

**COUNTY OF SAN DIEGO  
AIRPORTS**

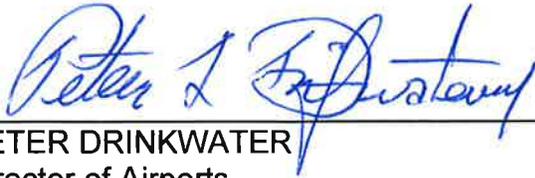
**POLICIES  
AND  
PROCEDURES**

FOR FIXED BASE OPERATORS, LESSEES, LICENSEES, TENANTS,  
PERMIT HOLDERS, USERS AND VISITORS



**March 2016**

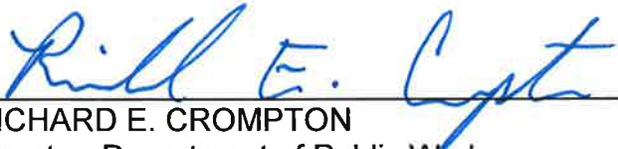
County Airports Policies and Procedures is established and adopted by the County of San Diego, Department of Public Works on the date indicated below.



3/14/16

PETER DRINKWATER  
Director of Airports

Date



3/14/16

RICHARD E. CROMPTON  
Director, Department of Public Works

Date

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# **GENERAL PROVISIONS**

## **PURPOSE OF POLICIES AND PROCEDURES**

These Policies and Procedures are one of three closely related documents that provide information regarding doing business with County of San Diego Airports and operating at County of San Diego airport facilities; the other two documents are Rules and Regulations and Minimum Standards.

The purpose of these Policies and Procedures as outlined in this document is to help ensure uniformity and consistency of County activities and actions in accordance with federal, State and local laws, ordinances, regulations, grant agreements, policies adopted by the Board of Supervisors, and policies, orders or permits of State or federal agencies with oversight responsibilities (collectively referred to herein as the "Laws"). These Policies and Procedures are approved by the Director, Department of Public Works and do not operate to excuse compliance with any Laws. In the event of a conflict between these Policies and Procedures and the Laws, the Laws shall control. Fixed Base Operators, Lessees, Licensees, Tenants, Permit Holders, Users, and Visitors (hence forward referred to as 'Users') shall at all times comply with the Laws. Compliance with these Policies and Procedures is required from Users with leases, permits, licenses or other agreements with the County that require compliance with County policy. In the event of a conflict between the terms of a license, lease or other agreement and these Policies and Procedures; the terms of the license, lease or agreement shall control. These Policies and Procedures do not establish a duty or obligation of any kind on the part of the County.

## **CODE OR RULE ENFORCEMENT**

### **POLICY**

It is the policy of County Airports to ensure that Users conduct operations and activities on County airport property in compliance with all applicable Laws and agreements. County Airports' staff shall take appropriate action under the circumstances to ensure compliance with applicable Laws and agreements.

### **PROCEDURE**

Citations or other authorized action for violations of Laws may be issued at the discretion of the Director of Airports when Airports has responsibility for enforcement. County Airports' staff at the discretion of the Director of Airports may initiate action to enforce permits, licenses and other agreements where County Airports has responsibility for enforcement or management of the agreement.

# **PART 1 - AIRPORT OPERATIONS**

## **POLICY**

It is the policy of County Airports that activities within the Aircraft Operations Area (AOA) shall be conducted in a safe, secure and efficient manner at all times and that entry into the AOA by anyone other than in an aircraft be minimized. Individual Leaseholders are responsible for the security of their leasehold, tenants, hangars, aircraft, visitors and equipment and for the education of their tenants.

## **PROCEDURES**

To implement this policy the County has established Rules and Regulations, Policies and Procedures and Minimum Standards concerning all activities within the AOA, see also Rules and Regulations, Part 1 – Airport Operations.

## **SECTION 1 - SECURITY**

### **1.1 ENTRY ACCESS**

AOA access shall be the responsibility of the Lessee by controlling access points on their leasehold.

Lessee is responsible for every individual and vehicle that enters through his/her entry access point regardless of where that individual or vehicle subsequently proceeds to on the Airport.

County Airports reserves the right to deny access to any person at any time.

### **1.2 GATE CONTROL**

All access points shall be positively controlled at all times. Under circumstances where an access point gate is non-operational, said gate shall be closed, locked and repaired within 48 hours.

County Airports reserves the right to lock any access point at any time.

Gate codes shall be changed periodically. At his or her sole discretion, the Airport Manager may require gate codes to be changed, by any or all Lessees, to ensure adequate control of access points is maintained.

Lessees and sublessees shall ensure their tenants, guests, agents and others using the leased or subleases premises are educated and fully understand the proper procedures for entering the AOA by any means. Such individuals shall not take part in activities in the

movement area unless they are experienced in such operations and have successfully passed a County Airports approved Driver Training Program.

## **SECTION 2 - DRIVER TRAINING PROGRAM**

### **PROCEDURE**

Driver Training Program is scheduled by contacting the Master Lessee. The Master Lessee will coordinate the training with the Airport Manager. Persons attending Driver Training Program shall present a valid driver's license. Upon successful completion of the Driver Training Program, Master Lessee or County Airports staff shall issue certification documentation.

Subjects covered in the Driver Training Program include, but are not limited to:

- Airport Driving Rules & Regulations
- Driving on the Non-Movement Areas
- Driving on the Movement Areas
- Communication

#### Driver Responsibility

- Contact Master Lessee to arrange training
- Complete training
- Pass driver training test with a score of 80% or greater
- Obtain driver certification card
- Carry certification card at all times when on AOA

#### Master Lessee Responsibility

- Obtain Driver Training Program packet from Airport Manager
- Provide and ensure completion of driver training to tenants, users, vendors and guests that will use or enter movement areas from your leasehold
- Administer written driver training test
- Issue driver certification card to those passing test with a score of 80% or higher

- Maintain current list of all certifications cards issued
- Send Airport Manager updated list after each certification card is issued or revoked

See Appendix B for Ground Vehicle Operations Training Program

# **SECTION 3 - INCURSION/DEVIATION PREVENTION PROGRAM**

## **POLICY**

Lessees and Licensees shall ensure their Users are educated in proper driving procedures for driving within all AOA movement and non-movement areas.

No person shall operate a motor vehicle within any movement area without successfully passing the County Airports approved Driver Training Program. (See Section 2 above).

## **PROCEDURE**

At tower controlled airports, the County will coordinate with the ATCT Manager and support the Local Runway Safety Action Team (LRSAT). At non-tower controlled airports, the Airport Manager will establish the LRSAT. In order to reduce incursions and deviations, the LRSAT shall review the safety related items listed below and provide recommendations to Airport Staff regarding:

- Signage and Marking
- Perimeter Security
- Driver Training
- Traffic Flow

If approved, current LRSAT recommendations shall be published on the County's web site at: [www.sdcountyairports.com](http://www.sdcountyairports.com)

LRSAT shall consist of one each:

- Airport Management
- ATCT Manager
- FBO/Operator Representative
- Pilots Association (if any)
- User group (if any)

In the case where the airport does not have a pilot or user group, each FBO/Operator may participate with up to a total of three (3) members on the LRSAT. Membership will be rotated if necessary. LRSAT will meet when necessary, at least annually.

# **PART 2 - COMMERCIAL ACTIVITIES**

## **SECTION 4 - LEASING LICENSING AND PERMITTING**

### **4.1 LEASING AND LICENSING POLICY**

The leasing and licensing of County Airport land is regulated and influenced by the Laws. Any person using a County airport for revenue producing or commercial activities shall first obtain a lease, sub-lease, license, permit or other such agreement. These Policies and Procedures are intended to help implement these Laws. If there is a conflict between these Policies and Procedures and the Laws, the requirements of the Laws shall control.

### **4.2 AUTHORITY TO LEASE OR LICENSE**

Authority for Leasing, Licensing and Permitting at County Airports is provided by State law and County ordinances. The Director of Airports has been delegated authority by the Board of Supervisors of the County to approve certain leases, licenses and permits. The Airports Schedule of Rates and Charges and Use Control Policy, as adopted by the Board of Supervisors, identifies the delegated authority for certain low-value leases and licenses.

### **4.3 LAND USES**

County Airports does not develop Airport Land Use Commission Plans (ALUCPs), General Plans or other zoning or land use restrictions impacting the development and use of property. County Airports does develop and regularly update Airport Layout Plans (ALPs), either individually or as part of a master planning process, for each of its airports. It is the responsibility of Lessees and Licensees to ensure their activities and premises are at all times used and developed in accordance with the current ALP. The Airports Director in his/her discretion may require a Lessee or Licensee to pay for updates to an ALP to reflect uses or improvements made by the Lessee or Licensee; or require the Lessee or Licensee to alter or remove the activity or improvements so as to ensure complete compliance with the ALP.

### **4.4 RESIDENTIAL USE PROHIBITED**

Leasing or licensing for residential use of airport property (temporary or permanent) is strictly prohibited unless approved by the Director of Airports consistent with current guidance from the FAA. At the present time, FAA guidance allows for residential use of airport property for very limited purposes such as crew and caretaker quarters. In circumstances where residential uses may be made of airport property consistent with FAA guidance, the County may seek a determination from the FAA that the use should nevertheless be prohibited where it could adversely impact the safety or efficiency of an airport.

#### **4.5 COMPETITIVE LEASE OR LICENSE PROPOSALS**

County Airports follows the applicable Laws when issuing leases or licenses.

#### **4.6 LENGTH OF LEASE OR LICENSE TERM**

County Airports follows the applicable Laws when considering lease or license term.

#### **4.7 FAIR MARKET VALUE**

County receives fair market value rent consistent with the applicable Laws when leasing or licensing its airport land for private use. The process for determining fair market value typically starts with an appraisal requisitioned by County Airports, followed by negotiations between County Airports' staff and the lessee or licensee to reach agreement. The County typically negotiates for a rental based on a 9% return on the appraised value of the land. Restaurants, car rental services and certain other land uses usually result in rentals based on a percentage of the lessee's/licensees gross income. Leases and licenses will be periodically adjusted to remain at fair market value.

#### **4.8 LEASE AND LICENSE CONTRACTS AND LEGAL REVIEW**

County lease and license contracts are intended to transfer to the lessee or licensee the liabilities associated with possession and control of real property, including compliance with all applicable Laws. All County leases and licenses shall be written on a form approved by County Counsel, and shall at a minimum conform to local/regional standards of lessee or licensee responsibility and liability. County leases and licenses may contain more restrictive clauses than private sector leases or licenses to better protect the public interest (including strict provisions for complying with all applicable Laws, particularly environmental laws such as hazardous materials management and stormwater pollution prevention regulations). Lease and license language is periodically updated to reflect changes in real estate law and to meet changing economic and other risks associated with the ownership or use of land. During the term of a lease or license, amendments may be agreed to between the parties to effect changes to the rent or other economic lease provisions, or to update lease or license language.

#### **4.9 CONSTRUCTION OF IMPROVEMENTS**

County Airports' leases typically require the construction of premises improvements, which will be owned by the lessee during the term and which will revert to the ownership of the County at the end of the term. Height restrictions, lot-line setbacks, parking requirements, building design, quality of construction and other requirements are controlled by the County Airports Development Standards and by County or city building code requirements. Environmental review is required for all improvements and FAA approval is required for most projects. Performance bonds may be required when, in the opinion of the County, it is prudent to guarantee the timely construction of required leasehold improvements. These requirements will be applied to lessees or licensees making improvements.

#### **4.10 EXTENSIONS OF TERM AND NEW AGREEMENTS**

Extensions consistent with limits imposed by applicable Laws on the maximum term may be granted to a lessee or licensee who has fully complied with all terms and conditions of the lease or license. Existing lessees or licensees may submit a written request for a new lease or license to the Director of Airports at any point during their term. The County is not obligated to accept such a request, but will consider all proposals, evaluating them in light of the following criteria:

- (a) County has no alternate plans for the land after current lease/license expires
- (b) Existing/proposed use must be consistent with any Airport Layout Plan and Master Plan
- (c) Lessee/Licensee is in good standing (i.e., compliant with existing lease/license terms)
- (d) Amount of new capital investment
- (e) Financial terms of a lease/license extension are beneficial to the County
- (f) Whether the public interest would be better served by allowing the lease/license to expire so that new proposals may be considered
- (g) Granting a new lease or license does not violate any Laws restricting term

The County requires that any leases or licenses for additional term be on the County's current standard form so that amendments to lease or license agreements to extend term may include amendments to multiple provisions. New leases or licenses will use the current form. Agreements approved by the Board may generally only be extended by the Board unless authority to grant an extension has been expressly delegated. In the absence of delegated authority, leases and licenses must be approved by the Board.

Typically, all County leases and licenses provide that at the end of the term, the improvements will become the property of the County regardless of who originally installed the improvements. If a lease or license is extended prior to the expiration of its term, the County requires payment for the postponement of County's future interest in the property. A variety of techniques to calculate this payment amount may be used, and negotiation may ultimately be involved to arrive at a value acceptable to both the County and the lessee.

#### **4.11 NEGOTIATED RENTAL ADJUSTMENT**

Long-term leases shall provide for periodic renegotiation of rent to market level, and interim cost-of-living adjustments, in keeping with industry standards.

#### **4.12 APPROVAL OF SHORT-TERM NON-AERONAUTICAL USE OF AVIATION LAND**

This policy allows temporary use of aviation land for non-aeronautical use when, due to

market conditions the land would be otherwise vacant. The procedure requires coordination with the FAA. Non-aeronautical uses of aviation land may be approved for short-term periods and may be canceled at any time with reasonable notice if an aeronautical use appears.

In order to obtain approval for short-term non-aeronautical use of aviation land, lessee or licensee shall send written request to the Director of Airports, which includes verification that:

- (a) The land has been marketed for aviation use without success; and,
- (b) Other vacancies of aviation-use properties exist at the Airport to serve future aviation needs.

Approval of non-aeronautical use will be at the sole discretion of the Director of Airports and must be approved by the FAA.

#### **4.13 CONSENT TO AVIATION SUBLEASES**

Aviation leases provide that any sublease of aviation land must be consented to by the Director of Airports prior to commencement. All subleases must be consistent with the terms of the Lease. Lessee shall provide to County all necessary documents and fees, and request consent, prior to commencement of the sublease. Licenses are not subject to sublease or assignment and are personal to the licensee.

#### **4.14 OTHER TYPES OF LEASES, SUB-LEASES AND LICENSES**

All lessees and licensees shall provide adequate insurance and are required to pay all applicable fees and shall comply with all State, federal and local laws, ordinances and regulations. Activities which require a lease, sub-lease or license include, but are not limited to, the following:

- Parachuting operations (FAA Part 105)
- Commercial airline operations (FAA Part 121, 129, 135 and DoT Part 380)
- Bulk fuel provision onto the airport
- Self-Fueling with a truck
- Flight training
- Aircraft detailing
- Aircraft tie-downs on County ramps

Persons who wish to conduct such activities shall contact Airports Real Property to request an appropriate application.

#### **4.15 MOBILE MECHANICS LICENSES**

All mobile mechanics shall be authorized to transact business on County-owned and operated airports only if a license is first obtained from County Airports. In any situation where an individual or a business entity seeks to offer mobile mechanics' services for compensation at a County-owned or operated airport, such individual or business entity shall contact Airports Real Property staff to request a license application to provide such services on County Airports.

An applicant for a mobile mechanic's license shall be certified under the FAA rules for an Airframe and Powerplant (A&P) mechanic and submit to County Airports copies of all current licenses, certificates with the ratings appropriate for the work being performed, and other credentials required for conducting the proposed business activities, if requested.

Where mobile mechanics intend to provide services on any premises controlled by a lessee of County consent from each such lessee is required. Licenses for mobile aircraft maintenance will only be issued as long as no more than two appropriately licensed and duly authorized businesses that lease or sublease aircraft maintenance hangar facilities at the Airport provide the same or similar services at that Airport.

The operations of airport-based mechanics are limited to that specific airport that houses their leased facilities. In addition, airport-based mechanics may also perform emergency repairs and warranty-related work on their existing customers' aircraft at other County airports. However, airport-based mechanics performing such work are prohibited from any form of business solicitation at airports other than the airport at which their permanent facilities are located.

#### **4.17 GROUND TRANSPORTATION LICENSES (EXCLUDING RENTAL CARS)**

Persons or companies wishing to operate ground transportation vehicle(s) for compensation, including traditional taxicabs, vans, shuttles, and limousines, at any County Airport shall contact Airports Real Property staff to request a ground transportation license application.

#### **4.18 OFF-AIRPORT RENTAL CAR LICENSES**

Off-airport rental car businesses seeking to transact business on any County-owned or operated airport must obtain a license for Off-Airport Rental Car Business and will be limited to delivering rental cars to a customer or picking up the customer at the airport for a delivery of the rental car off the airport. Off-airport rental car businesses shall not store rental vehicles on County Airports-controlled land or on private leasehold premises at any County Airport. Off-airport rental car businesses shall not advertise as providing "on-airport" services.

Persons or companies wishing to operate an off-airport rental car business at any County Airport shall contact Airports Real Property staff to request an off-airport rental car business license application. Licensee shall pay all applicable fees and percentage of gross income

amounts, and shall provide required insurance.

#### **4.19 PERMITS – GENERAL**

County Ordinance sets forth permit requirements for revenue-producing and commercial activities and for such other activities to be conducted at a County airport that the Director of Airports determines requires a permit. Permits shall be issued using a County form provided by the Director of Airports. Permits shall be for no longer than thirty (30) days. Activities that take place for longer than thirty (30) days may be temporarily permitted for up to thirty (30) days to allow for award of a license or lease. Permits shall be subject to revocation as specified in the permit. If no terms are specified in the permit for revocation, they shall be immediately revocable by the Director of Airports with or without notice. Permittees shall provide adequate insurance and are required to pay all applicable fees. Any party seeking a permit must contact County Airports' real property staff at least twenty (20) business days before the activity/event is proposed to commence.

#### **4.20 SPECIAL EVENT PERMITS**

Special events such as parties, charity events, fairs, etc., are not specifically allowed under the use clause in airports leases. Events promoting aviation, directly and indirectly, benefit Airports' relationship with the community and are appropriate to be held at the airport, but may still require a permit. However, some such proposed events are too large or too unsecured to be safely held on airport property and may detract from airports' responsibility to provide aviation services. There may also be life and fire safety concerns as most hangars have not been rated for large public assembly.

In order to make sure that health and safety is appropriately addressed, staff must review information about the proposed event and determine if a special event permit is required and appropriate. A permit may be required for events that meet any one of the following criteria:

- Attendance by more than 100 people
- Tickets sales
- Publicly advertised
- Liquor for sale or included with admission
- Need for flight line security
- Event will use any area that is not part of leasehold

If it is determined that the proposed event is a typical airport function, staff will promptly inform the Lessee that a permit is not required. As stated above, the application should be submitted at least 20 business days in advance; however, more notice is always preferable. The application should be submitted and approval granted before any advance tickets sales or advertising for the event begins.

In cases where the event is proposed by a sublessee, the request should come through the Lessee, along with confirmation that the Lessee supports the proposed event.

# SECTION 5- LEASEHOLD COMPLIANCE

## 5.1 POLICY

County Airports Leases require that all Lessees comply with all federal, State and local requirements. This includes, but is not limited to, all requirements in the lease, Minimum Standards, Rules and Regulations, and FAA Advisory Circulars and Requirements. County Airports' staff monitors compliance through regular inspections of aviation leaseholds and biennial inspections of all hangars and interior spaces. Hangars may be individually inspected more frequently than every other year if there has been a change in tenant/occupant since the last inspection, or for an observed or suspected violation to the stated requirements.

## 5.2 PROCEDURE

### Leasehold Compliance Process

When it is determined that a leaseholder is not complying with the provisions of their Lease, Minimum Standards, Rules and Regulations, FAA regulations and/or any applicable Laws, a Leasehold Compliance Letter will be issued (see Appendix C). The leaseholder will have 10 days from receiving the Leasehold Compliance Letter, in which to remedy the problem or outline a plan to resolve the issue. For urgent matters, such as safety or security issues, the Airport Manager may eliminate the period shown on the Lease Compliance Letter and notify the lessee that immediate compliance is required. Failure to remedy the matter will result in further action, including possible lease termination.

### Biennial Leasehold Inspections

- A. Inspections of leaseholds, including all interior areas, are completed every other year by Airports staff.
- B. Lessee must make arrangements for access to all portions of the leased premises, excluding those areas clearly set forth in the lease as not requiring inspection (such as safes).
- C. Inspection includes but is not limited to the following:
  1. Confirmation that the hangar is being used for its approved use (i.e., A B-2 hangar is strictly for aircraft storage; an H-5 hangar is required for aircraft maintenance)
  2. For aeronautical land, major use shall be aeronautical
  3. All improvements have been approved in writing by Director of Airports, as set forth in the Lease. If the inspector is not certain that the improvements have

been approved, the inspector should include subject improvements in the report to later be compared to approved plans.

4. Stormwater Violations / Hazardous Materials Storage
5. All commercial business must have approved County consent for subleases on file with the Real Property Staff
6. Appropriate signage and markings must be in place
7. Fences and gates must meet all applicable security requirements and be in working condition
8. No deferred maintenance or safety violations
9. Compliance with all federal, State and local ordinances and regulations, including but not limited to fire and municipal safety code

D. Inspector shall be permitted to take photographs and/or document findings.

See Appendix C for Leasehold Compliance Letter and Appendix D for flow chart of compliance process.

# **PART 3 - AIRPORT IMPROVEMENT**

## **SECTION 6 – AIRPORT IMPROVEMENT ACTIVITIES**

### **6.1 POLICY**

It is County Airports' policy to enhance the value of San Diego County public use airports in a manner consistent with the Laws. It is also Airports' policy to be a catalyst for aviation business development and be an innovator in regional air transportation, thereby increasing the economic vitality of the region.

### **6.2 PROCEDURE - PLAN CHECK AND APPROVAL**

Unless stated otherwise below, all plans must be approved in writing by the permitting authority and Director of Airports prior to the commencement of construction activities. The procedure is as follows:

- (a) The proposer expresses an interest in developing on a County of San Diego airport property.
- (b) The proposer obtains a County lease, license or other agreement to construct improvements on County property.
- (c) The proposer is given a Plan and Project Preparation Packet (see Appendix A). The proposer reads and understands the packet prior to the design process.
- (d) Along with the "initial" Site Plan submitted to Director of Airports, the proposer will also submit any other documents from the Plan and Project Preparation Packet that are applicable.
- (e) If Director of Airports believes that a proposed project may be in close proximity to, or penetrates FAR Part 77 airspace and/or other critical airspace zones, the Airports Engineer will confer with FAA to ensure these concerns are being properly evaluated.
- (f) Once the proposer and Airports staff have agreed to the final Site Plan design, the Director of Airports will stamp and sign the Site Plan. While this is not the final Airports' project approval, it will allow the proposer to take the conceptually approved Site Plan to the other permitting authorities to pursue their approvals.

Once the Airport has signed and stamped the proposer's Site Plan, the proposer will submit a Form 7460 to the FAA for approval (and submit a copy to the Director of Airports). It would be advantageous for the proposer to discuss the FAA Form 7460 with Airports staff prior to

submittal to the FAA. This will help avoid errors. It should be noted that in addition to FAA Form 7460 approval, staff would seek FAA approval in areas not covered under the 7460 process. For example, compatibility with airport design standards and non-aeronautical activities.

### **6.3 CONSTRUCTION ACTIVITIES ON AIRPORT PROPERTY**

All construction activities on airport property shall be coordinated with the Director of Airports and shall require environmental review and a Notice to Proceed prior to commencement. Construction activities shall be completed pursuant to a County lease, license or other agreement. Environmental review will typically be completed when a lease, license or other agreement is approved.

Any and all construction activities that physically impact airport operations areas, non-leasehold property, or other County property not under the control of the party making the improvements shall require a County right-of-entry permit or construction license prior to commencement of work.

The party making the improvements (hereinafter "proposer") shall comply with all applicable Laws, including without limitation any Laws related to access control, safety and security. Proposer shall comply with Federal Aviation Regulations (FAR) Part 77 and shall file and receive an approved FAA Form 7460-1, Notice of Proposed Construction or Alteration ("Form 7460"), prior to commencement of project. A copy shall be given to the Director of Airports prior to commencement of said project.

### **6.4 PROCEDURE – CONSTRUCTION ACTIVITIES**

- (a) The proposer, when ready to begin construction, will submit two (2) completed copies of the Airports Notice to Proceed Form (ANTP) for staff approval signatures along with a project construction schedule. The proposer does not have approval to begin construction until the ANTP Form has been signed and returned 'Approved' to the proposer.
- (b) Proposer and/or the proposer's construction contractor shall participate in a pre-construction meeting to include County Airports Management staff at least five (5) working days prior to start of construction.
- (c) Proposer shall ensure all construction personnel attend the County Airports approved Driver Training Program class prior to construction commencement.
- (d) All activities must comply with Airports Rules and Regulations, the Minimum Standards, these Policies and Procedures, and all other Laws.

## **SECTION 7 - AIRPORT LAND USE COMPATIBILITY PLANS**

The San Diego County Regional Airport Authority, in its' capacity as the Airport Land Use Commission is responsible for developing Airport Land Use Compatibility Plans (ALUCPs) for all County airports. These plans may be modified or amended by local cities or the County depending on the jurisdiction with land use authority over areas covered by the ALUCP.

The ALUCPs for each of the eight County of San Diego's Airports, can be obtained from the San Diego County Regional Airport Authority and are presently available on the Authority's website at [www.san.org](http://www.san.org).

### **Policy**

County of San Diego Airports may provide information, documents or material to the Airport Authority and local jurisdictions with land use authority in developing ALUCPs, or overruling provisions in an ALUCP. Provision of comments, material or information to the Airport Land Use Commission or a city with land use jurisdiction by County Airports should not be interpreted as the County's endorsement or approval of the action taken.

# DEFINITIONS / ABBREVIATIONS

**A&P** – Airframe and Powerplant

**Advisory Circulars (AC)** –Federal Aviation Administration Advisory Circulars ACs for the aviation industry.

**Aeronautical activity or service** – Any activity that involves, makes possible, or is required for the operation of aircraft or that contributes to or is required for the safety of such operations.

**AOA** - Air Operations Area - the area that is inside the Airport boundary in which aircraft movements take place as defined by the Federal Aviation Administration-Advisory Circular AC150/5300.

**ATCT** - Air Traffic Control Tower – the FAA or non-federal owned/staffed ATCT facility located on Airport premises.

**Aircraft** –any and all conveyances, now or hereafter used for flight in airspace.

**Aircraft Maintenance** – Mechanical maintenance, inspection, rebuilding, alteration, or performance of preventative maintenance on an aircraft, air frame, aircraft engine, propeller, appliance, or component part by a person currently certified to perform such activity, by the Federal Aviation Administration (FAA), as provided in Title 14, Code of Federal Regulations, Parts 43 and 65. “Aircraft maintenance” does not include aircraft wash and wax operations.

**Airport** – An area of land which is used, or intended to be used, for aircraft takeoff and landing. It includes any appurtenant areas used, or intended to be used, for airport buildings or other airport facilities or rights-of-way, together with all airport buildings and facilities located thereon. It also includes any heliport.

**Airport Manager** (SDCC §85.402) – the County Airports Director, the manager of any of the County Airports, or their duly authorized representatives.

**Airport-Based Mechanics** – Those FAA-licensed aircraft mechanics that perform aircraft maintenance activities at any County airport from a specifically designated airport-based facility on that same airport, which is either leased directly from County, or subleased, with County’s consent, from a lessee of the County, whose lease allows aircraft maintenance as a permitted use. This definition of airport-based mechanics includes certified airlines or their employees who perform maintenance on aircraft owned or leased by the airline.

**ALUC** – Airport Land Use Commission

**ALUCP** – Airport Land Use Compatibility Plan

**APCD** – Air Pollution Control District

**BMP** – Best Management Practice

**Board of Supervisors (Board)** –the County of San Diego elected officials as defined by the term “Board of Supervisors”.

**Bulk Fuel Vendors** – Businesses that transport and deliver fuel and lubricant supplies to businesses on the airport. Bulk fuel vendors do not dispense fuel or lubricants into aircraft at County Airports. Bulk fuel vendors are required to have a Fuel Concession License.

**City** –the City to which that airport is annexed as defined above under Airport.

**Codes** – the codes/rules as referenced below:

- NFPA 407 – Standard for Aircraft Fueling Servicing
- Aeronautics Law – State Aeronautics Act – Public Utilities Code
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of San Diego, in the State of California.

- f. McClellan-Palomar Airport (CRQ) – the County Airport, annexed in the City of Carlsbad, in the State of California.
- g. Ocotillo Airport (L90) – the County Airport, in an unincorporated area of the County of San Diego, in the State of California.
- h. Ramona Airport (RNM) – the County Airport, in an unincorporated area of the County of San Diego, in the State of California.

**Driver Training Program** – An awareness and airport procedures training course given by ATCT personnel or County staff or its designee teaching Search, Call, Acknowledge and Notice Procedures (SCAN).

**FAA** – Federal Aviation Administration.

**FAR** – Federal Aviation Regulation.

**Fuel Storage Facility** – A fixed facility consisting of underground or above ground fuel storage tanks and their associated piping and dispensing equipment, designed and built to the standards of the California Fire Code and NFPA 407.

**Movement Area** –the runways, taxiways, and other areas of an Airport which are used for taxiing, hover taxiing, air taxiing, takeoff, and landing of aircraft, exclusive of loading ramps and aircraft parking areas and as further defined in the FAA/AC 150-5300 “Airport Design.”

**NTSB** – Federal - National Transportation Safety Board.

**NFPA** – National Fire Protection Association.

**Non-Movement Area** –aircraft aprons, ramps, taxilanes and parking areas not under the positive control of the ATCT and where two-way radio communications with the ATCT is not required by aircraft or ground vehicles on Airport premises and as further defined in the FAA/AC 150-5300 “Airport Design.”

**Off-Airport Rental Car Business** –those businesses, other than on-airport rental car businesses, operating an automobile rental business at least part time on any County-owned or operated airport.

**Pedestrian** –a person on foot, on a bicycle, in a wheelchair (motorized or manual), on a skateboard (motorized or manual) or on a scooter (motorized or manual).

**Person** (SDCC §85.402) – any individual, estate, firm, association, political body, business, organization, group, partnership, business trust, company, corporation, or other legal entity including any member trustee, agent, employee, officer, receiver, assignee, or other representative of any of these.

**Positive Control** – Absolute or Active control

**Runway** – means a surfaced or un-surfaced area of the Airport reserved primarily for the landing and taking off of aircraft.

**Sublease** – means a portion of an Airport that is subleased to an individual person or entity by a holder of a Lease for a portion of that Lease parcel with approval of the Director of Airports.

**SWPPP** – Storm Water Pollution Prevention Plan

**Taxiway** – means a defined path established for the taxiing of aircraft from one part of an airport to another.

**Taxilane** – means the portion of the aircraft parking area used for access between taxiways and aircraft parking positions.

**Vehicle** – means auto, truck, fuel truck, golf cart, motorcycle, moped, or any motorized equipment

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## APPENDIX A

### PLAN AND PROJECT PREPARATION PACKET

Pursuant to the development process at County Airports, this packet has been prepared to assure that the Lessee (proposer) has a clear understanding of County Airports' basic design and project expectations. It also serves to provide the Lessee (developer) with SAMPLE design and permitting flowcharts with respect to the possible courses within the development process. This packet contains the following documents:

- a) **Plan Preparation Policy** – This document must be signed and submitted to Director of Airports with or prior to the initial plan submittal
- b) **Airport Site Plan Check List** – This must be completed and submitted to Director of Airports with or prior to the initial plan submittal
- c) **Sample Site Plan** – This Sample Site Plan serves as a “*simple example*” of the type of information and layout logic that staff expects to be professionally shown on a Site Plan layout prior to initial Site Plan submittal. Also see details in the Airport Site Plan Check List mentioned above
- d) **Sample 7460-1 Form** – This must be submitted to FAA after Director of Airports has approved the initial Site Plan
- e) **Sample Airport Development Flow Chart** – This illustrates the step-by-step process
- f)
- g) **Airports Notice to Proceed Form (ANTP)** – This must be submitted to County Airports with a construction schedule. This is the final approval prior to construction. This document must be signed by Airports staff and returned to the proposer prior to commencing construction

### PLAN PREPARATION

The proposer's final step, prior to proceeding with construction, is the proposer's receipt of the Airports Notice to Proceed (ANTP) form from Airports staff. The purpose of the ANTP form is to give Airports a final opportunity to verify that the proposer has complied with all of the required permits, construction, security and safety related issues prior to construction. It also allows the proposer and Airports staff to verify and confirm the proposed construction schedule prior to construction. The proposer shall not proceed with any construction without receipt of a signed ANTP form from Airports staff.

Airports staff may pre-sign a proposer's plan to help expedite the proposer's permitting process. However, signed plans, approved construction permits and/or an approved FAA Form 7460-1 does not imply that County Airports has given authorization to proceed with project construction.

**ALL of the following items must be completed by the proposer and submitted to Airports staff prior to commencing construction:**

- a) An approved FAA Form 7460-1 prior to construction (see sample attached)
- b) Project plans stamped and signed by Airport staff with all applicable grading, building and fire permits prior to construction
- c) A proposed construction schedule
- d) Signed Plan Preparation Policy Form
- e) All final project plans submitted on disk in an AutoCAD compatible format.

**NOTE:** The proposer will receive an ANTP form with the Airport Manager and Airports Engineer's signature prior to construction.

**SPECIAL ITEMS TO NOTE:**

- a) The proposer understands that airport development is highly specialized and can be a complex and onerous process that will involve several areas of the County and/or City permitting departments. It is therefore strongly recommended that the proposer retain qualified design personnel experienced with airport design standards.
- b) Proposer has received and understands the Airport Site Plan Check List. The initial site plan submittal to Airports needs to have the Airport Site Plan Check List submitted with the plan. Complying with the checklist (where applicable) will greatly reduce the number of design iterations and re-submittals to County Airports.
- c) The proposer will be required to submit two (2) sets of plans to Airports for each plan review. Proposer understands that each plan review and comment process may take approximately two (2) weeks to complete. However, this does not include the review time or the submittal processes required by other relevant permitting authorities.
- d) The proposer understands that the plan review process may require several iterations between County staff, Airports staff, local jurisdiction and the proposer. Each of these iterations will require additional time and possibly additional expense. The proposer understands that this additional time and expense is a normal part of the developmental process.
- e) The proposer is responsible for researching all proposed and existing utilities required for development at their own expense. Proposed utilities and easements should be indicated on the project plan.
- f) Proposer understands that County Airports has no control over the permitting process (external to Airports). The proposer is solely responsible for complying with any and all required federal, State and local laws and regulations, including any

permitting fees subsequent to their approval. County Airports cannot circumvent this process on behalf of the proposer or waive required fees on behalf of the proposer.

- g) If the proposer's project is near and/or penetrates important airport or airspace locations, then additional time and expense may be required to resolve these issues through the County, FAA and/or Caltrans Aeronautics. Some of these areas include but are not limited to the following:
  - 1. Building Restriction Lines, ATCT Line of Sight, Part 77 Surfaces, Runway Protection Zones, Runway Object Free Areas, Taxiway Object Free Areas, Safety Compatibility Zones and Safety Areas
- h) If there is an issue with any of the preceding items, Airports will not issue an ANTP until these issues are resolved and the proposer has received an approved FAA Form 7460-1 from the FAA. Proposer understands that even with an approved FAA Form 7460-1, County Airports may need to confer additionally with the FAA and proposer if Airports staff determines that the project may compromise future airport use, compatibility or operations.
- i) Proposer is responsible for preventing all runway, taxiway and apron incursions on Airport Operational Areas relative to their project. Airports may require the proposer's project personnel to attend airport specific training programs to assure that project personnel are operating safely on the airport and are operating within allowable security constraints. Identification badges may also be required. Airports may require the Driver Training Program prior to construction. All training, if required, will be at the sole expense of the proposer.
- j) Living quarters (by any definition) at County general aviation airports are strictly prohibited, unless approved by the Director of Airports, for Fire, Police or other emergency services and the use is consistent with FAA requirements. Any hangar project that has been approved by FAA, City, County or Airports staff does not imply an approval to build living quarters or build-outs resembling living quarters, nor does it imply any hangar uses inconsistent with aviation use. The proposer understands that Airports staff has the right to reject any project proposal if staff determines it resembles possible living quarters and approval for use as living quarters is not sought. This could happen where a proposed hangar project includes kitchen and restroom facilities consistent with residential uses. Any construction or hangar uses inconsistent with aviation use without County Airports and FAA approval is subject to removal at the proposer's sole expense.
- k) Federal, State and local environmental regulations require the proposer to develop a Storm Water Pollution Prevention Program plans or other similar plan (SWPPP) for their developments. Most commercial and industrial operators also require a SWPPP. A SWPPP is a plan that describes how a construction project and/or daily operations will be carried out without subjecting the environment or water bodies (e.g., storm drains) to contamination or the illicit discharge of non-stormwater. Storm water Best Management Practices (BMPs) are practices and physical barriers (like gravel bags,

hay bails, and plastic barriers) designed into a project or daily operation that prevents and/or minimizes these contaminants from entering the storm drain system. Failure to comply with storm water regulations could result in fines. The proposer understands that storm water BMPs are a routine part of project development and that it is the proposer's responsibility to assure that their project is in constant compliance with all storm water and environmental regulations at the proposer's own expense.

- l) Proposer shall provide the Airport Manager with a proposed construction schedule. Typical working hours on site are 7AM - 5PM Monday through Friday but may vary by site. If the construction scheduled needs to vary from these hours, the proposer shall request the change from the on-site manager / Airport Manager in advance.
- m) Proposer shall provide the on-site manager / Airport Manager at least a 48 hour notice prior to moving equipment on or off site over the taxiways/taxilanes. The on-site manager / Airport Manager shall be informed whenever a piece of equipment is to be moved over the taxiway/taxilane areas. Note: Under no circumstances shall the contractor enter the runway, taxiway, runway safety area or taxiway safety areas without being escorted by Airports staff or being in constant contact with ATCT personnel.
- n) The proposer shall provide the on-site manager / Airport Manager with a 24 hour emergency contact list. The list will include the general contractor's and project manager's 24 hour contact numbers.
- o) If a crane is to be used during construction, the Airport Manager will be notified at least 48 hours prior to the crane's arrival. This will allow the Airport Manager to file the proper Notice to Airmen (NOTAMS). The crane will be flagged and/or lighted while raised. An approved 7460-1 is required for crane use.

---

Name of Project or Leasehold

---

Signature of proposer(s) with responsible project charge

---

Date

**NOTE:** This signed document is to be submitted to Director of Airports prior to project approval.

**AIRPORT SITE PLAN CHECK LIST**

Lessee:

\_\_\_\_\_

Airport:

\_\_\_\_\_

Submittal No.:

\_\_\_\_\_

Designer/Consultant:

\_\_\_\_\_

Airports will not accept plans without this completed Check List and the initialed and signed Plan Preparation Policy included in this packet. These are to be submitted with the initial plan.

**Background:** All leasehold improvements shall be consistent with current Development Standards and Performance Standards and in accordance with all applicable laws and ordinances. All plans shall be prepared in a professional manner, signed by a California Registered Civil Engineer, Structural Engineer or Architect. Plans shall be submitted in triplicate with a transmittal letter to the Airports Supervising Real Property Agent prior to any submittal for a building permit. The anticipated date for start of construction should be noted in the letter. Time should be allowed for permit processing (Note: Permit processing time could take up to two (2) years.) Check appropriate box below.

Process	Plans Comply	Plans Don't Comply	N/A
1. Provide all layout dimensions required to construct and the construction is consistent with the Airport Layout Plan			
2. Provide dimension ties to leasehold boundary			
3. Type of occupancy indicated (hangar, office, restroom, storage, etc.)			
4. Type and details of building construction shown (hangar type)			
5. All structures are to be at least 10' back from lease lines			
6. Type and details of pavement construction to be shown on plans			

Process	Plans Comply	Plans Don't Comply	N/A
7. Proposed project will not displace currently based aircraft during or after construction			
8. Name "Critical Aircraft" in each taxiway for leasehold (max. weight, span, height)			
9. Proposed project will not introduce airside obstructions, i.e., curb, gutters, fencing, retaining wall, sudden slopes (greater than 1.5%), drainage swale, etc.			
10. All finished grades should not exceed a 1.5% slope			
11. Plans to show the Building Restriction Line (BRL)			
12. Underground all proposed utilities (power, telephone, television, water, sewer and gas)			
13. Utility related easements (show all on plan)			
14. Fire Main/Hydrants (contact Fire Marshall for signature on plans)			
15. Grading (show existing and final elevations). Note: Storm water plan will be needed for permit approval			
16. Show all maximum building and other structure elevations (use Mean Sea Level (MSL) elevations) i.e., roofs, eaves, and ridges			
17. Show all fence, wall and planting heights			
18. Auto parking pavement and base (indicate pavement section)			
19. Parking space striping and marking, including stall dimensions			
20. Auto circulation physically separate from aircraft when possible			
21. All proposed pedestrian walkways are shown on plans			
22. Taxiways, service and tie-down areas (designed for critical aircraft)			
23. Indicate all aircraft pavement sections (for example, 3" of asphalt, on 6" of Class II base, on 6" of compacted sub-grade to 95% Relative Compaction (RC))			
24. Taxiway centerline, 4" wide, yellow reflective paint with beads			

Process	Plans Comply	Plans Don't Comply	N/A
25. Tie-down positions striped and numbered with tie-down dimensions			
26. Tie-down anchors, per FAA standard			
27. Phasing is indicated on plans (for example, Phase I and Phase II)			
28. All hangars and tie-downs must be named or numbered			
29. Attach signage sketch to plans including size, dimensions and locations. All signs must have prior written approval by Director of Airports.			
30. Trash collection areas indicated. Locate outside of operational areas when possible			
31. Landscaping plans included or indicate areas for proposed landscaping			
32. Landscaped areas sized and located appropriately			
33. All proposed drains have fossil filters or equivalent			
34. Outdoor lighting, low pressure sodium, direct light downward			
35. Prohibited lights are not proposed			
36. All structures clear 7:1 Transitional Surface			
37. Plans complete enough for Lessee to submit FAA form 7460-1 and to apply to City or County for Building Permits			
38. Security fencing and electric keypads (Knox Box) are indicated on plan			
39. Neighboring leasehold is not adversely impacted by construction or proposed development			
40. Project does not propose non-aviation uses			
41. Project does not accommodate a caretaker's residence, a pilot's quarters, or residential dwelling			
42. Designer will state coordinate system (i.e., NAD 83 horizontal and NGVD 29 vertical datums)			

Process	Plans Comply	Plans Don't Comply	N/A
43. The following specialized facilities may require additional submittals and additional review time:			
44. Aviation fuel storage facilities (design at least 50' from any structure opening and 25' from structures and objects)			
45. Helicopter facilities			
46. Aircraft cleaning services			
47. Aircraft painting			
48. Aerial crop dusting and spraying			
49. Aerial fire fighting			
50. Aircraft maintenance			
51. Aviation or product manufacturing			
52. Wash racks			
53. Restaurants			
54. Commercial use			



**AIRPORTS NOTICE TO PROCEED FORM (ANTP)**

Typical construction working hours are 7:00 am – 5:00 pm, Monday through Friday but may vary by site. The Airport Manager must pre-approve any change in this construction schedule with at least a seventy two (72) hour advance notice.

\* **Submit this form with an estimated project schedule.** This ANTP Form will not be accepted without a project schedule.

**Project Name:** \_\_\_\_\_

**Leasehold Name:** \_\_\_\_\_

**Lessee’s Responsible Project Manager(s) and Contractor’s Emergency Contact info:**

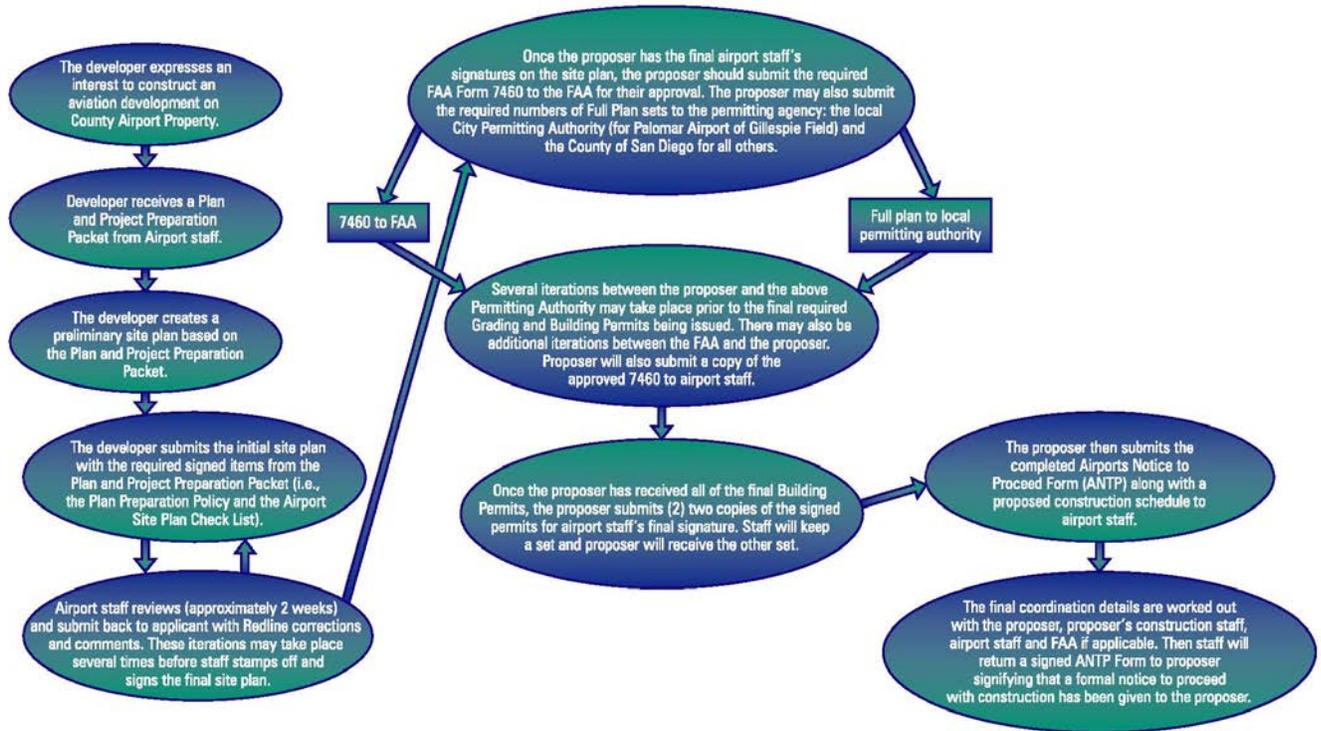
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Airport Manager/Date:** \_\_\_\_\_

**Airport Engineer/Date:** \_\_\_\_\_

**NOTE:** One (1) copy to Director of Airports  
One (1) copy to Proposer

# Sample Airport Development Flow Chart



## APPENDIX D

Date: \_\_\_\_\_

Master Lessee  
ADDRESS

Dear \_\_\_\_\_:

[AIRPORT] – [LEASE] – LEASEHOLD COMPLIANCE LETTER – NOTICE #1

For time to time, leasehold compliance issues are observed by Airports staff during routine inspections or are brought to our attention by other airport tenants. When this happens, Airports will bring the issue to your attention informally and give you the opportunity to address it, as we did for this matter on [DATE]. If the issue is not expediently resolved, Airports issues a Leasehold Compliance letter, like this, to help clarify the issue and steps needed in order to resolve it.

The following problem was observed on your leasehold, hangar \_\_\_\_ (or location):

- 1) **[Description of Compliance Issue]** (Example: Non-permitted use of the premises; non-aviation storage, motorcycle maintenance/repair.)

In order to remedy the situation, we ask that you take the following action within 10 days of this notification:

- 1) **[Suggested resolution]** (Example: Remove non-aviation related items in hangar D12 and return hangar to aviation use and then contact Airport Manager John Doe at 619-123-4567 or [john.doe@sdcounty.ca.gov](mailto:john.doe@sdcounty.ca.gov) to let him know this matter has been addressed.)

If it is not possible to meet this timeframe, please provide your plan, including a schedule of how you plan to address the situation. Our goal is to see your site brought into compliance without having to take enforcement measures contained in your Lease, so we request your cooperation to take action and quickly remedy this leasehold compliance issue.

If you have any questions, please call the Airport Manager at \_\_\_\_-\_\_\_\_-\_\_\_\_ to discuss this letter.

Your prompt attention to this matter is appreciated.

Signed by: \_\_\_\_\_  
Name, Title

cc: Airport Manager; Real Property

PHOTOS: (if applicable)

# DEFINITIONS / ABBREVIATIONS

**A&P** – Airframe and Powerplant

**Advisory Circulars (AC)** –Federal Aviation Administration Advisory Circulars ACs for the aviation industry.

**Aeronautical activity or service** – Any activity that involves, makes possible, or is required for the operation of aircraft or that contributes to or is required for the safety of such operations.

**AOA** - Air Operations Area - the area that is inside the Airport boundary in which aircraft movements take place as defined by the Federal Aviation Administration-Advisory Circular AC150/5300.

**ATCT** - Air Traffic Control Tower – the FAA or non-federal owned/staffed ATCT facility located on Airport premises.

**Aircraft** –any and all conveyances, now or hereafter used for flight in airspace.

**Aircraft Maintenance** – Mechanical maintenance, inspection, rebuilding, alteration, or performance of preventative maintenance on an aircraft, air frame, aircraft engine, propeller, appliance, or component part by a person currently certified to perform such activity, by the Federal Aviation Administration (FAA), as provided in Title 14, Code of Federal Regulations, Parts 43 and 65. “Aircraft maintenance” does not include aircraft wash and wax operations.

**Airport** – An area of land which is used, or intended to be used, for aircraft takeoff and landing. It includes any appurtenant areas used, or intended to be used, for airport buildings or other airport facilities or rights-of-way, together with all airport buildings and facilities located thereon. It also includes any heliport.

**Airport Manager** (SDCC §85.402) – the County Airports Director, the manager of any of the County Airports, or their duly authorized representatives.

**Airport-Based Mechanics** – Those FAA-licensed aircraft mechanics that perform aircraft maintenance activities at any County airport from a specifically designated airport-based facility on that same airport, which is either leased directly from County, or subleased, with County’s consent, from a lessee of the County, whose lease allows aircraft maintenance as a permitted use. This definition of airport-based mechanics includes certified airlines or their employees who perform maintenance on aircraft owned or leased by the airline.

**ALUC** – Airport Land Use Commission

**ALUCP** – Airport Land Use Compatibility Plan

**APCD** – Air Pollution Control District

**BMP** – Best Management Practice

**Board of Supervisors (Board)** –the County of San Diego elected officials as defined by the term “Board of Supervisors”.

**Bulk Fuel Vendors** – Businesses that transport and deliver fuel and lubricant supplies to businesses on the airport. Bulk fuel vendors do not dispense fuel or lubricants into aircraft at County Airports. Bulk fuel vendors are required to have a Fuel Concession License.

**City** –the City to which that airport is annexed as defined above under Airport.

**Codes** – the codes/rules as referenced below:

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- g. Ocotillo Airport (L90) – the County Airport, in an unincorporated area of the County of San Diego, in the State of California.
- h. Ramona Airport (RNM) – the County Airport, in an unincorporated area of the County of San Diego, in the State of California.

**Driver Training Program** – An awareness and airport procedures training course given by ATCT personnel or County staff or its designee teaching Search, Call, Acknowledge and Notice Procedures (SCAN).

**FAA** – Federal Aviation Administration.

**FAR** – Federal Aviation Regulation.

**Fuel Storage Facility** – A fixed facility consisting of underground or above ground fuel storage tanks and their associated piping and dispensing equipment, designed and built to the standards of the California Fire Code and NFPA 407.

**Movement Area** –the runways, taxiways, and other areas of an Airport which are used for taxiing, hover taxiing, air taxiing, takeoff, and landing of aircraft, exclusive of loading ramps and aircraft parking areas and as further defined in the FAA/AC 150-5300 “Airport Design.”

**NTSB** – Federal - National Transportation Safety Board.

**NFPA** – National Fire Protection Association.

**Non-Movement Area** –aircraft aprons, ramps, taxilanes and parking areas not under the positive control of the ATCT and where two-way radio communications with the ATCT is not required by aircraft or ground vehicles on Airport premises and as further defined in the FAA/AC 150-5300 “Airport Design.”

**Off-Airport Rental Car Business** –those businesses, other than on-airport rental car businesses, operating an automobile rental business at least part time on any County-owned or operated airport.

**Pedestrian** –a person on foot, on a bicycle, in a wheelchair (motorized or manual), on a skateboard (motorized or manual) or on a scooter (motorized or manual).

**Person** (SDCC §85.402) – any individual, estate, firm, association, political body, business, organization, group, partnership, business trust, company, corporation, or other legal entity including any member trustee, agent, employee, officer, receiver, assignee, or other representative of any of these.

**Positive Control** – Absolute or Active control

**Runway** – means a surfaced or un-surfaced area of the Airport reserved primarily for the landing and taking off of aircraft.

**Sublease** – means a portion of an Airport that is subleased to an individual person or entity by a holder of a Lease for a portion of that Lease parcel with approval of the Director of Airports.

**SWPPP** – Storm Water Pollution Prevention Plan

**Taxiway** – means a defined path established for the taxiing of aircraft from one part of an airport to another.

**Taxilane** – means the portion of the aircraft parking area used for access between taxiways and aircraft parking positions.

**Vehicle** – means auto, truck, fuel truck, golf cart, motorcycle, moped, or any motorized equipment

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- United States Environmental Protection Agency Codes and Regulations
- California Vehicle Code Section – 211113, 22511.8, 22651, and 22652
- San Diego County Administrative Code
- San Diego County Board of Supervisors’ Policies
- San Diego County Code of Regulatory Ordinances – Title 7, Division 3, Sec 73.101 – 73.107
- San Diego County Code Chapter 4 - Titled Airport Rules and Regulations Sections 85.401 - 85.461
- San Diego County Health and Safety Codes
- County of San Diego Air Pollution Control District Regulations

- Federal Aviation Administration FAA – Advisory Circulars, Orders, Rules
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## **Appendix B**

### **GROUND VEHICLE OPERATIONS TRAINING PROGRAM**

#### **Section 1. Airport Driving Rules and Regulations**

##### **B 1.1 APPLICABILITY**

This training program applies to all users of, and persons on any portion of, the property owned or controlled by County of San Diego. No persons are exempt from airport operating training requirements for operating a vehicle on the movement areas of an airport. Master Lessees shall be responsible for the education, dissemination of, accessibility to, and compliance with this program and the rules and regulations associated with this program by their employees, guests, users, subtenants and vendors.

##### **B 1.2 VIOLATION OF RULES – PENALTIES AND SUSPENSION OF DRIVING PRIVILEGES**

Any person who does not comply with any of the provisions of the Rules and Regulations, or any lawful order issued pursuant thereto, will be subject to progressive penalties for repeat violations. The penalties may include denied use of the Airport by the County of San Diego in addition to the penalties described pursuant to Federal, state, or local authorities.

- (a) Penalties for failure to comply with the movement area Motor Vehicle/Equipment Rules and Regulations shall consist of written warnings, suspension of airside driving privileges, and/or revocation of movement area driving privileges. Receipt of two written warnings by an operator of a vehicle in any 12-month period will automatically result in suspension of movement area driving privileges. Receipt of three written warnings in any 12-month period will automatically result in revocation of airside driving privileges
- (b) Based on an evaluation of the circumstances or the severity of a particular incident or incidents, the County of San Diego reserves the exclusive right to assess any penalty it deems appropriate at any time to any individual authorized to operate a vehicle on the movement area without regard to prior operating history

- (c) Suspension of movement area driving privileges shall be no less than 90 calendar days and no greater than 365 calendar days
- (d) The County of San Diego will provide a copy of all written warnings issued to an operator to the Master Lessee and the local manager of the company owning or in possession and control of the vehicle or vehicles involved in the violation(s).

### **B 1.3 REMEDIAL TRAINING**

The County of San Diego will require any individual involved in a runway incursion, deviation or other vehicle incident to complete remedial ground vehicle operations training.

### **B 1.3 DRIVER REQUIREMENTS ON THE MOVEMENT AREA OF THE AIRPORT**

Driver Requirements:

- (a) All applicants must satisfactorily complete the applicable driver's training program before receiving a movement area driver's license
- (b) All applicants must pass the written test with a grade of at least eighty percent. Applicants who do not pass the written test may retake the test after additional study and a ten day period
- (c) No person operating or driving a vehicle on any aircraft ramp shall exceed a speed greater than 20 miles per hour. Factors including, but not limited to, weather and visibility shall be taken into consideration when determining safe operating speed
- (d) No vehicle operator shall enter the movement area:
  - 1. Without first successfully completing the driver training program and a clearance from the ATCT to enter the movement area. During the times when the ATCT is closed, the driver shall broadcast their intentions on CTAF
  - 2. Unless equipped with an operable two-way radio in communication with the ATCT; or escorted by someone who is
- (e) No person shall:
  - 1. Operate any vehicle that is overloaded or carrying more passengers than for which the vehicle was designed
  - 2. Ride on the running board or stand up in the body of a moving vehicle.

3. A vehicle guide person is required whenever the view of the vehicle operator is restricted
4. No fuel truck shall be brought into, stored, or parked within 50 feet of a building. Fuel trucks must not be parked within 10 feet from other vehicles, edge to edge
5. Container carriers and tugs shall tow no more carts, pods, or containers than are practical, under control, tracking properly, and safe
6. When not serving aircraft or undertaking their intended functions, ramp vehicles and equipment shall be parked only in approved areas
7. No person shall park a vehicle in a movement area, safety area, or in a manner that obstructs or interferes with operations in the aircraft movement area or apron area
8. No person shall park, or leave unattended any vehicles, or other equipment that interfere with the use of a facility by others or prevent movement or passage of aircraft, emergency vehicles, or other motor vehicles or equipment
9. No person shall park a vehicle or equipment within 20 ft. of a fire hydrant or in a manner that prohibits a vehicle from accessing the fire hydrant
10. No person shall operate a vehicle or other equipment on County of San Diego property under the influence of alcohol or any drug that impairs, or may impair, the operator's abilities
11. Each vehicle operator using an airport perimeter (security) gate shall ensure the gate closes behind the vehicle prior to leaving the immediate vicinity of the gate. The vehicle operator shall also ensure no unauthorized vehicles or persons gain access to the airside while the gate is open
12. Vehicle operators shall not operate vehicles in a reckless or careless manner. A reckless or careless manner is one that intentionally or through negligence threatens the life or safety of any person or threatens damage or destruction to property
13. Vehicles shall not enter the movement area or cross runways unless the operator of the vehicle has received required training and authorization from the County of San Diego to operate on the movement area. Whenever possible, all airport vehicles shall use the airport perimeter and service roads to transition between areas on the airport

14. Each vehicle operator is responsible for the activities of each vehicle passenger on the airside of the airport

Vehicle Requirements:

- (a) All vehicles operated in the movement must have vehicle liability insurance
- (b) Carts or pieces of equipment being towed after darkness must have side and rear reflectors or rear lights
- (c) No vehicle shall be permitted in the movement area unless:
  - 1. It is properly marked, as outlined in FAA Advisory Circular 150/5210-5, *Painting, Marking, and Lighting of Vehicles Used on an Airport*
  - 2. It is in sound mechanical condition with unobstructed forward, side and rear vision from the driver's seat
  - 3. It has the appropriately rated and inspected fire extinguishers (service vehicles and fuel trucks)
  - 4. It has operable vehicle lights
- (d) Vehicles operating on the movement area shall be equipped with an operating amber rotating beacon or orange and white checkered flag for daytime operations
- (e) Vehicles operating on the movement area shall be equipped with an operating amber rotating beacon for nighttime operations
- (f) All aircraft refueling vehicles and any other vehicle 8-feet or more in width, shall be equipped with a flashing amber beacon and flashing hazard lights that are activated at all times when operating in the movement areas
- (g) No person shall operate any motor vehicle that is in such physical or mechanical condition as to endanger persons or property or that the County of San Diego considers an endangerment
- (e) Vehicular Accidents. Operators of vehicles involved in an accident on the airport that results in injury to a person or damage to an aircraft, airport property, or another vehicle shall:
  - 1. Immediately stop and remain at the scene of the accident.
  - 2. Render reasonable assistance, if capable, to any person injured in the accident.

3. Report the accident immediately to the County of San Diego before leaving the scene.
4. Provide and surrender the following to any responding County of San Diego personnel: name and address, ground vehicle operator's card, government driver's license, proof of liability insurance and any information such personnel need to complete a motor vehicle accident report.

## Section 2. Driving on the Non-Movement Areas

Non-movement areas include taxiways, aprons, and other areas **not** under control of the ATCT. Anyone authorized to operate a motorized vehicle in the movement area, may do so on the non-movement areas without being in positive radio contact with the ATCT. These areas include:

- (a) Service roads
- (b) Cargo aprons
- (c) General aviation aprons
- (d) Air carrier apron(s)

Driving. Operating within the ramp areas require the vehicle driver to exercise extreme caution as aircraft are often moving, aircraft passengers may be walking from an aircraft to the gate, and noise levels can be high. Vehicle drivers should:

- (a) Never drive between safety cones or across delineated passenger walkways.
- (b) Watch cockpit blind spots—pilots typically cannot see behind or below the aircraft.
- (c) Avoid jet blast or prop wash, which can blow debris or overturn vehicles.
- (d) Be aware and avoid moving propellers that can cause damage, injury, or death.
- (e) Be aware of other vehicle movements—you may not hear them approaching due to aircraft engine noise.
- (f) Yield to aircraft, passengers, and emergency vehicles, which ALWAYS have the right-of-way on any portion of the airport.

When traveling on the apron, always use designated vehicle service roads. This policy helps to establish a predictable order to vehicle movements in congested areas and helps to ensure their visibility to aircraft and other vehicles.

Parked aircraft may still have their engines running, so be aware of the hazards of jet blast or prop wash, which may overturn vehicles. Before an aircraft engine is started, the aircraft's red flashing beacons should be on. In some instances, propellers and engine spinners are marked to indicate when the engine is

operating. A pilot's ability to maneuver quickly on the ground is limited. Propellers and jet engines can cause significant damage and injury to personnel. In addition, cockpit visibility prohibits the pilot from seeing under the nose or behind the aircraft and limits the pilot's ability to avoid ground vehicles.

Nighttime and Poor Weather Driving Conditions. Poor weather conditions (fog, rain, etc.) might obscure visual cues, roadway markings, and airport signs. Vehicle operators should remain vigilant of their surroundings and operating boundaries. Watch out for aircraft operating in the vicinity under low-visibility conditions. There are additional risks present under these conditions.

## Section 3. Driving on the Movement Areas

Drivers who are authorized to drive on the movement area require more training and vigilance since there are dangers associated with this area that are not present on non-movement areas. In addition to the principals for driving on the non-movement area, drivers who have access to the movement area must be cognizant of the meaning of airfield signs, markings, and lighting configurations. Additionally, they must be able to communicate with the air traffic control tower (ATCT) and be able to follow ATC directions.

### B 3.1 AIR TRAFFIC CONTROL

Movement areas are defined as the runways, taxiways, and other areas of the airport that are used for taxiing, hover taxiing, air taxiing, and takeoff and landing of aircraft, exclusive of loading ramps and aircraft parking areas. Movement areas are considered “positive control,” meaning that all vehicle operators will need permission from ATC before entering the area.

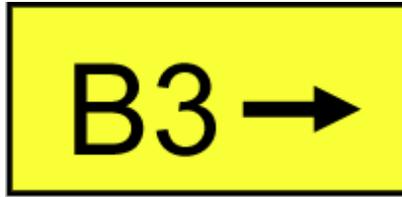
### B3.2 AUTHORIZED VEHICLES

Only those vehicles necessary for airport operations may enter a movement area. Therefore, fuel trucks, catering trucks, and other nonessential vehicles should not be permitted to enter these areas. Exceptions may include County of San Diego-authorized vehicles with appropriately trained personnel and emergency vehicles.

### B3.3 TAXIWAYS

- (a) Designations. Aircraft use taxiways to move to and from the aprons and the runways
- (b) Taxiways are designated by letters or by a letter/number combination such as A, B, G2, or B3
- (c) Lighting. Taxiways are lighted with **blue** edge lighting and/or reflectors. *(Use airport-specific example here.)*
- (d) Signs. The signs used on taxiways are direction, destination, location, and taxiway ending marker signs

**Direction and Designation Signs** have **black lettering** and a **directional arrow or arrows** on a **yellow background**. The arrow indicates the direction to that taxiway, runway, or destination.



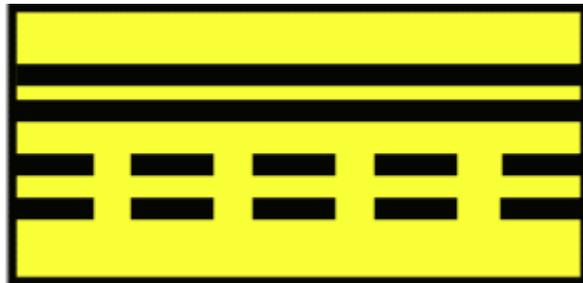
**Taxiway Directional Sign**

**Location Signs** have **yellow lettering** on a **black background**. The location sign below indicates that the operator of the vehicle/equipment is located on the named taxiway or runway.



**Taxiway Location Sign**

**Runway Safety Area (RSA)/Object Free Zone (OFZ) and Runway Approach Area Boundary Signs**, when required, identify the boundary of the RSA/OFZ or the runway approach area to the pilot and vehicle operator. The driver can use these signs to identify when the vehicle is clear of the runway environment. It has a black inscription that depicts the holdline marking on a **yellow background**.



**RSA/OFZ and Runway Approach Boundary Sign**

### B3.4 MARKINGS

Pavement markings on taxiways are always yellow. The taxiway centerline is painted on all taxiways. On the edges of some taxiways, there is a solid, double yellow line or double-dashed line. If pavements are usable on both sides of the line, the lines will be dashed; if not, the lines will be solid.

**Runway Holding Position Markings** are located across each taxiway that leads directly onto a runway. These markings are made up of **two solid lines** and **two broken yellow lines** and denote runway holding position markings. These markings are always co-located with a Runway Holding Position Sign. A vehicle operator must not cross from the solid-line side of the marking without first obtaining clearance.



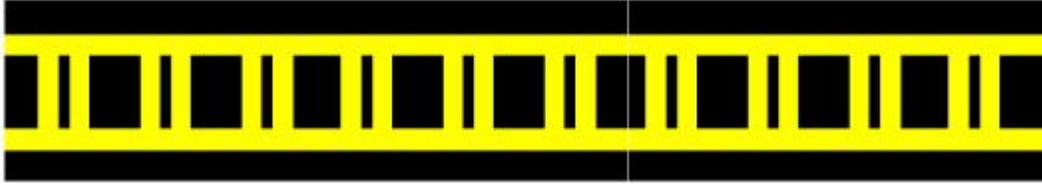
**Runway Holding Position Marking**

**Non-Movement Area Boundary Markings** consist of **two yellow lines** (one solid and one dashed). The solid line is located on the non-movement area side, while the dashed yellow line is located on the movement area side. A vehicle operator is not to cross from the solid-line side without first contacting the ATCT and obtaining a clearance to operate on the movement area.



**Non-Movement Area Boundary Marking**

**Instrument Landing System (ILS) Critical Area Holding Position Markings** are comprised of **two parallel yellow lines** with lines running perpendicular between the two parallel yellow lines. These markings identify the location on a taxiway where an aircraft or vehicle is to stop when it does not have clearance to enter ILS critical areas. The ILS critical area must remain clear, especially in inclement weather. If a vehicle proceeds past this ILS marking, it might cause a false signal to be transmitted to the landing aircraft.



ILS Hold Position Marking

### B3.5 RUNWAYS

- (e) Designations. Runways are areas where aircraft land and take off. Runways are always designated by a number such as 1 or 19. The number indicates the compass heading of the runway. An aircraft taking off on runway 19 is headed 190 degrees
- (f) Lighting. Runways are lighted with a variety of colored lights
- Runway Edge-lights are white. If the runway has an instrument approach, the last 2,000 feet of the runway will be yellow in color
  - Runway Centerline Lights are white except for the last 3,000 feet of the runway, where they begin to alternate red and white. For the last 1,000 feet of runway the centerline lights are all red
  - Runway Touchdown Zone Lights are white
  - Runway End/Threshold Lights are split lenses that are red/green. Green for the approach end of the runway and red for the departure end of the runway

**Mandatory Holding Position Signs for Runways have white numbering/lettering on a red background with a white border.** These are located at each entrance to a runway and at the edge of the runway safety area/obstacle-free zone and are co-located with runway holding position markings. **Do not proceed beyond these signs until clearance is given by the ATCT to enter onto a runway or taxiway.**



Runway Hold Sign

**Instrument Landing System (ILS) Holding Position Signs** have **white letters** on a **red background with a white border**. These signs tell pilots and vehicle operators where to stop to avoid interrupting a type of navigational signal used by landing aircraft. This is a critical area, and a vehicle/equipment operator must remain clear of it (*use airport-specific policy*). If a vehicle proceeds pass this microwave landing system/ILS marking, it may cause a false signal to be transmitted to the landing aircraft.



**ILS Hold Sign**

**Holding Position Signs for Runway Approach Areas**. The inscription on a sign for a runway approach area is the associated runway designation followed by a dash and the abbreviation APCH for approach. This sign has **white numbering** on a **red background** with a **white border**. The sign is installed on taxiways located in approach areas where an aircraft on a taxiway would either cross through the runway safety area or penetrate the airspace required for the approach or departure runway.



**Approach Sign**

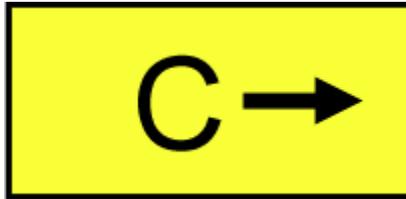
**Runway Distance Remaining Signs** provide distance remaining information to pilots during takeoff and landing operations. They have **white numbering** on a

**black background. The number on the sign provides the remaining runway length in 1,000-foot increments.**



### **Runway Distance Remaining Signs**

**Runway Exit Sign** is a destination sign located prior to the runway/taxiway intersection on the side and in the direction of the runway where the aircraft is expected to exit. This sign has **black lettering** and a **directional arrow** on a **yellow background**.



### **Runway Exit Sign**

- (g) Markings. Pavement markings on a runway are white. Runway Threshold Markings and Runway Threshold Bars, Runway Aiming Point Markings, Runway Designation Markings, Runway Touchdown Zone Markings, Runway Centerline Markings, Runway Side Stripes, and Displaced Threshold Markings are white. The only nonwhite lines on a runway are yellow lead-in/-off lines that extend from the runway centerline and hold lines for a specific operation known as land and hold short.

## Section 4. Communications

Any vehicle driving on the movement areas (runways and taxiways) must be in contact with the ATCT or capable of monitoring and transmitting on the CTAF. Vehicle operators must always monitor the appropriate radio frequency when in the movement areas. Permission must be requested and clearance given prior to driving on a movement area. A vehicle that is equipped with a radio may escort vehicles without radios.

The ATCT controller may use separate or common radio frequency to control all ground traffic, vehicle and aircraft, on the movement areas. The frequency is only to be used to get clearance onto and off the movement areas. When the ATCT is closed, the CTAF should be used to announce a driver's intentions when operating within the movement area.

### B4.1 PHRASEOLOGY

Vehicle operators must contact the ATCT ground controller each and every time they proceed onto or leave the movement area. When proceeding onto a movement area, vehicle operators must tell the controller three things: WHO you are, WHERE you are, and WHAT your intentions are. Vehicle operators must always acknowledge all communications so ground control and other persons know that the message was received. Vehicle operators must always give aircraft and ground control transmissions priority unless an emergency exists. Very high frequencies are for the primary use of aircraft and ATCT personnel. Some typical transmissions are as follows:

- (AIRPORT NAME) ground control, this is Airport 21 at Charlie 6. Request permission on all taxiways for a pavement inspection.”
- (AIRPORT NAME) ground control, this is Airport 21 at Taxiway Alpha. Request clearance south on runway 19 right for a light inspection.”

Reply transmissions may be brief, such as:

- ATCT: “Airport 21, hold short of runway 19 right.”
- Driver: “Airport 21 holding short of runway 19 right.”
- ATCT: “Airport 21 cleared south on runway 19 right.”
- ATCT: “Please expedite, landing aircraft on a 10 mile final for runway 19 right.”
- Driver: “Airport 21 cleared south on runway 19 right, will expedite.”

- Driver: “Ground control, Airport 21 is clear of runway 19 right.

**NOTE:** If you are unsure what the controller has said, or if you don't understand an instruction, ask the controller to repeat it. Good communications only occur when each party knows and understands what the other is saying.

## B4.2 COMMON USE PHRASES

<b>What Is Said:</b>	<b>What It Means:</b>
Acknowledge	Let me know you have received and understand this message
Advise Intentions	Let me know what you plan to do
Affirmative	Yes
Correction	An error has been made in the transmission, and the correct version follows
Go Ahead	Proceed with your message only. Do not move
Hold/Hold Short	Phrase used during ground operations to keep a vehicle or aircraft within a specified area or at a specified point while awaiting further clearance from air traffic control
How do you hear me?	Question relating to the quality of the transmission or to determine how well the transmission is being received
Immediately or without delay	Phrase used by ATC when such action compliance is required to avoid an imminent situation
Negative	"No" or "permission not granted" or "that is not correct."
Over	My radio transmission is ended, and I expect a response
Read Back	Repeat my message to me
Roger	I have received all of your last transmission
Stand By	Means the controller or pilot must pause for a few seconds, usually to attend to other duties of a higher priority. Also means to wait as in "stand by for clearance." The caller should reestablish contact if a delay is lengthy
Unable	Indicates inability to comply with a specific instruction, request, or clearance
Verify	Request confirmation of information

Wilco	I have received your message, understand it, and will comply with it.
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### B4.3 PHONETIC AVIATION ALPHABET

Because some letters have similar sounds, like B and P, the international aviation industry uses the following words to reduce confusion. For example; Taxiway B would be referred to as Taxiway Bravo on the radio.

Letter	Phonetic Equivalent
A	ALFA
B	BRAVO
C	CHARLIE
D	DELTA
E	ECHO
F	FOX-TROT
G	GOLF
H	HOTEL
I	INDIA
J	JULIET
K	KILO
L	LIMA
M	MIKE
N	NOVEMBER
O	OSCAR
P	PAPA
Q	QUEBEC
R	ROMEO
S	SIERRA
T	TANGO
U	UNIFORM
V	VICTOR
W	WHISKEY
X	X-RAY
Y	YANKEE
Z	ZULU

#### B4.4 ATCT LIGHT GUN SIGNALS

Air traffic controllers have a backup system for communicating with aircraft or ground vehicles if their radios stop working. The controller has a light gun in the tower that can send out different colored lights to tell the pilot or driver what to do. If a vehicle operator experiences a radio failure on a runway or taxiway, the operator should vacate the runway as quickly and safely as possible and contact the ATCT by other means, such as a cellular telephone, and advise the ATCT of the situation. If this is not practical, then the driver, after vacating the runway, should turn the vehicle toward the tower and start flashing the vehicle headlights and wait for the controller to signal with the light gun.

Light gun signals, and their meaning, are as follows:

Light Gun Signal	Meaning
Steady Green	OK to cross runway or taxiway.
Steady Red	STOP!
Flashing Red	Move off the runway or taxiway.
Flashing White	Go back to where you started.
Alternating Red and Green	Use extreme caution.

**Safety.** The FAA defines a runway incursion as “**Any occurrence at an airport involving an aircraft, vehicle, person, or object on the ground that creates a collision hazard or results in loss of separation with an aircraft taking off or intending to take off, land, or intending to land.**”

Runway incursions are primarily caused by error in one or more of the following areas:

- Pilot/ground vehicle/controller communications
- Airport familiarity
- Loss of situational awareness

An example of an incursion is a vehicle at an airport with an operating ATCT straying onto a runway in front of an aircraft causing the pilot to take an action to avoid a collision.

When driving on the airfield, vehicle operators need to always be aware of their location and the meaning of all pavement markings, lights, and signs. When on the aprons and taxiways, stay away and steer clear of aircraft. **Aircraft always have the right-of-way.**

**NOTE: Any individual involved in a runway incursion will receive remedial ground vehicle operations training given by the County of San Diego.**

**SAMPLE**  
**GROUND VEHICLE OPERATOR'S**  
**TRAINING RECORD**

Name: \_\_\_\_\_

Master Lessee: \_\_\_\_\_

Company Name: \_\_\_\_\_

Driver's License State and Number \_\_\_\_\_

Driver's License Expiration Date \_\_\_\_\_

Proof of liability Insurance: \_\_\_\_\_

I agree to abide by all rules and regulations prescribed for the operations of a vehicle within the airport operations area. As of this time, I certify that I hold a current and valid driver's license. If for any reason my license becomes invalid, I will notify the County of San Diego immediately.

Sign your name and indicate today's date below:

_____	_____
_____	_____
(NAME)	(DATE)

I certify that the above named individual has satisfactorily completed the ground vehicle operation training Program.

Instructor's Name (Printed): \_\_\_\_\_

Instructor's Signature: \_\_\_\_\_

## APPENDIX C

Date: \_\_\_\_\_

Master Lessee  
ADDRESS

Dear \_\_\_\_\_:

[AIRPORT] – [LEASE] – LEASEHOLD COMPLIANCE LETTER – NOTICE #1

For time to time, leasehold compliance issues are observed by Airports staff during routine inspections or are brought to our attention by other airport tenants. When this happens, Airports will bring the issue to your attention informally and give you the opportunity to address it, as we did for this matter on [DATE]. If the issue is not expediently resolved, Airports issues a Leasehold Compliance letter, like this, to help clarify the issue and steps needed in order to resolve it.

The following problem was observed on your leasehold, hangar \_\_\_\_ (or location):

- 1) **[Description of Compliance Issue]** (Example: Non-permitted use of the premises; non-aviation storage, motorcycle maintenance/repair.)

In order to remedy the situation, we ask that you take the following action within 10 days of this notification:

- 1) **[Suggested resolution]** (Example: Remove non-aviation related items in hangar D12 and return hangar to aviation use and then contact Airport Manager John Doe at 619-123-4567 or [john.doe@sdcounty.ca.gov](mailto:john.doe@sdcounty.ca.gov) to let him know this matter has been addressed.)

If it is not possible to meet this timeframe, please provide your plan, including a schedule of how you plan to address the situation. Our goal is to see your site brought into compliance without having to take enforcement measures contained in your Lease, so we request your cooperation to take action and quickly remedy this leasehold compliance issue.

If you have any questions, please call the Airport Manager at \_\_\_\_ - \_\_\_\_ - \_\_\_\_ to discuss this letter.

Your prompt attention to this matter is appreciated.

Signed by: \_\_\_\_\_  
Name, Title

cc: Airport Manager; Real Property

PHOTOS: (if applicable)

## Appendix D - Compliance Outreach Program Flow Chart

