



Summary

To address issues raised during an informal complaint process pursuant to 14 CFR Part 13 related to Martin County Airport, Witham Field (the "Airport"), Martin County staff developed a voluntary corrective action plan ("vCAP") which was submitted to FAA by County staff on April 25, 2025. On September 3, 2025, FAA issued a final request to the County for the most recent version of the County's lease with Daher Aerospace, Inc. ("Daher") and an amended vCAP. In response to FAA's request, the County has prepared this vCAP, which includes a plan to guide the effective issuance of RFPs for Airport properties in order to meet aeronautical demand and the County's federal obligations. The Martin County Board of County Commissioners has approved and is submitting this vCAP and providing a copy of the lease between Daher and the County.

The vCAP outlines current aeronautical demand at the Airport and aligns the solicitation criteria with that demand to ensure a focused approach. It eliminates any language soliciting non-aeronautical or mixed uses from the criteria, identifies optimal uses for vacant properties in accordance with the Airport Master Plan, and provides timelines with milestone goals for implementing the vCAP.

The County is taking immediate actions to implement the vCAP, but is open to further refinement of the plan subject to FAA input, including input provided during subsequent compliance coordination meetings

The County intends to solicit proposals for at least 50 acres of property. The timelines for those solicitations are included in the vCAP. Because County construction of capital infrastructure will add significant time to the period preceding issuance of solicitations, the County will seek tenant investment where possible.

Table of Contents

Summary	1
Daher Lease and Transition of Use.....	3
Aeronautical Demand for Vacant Properties.....	4
Proposed Selection Criteria for Vacant Properties.....	5
Proposed Selection Criteria:	6
Description of Parcels and Timelines for Lease Availability.....	7
Aeronautical Use Parcel A	8
Timeline / Milestones – Aeronautical Parcel A (9 Months-4 Years):	8
Timeline / Milestones – Aeronautical Parcel B (2.5 Years-4 Years):	11
Aeronautical Use Parcel C	14
Timeline / Milestones – Aeronautical Parcel C (9 Months-5 Years):	14
Aeronautical Use Parcel D	17
Timeline / Milestones – Aeronautical Parcel D (7 Months-4.5 Years):	17
Appendices.....	19
Figure 6-9, Southwest Airport Facilities – Concept A	19
Figure 6-8 – South Airport Facilities Concept C	20

Daher Lease and Transition of Use

To address Land Use and Grant Assurance compliance concerns, the County is currently in negotiations with Daher to (1) remove 13 acres of land from the premises so they may be made available for other aeronautical users and (2) transition Daher from non-aeronautical use to aeronautical use of the premises. Transitioning Daher off the Airport at this time is not feasible and would create significant economic impacts for the County and its residents. Instead, the County is working with Daher to transition from non-aeronautical use to 100% aeronautical use by 2031.¹ The County is seeking to expedite that timeline if possible.

The County will seek a temporary release of the Daher premises for non-aeronautical use during the period of time Daher is transitioning from non-aeronautical to aeronautical services. In addition, the County will coordinate with FAA regarding the most practical and achievable means of ensuring compliance with the Land Use Policy and Grant Assurances as the transition process is taking place. The County will submit its request for a temporary release no later than March 31, 2026.

The timelines for Daher's transition to aeronautical use are set forth in the previous vCAP. To date, Daher has invested \$2 million in transition infrastructure work. In addition, the County has been meeting and will continue to meet with Daher to negotiate the following items within the next ninety (90) days:

1. Removal of Parcel D from the leasehold so that it may be made available to other users.
2. Reappraisal of the leased premises and adjustment of rent to new appraised value based on fair market value non-aeronautical rent until the transition to aeronautical use is complete (including annual CPI increases and regular reappraisals).
3. Reappraisal of the leased premises for aeronautical use upon final transition and adjustment of rent to aeronautical rental value based on the appraisal (including annual CPI increases and regular reappraisals).
4. Expedition of transition timelines and milestones to speed transition process with the goal of achieving final transition by 2030 and achieving full Kodiak and TBM final assembly lines by 2028.

¹ The County is providing FAA with a copy of the lease between Daher and the County concurrently with its submission of this vCAP.

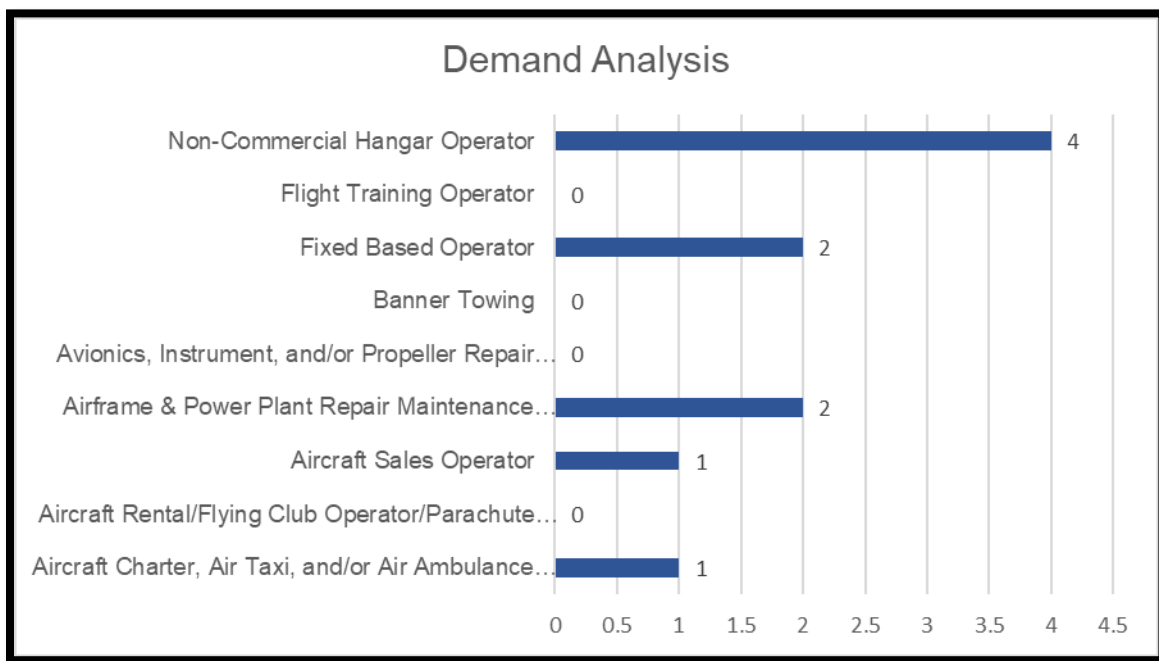
Aeronautical Demand for Vacant Properties

The following information was collected during the investigation of the 14 CFR Part 13 complaint and is part of the original voluntary corrective action plan submitted to the Federal Aviation Administration on April 25, 2025. A brief analysis of the collected data was conducted to align demand with activity types, which will help inform the recommended selection criteria in the subsequent section of the plan.

COMPANY NAME	PRIMARY CONTACT	PRIMARY EMAIL	DATE OF INQUIRY	ACTIVITY TYPE ²
Sky Harbor Group	Neil Szymczak	nszymczak@skyharbour.group	November 13, 2023	Non-Commercial Hangar Operator
Premier Private Jets	Joshua Birmingham	josh@premierprivatejets.com	November 13, 2023	Aircraft Charter, Air Taxi, and/or Air Ambulance Operator
Stuart Airshow Inc	Dewey Vinaya	dewey@stuartairshow.com	March 5, 2024	Non-Commercial Hangar Operator
Jet Sales Group	Brent Martin	brent@jetsalesgroup.com	November 12, 2024	Aircraft Sales Operator
Precision Jet Center	Diana Long	Diana@precisionjet.com	January 28, 2025	Airframe & Power Plant Repair Maintenance Operator
Big Sky Aviation	Brian Garner	bryan.garner@bigskyaviation.com	March 17, 2025	Airframe & Power Plant Repair Maintenance Operator
Jet Acquisitions	Neil Walash	Nwalash@jet-acquisitions.com	March 28, 2025	Non-Commercial Hangar Operator
	Robert Riedel	rjriedel1263@gmail.com	June 9, 2025	Non-Commercial Hangar Operator

² Activity Type is determined by referencing Section 4 of the Martin County Airport/Witham Field Minimum Standards for Aeronautical Activities.

Atlantic Aviation	Daniel Capen	dcapen@atlanticaviation.com	June 18, 2025	Fixed Based Operator
Blackbird Partners	Carson Fox	cf@blackbirdpartners.com	July 17, 2025	Non-Commercial Hangar Operator
APP Jet Center	Dan Harrow	dharrow@appjetcenter.com	September 4, 2025	Fixed Based Operator



Proposed Selection Criteria for Vacant Properties

To align the prioritization of needs with the existing demand for aeronautical activities by consulting the list of parties interested in leasing property at Witham Field, the County proposes the following selection criteria for future Requests for Proposals (RFPs) for aeronautical leases at the Airport.

Proposed Selection Criteria:

SELECTION CRITERION	POINT VALUE
Occupancy (Proposer intends to be the tenant and has no intent to sublease)	0-1
Aeronautical Activity³ <i>(scoring zero in this criterion disqualifies the proposer)</i> <ul style="list-style-type: none"> Proposals must only include activities that involve, make possible, or are required for the operation of an aircraft, launch or reentry vehicle or that contribute to or is required for the safety of such operations. Examples include, but are not limited to, Corporate Aviation, Air Taxi and Air Charter, Pilot Training, Aircraft Rental and Sightseeing, Aerial Photography, Aerial Application of Agricultural Agents, Aerial Advertising and Surveying, Aircraft Sales and Services, Aircraft Storage, Sale of Aviation Fuel Products, Repair and Maintenance of Launch or Reentry Vehicles, Unmanned Aircraft Systems (UAS), and Advanced Air Mobility (AAM). 	0-1
Prioritization of Needs Proposals will be scored from highest to lowest based on demand analysis from the Aeronautical Demand from Vacant Properties at Witham Field: <ul style="list-style-type: none"> High Demand: (20 points) <ul style="list-style-type: none"> Non-Commercial Hangar Operator Medium Demand: (10 points) <ul style="list-style-type: none"> Airframe and Power Plant Operator Fixed Based Operator Low Demand: (5 points) <ul style="list-style-type: none"> Aircraft Sales Operators Aircraft Charter, Air Taxi, and/or Air Ambulance 	0-20
Strength of Business <ul style="list-style-type: none"> The strength of a business will be evaluated based on the respondent's proposed business plan, their demonstrated financial capability to construct the proposed improvements and initiate operations in a timely manner, and the company profile. 	0-30

³ Incorporates FAA definition of Aeronautical Activities from FAA-2023-1739 "Policy on the Definition of Aeronautical Activities".

<ul style="list-style-type: none"> The company profile should include information about the company's background, qualifications, experience, licenses, certifications, and relevant operations at similar types of airports (NPIAS-National Airport). 	
Airport Investment <ul style="list-style-type: none"> <u>Value of Capital Investment:</u> <i>(20 points)</i> <ul style="list-style-type: none"> The proposed capital investment's total value will be assessed. Projects that offer greater economic benefits to the Airport beyond just lease payments and capital improvement scores higher. <u>Length of Proposed Lease Term:</u> <i>(20 points)</i> <ul style="list-style-type: none"> The preferred lease duration is 30 years, with options for two additional 5-year extensions. The maximum allowable lease term is 40 years. A longer proposed lease term scores higher. 	0-40
Price Proposals	8
<u>Total Points</u>	100

Description of Parcels and Timelines for Lease Availability

The County has identified approximately 50 acres of property for which to solicit proposals that address its current aeronautical demands, and is negotiating with Daher to remove an additional 13 acres from the premises leased by Daher so they may be made available to aeronautical users before termination of the Daher lease (referred to as Aeronautical Parcel D). These properties include those previously identified in the 2010 Witham Field Airport Business Plan for future aeronautical development (referred to as Aeronautical Parcel C), as well as properties that were considered inaccessible to aeronautical infrastructure (known as Aeronautical Parcel A). The current ongoing strategic business plan update aimed to identify the highest and best use of these properties.

The County intends to make each parcel available through a competitive Request for Proposal (RFP) process, with the selection criteria described above. Timelines and milestones for Parcels A through D are described below. The earliest a parcel can be made available is approximately August 1, 2026, and the latest a parcel can be made available is approximately January 1, 2031. Delays in availability are largely due to infrastructure requirements needed to certain sites, which the County is seeking to address through state and federal funding or tenant investments.

Aeronautical Use Parcel A

Aeronautical Parcel A, located between SE Airport Rd and the existing facilities off Witham Field Drive, spans approximately 16 acres. Previously, 9 acres of this property were under a lease option with Triumph Aerostructures (the predecessor to Daher) but were returned to the County following termination of that lease. The land is now retained for future aeronautical development in line with the approved 2023 Airport Master Plan Update.

The 2023 Airport Master Plan Update explores several concepts for providing aviation facilities. These concepts include options for multiple clear-span hangars, totaling approximately 120,000 square feet of aircraft storage, as well as 26,600 square yards of aircraft parking aprons and taxilanes, designed with ADG II object-free areas⁴.

The County's goal is to make Parcel A available for bidding following the Proposed Selection Criteria for Vacant Properties as soon as possible. As can be seen from the timeline provided below, the timing will depend significantly on the level of pre-site work and capital improvements needed by the County.

While the County will strive to make Parcel A available, it faces a significant hurdle because the parcel is located between Airport Road and two FBO tenants (APP Jet Center and Atlantic Aviation). It does not have runway access. Access to Taxilane Bravo and Runway 12/30 by Parcel A requires the FBO tenants to agree to amendments to their leases to create access. In addition, taxiway infrastructure for this Parcel is not currently included in the County's Capital Improvement Program. If the County were to provide the infrastructure, planning and programming would require at least 2 years (excluding construction). Alternatively, the County could transfer this requirement to the future tenant and provide oversight through its site plan approval. Environmental permitting, including NEPA, may also extend the timeline for development depending on project complexity and whether an Environmental Assessment is triggered.

Timeline / Milestones – Aeronautical Parcel A (9 Months-4 Years):

- Attempt to negotiate lease amendments enabling AOA access (by 3/31 2026, subject to agreement of current tenants)
- Environmental Permitting, if EA triggered (+ 18 Months)⁵
- Capital Improvements, if provided by County (+ 2 Years)⁶

⁴ Figure 6-9, Southwest Airport Facilities – Concept A, attached as an Appendix to this vCAP, is excerpted from the Airport Master Plan and depicts the conceptual layout for this parcel, which includes ten 12,000 SF clearspan hangars, about 26,500 SY of aircraft parking apron space, and taxilanes with ADG II object free areas.

⁵ This could be conducted post award if tenant is willing to provide capital improvements.

⁶ This could be conducted post-award if tenant is willing to provide capital improvements. Cost of these improvements are not known.

- Appraisal (by 6/1 2026)
- Prepare Request for Proposal Solicitation for Parcel A (+30 Days)
- Advertise Solicitation for Parcel A (+ 45 Days)
- Selection Committee Meeting (+14 Days)
- Lease Negotiation Phase (+90 Days)
- Board Approval of Lease Award (+30 Days)

Aeronautical Use Parcel B

Aeronautical Parcel B, located on the south side of the Airport off SE Aviation Way, spans approximately 10 acres. Currently, this property serves the Martin County Public Works. The Board of County Commissioners has completed site selection and is now reviewing construction delivery methods to relocate these services off Airport property.

In the 2023 Airport Master Plan Update, the County emphasized the importance of keeping this parcel for the storage of light general aviation aircraft. This includes facilities such as aircraft parking aprons, tie-downs, shade hangars, fueling stations, and a wash rack. Before approving the update, the County passed a resolution to offer self-service avgas (100LL) and to construct shade hangars as a proprietary exclusive. This decision marks the first step towards providing light general aviation services on Aeronautical Parcel B.

If developed, Aeronautical Parcel B would accommodate approximately 60 additional light general aviation users. Alternatively, the County could make a portion of the property available for competitive solicitation to provide a mix of services for both light and large general aviation users. This would include around 24,000 square feet of clear-span hangars, 44 shade hangars, and 10,800 square yards of aircraft parking apron⁷.

The County's goal is to prioritize capital improvements to Parcel B, including Airport Capital Improvement Plan (ACIP) and Joint Automated Capital Improvement Plan (JACIP) funding requests for the environmental assessment, financial feasibility assessment, and the planning, design, and engineering studies, so Parcel B can be made available for the highest and best aeronautical use.

Timeline / Milestones – Aeronautical Parcel B (2.5 Years-4 Years):

- Remove Public Works to off-Airport location (by 2/24 2028)⁸
- Survey (by 2/28 2026)
- ACIP and JACIP funding requests and grant process (meeting with FAA and State re: ACIP and JACIP January and February 2026)

⁷ Figure 6-8 – South Airport Facilities Concept C, attached as an Appendix to this vCAP, is excerpted from the Airport Master Plan and depicts the conceptual layout for this parcel, which includes two 12,000 SF clearspan hangars, 44 shade hangar units, and approximately 10,800 square yards (SY) of aircraft parking apron. Airfield access to the site would require the shifted and widened taxilane with up to an ADG III object free area. Concept C also provides the option for a 100LL self-serve fuel tank and aircraft wash rack area.

⁸ The removal is dependent on construction of a new facility off-site, which the County Board is considering a proposal for at its February 24th meeting. Following Board approval, construction and removal of the department is expected to take 18-24 months, after which the County can make the property available through its RFP process.

- Environmental Permitting (2028)⁹; if EA triggered (+ 18 Months)
- Capital Improvements, if provided by County (+ 2 Years)¹⁰
- Appraisal (+60 Days)
- Prepare Request for Proposal Solicitation for Parcel B (+30 Days)
- Advertise Solicitation for Parcel B (+ 45 Days)
- Selection Committee Meeting (+14 Days)
- Lease Negotiation Phase (+90 Days)
- Board Approval of Lease Award (+30 Days)

⁹ Environmental for horizontal capital improvements already contemplated in JACIP.

¹⁰ This could be conducted post-award if tenant is willing to provide capital improvements. The 2023 Master Plan estimated the cost of these improvements to be \$8.1.

Aeronautical Use Parcel C

Aeronautical Parcel C is located on the north side of the Airport property along SE Monterey Road and spans approximately 23 acres. Currently, this parcel is vacant, densely vegetated, and inaccessible to aeronautical infrastructure such as taxiways and runways. It is constrained by the Airport's building restriction line, the obstacle-free area for runway 07/25, and the line of sight from the Air Traffic Control Tower. In addition, a significant portion of this parcel is within the jurisdiction of the City of Stuart and is zoned for uses possibly incompatible with the Airport. The County will have to request a rezoning of this parcel from the City of Stuart before this site can be made available.

The 2023 approved Airport Layout Plan designates this parcel for "Future Improvement." However, the potential improvement options for this parcel are not addressed explicitly in the Alternatives Analysis of the 2023 Airport Master Plan Update.

The County participated in unsolicited meetings with various aeronautical developers over the past six months to discuss improvement plans for this parcel, some of whom have indicated their ability to improve this area without financial support from the County. Such improvement could include multiple clear span hangars to accommodate up to 75,000 SF of aircraft storage, 15,000 SY of aircraft parking apron, and the taxiways with the requisite object free areas to provide access to the Airport's aeronautical infrastructure. Shifting the capital improvements required to this Parcel C from the County to future tenants would significantly expedite the County's ability to make this Parcel available for bid. Without tenant investment, the County anticipates the required infrastructure improvements and capital financing / planning could take five years.

The County's goal is to make Parcel C available for bidding following the Proposed Selection Criteria for Vacant Properties. The County will initially solicit respondents that are willing to invest in the required capital improvements.

Timeline / Milestones – Aeronautical Parcel C (9 Months-5 Years):

- Apply for a rezoning from the City of Stuart (by 3/1 2026)
- Survey (by 2/28 2026)
- Environmental Permitting, if EA triggered (+ 18 Months)¹¹
- Capital Improvements, if provided by County (+ 2 Years)¹²
- Appraisal (by 6/1 2026)

¹¹ This could be conducted post award if tenant is willing to provide capital improvements.

¹² This could be conducted post-award if tenant is willing to provide capital improvements. The 2023 Master Plan estimated the cost of these improvements to be \$11.7 million.

- Prepare Request for Proposal Solicitation for Parcel C (+30 Days)
- Advertise Solicitation for Parcel C (+ 45 Days)
- Selection Committee Meeting (+14 Days)
- Lease Negotiation Phase (+90 Days)
- Board Approval of Lease Award (+30 Days)

Aeronautical Use Parcel D

Aeronautical Parcel D is located on the northwest corner side of the Airport along SE Dixie Highway and spans approximately 13 acres. This property is currently part of the Daher leasehold, but the County is in discussions with Daher regarding its possible removal from the leasehold so that it can be made available to other aeronautical users. Because there are no taxiways currently running from this parcel, they would have to be constructed by the County or a future tenant.

Timeline / Milestones – Aeronautical Parcel D (7 Months-4.5 Years):

- Negotiate removal of Parcel D from Daher leasehold (+90 Days, subject to concurrence from Daher)
- Environmental Permitting, if EA triggered (+ 18 Months)¹³
- Capital Improvements, if provided by County (+ 2 Years)¹⁴
- Appraisal (+60 Days)
- Prepare Request for Proposal Solicitation for Parcel D (+30 Days)
- Advertise Solicitation for Parcel D (+ 45 Days)
- Selection Committee Meeting (+14 Days)
- Lease Negotiation Phase (+90 Days)
- Board Approval of Lease Award (+30 Days)

¹³ This could be conducted post award if tenant is willing to provide capital improvements.

¹⁴ This could be conducted post-award if tenant is willing to provide capital improvements. The 2023 Airport Master Plan estimated these costs to be \$1.1 million.

Figure 6-9, Southwest Airport Facilities – Concept A



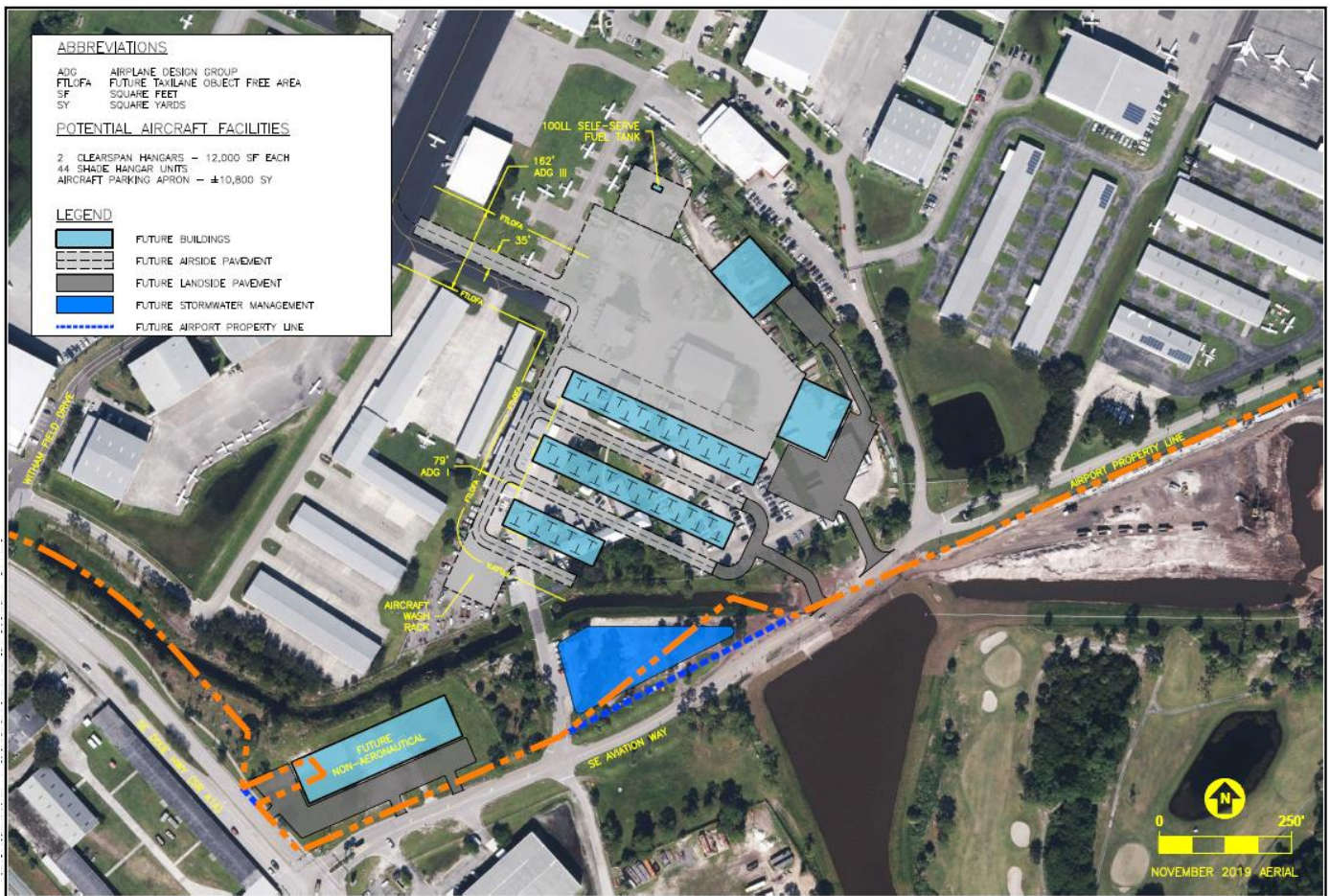
Source: ESA, 2022.

Witham Field Master Plan

FIGURE 6-9

SOUTHWEST AIRPORT FACILITIES - CONCEPT A

Figure 6-8 – South Airport Facilities Concept C



Source: ESA, 2022.

Witham Field Master Plan
FIGURE 6-8
 SOUTH AIRPORT FACILITIES - CONCEPT C