



Truckee Tahoe Airport District
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Comment Compilation and Response

Draft Rules and Regulations and General Aviation Minimum Standards

Truckee Tahoe Airport District

Truckee Tahoe Airport (TRK)

DRAFT – FOR DISCUSSION PURPOSES ONLY

July 15, 2016



The Truckee Tahoe Airport District (TTAD) believes that the development and implementation of Primary Management Compliance Documents (e.g., Rules and Regulations, Minimum Standards, Leasing, Rents and Fees Policy, and Development Standards) or PMCDs is: (1) consistent with best management (and customer service) practices and (2) necessary to ensure the successful planning, development, operation, and management of Truckee Tahoe Airport (Airport or TRK).

By way of background, when an airport sponsor (in this case, TTAD) obtains a grant for airport improvements under the Airport Improvement Program, the airport sponsor is required to give certain assurances to the Federal Aviation Administration (FAA) known as the Airport Sponsor Assurances.

Airport Sponsor Assurance #22, Economic Nondiscrimination, states "It [airport sponsor] will make the airport available as an airport for public use on reasonable terms and without unjust discrimination to all types, kinds and classes of aeronautical activities, including commercial aeronautical activities offering services to the public at the airport." Order 5190.6B Airport Compliance Manual further states that "Grant Assurance [Airport Sponsor Assurance] 19, Operations and Maintenance, requires the sponsor to protect the public using the airport by adopting and enforcing rules, regulations, and ordinances as necessary to ensure safe and efficient flight operations."

In the Airport Sponsor Assurances, the FAA identifies a number of Advisory Circulars (ACs) that, when attached to or incorporated by reference into the grant agreement, become mandatory contractual obligations of the airport sponsor.

In AC 150/5190-7, Minimum Standards for Commercial Aeronautical Activities, the FAA highly recommends the "use and implementation" of minimum standards "as a means to minimize the potential for violations of Federal obligations at federally obligated Airports." The AC states that "The FAA objective in recommending the development of minimum standards serves to promote safety in all airport activities, protect airport users from unlicensed and unauthorized products and services, maintain and enhance the availability of adequate services for all airport users, promote the orderly development of airport land, and ensure efficiency of operations." The AC also suggests that "airport sponsors establish reasonable minimum standards that are relevant to the proposed aeronautical activity with the goal of protecting the level and quality of services offered to the public."

It is significant to note the AC also states that "The airport sponsor's purpose in imposing standards is to ensure a safe, efficient and adequate level of operation and services is offered to the public" and that standards should be "relevant to the proposed aeronautical activity with the goal of protecting the level and quality of services offered to the public."



The FAA specifically indicates, in multiple instances throughout the AC, that an airport sponsor should develop minimum standards to address the level and quality of general aviation aeronautical services provided at an airport.

Several documents provide the foundation for the development and implementation of Minimum Standards and Rules and Regulations including: Airport Sponsor Assurances, AC 150/5190-6 Exclusive Rights at Federally-Obligated Airport, AC 150/5190-7 Minimum Standards for Commercial Aeronautical Activities, and Order 5190.6B Airport Compliance Manual. All interested parties are encouraged to thoroughly review and carefully consider each of these documents and to view these Rules and Regulations and Minimum Standards and in totality.

Within this context, it is the desire of the TTAD to: (1) ensure that the level and quality of products, services, and facilities desired by aviation consumers are consistently provided at the Airport in a safe, secure, efficient, prompt, and professional manner, (2) ensure the safe, orderly, and efficient operation and use of the Airport, (3) protect the public health, safety, interest, and general welfare of the Operators, Lessees, Sublessees, Permittees, and users of the Airport, and (4) create a “level playing field” (for operators) and “promote fair competition” (between operators).

Beyond being consistent with FAA policies and directives, the TTAD believes that all of these objectives are consistent with best management (and customer service) practices. It is not the desire or the intent of the TTAD to create an undue burden on existing or future operators, tenants, consumers, or users of the Airport.

As such, the TTAD and Aviation Management Consulting Group (AMCG) have prepared draft Rules and Regulations and General Aviation Minimum Standards (Minimum Standards) that are:

- relevant to the current (and/or anticipated) general aviation activities at the Airport
- reasonable and appropriate for the Airport and the market
- necessary to meet the type and level of demand that exists (and/or is anticipated) at the Airport and in the market, and
- protect the public health, safety, interest, and general welfare of all users of the Airport.

During the document development process, the TTAD and AMCG gathered and considered relevant information from: (1) current operators at the Airport and (2) airports considered comparable to the Airport. In addition, the TTAD and AMCG viewed the PMCDs from a consumer perspective.



The following outlines the public review process utilized during the document development process:

- The TTAD and AMCG facilitated a public forum on Wednesday April 27, 2016 to present the draft documents and to receive public input.
- The draft Rules and Regulations and Minimum Standards were made available for public review and comment on the Airport's website beginning May 1, 2016.
- All of the public comments received through June 15, 2016 were compiled and reviewed by the TTAD and AMCG.

The following is a compilation of comments received during the comment period regarding the draft Rules and Regulations (dated April 8, 2016) and draft Minimum Standards (dated May 3, 2016) for the Airport with AMCG's response to each comment received as of June 15, 2015.

In some cases, the comments received have been distilled (i.e., the essence of the comment has been captured), comments have been paraphrased, and/or typographical errors corrected. Each of the comments submitted have been addressed in this document and/or in the revised draft Rules and Regulations and draft Minimum Standards. **Each comment is represented by a "C" and the response to the comment is represented by an "R"**. The numbering is utilized only as a method to identify and organize comments. Also, if a respondent has requested to delete language from the draft documents, that language has been identified using ~~strike through~~ and when a respondent has requested to add language, that language has been identified using **red** highlight. Any language identified in *italics* is taken verbatim from the draft documents.

Thank you for your time and efforts to review the above referenced documents. If you have any additional questions pertaining to the documents or to AMCG's response, please feel free to contact us.



COMMENT COMPILATION AND RESPONSE

General Aviation Minimum Standards	
C1 Pg 6, Sec 2.7	2.7. Licenses, Permits, Certifications, and Ratings. "Operators ... shall adhere to the ... TTAD community annoyance reduction programs and directives issued by the TTAD." This sentence claims that TTAD has the authority to control airspace by requiring operators to comply with voluntary noise abatement procedures, but TTAD has no authority to control airspace.
R1	<p>TTAD community annoyance program does not purport to supersede FAA regulations or assert authority over the airspace. The TTAD community annoyance program is a voluntary effort intended to mitigate the impact of Aircraft and landside operations on the community. To ensure that there is no misunderstanding, the section will be modified to clarify compliance requirements of the TTAD community annoyance program:</p> <p>The following change will be made to Section 2.7: <i>Operators engaged in Activities at the Airport, whether using or occupying Airport land and/or Improvements, shall adhere to the practices recommended by the FAA and shall comply with all Safety Management Systems (SMS), Legal Requirements, TTAD community annoyance reduction programs and directives issued by the TTAD. Operators are requested to comply with the TTAD community annoyance reduction program and the TTAD recommended noise abatement procedures for the Airport whenever practicable.</i></p>
C2 Pg 19, Sec 4.5	4.5. Hours of Activities. Requires aircraft maintenance facility to be open 6 days/week. Onerous. Is this FBO ever allowed to take two days off in a row? There's no need for 6 days/week operation at Truckee. This would require more employees, further burdening a small operation. Choice of specific week/weekend days of operation should be up to the FBO.
R2	<p>Required hours of activities are specified in the Minimum Standards to ensure that aeronautical services are being consistently <i>offered and available to meet reasonable demand of customers</i>. However, upon further review by the TTAD, it has been determined that 5 days/week with supplemental call out requirements would provide adequate SASO services at this time.</p> <p>The following change will be made to table in Section 4.5: Days Per Week: 5.</p>
C3 Pg 29 Sec 8.5	8.5 Equipment. Requires that independent flight instructor has access to an IFR capable aircraft unless instructing a Sport aircraft. Why? Does anyone on the board understand training requirements for Sport Pilot, Recreational Pilot, and Private Pilot? An IFR capable aircraft is only required for Airplane Instrument Rating training. If a VFR aircraft is the only aircraft an instructor has available to him/her for Sport, Recreational or Private Pilot training, he/she should be able to use that aircraft. The requirement has no basis of need.
R3	<p>Section 8.5 states as follows: <i>Independent Flight Training Operator shall have access to one properly certified and airworthy Aircraft, which must be IFR capable (unless Independent Flight Training Operator is only providing sport pilot training) from an approved Aircraft Rental or Flight Training Facility Operator.</i></p> <p>The section requires that the independent shall have <u>access</u> to an IFR capable Aircraft. It does not require that the Operator exclusively use such an Aircraft in flight training. Access to an IFR capable Aircraft is essential for instructing IFR student pilots in instrument flying.</p> <p>No change to Section 8.5 is recommended.</p>
C4 Pg 37, Sec 13	13. Attachment A (Minimum Insurance Requirements). Requires Aircraft Maintenance Operator to carry \$5M Commercial General Liability insurance for piston/turboprop aircraft. Onerous. Operator should set its own minimum insurance at \$2M - \$3M, avoiding outrageous insurance fees for a small operation while carrying enough to handle its situations. Don't drive Sierra Aero out of business or force it to raise their shop rate to a point where local folks take their aircraft to other airports to have their aircraft maintenance performed.



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<p>R4</p>	<p>Required Commercial General Liability insurance requirements are based on a risk assessment by the TTAD and what is reasonable and customary in the marketplace. Upon further review, the TTAD has determined that current Commercial General Liability Insurance requirements for SASO's is adequate at this time.</p> <p>The following change will be made to Attachment A: Aircraft Maintenance Operator; Commercial General Liability Insurance: \$1,000,000 Piston/Turboprop.</p>
<p>C5 Pg 29 Sec 8.2</p>	<p>8.2. Limitations. "As determined by the TTAD in its sole discretion, if a Flight Training Facility Operator is fully meeting the demand for Flight Training, Independent Flight Training Operators may be prohibited at the airport." That's outrageous! If a pilot based at TRK wants to receive flight training from a specific IFTO and TTAD decides that a FTFO is fully meeting the demand for FT, TTAD would be wrong. Sole discretion is a dangerous thing when wielded incorrectly.</p>
<p>R5</p>	<p>A fundamental purpose of the Minimum Standards is to "level the playing field" and ensure that all proposed and existing commercial aeronautical service providers are subject to the same requirements and "promote fair competition" (between operators). Section 5 of the proposed Minimum Standards requires a Flight Training Operator (SASO) to lease "<i>adequate land and improvements to accommodate all Activities of Operator...</i>" Additionally, the Operator is also required to have a specific number of employees, equipment (Aircraft) and maintain defined business hours for the <i>consistent provision of high quality Commercial General Aviation products, services, and facilities at the Airport.</i></p> <p>A Flight Training Operator is required to make a significant financial and operational commitment to conduct such commercial activities at the Airport whereby an Independent Flight Training Operator does not have to make such a commitment. If the TTAD determines that the Flight Training Operator(s) is adequately fulfilling the demand for flight training at the Airport, the TTAD reserves the right to restrict flight training to authorized Flight Training Operators that conform to the requirements of Section 5.</p> <p>No change to Section 8.2 is recommended.</p>
<p>C6 Pg 29 Sec 8.4</p>	<p>8.4. Licenses and Certifications. "Independent Flight Training Operator shall be properly certificated as ground school instructor capable of providing on-demand ground school instruction sufficient to enable students to pass the FAA written examinations for commercial pilot and instrument rating." This sentence shows a lack of knowledge of flight instructors' privileges and limitations. Delete the whole sentence, because (a) everything through "pilot" is germane and (b) an IFTO is not required to be a CFII, and should not be, hence a CFI is not qualified as an instrument ground instructor.</p>
<p>R6</p>	<p>Upon further review, the TTAD has been determined that Section 8.4 will be modified to address this comment as follows:</p> <p>The following change will be made to Section 8.4: <i>Independent Flight Training Operator shall be properly certificated as ground school instructor and capable of providing on-demand ground school instruction sufficient to enable students to pass the FAA written examinations for commercial pilot and instrument the pilot rating being sought.</i></p>
<p>C7 Pg 33 Sec 10.5</p>	<p>10.5. Hours of Activity "... entities engaging in similar Activities at comparable airports." Is this a serious requirement? Is TTAD going to check on what hours of operations an on-demand aerial photographer keeps? Rewrite the sentence for real world operations.</p>
<p>R7</p>	<p>Required hours of activities ensure that aeronautical services are being consistently offered and available to meet reasonable demand of customers. Establishing operating hours that are reasonable and customary and reflect the hours of operation of entities engaging in similar Activities at comparable airports is an appropriate method of establishing such a requirement.</p> <p>No change to Section 10.5 is recommended.</p>



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C8	As the AOPA Airport Support Network Volunteer for TRK, I would like to comment on the above referenced sections of the Draft General Aviation Minimum Standards dated April 8, 2016 as relates to Sierra Aero, our local aircraft maintenance and flight training/aircraft rental operation located on the airport. When reviewing my comments, please bear in mind the guidelines outlined in FAA AC 150/5190-7, specifically the comment in section 1.2.c developing Minimum Standards which states "Minimum standards should be tailored to the specific aeronautical activity and the airport to which they are to be applied. For example, it would be unreasonable to apply the Minimum Standards for a fixed-base operator (FBO) at a medium or large hub airport to a general aviation airport serving primarily piston –powered aircraft." I believe this statement would hold true for a SASO (or special FBO) as well.
R8	No specific change was requested.
C9 Pg 19 Sec 4.5	Section 4.5 Hours of Activities - Days of the week should be 5, not 6. The airport is lucky to have a maintenance facility at all. Sierra Aero is a small but very capable maintenance facility. Their current workload does not justify being open 6 days a week. During the winter months they are at times forced to furlough employees as demand for their services decreases.
R9	See discussion and changes identified in R2.
C10 Pg 21 Sec 5.5	Section 5.5 Equipment. Number of airplanes for both rental and training should be 1, not 2. This is a simple supply and demand scenario. Presently, the rental and training activity at the airport does not justify 2 airplanes. If the demand increased I feel confident that Sierra Aero would acquire additional aircraft as they are a for profit business.
R10	The recommended number of Aircraft (two in this case) assures the flying public that an adequate number of Aircraft are available for the service provided. It is not uncommon to have an Aircraft “down” for required maintenance and/or inspection (annual/100-hour inspection) or rented for an extended period of time. In either of these scenarios, there would be no other Aircraft available to provide the required services. The “second” Aircraft provides a back-up in this regard. No Change to Section 5.5 is recommended.
C11 Pg 22 Sec 5.6	Section 5.6 Hours of Activities. This should be on an on demand basis, not 6 days a week. Again the level of activity cannot justify a rental/training facility being open 6 days a week. Since Sierra Aero will already be on site 5 days a week with the maintenance portion of their business, this hourly coverage will cross over to the rental/training portion of their business. Customers can arrange for both rentals and training during non-business hours on an as needed basis.
R11	Required hours of activities are specified to ensure that aeronautical services are being consistently offered and <i>available to meet reasonable demand of customers</i> . Upon further review, it has been determined that a minimum of 5 days/week would provide adequate SASO service at this time. The following change will be made to table in Section 5.6: Days Per Week: 5.
C12 Sec 13 Pg 37 Att A	13. Attachment A (Minimum Insurance Requirements) The general liability requirement of \$5M is much too high for the type of business Sierra Aero is involved in. The industry average for their category of business is \$1M.
R12	See discussion and changes identified in R4.



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C13	In conclusion, the above Minimum Standards as currently outlined in the draft document dated April 8, 2016 would have a tremendous financial impact on Sierra Aero or any other SASO on the airport engaged in similar activities. The airport cannot afford to lose this business since their reputation is excellent and I highly doubt another SASO would take their place under the proposed Minimum Standards - it just does not make financial sense. Please also bear in mind that the stated objective of FAA AC 150/5190-7, Developing Minimum Standards, includes verbiage to "promote safety" and "maintain and enhance the availability of adequate services for all airport users". It also states airport sponsors should "strive to develop minimum standards that are fair and reasonable to all on-airport aeronautical service providers and relevant to the aeronautical activity to which it is applied". Without a maintenance facility on the airport the safety of airport operations goes down due to users potentially delaying maintenance on their aircraft until they can be moved to another location for service. The airport minimum standards should not restrict anyone from doing business on the airport due to unreasonable constraints and requirements.
R13	No specific change was requested.
C21 Sec 13 Pg 37 Att A	13. Attachment A Minimum Insurance Requirements. Insurance requirements. When we started up Sierra Aero and negotiated the lease in 2012, we went through the insurance requirements that was then proposed by TTAD, which was the same as Regent Air had, who operated a jet business in a Part 135, and had almost twice the size hangar space (which included A9). With the help of Bramar Associates, who is our insurance agent, who provide insurance to a number of maintenance shops/FBO's in 18 different states, we discussed at length what insurance limits would be appropriate, and affordable, by an operation our size. We and TTAD then agreed that the \$1,000,000 liability per occurrence was sufficient, along with a \$200,000/aircraft \$400,000/occurrence for the hangar's keeper's portion. This is industry standard for an operation of our size and for the type of maintenance we do. See attached a letter from Bramar Associates. We suggest the liability limit stays at \$1,000,000.
R14	See discussion and changes identified in R4.
C22 Sec 5.5 Pg 21	Section 5.5 Equipment. Proposed number of rental/training aircraft. Since 2010, there has only been one aircraft operating as a rental and training aircraft, our 172, N1968F. We added another 172 in August last year, just to see if it would make sense to have 2 planes in the rental pool. We want to keep it until the end of 2016, and will try our hardest to keep two planes going. We suggest a change from 2 aircraft to 1 as a minimum. The reality is that there are not enough students in our area, even with our competitive rate.
R14	See discussion and changes identified in R10.
C15 Pg 2 Sec 1.5	Section 1.5 Applicability. How are the Minimum Standards applicable to an existing Agreement?
R15	The Minimum Standards apply to any new Agreement or any amendment to any existing Agreement. If an Operator desires (under the terms of an existing Agreement) to change its Activities, the Operator must comply with the Minimum Standards, unless an exemption or variance has been granted by the TTAD. Furthermore, the Minimum Standards shall not affect any Agreement or amendment executed prior to the date of adoption the Minimum Standards except as provided for in the Agreement, in which case, the Minimum Standards will apply to the extent permitted under the Agreement. No change to Section 1.5 is recommended.
C16 Pg 5 Sec2.5	Section 2.5 General Provisions; Hangars. Explain the rationale behind the Hangar door height and width for turbojet Aircraft
R16	These are the general requirements for hangar construction if a SASO or FBO desired to build such facilities and if the TTAD would permit such development. The dimensions are based upon recognized industry standards for the type of Aircraft identified. No change to Section 2.5 is recommended.



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C17 Pg 12 Sec 3.2	Section 3.2 Scope of Activities; Aircraft Ground Handling Services. Doesn't say exclusivity.
R17	<p>The section has been clarified to emphasize that the TTAD is exercising its proprietary rights for:</p> <ul style="list-style-type: none"> • Aviation fuels and lubricants • Aircraft ground handling services • Passenger and crew services • Aircraft storage <p>Additionally, other services listed currently not being offered by the TTAD are now characterized as "optional".</p> <p>No change to Section 3.2 is recommended.</p>
C18 Pg 17 Sec 3.9	Section 3.9 Employees. Why is there one (1) line service technician required to be on-call when the TTAD does not have such an employee on-call?
R18	<p>If the TTAD intends on providing FBO products, services, and facilities, it is recommended that they conform to industry best practices which includes on-call services. TTAD staff is in the process of developing a fee structure for after hour services.</p>
Rules and Regulations	
C19 Pg 27 Sec 3.12	3.12 Parking and Storage. "Any person operating an aircraft engine in an area which is accessible to the public shall alert and take precautions to protect the public from potential hazards resulting from such operations." How does one "alert" the public that he/she is operating an aircraft engine? Is there any requirement for the public to exercise caution when in the vicinity of potential aircraft movement? Don't put the entire responsibility of see and avoid onto the person operating the aircraft engine.
R19	<p>This section is intended to safeguard the public from hazards associated with Aircraft engine operation (i.e. propeller/jet exhaust blast). The Aircraft operator is requested to use sufficient care and judgement as to the most appropriate method of alerting the public who might not be aware of the inherent dangers associated with Aircraft engine operations.</p> <p>No change to Section 3.12 is recommended.</p>
C20 Pg 29 Sec 3.16	3.16 Taxiing and Towing of Aircraft. "Aircraft being taxied shall have a person...." Insert "for purposes of flight" between "taxied" and "shall."
R20	<p>Aircraft are routinely taxied without the intention of flight such as taxiing from the self-service fueling facility to the Aircraft's parking area. During those times it is incumbent on the person at the controls of the Aircraft to be aware of Aircraft operations by monitoring the Unicom frequency.</p> <p>No change to Section 3.16 is recommended.</p>
C21 Pg 29 & 30 Sec 3.19	<p>3.19 Noise Abatement Procedures. "> Use best angle (Vx) for first 500 feet then best rate (Vy) to achieve maximum altitude." This statement is an order, not a recommendation or request - change the wording.</p> <p>3.19 Noise Abatement Procedures. "> Avoid shallow...." and "Conform with...." are orders and not requests or recommendations. TTAD does not control airspace. Change the wording to indicate request or recommendation. This document is "Rules and Regulations" and ordering pilots to operate in a certain manner and ordering them where to fly cannot be part of this document, and if not changed will undoubtedly result in complaints to the FSDO.</p>



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<p>R21</p>	<p>Section 3.19 states: <i>Consistent with the Aircraft Operator's responsibility for complying with 14 CFR and the operating parameters of the Aircraft as set forth by the Aircraft manufacturer, Aircraft Operators are requested to use procedures which minimize the noise impact on surrounding areas.</i></p> <p>The second paragraph states: <i>Whenever safely possible, Aircraft Operators are requested to conform with the TTAD voluntary [emphasis added] noise abatement procedures for arriving and departing Aircraft designed to minimize impacts to the community as part of its "Good Neighbor" policy....</i> [followed by a list of requested procedures].</p> <p>The TTAD requests the use of recommended noise abatement procedures to mitigate the impact of Aircraft operations on the community; however, the use of all requested noise abatement procedures is at the discretion of the pilot in command.</p> <p>No change to Section 3.19 is recommended.</p>
<p>C22 Pg 30 Sec 3.20</p>	<p>3.20 Restricted Activities. "> Use of Ultralight Vehicles – the landing upon or taking off of Ultralight Vehicles unless approved in writing by the General Manager." First off, I don't think any pilot wants to "land upon" an ultralight aircraft. Second, this is a prohibition (without written permission) of a FAA certificated pilot to operate an airworthy aircraft at an airport that allows other categories and classes of aircraft to freely use without any such restriction. "> Use of lighter-than-air...." Delete "upon." "> Banner...." Delete "upon." "> Powered parachute...." Once again this document prohibits (without written permission) a FAA certificated pilot to operate an airworthy aircraft at an airport that allows other categories and classes of aircraft to freely use without any such restriction.</p>
<p>R22</p>	<p>FAA Advisory Circular AC No: 103-6 Ultralight Vehicle Operations - Airports, Air Traffic Control, and Weather Chapter 1. paragraph (2) states, <i>in part</i>,: <i>"There are many airports where air traffic is not controlled by an air traffic control tower and the traffic activity level is usually low. These airports are referred to as "uncontrolled airports." Use of these airports by ultralight vehicles may require prior permission of the airport operator...."</i>. Therefore, the TTAD is within its authority to regulate these types of operation in the interest of safety. Powered parachutes are considered an ultralight vehicle and therefore fall within with the guidelines of the aforementioned Advisory Circular.</p> <p>The following changes will be made to Section 3.2:</p> <ul style="list-style-type: none"> ➤ Use of Ultralight Vehicles – the landing upon or taking off of Ultralight Vehicles unless approved in writing by the General Manager. ➤ Use of lighter-than-air Aircraft – the landing upon or taking off of airships, dirigibles, blimps, balloons, and other certificated lighter-than-air Aircraft which utilize gasses or hot air to provide lift. ➤ Banner towing – the landing upon or taking off of Aircraft which tow banners, or other devices.
<p>C23 Pg 34 Sec 5.4</p>	<p>5.4. Operations. "Maximum Speed" Airside 20 mph Recommend Airside speed limit be reduced to 15 mph; 20 is too fast.</p>
<p>R23</p>	<p>Paragraph four in Section 5.4 stipulates: <i>Safe Speed – Vehicles shall not be operated at a speed greater than is reasonable and prudent under prevailing conditions and/or in a manner that endangers persons or Property.</i> The TTAD has determined that 20 MPH is the maximum safe speed permitted subject to the aforementioned conditions.</p> <p>No change to Section 5.4 is recommended.</p>



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<p>C24 Pg 26 Sec 3.6</p>	<p>3.6. Voluntary Curfew. Page 26 Sec 3-6 “Prior permission for the General Manger to operate an Aircraft after 10:00 p.m. or before 7:00 a.m. local time is requested. A minimum of 6 hours’ notice is requested prior to arrival or departure.” This paragraph is a request and is therefore neither a rule nor a regulation. The paragraph should be deleted. Why would someone need to ask permission to comply with a voluntary operation? “Hey, do you mind if I do this thing that’s voluntary and has no rules governing it because it is voluntary?” “Hey, do you mind if I voluntarily pay next month’s hangar rent on the last day of this month even though the rules are that it’s due on the first of next month, or do I need permission to voluntarily pay it early and should I ask at least 6 hours before paying the rent early?” If a pilot needs to take off at 0631, complying with the voluntary curfew he/she has agreed to, is it OK to call the Manager at 0031 to get permission to comply with a voluntary operation? Further, signs posted at the airport demand “AVOID FLYING BETWEEN 10PM AND 7AM,” which is an order to comply with a voluntary curfew. Change the signs to be user friendly instead of brusque, while realizing that TTAD is addressing a voluntary curfew.</p>
<p>R24</p>	<p>The request to receive prior permission from the General Manager to operate an Aircraft during voluntary curfew hours is meant to ensure that Aircraft operators are made aware of the safety implications and the Airport’s voluntary noise abatement procedures and the negative impact operations have during curfew hours on the surrounding community.</p> <p>The use of the word “AVOID” in the airfield signage mentioned is intended to encourage Aircraft operators to <u>refrain from</u> operating during the voluntary curfew hours. It is not an “order” to not fly during curfew hours.</p> <p>The following change will be made to Section 3.6: <i>A prior Prior permission request submitted to from the General Manager to operate an Aircraft after 10:00 p.m. or before 7:00 a.m. local time is requested. A minimum of 6 hours’ notice is requested prior to arrival or departure. Inquires may be directed to the General Manager.</i></p>
<p>C25 Pg 21, Sec 2.21</p>	<p>Section 2.21. Environmental (Hazardous Materials) Clean Up. Will this [Section] allow individual use [of deicing fluids]?</p>
<p>R25</p>	<p>This Section addresses the characterization of the use of deicing fluids in the context of a hazardous materials overflow or spill. It does not address the permitting or individual use of deicing fluids.</p> <p>Sec 3.11 addresses deicing of Aircraft as follows: <i>Aircraft deicing (the removal of snow and/or ice with chemical substances) shall only be accomplished in full compliance with TTAD’s SWPPP and at location(s) specified and permitted by the General Manager.</i></p> <p>No change to Section 2.21 is recommended.</p>
<p>C26 Pg 25 Sec 3.5</p>	<p>Section 3.5. Hours of Operation. [Does this Section apply to] Runways [or the] Airport [as a whole]?</p>
<p>R26</p>	<p>This Section applies to all public use aeronautical areas of the Airport (runways, taxiways, ramps, etc.). The FAA requires airport sponsors to make the airport open and available to the public in accordance with Airport Sponsor Assurance #19 and in conformance with all Legal requirements. However, the TTAD (or any based commercial operator) is not required to provide FBO/SASO services to the flying public during non-business hours.</p> <p>The following change will be made to Section 3.5: The public use aeronautical areas (runways, taxiways and supporting infrastructure) of the Airport are is available for use 24 hours per day, 7 days per week, unless closed by Notice to Airmen (NOTAM).</p>



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C27 Pg 27 Sec 3.12	Section 3.12. Engine Operation. Why isn't [the run up area for] Runway 02 mentioned?
R27	The Runway 29 runup area is mentioned in this Section strictly within the context of engine maintenance runups. Maintenance runups typically require prolonged engine operation at high power settings that generates significant noise. The Runway 29 runup area is the furthest from residential areas and is the most compatible for this type of necessary operation. No change to Section 3.12 is recommended.
C28 Pg 29 Sec 3.19	Section 3.19. Noise Abatement Procedures. What is the ["Good Neighbor" policy]?
R28	The "Good Neighbor" policy is the overarching purpose of the TRK noise abatement program. It encourages pilots to act as good neighbors and take efforts to reduce the negative impact of Aircraft operations on the surrounding neighborhoods by adhering to recommended noise abatement procedures and curfew hours. The following change will be made to Section 3.19: Add sentence to first paragraph as follows: Aircraft Operators shall inform and instruct their passengers and/or Pilots in the responsible use of the Aircraft in support of the TTAD Tranquility Campaign.
C29 Pg 43 Sec 7.6	[Does this Section apply to] working aircraft?
R29	This Section governs the use of Aircraft Hangars and applies to both working and non-working Aircraft. Additionally, the Lessee must fully comply with the provisions of the Hangar Agreement and Section 5.3 Hangar Leasing Policy of the General Aviation Leasing/Rents and Fees Policy. No change to Section 7.6 is recommended.
C30 Pg 45 Sec 7.11	[what does] "reasonable times" [mean]?
R30	The term "reasonable times" generally refers to business hours or a mutually agreed upon time. No change to Section 7.11 is recommended.
C31 Pg 46 Sec 8.1	[Does Section 8 apply] for us [TTAD]?
R31	This section applies to all aviation fuel providers including the TTAD. No change to Section 8.1 is recommended.
C32 Pg 53 Sec 8.3	[Does Section 8.3 apply] for others?
R32	This Section specifically applies to any entity desiring to engage in non-commercial self-fueling of their own Aircraft using their own resources. It does not apply to TTAD fueling operations or other potential commercial fueling providers. No change to Section 8.3 is recommended.