

CARSON CITY AIRPORT HANGAR INSPECTION POLICY

The Carson City Airport has never had a hangar inspection and as such, should ensure compliance of CCMC Title 19 by conducting inspections of airport hangars.

I'm recommending that Annual hangar inspections should be conducted which will include participation by representatives of the Carson City Fire Department, Carson City Tax Assessor, Carson City Building Department, Airport Manager and an Authority Member for compliance with all applicable regulations.

The Carson City Municipal Code Title 19 – Airport Rules and Regulations describe the requirements set forth by the FAA and requirements for hangar use and CCMC Title 19 describes the limitations of that use.

CARSON CITY MUNICIPAL CODE – TITLE 19

19.2.20.350 FIXED BASE OPERATORS

H. AIRCRAFT STORAGE.

2. INSIDE STORAGE

a.) That the premises are to be used and occupied primarily for aircraft storage and at least one aircraft will be housed in each occupied hangar. Aircraft housed in a hangar will be listed as personal property with the Carson City Assessor's office, or, if domiciled at another location, documentation provided to support such classification. Each hangar owner shall notify the Airport Manager of the aircraft stored in such hangar(s) including FAA N-number, Manufacturer, year and model. Users of all hangars shall comply with all applicable Carson City fire and safety codes. Fire suppression shall be provided in each hangar as required by the Fire Code of Carson City.

We appreciate that all airport users value our airport, and overall do a good job of utilizing the facilities for aeronautical use, but it is time to implement a formal hangar policy and inspection program to insure compliance of CCMC Title 19 and compliance with the New FAA Hangar Policy, Dated June 15, 2016.

FEDERAL AVIATION AIRPORT COMPLIANCE POLICY

The FAA Airport Compliance Policy requires that the FAA discharge its responsibility for ensuring that airport sponsors comply with their federal obligations through the FAA's Airport Compliance Program. Carson City, as the airport sponsor, accepts these obligations when receiving federal grant funds or

when accepting the transfer of federal property for airport purposes. The FAA incorporates these obligations of grant agreements and instruments of conveyance to protect the public's interest in civil aviation and to ensure compliance with federal laws.

The airport sponsor's permission to lease aeronautical land on the airport for construction of a hangar accepts the sponsor's conditions that come with that land, in return for the special benefits of the location. The fact that a tenant uses the land through a ground lease with the airport sponsor and constructs the hangar using tenant funds does not affect the airport sponsor's agreement with the FAA. That agreement requires the airport land and facilities, including aircraft hangars, be used for aeronautical purposes.

Based on the compliance inspection by Robert Y. Lee, from the FAA Compliance Office at the Brisbane, CA. Airport District Office, it was recommended that the Carson City Airport adopt a hangar policy and conduct an inspection of airport hangars for compliance of Aeronautical Use along with other Federal, State, and local compliance issues.

During the Compliance Inspection at the Carson City Airport, Robert Y. Lee recommended in his draft of the findings, the following:

1. The airport sponsor does not have a sponsor hangar use program and therefore there is no evidence that the sponsor has limited hangars to aviation use. Having a hangar use program will allow the sponsor to better manage hangar use for aeronautical purposes and if the hangars meet City fire safety and building codes.

Recommendation

Carson City Airport should formulate a program to monitor use of hangars and take measures to prevent unapproved non-aeronautical use of hangars. Airport Management should consider factors such as emergency access, City fire codes, security, insurance, and the impact of vehicular traffic on surface areas when enacting rules regarding hangar storage.

- Sponsor should ensure that length of time on a waiting list of those in need of a hangar for aircraft storage is minimized.

- Incorporate provisions in leases that the airport sponsor will adjust the rental rates to Fair Market Value for any non-incident non-aeronautical use of the leased facilities.
- A developed and documented hangar use program would demonstrate that the sponsor has limited hangars to aviation use.

Recommendation

Since there are no records of a hangar inspection at CXP, conduct a hangar use inspection in conjunction with a fire safety and building code inspection to obtain a status on hangar use at the airport and the condition of the hangars meeting fire safety and building codes.

The Airport should also coordinate with the Tax Assessor's Office for proper listing of aircraft on the tax assessor's roles, and a member of the Airport Authority to insure fairness in the inspection process.

HANGAR INSPECTION PROGRAM

I am recommending that the Airport Authority approve a hangar inspection policy to include an annual inspection of all hangars on the Airport.

The scheduling of any hangar inspection should include:

- a. Advanced notification to the hangar owner to ensure access to their hangar.
- b. The presence of a representative of a hangar owner to be present during an inspection if the hangar owner is not available to grant access to the hangar.
- c. Hangar owner will be notified of inspection results and allowed reasonable time to correct any identified deficiencies unless any deficiency represents an immediate threat to life or property. Under such circumstances, airport management may take reasonable action at the hangar owner's expense to correct the deficiency and notify the owner or the owner's designated representative.

- d. Hangar inspections be conducted using an Inspection Checklist approved by the Airport Authority.

INSPECTION CHECKLIST

- An Inspection checklist will ensure compliance with CCMC Title 19 and the FAA Hangar Policy in that:
- A stored aircraft must be airworthy, properly registered with the FAA, properly insured, and registered with the Carson City Tax Assessor;
- If an aircraft is non-airworthy or under construction, the aircraft must show significant signs of progress toward airworthiness every 90 days and a report made to the airport manager;
- Storage only hangars are primarily used for aircraft and;
- Storage of recreational vehicles (i.e. boats, motorhomes, trailers or campers) will not be allowed;
- Storage of other items shall not impede aircraft ingress and egress;
- Exit path is clear of obstructions;
- Fire extinguishers are serviceable and are accessible;
- Combustible material is stored in proper containers and not stock piled in excess;
- Flammable liquids stored in such containers that comply with all applicable Carson City fire and safety codes;
- Extension cords not be used as a permanent source of wiring;
- Electrical junction boxes must be covered and maintained properly;
- Portable electric heater must be directly plugged into a permanent receptacle.

NON-AERONAUTICAL ITEMS ALLOWED IN HANGARS

Provided the hangar is used primarily for aeronautical purposes, the Airport Authority may permit limited, non-aeronautical items to be stored in a hangar provided the items occupy an insignificant amount of hangar space;

Determining whether items in a hangar are considered limited, incidental or non-aeronautical use, the Airport Authority may allow such items provided the items:

- a. Does not interfere with the aeronautical use of the hangar;
- b. Does not displace the aeronautical contents of the hangar;
- c. Does not impede access to aircraft or other aeronautical contents of the hangar;
- d. Does not require a larger hangar that would otherwise be necessary if such items were not present;
- e. Are not used for non-aeronautical commercial purposes (i.e., the tenant is not conducting a non-aeronautical business from the hangar including storing inventory);
- f. Are not stored in violation of CCMC Title 19 Airport Rules and Regulations.