

# Through-the-Fence Operations Quick Reference Guide

## What are Through-the-Fence (TTF) Operations?

TTF operations occur when an airport sponsor gives ground access permission to a private party (individual or firm) so that the user can access an airport's airside infrastructure and engage in associated activities from an adjacent property. TTF operations commonly refer to access to the airport infrastructure by aircraft, but TTF access points can also include access by pedestrian and vehicles.<sup>1</sup>

## What are the Different Types of TTF Operations?

- **Residential:** Activity conducted by someone living in a residence located on TTF property with an attached or detached hangar. Residential TTF activities can include a single residential user with a single access point, or multiple residential users with multiple TTF access points.
- **Commercial Aeronautical:** Commercial activity related to, or required for the operation of aircraft, such as aircraft storage facilities, fueling products and services, flight instruction, aircraft leasing, ground handling, and more.
- **Non-commercial Aeronautical:** Activity conducted by a person or business that has exclusive control of an aircraft for non-commercial purposes that is located on and operated from a TTF property, such as non-commercial aircraft storage.
- **Non-aeronautical:** Activity that does not include or require the use of an aircraft or is not required for the safety of aircraft operations. This may include manufacturing of aircraft or aircraft parts, ground-based aviation training, and non-flying aircraft museums.
- **Government and Military:** Activity conducted by government and military agencies on TTF property (aeronautical or non-aeronautical) that typically is related to public service (e.g. search and rescue) or national defense.

## What are the Key Considerations for Allowing or Not Allowing TTF Activity at an Airport?

The following table presents some example pros and cons of allowing different types of TTF activity at an airport. This is not an exhaustive list.

TTF Pros	TTF Cons
TTF activities can generate job growth at the airport and in the surrounding community/region.	Some TTF activities can result in non-compatible land use developments or non-aviation activities that may hinder airport operations.
TTF activities can increase utilization of the airport, which results in enhanced revenues for the airport sponsor.	Unless TTF properties are equipped with appropriate infrastructure (such as dedicated roadways used for refueling vehicles and other aviation ground vehicles or equipment), then logistical challenges may occur.

<sup>1</sup> ACRP Report 114: Guidebook for Through-the-Fence Operations, 2014

## TTF Pros

TTF activities can result in more customers using services provided by on-airport fixed-base operators or other aviation service tenants, resulting in increased revenues and economic viability for those on-airport tenants.

TTF activities can provide opportunities for additional commercial aeronautical activities when an airport is fully developed.

TTF activities may increase property taxes because of TTF property developments and improvements.

## TTF Cons

Commercial TTF activities could attract business away from on-airport tenants unless rent and fee guidelines have been established so that TTF rent and fees are equal to or greater than what is provided on-airport.

Issues may arise if non-commercial (aeronautical or non-aeronautical) TTF operators want to transition to commercial purposes, if zoning ordinances do not support commercial development, or if the TTF agreement prohibits commercial purposes.

## What are the Obligations of Airport Sponsors in Allowing TTF Activity?

Sponsors of federally obligated airports must comply with numerous federal obligations, including statutes, assurances, policies, and other guidance if TTF activity is to be allowed. Some of these are summarized here:

- Applicable Airport Sponsor Assurances for airports that are federally obligated:
  - Assurance 5, Preserving Rights and Powers
  - Assurance 19, Operation and Maintenance
  - Assurance 20, Hazard Removal and Mitigation
  - Assurance 21, Compatible Land Use
  - Assurance 22, Economic Nondiscrimination
  - Assurance 23, Exclusive Rights
  - Assurance 24, Fee and Rental Structure
  - Assurance 29, Airport Layout Plan
- FAA Modernization and Reform Act of 2012, Public Law 112-95, Section 136 allows an airport sponsor of a federally obligated airport (excluding commercial service airports or private, public-use airports) to permit residential TTF activities without being in violation of the airport sponsor's obligation and assurances. The TTF agreement used by the airport sponsor must contain the specific terms and conditions stipulated in the federal statute.
- FAA Policy Regarding Access to Airports from Residential Property covers residential TTF access to federally obligated airports.
- FAA Order 5190.6B, Airport Compliance Manual, includes guidance for complying with federal obligations relevant to TTF operations and may be helpful in understanding how the FAA views TTF operations.
- Compliance Guidance Letter 2021-03 - FAA Review of Existing and Proposed Residential Through-the-Fence Access Arrangements includes guidance for FAA staff in reviewing existing and proposed residential TTF agreements.

Note that airport sponsors can prohibit any type of TTF operation or activity without being in violation of their sponsor obligations.

## Where can I learn more?

- **ACRP Report 114:** Guidebook for Through-the-Fence Operations
- **FAA Residential Through-the-Fence Access Toolkit**

