

CASE STUDY

SHAWNEE INSTRUMENT OF TRANSFER LAND

Federal Property, Local Use & Public Accountability - 1947-2026

A documentary reconstruction of Shawnee, Oklahoma airport-associated property, lease administration, federal oversight, fair-market-value practices and unresolved parcel status.

Prepared for public research and accountability review | September 2026

Evidence standard

This report distinguishes documented facts from unresolved questions. It does not conclude that Shawnee, the Airport Authority, any lessee, or any public official violated law. Incomplete issues are identified for title, FAA or other federal verification.

Executive Summary

This case study examines the relationship between the **1947 federal transfer of former Shawnee Naval Air Station property** and later local management of Shawnee Regional Airport-associated land. The assembled record includes leases, amendments, City and Airport Authority memoranda, surveys, deeds, assessor material, meeting records and modern FAA-related transactions.

The central accountability question is whether the original federal conveyance, later releases or reclassifications, present parcel boundaries, valuation requirements and airport-revenue obligations can be reconciled **parcel by parcel**. The research does not presume that every later non-aeronautical use was improper.

Three documentary anchors

- **2011 Expo:** former-airport-land transfers and a 90.53-acre Expo footprint; the lease record expressly references the November 20, 1947 Instrument of Transfer and FAA approval.
- **2022 National Guard:** FAA-authorized non-aeronautical use, appraisal-based FMV, 40 acres at \$174,240 annually with CPI escalation, and airport-directed revenue.
- **Longitudinal portfolio:** Brown Derby, Shawnee Lube, 1836 N. Kickapoo, 702 W. Independence, Metro Mart, YMCA/Lions Club and other transactions create parcel-level tests.

The principal finding is a **records-reconciliation gap**: local records demonstrate continuing federal relevance and multiple valuation/approval mechanisms, but do not yet provide one authoritative schedule showing the current federal status of each historically related parcel.

1. Documentary Timeline

Year	Documented milestone
1947	Federal Instrument of Transfer associated with former Shawnee Naval Air Station establishes the historical starting point.
1964	YMCA lease lineage begins for property later identified at 700 W. Saratoga.
1979	City memorandum later reports transfer of 24.496 acres of former airport land to SCCDA.
1986	SCCDA transfers the same tract to Shawnee Municipal Authority for financing.
1988	Additional 31.43-acre Expo lease plus a shorter three-year tract.
2004	Shawnee Lube airport-property lease begins.
2009	702 W. Independence commercial airport lease begins.
2011	Expo footprint consolidated to 90.53 acres; lease record references the 1947 Instrument and FAA approval.
2013	1836 N. Kickapoo memo documents FMV/CPI method; YMCA begins separate Lions Club operating agreement.
2014	YMCA 700 W. Saratoga lease extended through February 2064.
2017	Brown Derby and Shawnee Lube records document commercial valuation/expansion practices.
2019	Airport lease/development policy formalizes periodic valuation/CPI practices.
2022	FAA authorizes 40 acres for National Guard-related non-aeronautical use; FMV documented at \$174,240/year plus CPI.
2025-26	Public-records and parcel-reconciliation research continues.

2. Expo & National Guard: Two Key Federal Anchors

The **2011 Expo transaction** is the strongest historical bridge to the 1947 conveyance. A City memorandum reconstructs transfer of 24.496 acres of former airport land to SCCDA in 1979, transfer to Shawnee Municipal Authority in 1986, additional leasing in 1988, and consolidation of the land then used by the Expo into a **90.53-acre** management footprint. The underlying lease record expressly references the 1947 Instrument and requires FAA approval.

The **2022 National Guard transaction** is the clearest modern control case. Shawnee documented FAA authorization for non-aeronautical use and described FAA Order 5190.6B as requiring appraisal-based FMV for non-aeronautical airport property, subject to limited exceptions.

2022 transaction layer	Documented treatment
Airport Authority -> City	40 acres at \$0.10/SF = \$174,240/year, escalating annually by CPI.
City -> Oklahoma Military Department	Nominal downstream lease while the City satisfies the parent FMV obligation.
Revenue destination	FAA grant local match, airport-owned facility capital repairs and airport capital equipment.

These transactions do not prove that every earlier parcel required identical treatment. They demonstrate that federal classification, approval, valuation and revenue destination are concrete administrative concepts in Shawnee's own records.

3. Commercial Non-Aeronautical Portfolio

Property	Use	Area / rent evidence	Priority unresolved record
Brown Derby	Restaurant	23,400 SF / 0.537 ac.; \$3,792/year; 2017 memo referenced land appraisals.	2017 appraisal, 1988 lease, parcel-specific FAA status.
Shawnee Lube	Auto service	0.71 ac. after 2017 expansion; about \$7,414-\$7,416/year.	2012 extension to 2054 and valuation/federal approval basis.
1836 N. Kickapoo	Coffee/bagel	8,462 SF / 0.19 ac.; \$1,620/year; original rate described as FMV plus CPI.	Heavenly Grind original lease and FMV support.
702 W. Independence	Retail/recreation	Approx. 7,200 SF building + 35,305 SF land; original rent \$12,000/year plus renovation.	Original valuation and federal classification history.
Metro Mart Tract #23	Commercial leasehold	2.48 acres; leasehold financing documented.	2008 lease, rent/FMV basis and federal tract status.
Vyve / Armory	Call center	2017 amendment raised rent from \$750 to \$775/month.	2015 original lease, square footage and valuation basis.

Raw rental figures are not directly comparable. Parcel characteristics, improvements, appraisal dates and tenant obligations differ. The stronger test is procedural: **what federal classification applied, what valuation method or exception applied, and where did resulting revenue go?**

4. YMCA & Lions Club: Distinct Property Relationships

Track	Documented relationship	Unresolved question
700 W. Saratoga YMCA	Approx. 4.81 acres; lease lineage dates to February 19, 1964; 2014 memorandum extends through February 18, 2064; Airport Authority renewal record.	Was this footprint part of the 1947 conveyance or later federally obligated airport property, and what conditions govern it?
Lions Club Park	Separate 2013 recreational agreement after SYAA termination; \$1 annual cash rent plus YMCA maintenance duties, City utilities/major repairs and later mower support.	What is the parcel's federal status and, if federally obligated, what community-use classification or exception applied?

A nominal \$1 lease is not itself evidence of improper treatment. Total consideration and federal classification matter. The Guard transaction demonstrates that a downstream nominal lease can coexist with an upstream FMV payment.

Revenue & valuation framework

- **Sips Downtown Cafe:** original rate described as FMV; later rate adjusted by CPI.
- **Brown Derby:** staff referenced new boundary surveys and land appraisals; rent set at \$0.16/SF.
- **2019 policy / 2022 implementation:** periodic valuation and CPI concepts; airport rental revenue accounts identified.
- **Guard:** appraisal-based FMV with explicit airport-capital destination.

5. Priority Records Needed for Reconciliation

Priority record	Why it matters
Complete 1947 conveyance file and legal-description schedule	Establishes authoritative federal origin and conditions.
Historical/current FAA Airport Property Maps / Exhibit A	Connects original conveyance to modern parcel boundaries.
FAA releases, reclassifications and disposal approvals	Identifies parcels no longer subject to original or later airport obligations.
2011 Expo FAA approval file	Tests how FAA interpreted the Instrument in a modern local transaction.
Original 1964 YMCA lease and amendments	Clarifies the 4.81-acre long-term property relationship.
2012 Shawnee Lube extension to 2054	Clarifies valuation, term and any federal approval for a long commercial lease.
2017 Brown Derby appraisal and 1988 predecessor lease	Provides actual valuation basis and historical footprint.
Heavenly Grind original FMV file	Supports the 1836 N. Kickapoo valuation chain.
Historical airport lease receipts and revenue ledgers	Allows tracing of rent/proceeds to airport accounts and expenditures.
County Clerk deed/release/lease instruments	Completes title history beyond assessor sale-history fields.

The goal is not to presume a violation. It is to replace inference with an authoritative federal/title reconciliation.

6. Questions for Federal & Public Review

- Which parcels conveyed under the 1947 Instrument remain federally obligated today?
- Which parcels have been released, disposed of, reclassified or otherwise relieved of original restrictions, and under what conditions?
- What FAA approval was issued for the 2011 Expo lease amendment that expressly referenced the 1947 Instrument?
- What federal status applies to the YMCA property at 700 W. Saratoga and to Lions Club Park?
- What federal approvals or FMV determinations applied to Shawnee Lube, Brown Derby, 702 W. Independence, 1836 N. Kickapoo and other non-aeronautical commercial uses?
- What airport-revenue requirements applied to revenue generated from federally obligated property?
- Can FAA reconcile the current Airport Property Map/Exhibit A with the original 1947 conveyance and all subsequent releases?

Conclusion

The documentary record establishes a long and complex history of airport-associated property management in Shawnee. It also establishes that federal approval, federal subordination, fair-market-value analysis, appraisal, CPI escalation and airport-directed revenue have all appeared in Shawnee's own property-management records. What remains unresolved is the parcel-by-parcel federal status that connects those modern transactions back to the 1947 conveyance.

The appropriate next step is an authoritative reconciliation - not an accusation. A complete federal and title record would allow the public to distinguish lawful releases, approved non-aeronautical uses, community-purpose arrangements and continuing federal obligations from any transaction that may require additional review.

Prepared as part of the Baseball Heaven / Integrity of the Game vs. Economic Impact (Politics) public-accountability research archive.