport, with an allowance for an administrative fee not to exceed 15% of the rental rate. The leasing airline may also charge the sublessee reasonable fees to cover the sublessee's use of the airline's capital improvements fixtures and equipment in that space, any utility charges paid by the leasing airline, and any other payments to third parties for services and supplies related to the space that are paid by the leasing airline (with an allowance for an additional 15% markup to cover administration costs).

Currently there are no specific rules regarding the fees that one airline could charge another (or a third-party handler could charge an airline) for handling services. The City will consider updating its Rules and Regulations for the Airport accordingly.

### **4. Process by which availability of facilities for sublease or sharing is communicated to other interested carrier**

There is no formal process for signaling the availability of facilities for sublease or sharing, but the Airport disseminates such information to the carriers as part of routine interactions.

### **5. Airport policies regarding sublease fees**

As noted above, Article XIV of the Airline Agreement governs subleasing fees and arrangements.

### **6. How complaints by sub-tenants about excessive sublease fees are resolved. How independent contractors who want to provide such service as ground handling are accommodated**

As noted above, the parameters related to sublease fees are described in Article XIV of the Airline Agreement.

Currently there are four independent contractors providing ground handling services on the Airport related to the commercial airlines – DGS (a subsidiary of Delta), Piedmont, Horizon Air (a subsidiary of Alaska), G2 Secure Staff, and Jackson Jet Center (the FBO). Independent handlers need to obtain a Business Activity Permit from the Airport and demonstrate evidence of insurance to do so.

### **7. Formal dispute resolution procedure**

There are no formal dispute resolutions in place, beyond what is included in the Airline Agreement for the signatory carriers. The Airport is available to assist if a dispute were to arise.

There have been no disputes over subleasing arrangements at the Airport over the past 12 months.

### III. PATTERNS OF AIR SERVICE

The Airport serves a large origin-destination (O&D) passenger base, reflecting the strength of the Boise MSA's economy and its role as a business, trade, manufacturing, and government center. In 2020, four U.S. mainline passenger airlines and their regional affiliates and two low cost carriers (LCC) provided service at the Airport, as shown in Table 2. Frontier and JetBlue Airlines, both LCCs, started passenger service at the Airport in June and July 2021, respectively.

#### 1. Markets served

In 2020, the airlines at the Airport provided service to 22 destinations, including 4 cities with limited seasonal service, as shown in Table 2. Seattle, a connecting hub for Alaska and Delta airlines, accounted for the largest share of scheduled nonstop departures at the Airport in 2020 with 24.5% (an average of 13 average daily departures). Denver, a connecting hub for United and Frontier and an operating base for Southwest, accounted for the second largest share of scheduled nonstop departures at the Airport in 2020 with 9.9% (an average of 5 average daily departures).

#### 2. Small communities served

In 2020, the Airport provided scheduled service to two destinations located in Combined Statistical Areas with populations of less than 750,000, as shown in Table 2.

#### 3. Markets served by low-cost carriers

The two LCCs serving the Airport in 2020—Allegiant and Southwest—accounted for 18% of scheduled nonstop departures and provided service to 11 destinations, as shown in Table 2. Two destinations—Las Vegas and Oakland—were served exclusively by LCCs in 2020. As noted previously, Frontier and JetBlue Airlines, both LCCs, started passenger service at the Airport in June and July 2021, respectively.

#### 4. New markets added or dropped in the past year

Scheduled airline service at Boise Airport and at airports throughout the United States was interrupted in 2020 due to the emergence of the Covid-19 virus in early 2020. The number of scheduled nonstop departures decreased in each of the 22 markets served at the Airport in 2020. However, new nonstop service was started in late 2020 to two destinations—Atlanta and Palm Springs in November 2020. In addition, scheduled service from Boise to Reno was discontinued in January 2020 and not restored.

In 2021, new airline service is expected to be added to eight destinations, including Austin, Chicago Midway, Dallas Love Field, Nashville, New York Kennedy, Orange County, Pullman, and Seattle Paine Field, based on advance published airline schedules.

**Table 2**  
**SCHEDULED AIRLINE SERVICE BY DESTINATION IN 2020**  
**Boise Airport**

Destination	2020 Population	Nonstop miles from Boise	Scheduled nonstop departures in 2020									Percent of total
			Mainline airlines					Low-cost carriers			Total	
			American (a)	Alaska (b)	Delta (c)	United (d)	Total	Allegiant	Southwest	Total		
Seattle	4,952,595	399	--	2,944	1,767	--	4,711	--	--	--	4,711	24.5%
Denver	3,652,385	649	--	--	--	1,057	1,057	--	844	844	1,901	9.9%
Salt Lake City	2,672,368	290	--	--	1,547	--	1,547	--	--	--	1,547	8.0%
Portland	3,282,871	344	--	1,496	--	--	1,496	--	--	--	1,496	7.8%
San Francisco	9,608,006	522	--	193	--	1,145	1,338	--	--	--	1,338	7.0%
Los Angeles	18,629,661	674	--	435	404	363	1,202	114	--	114	1,316	6.8%
Dallas/Fort Worth	8,186,093	1,272	845	--	--	--	845	--	--	--	845	4.4%
Las Vegas	2,364,017	519	--	--	--	--	--	107	671	778	778	4.0%
Phoenix Sky Harbor	5,114,212	735	611	--	--	--	611	--	167	167	778	4.0%
Chicago O'Hare	9,770,485	1,437	140	--	--	614	754	--	--	--	754	3.9%
Oakland	9,608,006	512	--	--	--	--	--	--	739	739	739	3.8%
Spokane	745,213	287	--	522	--	--	522	--	213	213	735	3.8%
San Jose	9,608,006	523	--	395	--	--	395	--	221	221	616	3.2%
San Diego	3,298,349	749	--	434	--	--	434	--	121	121	555	2.9%
Minneapolis/St. Paul	4,046,181	1,142	--	--	527	--	527	--	--	--	527	2.7%
Sacramento	2,650,900	437	--	142	--	--	142	--	182	182	324	1.7%
Houston Intercontinental	7,340,823	1,482	--	--	--	153	153	--	--	--	153	0.8%
Phoenix Mesa	5,114,212	735	--	--	--	--	--	64	--	64	64	0.3%
Atlanta	6,928,515	1,838	--	--	38	--	38	--	--	--	38	0.2%
Palm Springs	2,489,188	672	--	15	--	--	15	13	--	13	28	0.1%
Reno	644,730	335	--	6	--	--	6	--	--	--	6	0.0%
Columbus	2,541,313	1,728	--	--	--	<u>1</u>	<u>1</u>	--	--	--	<u>1</u>	<u>0.0%</u>
<b>Total</b>			<b>1,596</b>	<b>6,582</b>	<b>4,283</b>	<b>3,333</b>	<b>15,794</b>	<b>298</b>	<b>3,158</b>	<b>3,456</b>	<b>19,250</b>	<b>100.0%</b>
Percent of total			8.3%	34.2%	22.2%	17.3%	82.0%	1.5%	16.4%	18.0%	100.0%	
Average daily			4	18	12	9	43	1	9	9	53	

Note: Totals may not add due to rounding.

(a) Envoy Air, Mesa, Republic, and Skywest airlines.

(b) Horizon and Skywest airlines.

(c) Compass and Skywest airlines.

(d) GoJet, Mesa, Republic, and Skywest airlines.

Sources: OAG Worldwide Aviation Ltd, online database, accessed September 2021.

## IV. GATE ASSIGNMENT POLICY

This section summarizes the Airport's policies related to gate and Remain Overnight (RON) parking positions.

### 1. Method of informing carriers of gate assignment policy

As described in Section I, the Airport Operations Department has responsibility for overseeing gate assignments at the Airport, and utilizes the GoApron software platform as a tool for this purpose. Specific gate assignments for common-use gates are communicated to the airlines via the GoApron software, the output of which is available to and communicated with the airlines via the software.

The airlines are given preference for their leased gates and the common use gates that they customarily use. Currently the Airport only assigns those gates to other airlines in emergencies. The airlines have their own podiums and computer equipment at the Concourse B gates and their own computer equipment on the Concourse C gates.

The Airport currently has no formal written policy covering the priority for use of the common-use gates, but expects to revisit this as part of the negotiations for, and implementation of, a new Airline Agreement.

The Airport has not had substantial issues resolving conflicts on common use gates and carriers have been willing to engage in discussion to provide flexibility on these gates. However, given the Airport's anticipated growth and potential space constraints in the near and long-term future, and the expected conversion/addition of new common use gates with the new Airline Agreement and planned capital improvements, the City intends to develop a written gate policy that will articulate priorities of use for common use gates and space, and will do so in a way that fosters competition and allows incumbent and new carriers to make use of such space to improve service at the Airport.

### 2. Methods for announcing to carriers when gates become available

The GoApron software is used to communicate gate availability to the airlines serving the Airport.

Additionally, as part of routine meetings between Airport staff and the airlines to discuss operational issues in general, Airport staff informs the airlines of any intentions to convert gates from preferential-use to common-use (or vice versa), and also any changes with regard to RON policies and procedures.

### 3. Policies on assigning RON positions

Each of the 23 aircraft gates in Concourse B and Concourse C serves as a RON position at the Airport, and the airlines with preferential gates can use those gates for RON purposes.

The off-gate (remote) RON parking positions can be used on a first come, first served basis, unless prior arrangements have been made with the Airport Operations Department. Airport

Operations monitors the use of the off-gate RON positions and coordinates RON parking needs when requested by an airline or aircraft operator.



## V. GATE USE REQUIREMENTS

This section summarizes gate use requirements at the Airport. As noted elsewhere, the City is currently in the process of negotiating a new successor agreement to the current Airline Agreement which would become effective on October 1, 2022. Some of the provisions of the existing Airline Agreement described herein may be materially different in any successor agreement, although the City will strive to ensure that the new agreement will incorporate industry “best practices” and maximize flexibility in terms of airline competition and ease of adding air service.

### 1. Gate use monitoring policy

As described in Section I, the Airport uses the GoApron software platform to monitor and manage gate use at the Airport. The Airport Operations Department monitors the usage of gates.

### 2. RON monitoring policy

The Airport Operations Department monitors the usage of the 6 remote (off-gate) RON positions and coordinates RON parking needs when requested by an airline or aircraft operator. The usage of off-gate RON positions is on a first-come, first-served basis unless coordinated in advance with the Operations Department.

### 3. Requirement for signatory status

Under the existing Airline Agreement that extends through September 20, 2022 (as amended), the Airport imposes no minimum requirements on an airline as a condition of being granted signatory status. There is no minimum amount of space or number of gates that a signatory airline needs to sign up for. All passenger airlines serving the Airport are eligible to sign the Airline Agreement and become a signatory airline if they so wish.

Airlines that are affiliates of a mainline carrier (such as Horizon Air, which is affiliated with Alaska Airlines) operate at the Airport under the “umbrella” of the mainline carrier. Each such affiliated carrier enters into an “Airline Affiliate Operating Agreement” (“Affiliate Agreement”), which includes the City, the mainline carrier and the affiliate carrier as parties. Under the Affiliate Agreement, the affiliate carrier is allowed the same use and access to Airport premises and equipment as the mainline carrier, and pays the same schedule of rates and charges as the mainline carrier.

Carriers providing service at the Airport that do not wish to become a signatory to the Airline Agreement can operate on a non-signatory basis, in accordance with the terms of a Non-Signatory Permit and Terminal Space Lease. These non-signatory carriers, which currently are JetBlue and Allegiant, operate from common-use gates.

While the current Airline Agreement calls for non-signatory airlines and pay a 1.50 times premium to the schedule of signatory fees and charges, since the start of FY 2021 the Airport has levied a premium of 1.25 times only on landing fees, baggage fees, PBB fees, ground load

walkway fees, and fuel flowage fees. The terminal rental rate per square foot charged to both signatory and non-signatory carriers is the same.

While the Airport has historically charged a premium for nonsignatory airlines, because of the COVID-19 pandemic it has lowered rates for both nonsignatory and signatory airlines in order to reduce strain on the airlines operating at the Airport. However, the Airport intends to reconsider the rate differential for nonsignatory airlines and signatory airlines as part of the current Airline Agreement discussions and changes to the rates and charges at the Airport. As it does so, it will ensure that any rate differential is fair and reasonable and provides appropriate incentives and protections.

The City also expects to revisit the issue of minimum space or gate requirements for an airline to become signatory as part of the airline negotiations for a new Airline Agreement. In the event that the City and the airlines cannot come to agreement on a new successor use and lease agreement, the City expects to impose a “rates by ordinance” arrangement at the Airport.

#### **4. Minimum requirements for a lease**

There are no minimum requirements at present for an airline to become signatory to the Airline Agreement, in terms of things such as threshold aircraft operations, or a minimum amount of terminal space that needs to be leased. The City expects to revisit this provision and impose minimum requirements for obtaining signatory status under a successor Airline Agreement.

#### **5. Accommodation priorities**

It is the City’s objective and priority to ensure that adequate gate capacity is available at the Airport to accommodate existing airlines wishing to add or expand service, and to new entrant carriers wishing to enter the Boise market.

As described elsewhere in this report, the current Airline Agreement provides for both preferential-use gates and common-use gates. All the signatory carriers (Alaska, United, Delta, Southwest, and American) operate from preferential-use gates, and also sometimes operate flights through one of the common-use gates. The three non-signatory airlines (Frontier, Allegiant, and JetBlue) operate flights from the common-use gates. The allocation of airlines to the various gates is shown earlier in Table 1.

Currently, none of the common-use gates at the Airport are equipped with standard common-use equipment. The Airport’s goal is to develop a plan to standardize the equipment available at the common-use gates, which will enhance the flexibility for airlines to use those gates.

#### **6. Common-use gate usage policies**

As described elsewhere, gate usage policies are outlined in the Airline Agreement, and the GoApron software platform is used as the tool for ensuring that all flights can be accommodated. Common-use gate utilization is managed and monitored by the Airport Operations Department.

The Airport will be revisiting its policies and priorities for the use of common-use gates as part of the negotiation of a new Airline Agreement.

#### **7. Methods for calculating rental rates for common-use gates**

Common-use gate fees are derived from the terminal rental rate set in accordance with the provisions of the current Airline Agreement and per the Airport Rules and Regulations as stated in the Airport Rates and Charges schedule. The terminal rental rate is \$29.98 per square foot per year, as of July 1, 2021. The terminal rental rate is calculated on a cost center residual basis.

The Terminal Building rental rate per square foot per year at the Airport is calculated as follows:

- The direct and allocated indirect Operation and Maintenance Expenses to the terminal building cost center are added to any applicable depreciation and Debt Service allocable to the terminal.
- Nonairline revenues generated in the terminal (including rental car fees and charges) are deducted.
- Capital improvements funded from the Capital Improvement Fund above a threshold of \$1,841,648 are deducted.
- The resulting total is divided by the estimated airline rented square footage in the terminal (including exclusive, preferential, and common-use space) to obtain the terminal rental rate per square foot. The airlines currently rent 109,701 square feet of space in the terminal.

Separately for Concourse B and Concourse C, the gate use (holdroom) fee is calculated as the total holdroom square feet for the common-use gates in the respective concourse times the rental rate divided by 365 (i.e., to calculate a fee per day). Depending on where the aircraft is operating from a Concourse B gate or a Concourse C gate, there are additional fees also. See Table 3 for a summary of the fee structure.

Table 3		
<b>COMMON-USE GATE FEES</b>		
Boise Airport		
As of July 1, 2021		
	<u>Concourse B gates</u>	<u>Concourse C gates</u>
Terminal rental rate per sf per year	\$ 29.98	\$ 29.98
Common-use holdroom square feet	2,100	1,220
Total attributable to common-use holdrooms	\$ 62,958	\$ 36,576
Divisor (days per year)	365	365
<b>Gate use fee per day</b>	<b>\$ 172.49</b>	<b>\$ 100.21</b>
Plus:		
JetBridge fee (per arrival & per departure)	30.00	30.00
Ground loading walkway fee (per arrival & per departure)	-	-
<b>Signatory Airline cost per turn (assuming one turn in a day)</b>	<b>\$ 232.49</b>	<b>\$ 160.21</b>
<p>Note: In Concourse C, if an airline ground loads an aircraft, it pays a \$20 ground load walkway fee instead of a \$30 jetbridge fee.</p>		

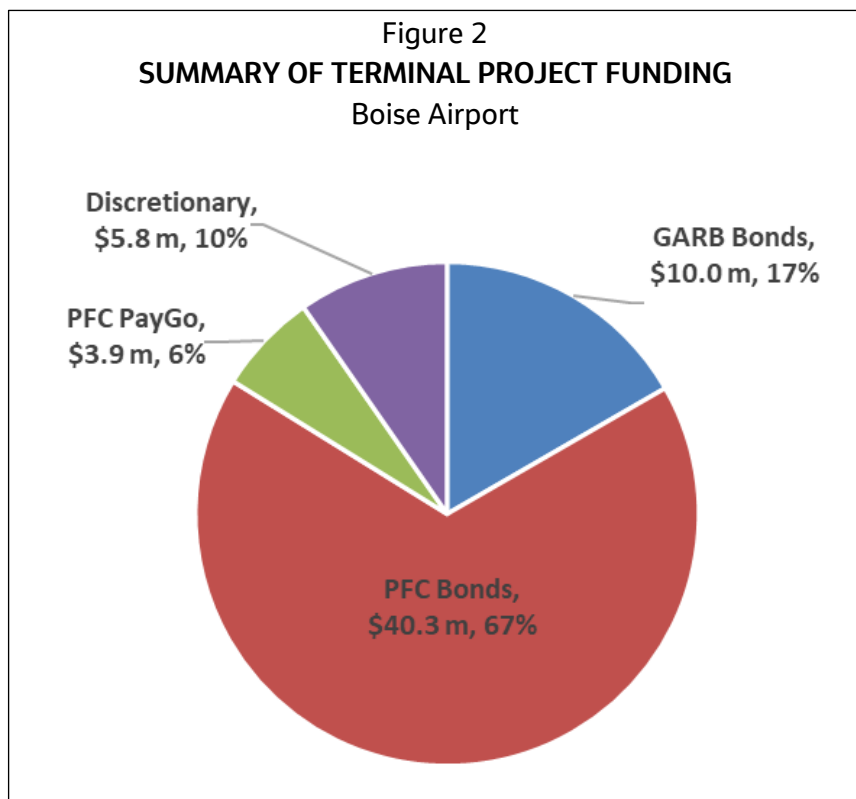
## VI. FINANCIAL CONSTRAINTS

The Airport's terminal facilities underwent a major expansion and renovation, which was completed in 2004. The terminal and concourses encompass 415,054 square feet of space providing both preferential- and common-use gates. The City's most recent six-year capital improvement program (CIP) covering FY 2020 through FY 2026 totals \$341 million with approximately \$60 million in terminal related projects including construction of a new Concourse A and improvements to Concourse B.

### 1. Major source of revenue for terminal projects

The City expects that several funding sources will be used to develop the above referenced terminal projects including passenger facility charges (PFCs), general airport revenues bonds (GARBs), and available Airport cash balances. The City currently expects to issue one additional series of Bonds on a parity basis with the recently issued Series 2021 Bonds during the next few years, primarily to finance the development of Concourse A.

A summary of estimated funding sources for Terminal related projects over the period FY 2020 through FY 2026 is shown in Figure 2.



The new Concourse A will extend to the west of the Airport terminal initially providing a five new gates as part of Phase 1; however, it is designed with the ability to expand up to 10 gates as demand grows in the future. Concourse A will also include restrooms, restaurants, and retail stores. Construction is expected to be complete by 2025. Upon completion of Concourse A,

Concourse B will be remodeled to increase the size of the passenger waiting areas and update customer amenities such as restrooms, seating and charging areas. Concourse B was initially constructed in 1984 and expanded in 1995.

Along with these large projects, several other passenger experience enhancements are included in the CIP such as expansion to the TSA checkpoint.

## **2. Use of PFCs for gates and related terminals**

In 1994, the City received approval from the FAA to impose a PFC of \$3 per eligible enplaned passenger at the Airport. Effective FY 2002, the City increased the PFC per eligible enplaned passenger to \$4.50, with the FAA's approval. The City received approval from the FAA to collect and use a total of \$106.1 million in PFC revenues for debt service related to PFC-approved project costs, and the payment of PFC-approved project costs on a pay-as-you-go basis. These PFC funded costs included terminal related projects, a majority of which was used to fund Concourse C construction and enabling work. As of mid-2015, the City had collected PFCs up to the authorized limit approved in its first four PFC applications, and PFC collections ceased in 2015.

In 2020, the FAA approved a fifth PFC application for the Airport, to collect and use \$11.2 million of PFCs to partially finance six airfield and terminal projects. Terminal related projects approved as part of this application included passenger boarding bridge upgrades, public address system upgrades, and planning and program management related to terminal upgrades. The authorized PFC collection amount under this PFC application was reached on October 1, 2021.

In 2021, the FAA approved a sixth PFC application for the Airport, to collect and use \$15.5 million of PFCs to partially finance 19 projects, the majority of which were airfield and terminal improvements, including \$500,000 for gate management utilization planning software. This extends the PFC collection authority at the Airport to October 1, 2023.

PFC revenues are expected to be pledged toward debt service on a future senior bond issue that will be used to partially fund the first phase of the new Concourse A and improvements to Concourse B. The City expects to submit an application to the FAA for approval to impose and use PFCs for this purpose during calendar year 2022.

### **3. Availability of discretionary income for capital improvement projects**

The current Airline Agreement establishes the Capital Improvement Fund and the Discretionary Fund. Monies in the Capital Improvement Fund are to be used on a priority basis for terminal and airfield capital and equipment projects but can also be used for parking and environmental projects. Monies in the Discretionary Fund may be used for any lawful purpose and use that are not subject to Signatory Airline approval (to be discussed further in Section VII).

Due in large part to many years of conservative financial planning and reserve funds being held in anticipation of large capital upgrades, the Airport has been able maintain adequate liquidity estimating a fiscal year-end balance of approximately \$37 million, or 406 days cash on hand. The Airport's CIP assumes approximately \$50 million in discretionary funding through FY 2026 with about \$6 million being applied to terminal related projects.



## VII. AIRPORT CONTROLS OVER AIRSIDE AND GROUND SIDE CAPACITY

The City has entered into an agreement with five passenger airlines (the Signatory Airlines). The term of the Airline Agreement, as amended, extends through September 30, 2022. The City has recently initiated discussions with the airlines regarding the implementation of a new Airline Agreement to come into effect on October 1, 2022.

### 1. Majority-in-interest (MII) clauses covering projects

The terms of the current Airline Agreement, with certain exceptions, establish procedures through which Signatory Airlines are notified and can provide input on capital expenditures for improvements and developments that are to be included in space rentals and landing fees charged for the use and/or occupancy of terminal and airfield facilities. A project is considered to be disapproved if a Majority-in-Interest (MII) of Signatory Airlines submits disapprovals. A Majority-in-Interest means at least 66 2/3% in number of the Signatory Airlines, representing at least 66 2/3% of Signatory Airline total landed weight for the most recent 12 month period for which landed weight data are available.

In the event that an MII disapproves a capital expenditure, the City may proceed with the expenditure as long as the project is deferred twenty one (21) months after the disapproval.

### 2. Projects delayed because MII clauses invoked

To date, there have been no project delays at the Airport because the MII clause of the Airline Agreement was invoked. Under the terms of the one-year extension currently in effect through September 30, 2022, the airlines have approved certain capital projects at the Airport and a new capital cost threshold was established for Majority-In-Interest (MII) approval of any additional, currently unidentified, capital projects proposed for the Airport during FY 2022.

### 3. Plans to modify existing MII agreements

During FY 2022, the City expects to negotiate a successor Airline Agreement with the airlines, to come into effect on October 1, 2022 (i.e., the start of FY 2023), which is expected to have a different airline ratemaking methodology to that currently in place under the existing Airline Agreement. As discussed above, the Airline Agreement, as amended, expires on September 30, 2022, and the City expects to no longer be bound by these MII conditions when implementing capital projects at the Airport, as of October 1, 2022. If a new agreement cannot be reached with the airlines, the City would unilaterally impose rates commencing in FY 2023. In this eventuality, airlines operating at the Airport would be required to adhere to the conditions of an Operating Permit governing their activities at the Airport.

Under a new Airline Agreement, the City expects that the MII clause would either be eliminated or significantly relaxed, giving the Airport more flexibility in terms of meeting the expanding service development needs of the airlines serving Boise (and enhancing the ability of new airlines to enter the market). Restrictive MII clauses in airline agreements can be a hinderance to airline competition because they may limit an airport's ability to implement capital

improvements and projects that would enhance airline competition on a timely basis in ways that best meet the operations needs the airport.

As noted above, an MII disapproval finding on any particular project at Boise Airport that the City wishes to undertake would delay the implementation of that project by 21 months (almost two year), potentially leading to restricted competition and a less than optimal operating environment at the Airport for that period of time.

## VIII. AIRPORT INTENTIONS TO BUILD OR ACQUIRE GATES TO BE USED AS COMMON FACILITIES

This section describes Boise Airport's plans to develop the first phase of Concourse A – a new concourse with an initial complement of five gates, which will accommodate expected future growth at the Airport, and increase the overall contact gate availability at the Airport from 21 gates to 26 gates. A second phase of the project will lead to a further five gates in Concourse A, for an ultimate total of 10 gates in Concourse A.

### 1. Common-use gates available

As described in Section I, there are currently nine common-use gates at Boise Airport – two in Concourse B and seven in Concourse C, as well as six remote parking positions.

### 2. Common-use gates scheduled to be built

During 2023-24, Boise Airport expects to undertake an approximately \$46 million project to build Concourse A, including associated apron works. Concourse A is expected to be open for service by 2025. This would be the first phase which would add five new gates.

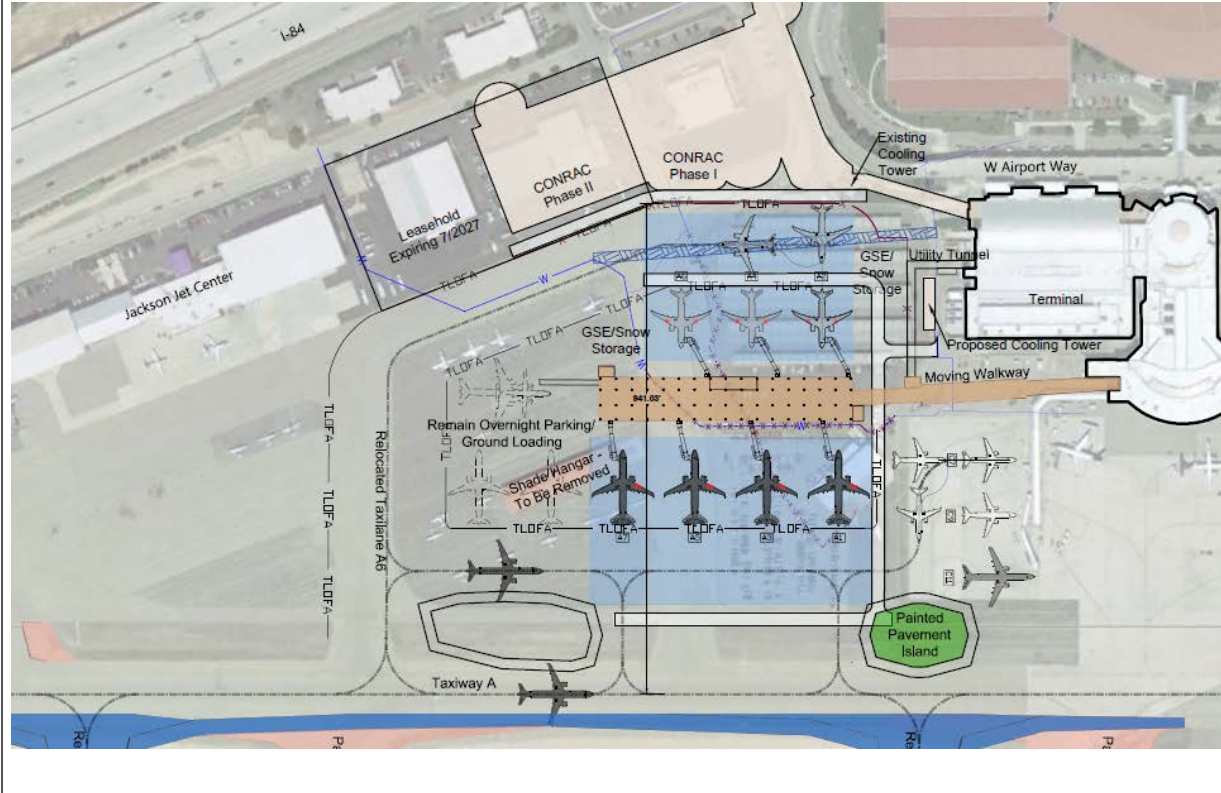
As shown in Figure 3, the current development plan contemplates adding mainline gates along the front and back sides of a new Concourse A facility (the first phase would involve front side gates only). Development and expansion of Concourse A would be similar in configuration to the buildout of Concourse B. Aircraft access to the front side Concourse A gates would be via Taxiway A, while a new taxilane would provide access to the gates located along the back side of Concourse A.

While this is the Concourse A concept currently being planned, it may be adjusted during the design phase. The Concourse A project is expected to be primarily funded with general airport revenue bonds, and PFCs are expected to be used to pay a significant share of the associated debt service. The City expects to initiate a PFC application process for this project during 2022 (its seventh PFC application) and hopes to receive FAA approval for the project during 2023.

While a final decision has not been made regarding which airlines will operate from the new Concourse A, and whether the gates will be leased on a preferential-use basis or used on a common-use basis, the Airport expects that a share of the gates in the new concourse will be made available on a common-use basis.

It is expected that the initial buildout of five new gates in Concourse A (and 10 new gates at full build out) will help to ease the current gate constraints.

Figure 3  
OVERVIEW OF CONCOURSE A DEVELOPMENT – PHASE 1 CONCEPT  
Boise Airport



### **3. International gates available for domestic use and fee differences between international gate use for domestic service and domestic gates**

Currently, Boise does not have direct service to locations outside the U.S. The Airport does not have an international passenger processing or customs capability for scheduled airline service. No gates at the Airport are designated for international use (either dedicated international, or on a “swing” basis).

### **4. Carrier reliance on common-use gates**

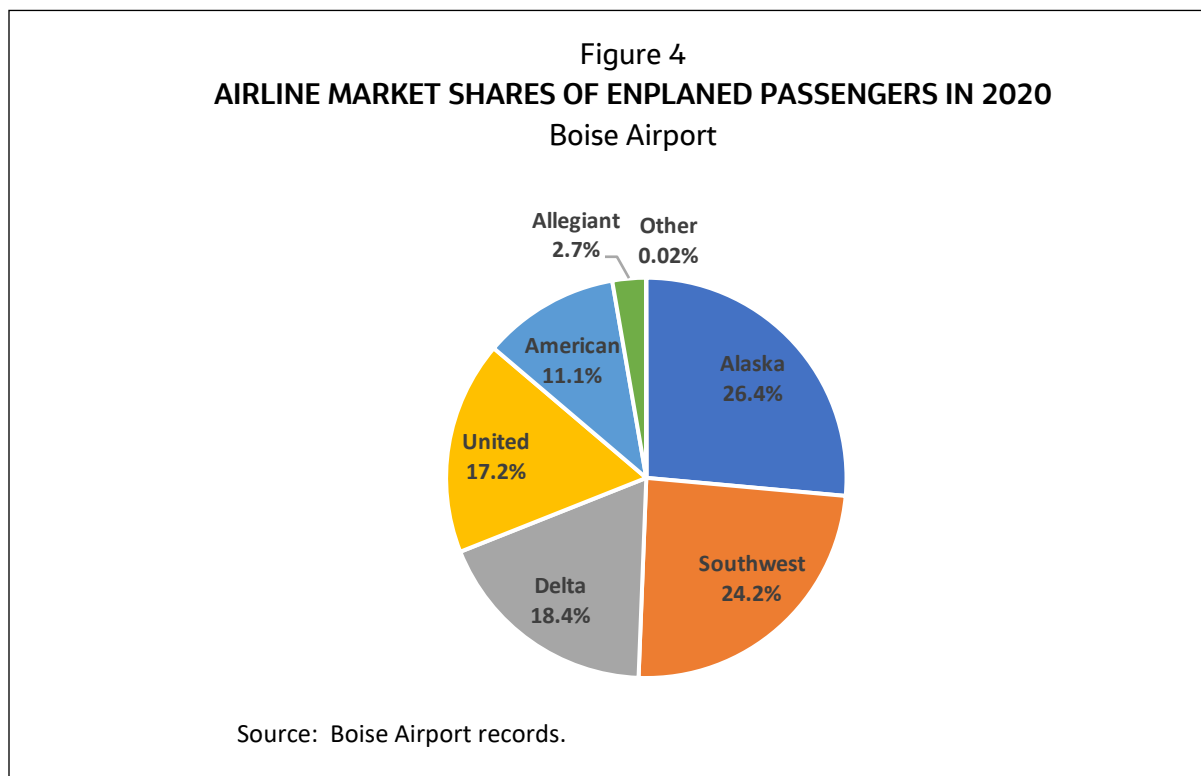
As shown earlier in Table 1, Allegiant and JetBlue operate exclusively from common-use gates at the Airport. American, Southwest, Delta, United and Alaska primarily operate from preferential-use gates, but also use common-use gates for some operations. Southwest uses common-use Gate B16 for daily operations, American uses B19 for daily operations and Alaska uses common-use gates C7 to C12 for daily operations. On occasion Delta uses B16 and B14, and United uses B14.

## IX. AIRFARE LEVELS AS COMPARED TO OTHER LARGE AIRPORTS

Boise Airport is characterized by diverse airline service with no one major airline and an array of mainline and low-cost carrier routes. In addition, the Airport benefits from limited regional competition, with the closest large-hub airport located 340 miles away in Salt Lake City.

### 1. Carrier local passenger, average fare, market share and average passenger trip-length data

The airline market shares of enplaned passengers at the Airport in 2020 are presented in Figure 4. In 2020, Alaska (including Horizon) enplaned the largest share of passengers at the Airport (26.4%), followed by Southwest Airlines with 24.2% and Delta (mainline and regional affiliates) with 18.4%. Mainline and regional airlines accounted for 73.1% of enplaned passengers at the Airport in 2020; low cost carriers (Allegiant and Southwest) accounted for the remaining 26.9%.



The top 25 markets accounted for 70.4% of domestic O&D passengers at the Airport in 2020 with an average one-way airfare of \$120, as shown in Table 4. Low cost carriers (LCCs) provided nonstop service to 21 of the top 25 markets at Boise in 2020 with an average one-way airfare of \$93, compared with \$145 for mainline airlines and \$129 for regional affiliates. LCC average airfares were lower than those for mainline airlines and regional affiliates in each market served by LCCs.

**Table 4**  
**DOMESTIC PASSENGER ORIGIN-DESTINATION MARKETS AND AIRFARES IN 2020**  
**Boise Airport**

O&D market/Airport	Average passenger trip length (miles)	Percent of 2020 Domestic O&D passengers	Domestic one-way airfares in 2020														
			Mainline airlines					Regional affiliates					Low cost carriers (LCC)				
			AA	AS	DL	US	Total	CP	MQ	OO	QX	YV	Total	G7	WN	Total	Total
Seattle	400	10.3%	--	78	190	--	78	74	--	87	85	--	86	--	31	31	84
Los Angeles	738	6.3%	115	118	143	103	120	146	--	114	122	97	115	40	77	51	98
Phoenix Sky Harbor	852	5.1%	140	115	134	125	139	101	--	147	120	135	140	--	106	106	125
Denver	682	4.8%	126	96	142	130	130	235	119	153	111	191	151	--	90	90	113
Portland	357	4.7%	--	102	269	--	110	69	--	120	121	--	120	--	79	79	120
San Diego	860	4.4%	108	90	130	166	120	114	--	116	115	65	116	--	89	89	105
Las Vegas	570	4.3%	146	540	120	160	126	77	--	139	128	86	137	35	109	89	94
Spokane	329	3.3%	--	161	224	--	165	--	--	94	95	--	95	--	73	73	90
Sacramento	571	2.7%	--	42	108	158	108	--	--	111	100	--	108	--	89	89	97
Oakland	529	2.6%	--	134	168	--	153	--	--	175	113	--	12	--	103	103	104
San Jose	592	2.3%	--	125	142	--	138	98	--	116	107	--	111	--	94	94	105
Salt Lake City	290	2.1%	--	--	145	--	145	--	--	173	--	--	173	--	80	80	163
San Francisco	589	2.1%	--	86	110	171	132	303	--	155	102	--	151	--	101	101	149
Santa Ana	936	2.0%	125	122	152	119	138	175	--	140	129	113	138	--	95	95	115
Dallas/Fort Worth	1,346	1.9%	200	69	189	143	194	--	238	183	103	144	215	--	--	--	204
Chicago O'Hare	1,568	1.5%	173	132	216	187	185	--	170	232	130	--	218	--	--	--	212
Orlando	2,405	1.5%	162	158	218	172	181	179	189	204	186	166	197	--	136	136	176
Ontario	913	1.5%	135	103	141	160	133	--	--	135	119	147	129	--	98	98	108
Minneapolis/St. Paul	1,261	1.4%	146	149	180	191	179	--	191	215	157	--	209	--	140	140	185
Atlanta	2,021	1.2%	146	84	239	169	210	247	166	266	125	127	244	--	121	121	206
Anchorage	1,860	1.1%	--	202	239	207	203	231	--	241	217	--	223	--	--	--	219
Houston																	
Intercontinental	1,621	0.9%	159	115	181	174	169	--	154	231	149	189	219	--	--	--	195
Austin	1,567	0.9%	181	92	183	163	175	--	222	182	141	163	182	--	130	130	159
Burbank	844	0.9%	126	211	194	268	175	--	--	146	125	122	136	--	94	94	105
Nashville	1,871	0.8%	140	163	174	158	158	--	208	217	174	--	212	--	147	147	168
Top 25 markets listed		70.4%	159	95	168	148	145	122	215	139	107	135	129	38	99	93	120
All other markets		29.6%	168	172	200	176	181	256	216	204	176	158	200	40	132	121	177
Total--all markets		100.0%	163	111	184	164	162	129	216	158	116	143	147	38	106	99	137

Airline codes: AA = American; AS = Alaska; DL = Delta; UA = United; CP = Compass; MQ = Envoy; OO = Skywest; QX = Horizon; YV = Mesa; G7 = Allegiant; WN = Southwest

Note: Average passenger trip length is calculated by dividing total coupon miles by the number of O&D passengers and may differ from the nonstop air miles for the same flight segment due to differences in passenger itineraries.

Source: U.S. Department of Transportation, Origin-Destination Survey, online database, accessed September 2021.



## 2. Data above compared to other airports

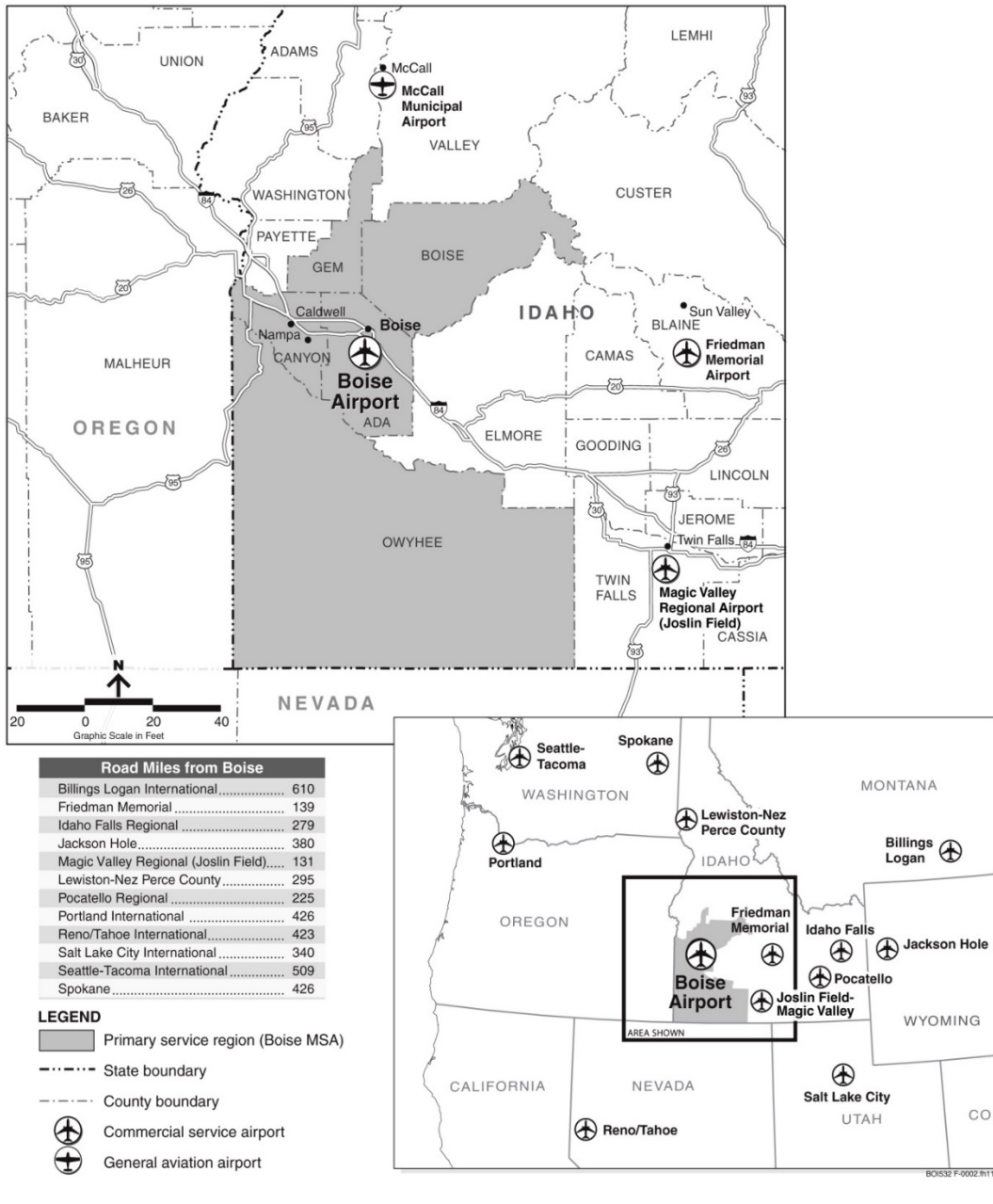
The primary geographical area served by the Airport consists of Ada, Boise, Canyon, Gem and Owyhee counties in Idaho (the Boise Metropolitan Statistical Area or MSA), as shown on Figure 5. The secondary region served by the Airport, which includes many of the counties surrounding the Boise MSA, is defined by the location of, and the airline service offered at other “nearby” air carrier airports.

The nearest airports with scheduled air carrier service to the Airport include

- Salt Lake City International Airport, a large-hub airport 340 miles to the southeast
- Reno/Tahoe International Airport, a medium-hub airport 423 miles to the southwest
- Portland International Airport, a medium-hub airport 426 miles to the northwest
- Spokane International Airport, a small-hub airport 426 miles to the north
- Other airports near Boise, such as those in Hailey, Lewiston, Pocatello, and Twin Falls offer limited passenger service

Table 5 presents a comparison of the average one-way airfares and other metrics at the Airport and the nearby competing airports. In 2020, the Airport accounted for the lowest average one-way airfare (\$137) of the airports listed as well as the lowest average passenger trip length (1,067 miles). Airline concentration at the Airport, in terms of the percent of enplaned passengers, was lowest among the airports listed, with Alaska’s share of 27%.

Figure 5  
AIRPORT SERVICE REGION



**Table 5**  
**COMPARATIVE DOMESTIC AIRFARES AND OTHER METRICS IN 2020 FOR**  
**COMMERCIAL SERVICE AIRPORTS IN IDAHO AND ADJACENT STATES**

Airport	Driving distance from Boise (miles)	2020 Hub size (a)	2020 Enplaned passengers (a)	Average passenger trip length (b)	Average one-way domestic airfare (b)	Airline share of domestic O&D passengers (b)	
						Largest share	Airline
<b>Idaho</b>							
<b>Boise</b>	--	<b>Medium</b>	<b>991,241</b>	<b>1,067</b>	<b>\$137</b>	<b>27%</b>	<b>Alaska</b>
Idaho Falls Regional	279	Nonhub	101,420	1,106	182	39	Delta
Lewiston-Nez Perce County	295	Nonhub	15,630	1,292	205	100	Delta
Haley/Friedman Memorial	139	Nonhub	46,468	1,154	270	46	Delta
Magic Valley Regional	131	Nonhub	23,528	1,182	228	96	Delta
Pocatello Regional	225	Nonhub	19,395	1,152	205	100	Delta
<b>Adjacent states</b>							
Seattle-Tacoma International	509	Large	9,462,411	1,693	189	51	Alaska
Salt Lake City International	340	Large	5,981,032	1,293	179	55	Delta
Portland International	426	Medium	3,455,877	1,509	159	40	Alaska
Reno/Tahoe International	423	Medium	976,937	1,227	157	40	Southwest
Spokane International	426	Small	913,291	1,298	149	34	Alaska
Billings Logan International	610	Small	240,713	1,199	165	27	Delta
Jackson Hole	380	Small	276,297	1,493	257	42	United

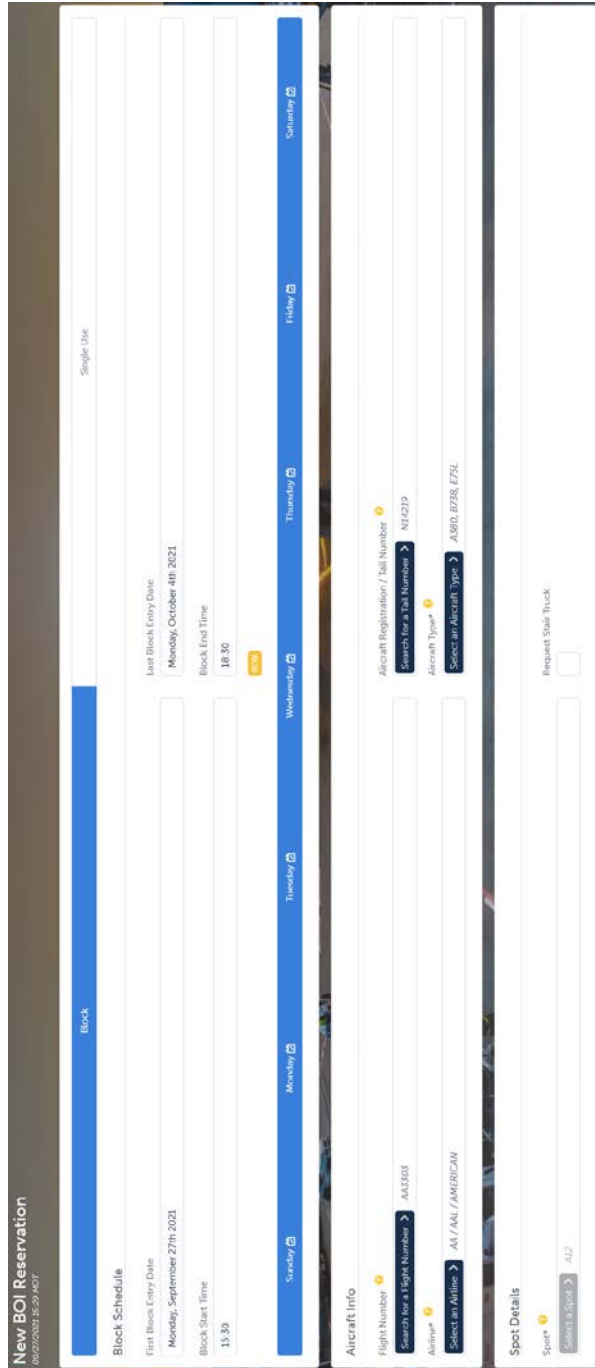
(a) Federal Aviation Administration, 2020 Passenger Boarding (Enplanement) and All-Cargo Data for U.S. Airports, [www.faa.gov](http://www.faa.gov).

(b) U.S. Department of Transportation, Origin-Destination Survey, online database, accessed September 2021.

## APPENDIX A

### SAMPLE OUTPUT FROM "GoApron" SOFTWARE

The pictures below show four sample screen shots from the GoApron software, which is used by the Airport to manage its gate capacity and utilization.

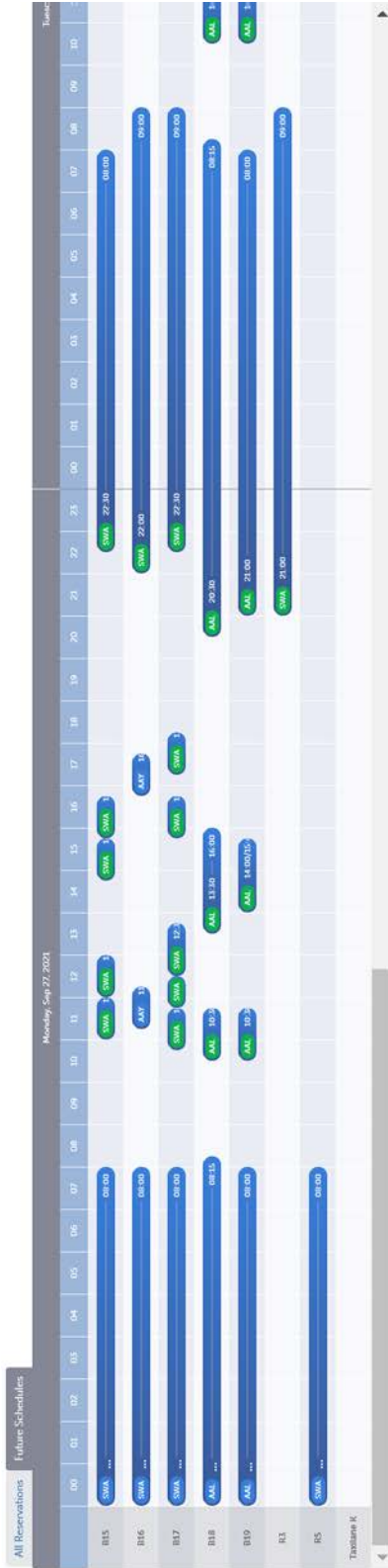


This screenshot shows the creation of a new reservation at either a Gate or RON position.

Future Schedules														
Gate / Spot	Airline	Operated By	Flight Designator	Registration / Tail	Aircraft Type	Reservation Start	Reservation End	Stay Type	Status	Star Truck Requested	Comments	Block	Received By	Last Reviewed / Edited By
B18	AAL	-	TBD	TBD	A320	Sun, Sep 20, 2021 21:30 (MGT)	Mon, Sep 27, 2021 08:00 (MGT)	INM	●	X	-	Block AM-BB-2	Frank L.	-
B19	AAL	-	TBD	TBD	A320	Sun, Sep 20, 2021 21:00 (MGT)	Mon, Sep 27, 2021 08:00 (MGT)	INM	●	X	-	Block AM-BB-10	Frank L.	Zack T.
B5	SWA	-	WN2001*	TBD	B737	Sun, Sep 19, 2021 22:00 (MGT)	Mon, Sep 27, 2021 08:00 (MGT)	INM	●	X	-	Block SWA-BB-5	Liselotte R.	Michael O.
B15	SWA	-	WN356P*	TBD	B738	Sun, Sep 19, 2021 22:30 (MGT)	Mon, Sep 27, 2021 08:00 (MGT)	INM	●	X	-	Block SWA-BB-45	Liselotte R.	-
B16	SWA	-	WN223P*	TBD	B737	Sun, Sep 19, 2021 23:00 (MGT)	Mon, Sep 27, 2021 08:00 (MGT)	INM	●	X	-	Block SWA-BB-16	Liselotte R.	Michael O.
B17	SWA	-	WN342P*	TBD	B738	Sun, Sep 19, 2021 23:30 (MGT)	Mon, Sep 27, 2021 08:00 (MGT)	INM	●	X	-	Block SWA-BB-50	Liselotte R.	-
B19	AAL	-	TBD	TBD	A320	Mon, Sep 27, 2021 10:30 (MGT)	Mon, Sep 27, 2021 11:45 (MGT)	Day Use	●	X	-	Block AM-BB-11	Frank L.	Zack T.
B18	AAL	-	TBD	TBD	A320	Mon, Sep 27, 2021 10:30 (MGT)	Mon, Sep 27, 2021 11:45 (MGT)	Day Use	●	X	-	Block AM-BB-6	Frank L.	-
B17	SWA	-	WN4001*	TBD	B737	Mon, Sep 27, 2021 10:45 (MGT)	Mon, Sep 27, 2021 11:45 (MGT)	Day Use	●	X	-	Block SWA-BB-51	Troy T.	-
B15	SWA	-	WN504P*	TBD	B738	Mon, Sep 27, 2021 11:00 (MGT)	Mon, Sep 27, 2021 12:00 (MGT)	Day Use	●	X	-	Block SWA-BB-4	Troy T.	-

This screenshot shows a spreadsheet view of the current reservations submitted via GoApron at the Airport.





This screenshot shows is a graphical reservations of the current reservations submitted via GoApron at the Airport.



All Aircraft Type Usage		All Passenger Usage		All Cargo Usage		Aircraft Type		Aircraft Type		Aircraft Type		Aircraft Type		Aircraft Type		Aircraft Type		Aircraft Type		
Date	Airline	Flight	Operated By	Number of Departures	Number of Landings	MDTW	MDLW	MDLW	MDLW	MDLW	MDLW	MDLW	MDLW	MDLW	MDLW	MDLW	MDLW	MDLW	MDLW	
Sep 01, 2021	DAL	DL2903		-	1	207,000 lbs	206,800 lbs	171,500 lbs	162,700 lbs	-	-	-	-	-	-	-	-	-	-	-
Sep 01, 2021	UPS	5X848		-	1	365,740 lbs	363,760 lbs	304,230 lbs	286,600 lbs	-	-	-	-	-	-	-	-	-	-	-
Sep 01, 2021	UPS	3X398		-	1	499,000 lbs	498,000 lbs	326,000 lbs	309,000 lbs	-	-	-	-	-	-	-	-	-	-	-
Sep 01, 2021	FDX	F3495		-	1	363,760 lbs	363,760 lbs	304,230 lbs	286,600 lbs	-	-	-	-	-	-	-	-	-	-	-
Sep 01, 2021	FDX	F3459		-	1	231,000 lbs	231,000 lbs	210,000 lbs	200,000 lbs	-	-	-	-	-	-	-	-	-	-	-
Sep 01, 2021	WAE	WA441		-	1	-	6,890 lbs	6,890 lbs	-	-	-	-	-	-	-	-	-	-	-	-
Sep 01, 2021	TBD / Charter	N239RT		-	1	12,652 lbs	12,500 lbs	11,525 lbs	9,700 lbs	-	-	-	-	-	-	-	-	-	-	-
Sep 01, 2021	EJA	EJA93		-	1	18,078 lbs	17,968 lbs	16,865 lbs	13,999 lbs	-	-	-	-	-	-	-	-	-	-	-
Sep 01, 2021	TBD / Charter	N528DV		-	1	14,070 lbs	13,870 lbs	12,790 lbs	10,675 lbs	-	-	-	-	-	-	-	-	-	-	-
Sep 01, 2021	TBD / Charter	N18PCF		-	1	56,000 lbs	35,700 lbs	31,800 lbs	24,400 lbs	-	-	-	-	-	-	-	-	-	-	-
Sep 01, 2021	ASA	ACA451	OJE	-	1	64,700 lbs	64,500 lbs	61,750 lbs	57,000 lbs	-	-	-	-	-	-	-	-	-	-	-
Sep 01, 2021	DAL	DL3360	SWP	-	1	83,026 lbs	82,073 lbs	74,057 lbs	69,886 lbs	-	-	-	-	-	-	-	-	-	-	-
Sep 01, 2021	ASA	A3232	OJE	-	1	64,700 lbs	64,500 lbs	61,750 lbs	57,000 lbs	-	-	-	-	-	-	-	-	-	-	-
Sep 01, 2021	UAL	UA3364	SWP	-	1	51,250 lbs	51,000 lbs	47,000 lbs	44,000 lbs	-	-	-	-	-	-	-	-	-	-	-
Sep 01, 2021	ASA	A3200	OJE	-	1	86,870 lbs	85,517 lbs	74,957 lbs	69,886 lbs	-	-	-	-	-	-	-	-	-	-	-

This screenshot is an example of flight details (i.e. flight number, aircraft type, aircraft weight specifications etc.)



## APPENDIX B

### AIRLINE AGREEMENT SECTION ON NON-EXCLUSIVE GATE ASSIGNMENTS

The following paragraphs are from Article XVII (17) of the current Airline Agreement related to preferentially assigned gates, which will be in effect through September 30, 2022. The City will be revisiting these procedures as part of the negotiation of a new, successor Airline Agreement, with a view to updating them to foster and enhance airline competition at the Airport.

#### 17.2 - PROCEDURE FOR ASSIGNING NON EXCLUSIVELY LEASED GATES

17.2.A The CITY may require an AIRLINE which leases non-exclusive space to move its aircraft to permit use by other carriers which have an active need for use of the gate. In such event, the accommodated carrier shall be required, in writing, to reimburse the accommodating AIRLINE for all costs that it incurs to remove its aircraft from the gate. The carriers will be required to first utilize their own non-exclusive gates prior to requesting use of another carrier's non-exclusive gate.

17.2.B If CITY needs to assign to another carrier for an active operation the use of a gate on which a non-exclusive carrier is parking an aircraft overnight, the CITY will first seek volunteers to remove its aircraft. If no airline volunteers to move its aircraft, then the CITY will consider the following factors in designating specific non-exclusive premises for temporary or shared use: (i) the average number of flight arrivals and departures per aircraft parking position per day; (ii) flight scheduling considerations; (iii) potential labor conflicts; (iv) aircraft parking position locations; and (v) other operational considerations.

17.2.C AIRLINE may charge the accommodated airline for the latter's access to the AIRLINE's non-exclusive space (i) an amount equal to the amount of rentals and/or other charges due from AIRLINE to the CITY for the actual time the accommodated AIRLINE uses the gate, (ii) for any materials, supplies and equipment sold to or utilized by the accommodated carrier from the AIRLINE, (iii) a labor cost component plus any additional percentage for direct and indirect costs which AIRLINE deems appropriate in providing access to the gate and for providing a particular supply or service to the accommodated carrier, and (iv) an administrative fee, not to exceed fifteen percent (15%) of the rentals. The accommodated carrier will bear the charge of moving the non-exclusive aircraft from the gate, replacing it for the first flight and be liable for damages occurring during or as a result of the tow.

17.2.D The accommodated airline will pay AIRLINE within 30 days after the issuance date of an invoice from AIRLINE for those charges allowed in Section 17.2.C AIRLINE shall not be required to allow temporary access to its non-exclusive space, if AIRLINE establishes, to the satisfaction of the CITY, that the proposed accommodated airline is an unreasonable credit risk and that reasonable precautions are not sufficiently available to reasonably protect AIRLINE.



### 17.3 - PROCEDURE FOR ASSIGNING SPACE FOR NEW ENTRANTS

New entrant airlines seeking ticket counter and baggage makeup space will utilize the following procedure:

- Unused ticket counter space would be utilized first.
- If no unused space is available, an attempt will be made to set up and create temporary space.

If neither of these options will work, the Airport will work with existing airlines to determine where best to reallocate space.

- Airlines may be required to shift or reduce their ticket counter space.
- New entrant space will be proportionate to their number of flights and size of aircraft as compared to existing airlines.
- Costs for shifting existing airline locations will not be at the expense of the incumbent.