



**FAA
Airports**

ARP SOP 1.00

Effective Date:
October 1, 2013

Standard Operating Procedure (SOP)

FAA Evaluation of Sponsor's Construction Safety and Phasing Plans Funded by the AIP or PFC Programs

1. PURPOSE

Establish uniform procedures for the Federal Aviation Administration (FAA) Office of Airports (ARP) that address receiving, evaluating, processing, approving/disapproving and archiving Construction Safety and Phasing Plans (CSPPs) for construction projects within the [Airport Operations Area \(AOA\)](#).

2. SCOPE

This SOP applies to all CSPPs for airfield construction projects funded in whole or part under the Airport Improvement Program (AIP) or the Passenger Facility Charge (PFC) program.

3. CANCELLATION

This is the initial version of the SOP.

4. LIMITATIONS OF THIS SOP

The following limitations apply to this SOP:

- a.** The procedures outlined in this SOP only address actions necessary for the review of safety measures for the temporary construction state. These procedures do not address a review of the proposed improvements for the [end-state development](#).
- b.** The requirements established within this SOP do not supersede or modify the [Airport Certification Safety Inspector's \(ACSI\)](#) oversight requirements of a certificate holder's compliance with Title 14 Code of Federal Regulation (CFR) Part 139.
- c.** The requirements established within this SOP do not supersede or modify the obligations and responsibilities of FAA ARP personnel or [Airport Sponsors](#) as they relate to compliance with applicable statutory and regulatory requirements.
- d.** This SOP addresses procedures necessary for complying with existing FAA policy. This SOP does not establish or modify FAA policy.

5. APPLICABLE REGULATIONS, POLICY, AND GUIDANCE

Requirements identified within this SOP originate in various FAA directives including Orders, regulations and statutes. Refer to [Appendix A](#) for an abstract that addresses each of the listed documents. In the event a listed directive is revised subsequent to the date of this SOP, users of this SOP shall refer to the current version of the policy directive to establish current applicable policy and requirements.

- a. Title 49 United States Code (U.S.C.) § 44718, Structures Interfering with Air Commerce
- b. FAA Order 5100.38 – Airport Improvement Program Handbook
- c. FAA Order 5200.11 – FAA Airports (ARP) Safety Management System (SMS) and associate supplement “FAA Office of Airports Safety Management System (SMS) – Desk Reference”
- d. FAA Order 5280.5 – Airport Certification Program Handbook
- e. FAA Order 5500.1 – Passenger Facility Charge Handbook
- f. FAA Joint Order 7400.2 – Procedures for Handling Airspace Matters
- g. Title 14 CFR Part 77 (Part 77) – Objects Affecting Navigable Airspace
- h. Title 14 CFR Part 139 (Part 139) – Certification of Airports
- i. FAA Advisory Circular 150/5370-2 – Operational Safety on Airport During Construction

6. CSPP REVIEW REQUIREMENTS AND OBJECTIVES

The FAA review of a Sponsor’s CSPP involves two distinct objectives that assure operation safety during airfield construction.

- a. To determine conformance of the CSPP with the standards of AC 150/5370-2
- b. To identify and mitigate any potential adverse effect construction activity may have on air navigation

In addition to these objectives, a review of a CSPP for a project at a [Part 139 airport](#) represents an action the Airport Certification Safety Inspector (ACSI) can take to assure the certificate holder’s compliance with Part 139.

A Sponsor’s requirement to prepare and submit a CSPP is a function of funding source and the location of the project. Similarly, a FAA [Project Manager’s \(PM\)](#) responsibility to review and offer approval or non-approval is also a function of the funding source and the location of the project. Table 1 identifies the various scenarios that address when a Sponsor must prepare a CSPP as well as the level of review required of ARP personnel. Table 1 also addresses the separate but related Part 77 notice for temporary construction objects.

Table 1 – Project Scenarios and Review Requirements

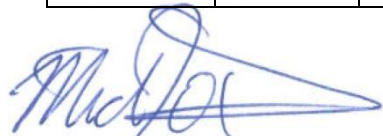
	AIP Funded Projects (Includes partial AIP participation) ¹		PFC Funded Projects (100%)	Non-Federally Funded Projects	
	Part 139	Non-Part 139	Part 139	Part 139	Non-Part 139
Part 77 Notice (Construction Objects) ²					
Within AOA	Required	Required	Required	Required	Required
Outside of AOA	Required	Required	Required	Required	Required
Sponsor Preparation and Submittal of a CSPP ³					
Within AOA	Required	Required	Required	Certificate holder must comply with §139 requirements ⁴	Not Required
Outside of AOA	Not Required	Not Required	Not Required	Not Required	Not Required
PM Review of CSPP for Conformance to AC 150/5370-2 Standards ⁵					
Within AOA	Required	Required	Not Required ⁶	Not required	Not Required
Outside of AOA	Not Required	Not Required	Not Required	Not Required	Not Required
ACSI Review of CSPP for Compliance with Part 139 ⁷					
Within AOA	ACSI Discretion	Not Required	ACSI Discretion	ACSI Discretion	Not Required
Outside of AOA	Not Required	Not Required	Not Required	Not Required	Not Required

Notes:

1. The oversight requirements of the AIP, including CSPP review and approval, apply to any project that utilizes a combination of PFC and existing or proposed AIP funding (FAA Order 5500.1 Appendix 3).
2. The Part 77 notification addresses the aeronautical study of temporary construction objects such as haul routes, equipment and stockpiles. A Sponsor must submit this notice regardless of funding source. The FAA coordination of a CSPP within the [Obstruction Evaluation Airport Airspace Analysis \(OE/AAA\)](#) system does not replace or fulfill the Sponsor's obligation to file notice under Part 77. Refer to Appendix C for additional information.
3. Projects that are entirely outside of the AOA and that do not increase the facility envelope (i.e. AOA footprint) do not require a [Safety Assessment](#) (5200.11, [Appendix A](#)) or the preparation of a CSPP (AC 150/5370-2F, Paragraph 103.a). This exception does not preclude the Sponsor's requirement to submit a 7460-1 for temporary construction objects.
4. The preparation of a CSPP represents an acceptable method a certificate holder may use to meet Part 139 requirements during airfield construction activity. However, the preparation of a CSPP is not necessarily the only method a certificate holder may use to meet the requirements of Part 139 (AC 150/5370-2F, Para. 3)
5. For projects where a proponent submits a CSPP even though one is not required (e.g. outside of the AOA), the PM may instruct the proponent to include the CSPP as an attachment to the 7460-1 submittal for the temporary construction objects. There is no requirement to initiate a separate aeronautical study for CSPPs that address non-Federally funded projects.
6. The FAA review and approval processes for projects funded entirely by PFC funds are the same as those for other non-Federally funded projects (FAA Order 5500.1, Appendix 3, Para. 3-12). This does not preclude the ACSI from reviewing a CSPP for a PFC funded project in order to determine compliance with Part 139 requirements.
7. The ACSI's review of a CSPP is an effective method for assuring a certificate holder's compliance with 14 CFR Part 139, which may also include other appropriate actions such as interim site visits, attendance at preconstruction conference and surveillance inspections.

7. CHANGE TABLE

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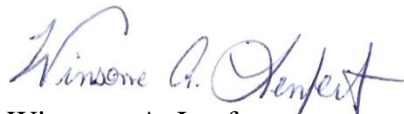
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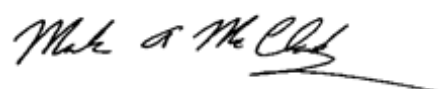
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1. ROLES AND RESPONSIBILITIES

1.1. Airports (ARP)

1.1.1. Project Manager (PM)

The Project Manager (PM) assumes the lead role in receiving, reviewing, coordinating and approving CSPP submittals from the airport Sponsor. PMs shall carry out their responsibilities in a collaborative manner. Because a CSPP is an acceptable method to assure an airport operator's compliance with Part 139, the PM **must** provide the ACSI the opportunity to review a CSPP for any project affecting the AOA of a Part 139 airport.

1.1.1.1. Required actions of the PM for AIP funded construction projects affecting the AOA include:

- a.** Receive Copy of Sponsor's CSPP
- b.** Review Sponsor's CSPP for conformance to AC 150/5370-2
- c.** Coordinate Sponsor's CSPP with other FAA Lines of Business (LOB)
- d.** Submit to ACSI copy of the CSPP for any project located within the AOA of a Part 139 airport
- e.** Initiate Safety Assessment Screening for projects that require a safety assessment
- f.** Compile PM's review comments along with comments received from other FAA offices, ACSI and SRM process
- g.** Initiate letter for Approval, Conditional Approval or Disapproval
- h.** Archive approval letter and final approved CSPP

1.1.1.2. Restrictions of the PM include:

- a.** PM may not accept a Sponsor's self-certification of a CSPP.
- b.** PM may not require measures or provisions that are not based upon an existing FAA standard, regulation or policy.

1.1.2. Airport Certification Safety Inspector (ACSI)

The primary role of the ACSI is to provide appropriate oversight of a certificate holder's compliance with 14 CFR Part 139. For projects funded under the AIP and PFC programs, an ACSI's review of a CSPP is complementary to the PM's review.

Part 139 does not fully prescribe how the ACSI shall conduct oversight of the certificate holder's compliance with Part 139 when airfield construction activity occurs. Oversight actions may include reviewing project CSPPs, conducting surveillance inspections, participating in preconstruction conferences and SRM panels or making periodic site visits.

The ACSI's review of a CSPP represents an effective method for assuring the certificate holder's compliance with Part 139. Their review provides a valuable perspective that may help identify CSPP deficiencies prior to commencement of construction operations.

1.1.2.1. Required actions of the ACSI for AIP funded projects within the AOA at a Part 139 airport include:

- a.** Notifying the PM whether or not the ACSI will be conducting a review of the CSPP
- b.** Forwarding applicable objections, comments or non-concurrence to PM (Only if ACSI conducts a review of the CSPP)
 - (1) Citing by section designation (i.e. §139.333) the basis for any objection or non-concurrence

1.1.2.2. Restrictions of the ACSI include:

- a.** ACSI shall not offer an approval action. ACSI shall limit response to objections, non-concurrence and recommendations.
- b.** ACSI may not require measures and provisions that are not based upon an existing FAA standard, regulation or policy.

1.1.3. Planner

The FAA [Planner](#) has no required action for the majority of CSPP submittals an [Airport District Office \(ADO\)](#) receives. However, projects that temporarily reconfigure airfield pavements (e.g. Taxiways used as temporary runways) may necessitate coordination of the CSPP with the assigned Planner. For these unique projects, the Planner shall assume a support role similar to the ACSI's role by offering guidance and comment on the temporary airfield reconfiguration.

1.1.3.1. Restrictions of the Planner include:

- a.** Planner may not require measures and provisions that are not based upon an existing FAA standard, regulation or policy.
- b.** Planner may not require actions that are outside of the scope of project under evaluation.

1.2. Other FAA Offices

Joint Order 7400.2 establishes roles and responsibilities for specific FAA offices and other Federal Services when conducting aeronautical studies through the OE/AAA system. Each FAA [LOB](#) reviews the CSPP to offer comment and to determine the potential for any adverse impacts to their area of responsibility. These offices primarily include Air Traffic, Airports, Flight Procedures, Flight Standards, Technical Operations Services and Military Service.

In addition to these offices, other FAA offices may express an interest in reviewing CSPPs even though they do not have an assigned role in OE/AAA. This includes the Runway Safety Office, System Support Center and the Quality Control Group (SMS Specialist). These offices and those that only have “read-only” access rights to OE/AAA may transmit their comments directly to the PM rather than through the OE/AAA system.

Refer to [Appendix B](#) for a brief summary of the roles each FAA office may have with respect to CSPP reviews.

1.3. Airport Sponsor

The CSPP responsibilities of a Sponsor for an AIP or PFC funded project located within an AOA include the following actions:

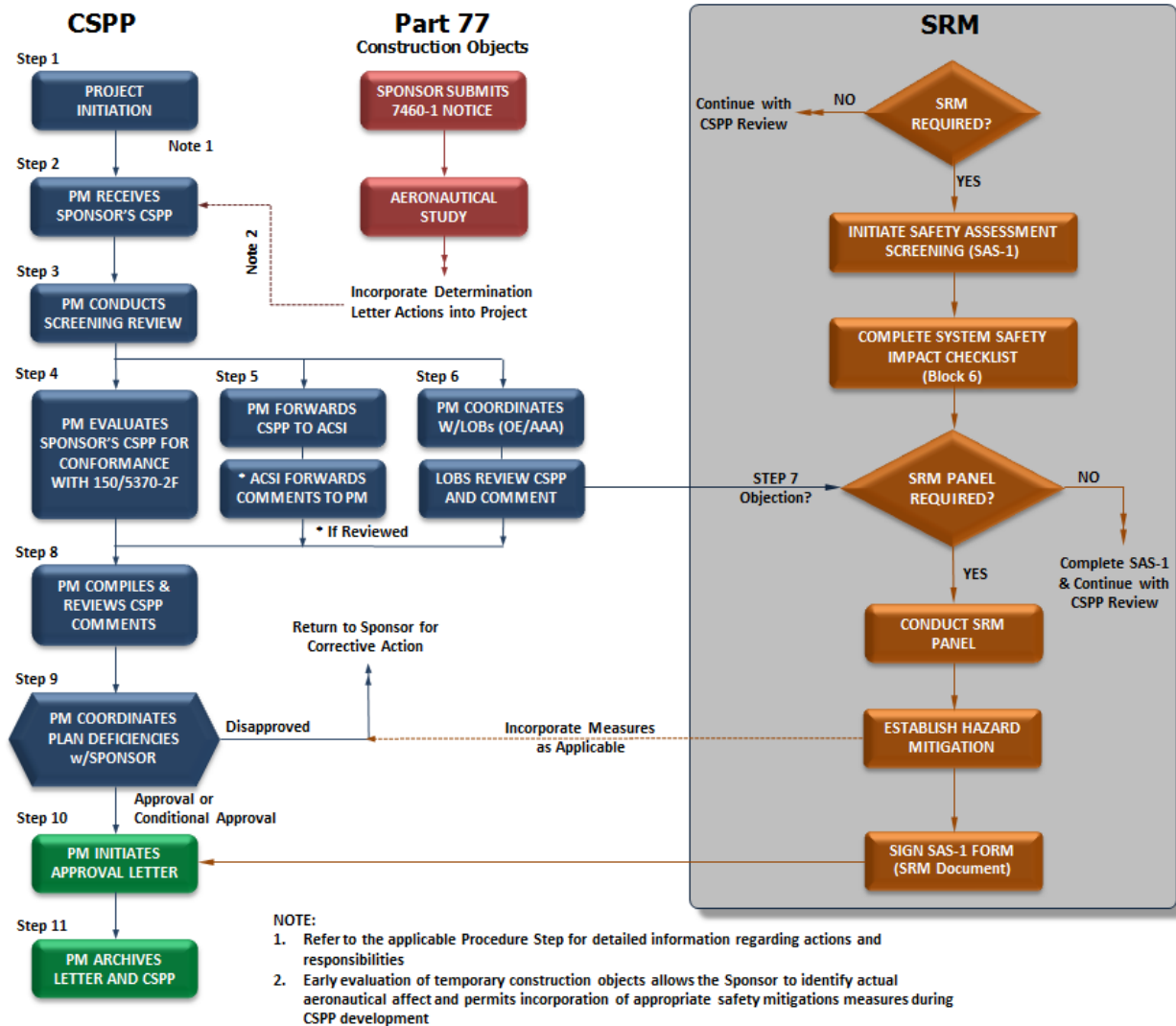
- a. Develop a CSPP that conforms to AC 150/5370-2
- b. Submit CSPP to FAA (AIP funded projects only)
- c. Revise CSPP as applicable to address FAA review comments
- d. Incorporate CSPP into bid package
- e. Monitor contractor compliance with approved CSPP
- f. Assist FAA Safety Risk Management process
- g. Assure timely submittal of 7460-1 information for permanent and temporary construction objects
- h. Comply with Part 139 requirements (only if they hold a 139 certificate)

2. PROCEDURE

The FAA review of CSPPs is a systematic process with the ultimate objective of assuring the Sponsor has established an effective CSPP that is acceptable to the FAA. This SOP addresses required actions that assure the CSPP conforms to the standards established in AC 150/5370-2 and that it is properly coordinated with other FAA LOBs. The flowchart also depicts the integral relationship between the CSPP review and the SRM process as well as the separate but related Part 77 notification process for construction objects.

The FAA review generally follows a sequential process as depicted in Figure 1. The PM may modify the exact order of steps provided there is no conflict of logical order. For example, although steps 4, 5 and 6 are concurrent steps, it is acceptable for the PM to combine Steps 3 and 4 and conduct a thorough review of the CSPP prior to sending the CSPP onto the ACSI or through the OE/AAA system. Conversely, it is not acceptable to initiate an approval letter prior to conducting the thorough review of the CSPP.

Figure 1. Flowchart of CSPP and SRM Processes



2.1. Step 1 – Project Initiation

2.1.1. Required Actions (PM)

- a. Promote establishment of a Safety Culture (Para 104a – AC 150/5370-2)
- b. Initiate SAS-1 form for projects requiring a Safety Risk Management assessment (Order 5200.11)

2.1.2. General

- a. Early emphasis of safety provisions, hazard identification and risk mitigation during the pre-design phase is a high value action that can aid in limiting objections and delays that potentially could jeopardize the project schedule.
- b. Sponsors that initiate Part 77 notices for temporary construction objects (i.e. equipment work areas, haul routes, stockpiles, etc.) permit early identification of actual aeronautical impact that allows incorporation of appropriate mitigating safety measures within the final CSPP
- c. Physical impacts to FAA NAVAIDS such as relocation or temporary equipment removal require the Sponsor to coordinate in advance with the FAA Air Traffic Organization (ATO) for the purpose of establishing a [FAA reimbursable agreement](#).

2.2. Step 2 – Receive CSPP from Sponsor

2.2.1. Required Actions (PM)

- a. Receive copy of CSPP from Sponsor
- b. Receive copy of final (as-bid) CSPP
 - (1) Obtain a copy of the final CSPP when the Sponsor solicits for bids.
- c. Receive copy of any proposed revision to the approved CSPP.

2.2.2. General

- a. Acceptable methods for Sponsor submittal of CSPP include:
 - (1) Attachment to [Non-Rulemaking Airport \(NRA\)](#) case within OE/AAA
 - (2) E-mail attachment (Subject to size limitations)
 - (3) Electronic media such as Compact Disk (CD) or a File Transfer Protocol (FTP) site provided the method conforms to FAA IT policy
 - (4) US mail -Hard Copy (Least Preferred)
- b. Acceptable formats
 - (1) Portable Document File (pdf)
 - (i) Preferred format for coordination purposes through OE/AAA
 - (2) Paper copy (Least preferred)
 - (i) Sponsor shall submit a sufficient number of sets as requested by the PM to facilitate coordination with other FAA offices.

c. A Sponsor's early submittal of a CSPP will facilitate the FAA's review and the SRM process. Early submittal may prevent delays to the project and could limit high safety risks from reaching the construction site. Early review of CSPPs also limits costly contract modifications that may be necessary in order to correct latent CSPP defects that are subsequently discovered in the field.

(1) For most projects, a CSPP submittal 3-4 months prior to bid solicitation is appropriate.

(2) For complex projects, a CSPP submittal 6-8 months prior to bid solicitation may be more appropriate.

(3) Refer to the ARP SMS Desk Reference for complete information regarding timing of SRM assessments.

d. The PM should not initiate a formal review of a submitted CSPP until the Sponsor establishes the principal CSPP elements addressed in AC 150/5370-2, which include:

(1) Firmly establishing the phasing and sequencing (Section 206, AC 150/5370-2)

(2) Identifying all affected areas and operations (Section 207, AC 150/5370-2)

(3) Clearly depicting on the safety drawings all areas impacted by construction operations.

e. To facilitate their review, the PM may request (not require) the Sponsor (or their consultant) submit a completed copy of the checklist provided in AC 150/5370-2

2.3. Step 3 – Conduct Screening Review of CSPP

2.3.1. Required Actions (PM)

a. Conduct a brief cursory review of the Sponsor's CSPP to establish whether the Sponsor has sufficiently addressed the principal CSPP elements that permit a detailed review by other FAA offices.

b. Notify the Sponsor if their CSPP is incomplete.

c. Indicate within rejection notification why the submitted CSPP is not acceptable.

(1) Inform the Sponsor they are responsible for preparing a CSPP that conforms to AC 150/5370-2.

(2) Instruct the Sponsor to review AC 150/5370-2 prior to re-submitting their revised CSPP if their initial submittal contains significant deficiencies.

d. Proceed to next step if submitted CSPP sufficiently addresses the principal CSPP elements of AC 150/5370-2 that permit review by other subject matter experts.

2.3.2. General

a. This step represents a quick screening measure to limit unsuitable and incomplete CSPPs from being subject to further detailed FAA review.

b. The PM's review does not represent a quality control check for the Sponsor or their consultant.

c. This step differs from step 4, which addresses a thorough review for conformance to AC 150/5370-2.

2.4. Step 4 – Evaluate CSPP Conformance with AC 150/5370-2

2.4.1. Required Actions (PM)

2.4.1.1. Review Sponsor's CSPP to determine conformance with standards and guidelines presented within in AC 150/5370-2

a. Identify areas where CSPP is deficient with respect to the safety standards established within Chapter 2 of AC 150/5370-2.

b. Evaluate any Sponsor proposed change to a previously FAA approved CSPP to determine:

- (1) If proposed revisions conform to standards of AC 150/5370-2
- (2) If additional review by other FAA offices or SRM panel is necessary due to:
 - (i) Changes that could affect the areas of responsibility of other FAA offices
 - (ii) Substantial changes to phasing, sequencing and overall construction operations

2.4.2. Required Actions (ACSI) – Only applies if ACSI conducts a review of the CSPP.

a. Forward to the PM (prior to review deadline) any applicable objections or non-concurrence.

b. Cite by section designation (i.e. Part 139 or AC 150/5370-2) the basis for their objection or non-concurrence.

2.4.3. General

a. Steps 4, 5, and 6 will typically be concurrent.

b. The PM ultimately is responsible for establishing how many reviews may be necessary to establish an acceptable CSPP. Depending on project complexity and potential impacts, the review process may be iterative or may only consist of a one-time review. This is largely dependent upon the point at which the PM qualitatively determines the CSPP conforms to the standards of AC 150/5370-2.

- (1) **Multiple reviews:** Multiple reviews are appropriate for projects that:
 - (i) Are moderate to large in size and complexity
 - (ii) Are subject to ARP Safety Risk Assessment
 - (iii) Are located at commercial service airports
 - (iv) Include temporary relocation or displacement of existing runway threshold(s).
- (2) **Single Review:** A one-time review of the CSPP at the point the plans and specifications are substantially complete (i.e. 80-90% design phase) is appropriate for projects that:
 - (i) Are small in size and are located at relatively low activity airports

(ii) Are less complex allowing the Sponsor to clearly establish all impacts and hazard mitigation

(iii) Have a CSPP with only minor deficiencies that do not require significant modification in order to become compliant.

c. The PM and the ACSI may submit recommendations for enhancing the CSPP based upon their knowledge, past experience and best practices.

d. The PM may use the CSPP checklist provided in Appendix F as a review aid. A completed CSPP checklist is not a required grant document.

2.5. Step 5 – Forward Copy of CSPP to ACSI

2.5.1. Required Actions (PM)

a. PM must forward one copy of the CSPP to the ACSI that currently has oversight responsibilities for the Part 139 airport.

(1) PM shall document coordination by archiving the transmittal memo or email notification.

(2) For offices where the ACSI is co-located with the PM, it is acceptable to send an e-mail notification to the ACSI advising them of the availability of the CSPP for their review.

(3) If the ACSI has access to the OE/AAA system, the PM may accomplish this action by emailing the ACSI the NRA case number for the CSPP. (This option is not permissible if the ACSI does not have access to OE/AAA)

(4) Regional Offices may establish controls that require the PM to first submit the CSPP to the Safety and Standards Branch Manager or the lead ACSI, who then becomes responsible for distributing the CSPP to the appropriate individual.

b. PM must allow the ACSI a minimum of thirty calendar days to review and submit comments on the submitted CSPP.

2.5.2. Required Actions (ACSI)

a. Provide written notification (i.e. e-mail) to the PM regarding whether or not they will be:

(1) Reviewing the CSPP within the identified timeframe; or

(2) Foregoing the review of the CSPP; or

(3) Requesting the PM extend the period for review.

2.5.3. General

a. Step 5 only applies to federally funded airfield construction that affects the AOA of a Part 139 airport.

b. Steps 4, 5, and 6 will typically be concurrent.

c. Chapter 10 of FAA Order 5280.5 addresses the ACSI's responsibilities as they pertain to safety plans. While the ACSI has the discretion to review the submitted CSPP, the PM does not have the option to forgo submittal of the CSPP to the ACSI.

d. The purpose of the 30-day timeframe is to allow sufficient time for the ACSI to schedule time for the review without causing unnecessary delays to the project schedule. The PM may proceed to Step 7 after 30 days has elapsed.

e. PM has the discretion to grant an extension to the review deadline.

f. The PM's review of a CSPP does not supersede or diminish the ACSI's responsibility to provide oversight of the certificate holder's compliance with Part 139.

2.6. Step 6 – Coordinate CSPP with other FAA Offices (OE/AAA)

2.6.1. Required Actions (PM)

a. Confirm input of the CSPP into the OE/AAA system for purpose of internal FAA coordination of the CSPP.

(1) For CSPPs sent by e-mail or other electronic media such as CD, thumb drive or ftp site, the PM shall initiate the OE/AAA study for the CSPP review.

(2) For CSPPs entered into the OE/AAA system by the Sponsor or their consultant, the PM shall verify the adequacy of the CSPP per Step 3 before forwarding the CSPP onto other FAA offices.

b. Verify that the "Describe/Remarks" field has sufficient detail that clearly describes the project.

c. Confirm that the "Component Type" and "Development Type" fields indicate "Const. Safety Plan".

d. Forward a copy of the CSPP to other FAA offices that specifically request a copy.

2.6.2. General

a. Steps 4, 5, and 6 will typically be concurrent.

b. The PM must coordinate (FAA Order 5100.38) the CSPP and any subsequent significant changes to the CSPP with other appropriate FAA offices. Presently, the PM accomplishes a portion of this internal coordination through the OE/AAA system.

c. Other FAA offices that may have an interest in reviewing the CSPP but who do not have an assigned role within OE/AAA include:

(1) Runway Safety Office

(2) System Support Center (SSC)

(3) ATO Quality Control Group - SMS Specialist

d. CSPPs submitted for a non-Federally funded project do not require a separate NRA case for internal FAA review coordination. Sponsors may attach copies of non-Fed CSPPs to the 7460-1 submittal for the construction objects (work area, equipment, access roads and stockpiles).

e. To facilitate understanding of expectations, the PM may attach the "Requested Information of Subject Matter Experts" statements provided under [Appendix D](#) to the NRA case for the CSPP coordination.

f. PM may assist Sponsor (or consultant) with identifying select [points-of-interest](#) for the Part 77 study of construction objects (e.g. equipment in work area limits, haul road, staging areas, stockpiles...). Refer to [Appendix C](#) for additional guidance and information regarding aeronautical studies of construction objects.

g. Permanent objects associated with the end state development (e.g. building, structure, vault, pole, etc.) require a Part 77 notification submittal that is separate from the Part 77 notification submittal for construction objects. Refer to the Part 77 paragraph of [Appendix A](#) for additional information.

2.7. Step 7 – Conduct Safety Assessment Process

2.7.1. Required Actions (PM)

a. Conduct ARP Safety Assessment Screening for those projects that require Safety Risk Management (Ref. FAA Order 5200.11).

(1) PM shall initiate a Safety Assessment Screening (SAS-1) form at the project initiation phase.

(2) Determine if the data input for Blocks 5 & 6 of the SAS-1 form result in the need for a SRM Panel.

(3) Notify Sponsor of their requirement to prepare a [Project Proposal Summary](#) only if the results of the SAS-1 form indicate a SRM panel is necessary.

b. When requested by other FAA LOBs, the ADO (i.e. PM, ACSI...) must participate in the LOBs SRM panel as a subject matter expert for ARP (FAA Order 8040.4).

c. When requested by another FAA LOB, the PM shall forward a copy of the current CSPP or Project Proposal Summary to the LOB's SMS specialist

2.7.2. General

a. The ARP SRM process is only required for those projects that require a Safety Assessment per FAA Order 5200.11. Consult the current version of this FAA order to determine whether the Safety Assessment is applicable for any given airport or project.

b. Refer to current version of ARP "SMS Desk Reference" for complete information pertaining to the SRM safety assessment process.

2.8. Step 8 – Compile and Evaluate Comments from PM, ACSI and other FAA offices.

2.8.1. Required Actions (PM)

a. Compile comments from PM's review and those submitted by ACSI and other FAA LOBs (i.e. NRA Case).

b. Evaluate comments to determine validity of comment.

(1) PM may omit any comment that has no substantive basis (e.g. FAA standard, Federal Regulation, Statute) as it relates to operational safety during the temporary construction activity.

(2) PM may forgo action on any comment that the CSPP already adequately addresses to the PM's satisfaction. For example, a NRA comment may state, "*All vehicles and equipment*

must be marked and lighted in accordance with FAA Advisory Circular 150/5210-5". The PM may forgo action on this comment if the CSPP clearly already accounts for this safety control measure.

(3) Received comments should only address the temporary construction state. Comments that address the end state development are outside of the scope of the CSPP review. The PM may omit such comments.

2.8.2. General

a. Even though all offices receive the NRA case at the same time, the review of a CSPP through OE/AAA may end up following an informal sequential process. This is partly because the evaluation by one FAA LOB may be relative to the comments of separate LOB. PMs should plan for an expected timeframe of 45-60 days for completion of a CSPP review through OE/AAA.

b. It is permissible for PM to contact a SME to discuss any comment they feel requires clarification or is outside of the intended scope of the CSPP review.

c. PM may incorporate recommendations made by the ACSI and other FAA offices provided the recommendations are reasonable, enhance the effectiveness of the CSPP and do not conflict with program eligibility and applicable FAA standards.

2.9. Step 9 – Coordinate with Sponsor to Mitigate Hazards, Objections and Plan Deficiencies

2.9.1. Required Actions (PM)

a. Coordinate with Sponsor to address any objection or CSPP deficiency.

(1) PM shall document their review comments in written format. Correspondence template No. 1 in [Appendix E](#) is suitable for this purpose.

b. Confer with Sponsor to determine if they can make any adjustments to the proposed construction operations that will minimize or eliminate an adverse effect

c. Require Sponsor to provide an annotated response that indicates how they have reconciled any identified hazard, objection or plan deficiency.

d. Coordinate Sponsor's response with appropriate FAA LOB if their response does not adequately address the reviewer's original comment.

e. File a copy of the Sponsor's response in the project file.

2.9.2. General

a. FAA Joint Order 7400.2, Procedures for Handling Airspace Matters, requires FAA offices to give first consideration towards altering a proponent's proposal to reduce the aeronautical impact.

b. If the CSPP only has minor deficiencies or shortcomings that are few and limited, the PM may address the deficiencies via a conditional approval letter. Refer to Step 10 for conditional approval letters.

2.10. Step 10 – Initiate FAA Letter Conveying Approval or Disapproval Action

2.10.1. Required Actions (PM)

- a. Write letter that conveys approved, conditional approved or disapproved action. Refer to [Appendix E](#) for a sample “approval letter” template.
- b. Incorporate, as applicable, explicit language conveying conditions of FAA approval that:
 - (1) Identifies the condition(s) the Sponsor must meet in order to attain a CSPP acceptable to the FAA.
 - (2) Requires the Sponsor provide a written annotated response indicating how they resolved the condition.
- c. Incorporate, as applicable, the following “limitations of approval” statements:

This FAA approval action does not:

 - *Relieve you of the responsibility for the accuracy, completeness, and technical content of the CSPP.*
 - *Pre-empt or modify your responsibilities to comply with obligations established under 14 CFR Part 139.*
 - *Negate or modify your obligations and responsibilities as they relate to compliance with applicable AIP statutory and regulatory requirements.*
 - *Represent FAA approval for modification of a FAA standard.*
- d. Incorporate, as applicable, the following “Required Actions” statements:

You must take appropriate action to assure the following:

 - *Verify the successful bidder prepares a Safety Plan Compliance Document (SPCD) that outlines how they intend to comply with the established CSPP requirements.*
 - *Verify the submittal of a 7460-1 for point-of-interests for any contractor equipment (i.e. crane, batch plant, concrete pump) or material stockpile that exceeds the height and lateral dimension of your previous aeronautical studies for construction objects associated with this project.*
 - *Provide advance coordination with our office if there is any proposed material change to the approved CSPP. (Note: A proposed change to the approved project CSPP may require further FAA evaluation, including additional aeronautical review through the OE/AAA system.)*
 - *Monitor the contractor's compliance with the approved project CSPP.*
 - *Take immediate and appropriate corrective action to address any CSPP deficiency discovered subsequent to our approval action.*
 - *Complete a Strategic Events Coordination form and forward to appropriate FAA ATO P&R office for any project that requires temporary shutdown of an FAA Navaid facility.*

2.10.2. General

- a. FAA Order 5100.38 establishes that the ADO must review all CSPPs for projects funded under the AIP and then issue a written letter approving or disapproving the CSPP. The ADO may not accept sponsor certification for a CSPP. The PM may not approve or conditionally approve a CSPP unless they are satisfied the Sponsor has established a CSPP that substantially conforms to AC 150/5370-2.

b. The Project Manager's issuance of an approval or disapproval letter represents the official documentation that the FAA has conducted a review of the CSPP for the purpose of evaluating conformance to the requirements of AC 150/5370-2.

c. The PM shall avoid initiating a conditional approval letter if the submitted CSPP has numerous deficiencies or deficiencies that are beyond minor.

(1) Such deficiencies are an indication that the Sponsor has not prepared a CSPP that conforms to the standards established under AC 150/5370-2.

(2) The determination of "minor" is a qualitative assessment based upon the reviewer's knowledge and experience. If in doubt, require the Sponsor to correct the deficiencies and re-submit.

d. PM may incorporate comments conveying recommendations and best practices that enhance the CSPP.

e. The [Strategic Events Coordination \(SEC\)](#) form alerts ATO and other FAA offices on upcoming airport projects that may affect their facilities or operations. The Sponsor shall submit this form no later than 45 days prior to commencement of work activities.

f. The PM shall refrain from using the phrase "Object, No objection" when issuing a CSPP approval/disapproval letter. While the use of these terms is appropriate for an aeronautical study of an object, they are not appropriate for an approval action of a plan such as a CSPP or ALP. PM shall only use the terms "approve, conditionally approved and disapproved" when conveying their action

2.11. Step 11 – File copy of letter and Final CSPP in Project Document File

2.11.1. Required Actions (PM)

a. Retain in the AIP project document file:

- (1) One copy of the approved CSPP and one copy of the FAA approval letter
- (2) FAA review comments
- (3) Sponsor's disposition of FAA comments
- (4) Copies of any applicable SRM documentation (i.e. SAS-1 form)
- (5) Copies of documentation addressing any revisions to the approved CSPP

2.11.2. General

a. FAA Order 5100.38 requires the ADO to retain as part of the project documents, a copy of the CSPP and the FAA's approval/disapproval letter.

b. If the ADO has an electronic document management system in place that archives select project records and documentation, identify in the official project document file where the CSPP and the associated approval/disapproval letter may be accessed to facilitate a 3rd party audit.

3. PERMISSIBLE VARIANCES

The procedures and processes established under this SOP primarily apply to the conventional Design-Bid-Build (DBB) method of project delivery. The procedures established within this

SOP may require minor adjustment for other acceptable methods of project delivery. In all cases, projects within the airport operations area that include AIP or PFC funding require the Sponsor to prepare a CSPP that conforms to the standards established in AC 150/5370-2. The Sponsor must also allow time for the ARP's Safety Risk Assessment before commencing construction activity. The following represent two alternate delivery methods a Sponsor may occasionally use under the AIP and PFC programs:

3.1. Design–Build (DB)

For Design-Build projects that affect the existing AOA, the PM should consult with the Sponsor to assure:

- a.** The design–build contract includes the preparation of a CSPP conforming to AC 150/5370-2
- b.** They incorporate sufficient contract provisions that allow the Sponsor to control contractor construction activities within an AOA
- c.** They restrict the contractor from commencing construction operations within the AOA until they have prepared and submitted a CSPP acceptable to the FAA
- d.** They implement appropriate oversight measures to assure the contractor conforms with the approved CSPP (Note: The consultant works for the contractor as opposed to the Sponsor)

3.2. Construction-Manager-at-Risk (CMAR)

For CMAR projects that affect the existing AOA, the PM should consult with the Sponsor to assure:

- a.** They address preparation and submittal of a CSPP acceptable to the FAA
- b.** They refrain from establishing the Guaranteed Maximum Price until the PM has taken action to approve or disapprove their CSPP
- c.** They implement appropriate oversight measures to assure the Contractor conforms with the approved CSPP

4. GLOSSARY

a. Airport Certification Safety Inspector (ACSI) – For the purpose of this SOP, ACSI shall refer to the FAA employee currently assigned 139 oversight responsibilities for the subject airport.

b. Airport District Office (ADO) – For the purpose of this SOP, ADO refers to the office within the FAA Region that administers projects under the AIP and PFC programs. For Regions that do not formally have an ADO office, it refers to the section of the Regional office that administers projects under the AIP and PFC programs.

c. Airport Sponsor/Sponsor – The entity that is legally responsible for the management and operation of an airport, including the fulfillment of Federal program obligations and the requirements of applicable laws and regulations.

d. Airport Operations Area (AOA) – Any area of the airport used or intended to be used for the landing, takeoff, or surface maneuvering of aircraft. An air operations area includes such

paved or unpaved areas that are used or intended to be used for the unobstructed movement of aircraft in addition to its associated runways, taxiways, or aprons. (AC 150/5370-2)

e. Construction Manager at Risk (CMAR) – A project delivery method in which the Sponsor enters into two separate contracts, 1) Design Consultant and 2) Construction Manager. A key difference compared to the Design Bid Build method is that the construction manager collaborates with the design consultant during the preparation of plans & specifications.

f. Construction Object – Any object with mass and height that is used on a temporary basis during the construction of a project. This includes equipment, vehicles, material stockpiles, batch plants, cranes and booms.

g. Design-Build (DB) – A project delivery method in which the Sponsor enters into one contract to complete both design and construction of the proposed development.

h. End-state Development – The permanent improvement that results from the temporary construction state.

i. FAA Reimbursable Agreement (RA) – An agreement that allows the FAA to recover costs that result from impacts caused by a proponent's project; such agreements typically require a one to two year lead-time.

j. Line of Business (LOB) – As used in this SOP, LOB represents service units of other FAA organizational offices (e.g. Flight Procedures).

k. Material Change – As used in this SOP, an alteration or revision that has the potential to increase safety hazard risk or significantly affect existing safety measures and controls. Example –Re-defining the phasing limits and sequence of construction is a material change that requires additional FAA evaluation.

l. Minor Deficiency – As used in this SOP, an incomplete safety provision that has low risk and one the Sponsor can easily correct with little effort; the determination of whether a deficiency is minor or not is a qualitative action based upon the knowledge and experience of the reviewer.

m. Non-Rulemaking Airport (NRA) – A term used to identify the aeronautical study for a proposed construction or alteration on an airport; such studied do not require publication in the Federal Register.

n. Obstruction Evaluation Airport Airspace Analysis system (OE/AAA) – The FAA's automated system for the aeronautical evaluation of objects that may affect navigable airspace and navigation facilities/equipment.

o. Part 139 Airport – A commercial service airport that holds a current Part 139 Airport Operating Certificate as issued by the FAA.

p. Planner – The FAA ARP employee that is currently assigned responsibilities for administering airport planning actions for a specific airport.

q. Points-of Interest – As used in this SOP, a point-of-interest refers to a specific point on a large object selected for the purpose of conducting an aeronautical study to determine the effect on navigable airspace or air navigation facilities and equipment. The identification of multiple points-of-interest can define the footprint of a large area. Selection of multiple points can represent a sampling practice that demonstrates due diligence.

r. Project Manager/Program Manager/Engineer (PM) – For the purpose of this SOP, the titles “Project Manager”, “Program Manager” and Engineer shall be considered synonymous. All references to PM shall mean the FAA ARP employee currently assigned responsibilities for overseeing and administering AIP and PFC funded construction projects at the subject airport.

s. Project Proposal Summary (PPS) – A clear, concise description of the airport and proposed changes to the existing state. The PPS is used by stakeholders and SRM panel members (if needed) to quickly understand relevant safety and operational factors. For airfield construction projects, the CSPP represents a significant portion of a project proposal summary.

t. Required Action – Refers to a mandatory function; a process activity or action in which the individual must take appropriate action.

u. Safety Assessment – The completion of the applicable Safety Assessment Screening (SAS) and the SRM five-step process of identifying and analyzing hazards and documentation of the SRM panel’s findings, as applicable.

v. Safety Assessment Screening (SAS) – A FAA form (5200-8, 5200-9 or 5200-10) used to document the ARP Safety Assessment process. It is used to document the appropriate level of assessment, the five steps of SRM and the final signatures and approvals.

w. Safety Risk Management (SRM) – A standard set of processes to identify and document hazards, analyze and assess potential risks and develop appropriate mitigation strategies.

x. SRM Panel – SRM panels conduct in-depth evaluations of the hazards and risks through completion of the SRM five-step Safety Assessment Process ultimately resulting in a Safety Assessment document.

y. Strategic Events Coordination (SEC) form – A notification form established by the NAS Strategic Event Interruptions National Service Level Agreement that requires the airport Sponsor to provide notification to the ATO at least 45- days in advance of any construction operation that will affect an existing FAA facility.

z. Subject Matter Expert (SME) – An individual who possesses technical knowledge, skills and abilities that qualifies them as a competent authority for a specific area of expertise.

APPENDIX A. POLICIES AND REGULATIONS – APPLICABLE SECTIONS

The following applicable FAA directives establish the requirements identified within this SOP. The associated abstracts are based upon the version of the directive current as of the date of this SOP. If any directive is modified after the date of this SOP, the requirements of the current directive supersede the information provided herein.

A.1. 49 U.S.C § 44718 – Structures Interfering with Air Commerce (4/1/2012)**Abstract:**

This section of Title 49 requires the Department of Transportation to conduct an aeronautical study to determine the extent of any adverse impact that constructing or altering a structure may have on the safe and efficient use of the navigable airspace or air navigation facilities and equipment.

A.2. FAA Order 5100.38 – Airport Improvement Program Handbook**Abstract:**

Provides guidance and sets forth policy and procedures that the ADO must use in the administration of the Airport Improvement Program. AIP policy prohibits the acceptance of a Sponsor's CSPP based upon self –certification. AIP policy also requires the ADO to review the CSPP and issue a written letter approving or disapproving the CSPP. The ADO must retain as part of the project document files, copies of the approval/disapproval letter and the CSPP.

A.3. FAA Order 5200.11 – FAA Airports (ARP) Safety Management System**Abstract:**

FAA 5200.11 establishes the Office of Airports (ARP) formal policy for implementing Safety Management Systems (SMS). The goal of the ARP SMS is to identify hazards and safety concerns early in the project phase for the purpose of limiting or removing possible hazards through mitigation measures.

The type of project, the location and the size of the airport are factors in determining when a Safety Risk assessment is required. A safety risk assessment is not necessary for projects located entirely outside of the air operations area (AOA), does not involve expansion of the facility envelope (footprint) and does not involve construction equipment, haul routes or placement of material in or adjacent to the AOA .

For airfield projects that require an assessment, the CSPP plays a key complementary role in the SRM process. Because the CSPP identifies the general location, character and overall safety mitigation detail of the proposed project, the review of the CSPP through OE/AAA allows other FAA LOBs the opportunity to identify the potential for adverse effect on air navigation. Ultimately, the review of the CSPP within OE/AAA assists the PM with determining whether an SRM panel is required.

The determination of whether an SRM panel is necessary project begins with the preparation of the Safety Assessment Screening (SAS)-1 form. This form requires input from the CSPP OE/AAA study (also referred to as the NRA case) and requires the PM to complete a System Safety Impact checklist. Proper completion of this form will indicate whether a SRM panel is necessary.

Consult FAA Order 5200.11 and the associated supplement “SMS – Desk Reference” to determine current policy and triggering actions for SRM.

A.4. FAA Order 5280.5 – Airport Certification handbook

Abstract:

This order ensures standardization and uniformity in the application and enforcement of Title 14 CFR Part 139. Two relevant sections are as follows:

a. Section 427(b) establishes ACSI responsibilities, which include ascertaining whether the certificate holder has prepared a safety plan (or equivalent) and has taken proper measures to prevent damage to existing utilities. The ACSI must also ensure that the temporary marking and lighting of areas servicing air carrier aircraft meets standards of §139.311.

b. Section 1002 establishes recommended actions for the ACSI, which include, for complex projects, attendance at pre-design and pre-construction conferences and the review of a safety plan.

A.5. FAA Order 5500.1 – Passenger Facility Charge

Abstract:

This order provides guidance and procedures for Federal Aviation Administration (FAA) Airports offices' use in administering the Passenger Facility Charge (PFC) program. Airports with an approved PFC application must prepare a CSPP for any project located on the airfield AOA. The FAA review requirements for a PFC funded project differ from that of an AIP funded project.

a. Airfield Project with 100% PFC funding: Per Appendix 3, paragraph 3-12, the FAA review, coordination and approval of the CSPP shall be the same procedures as those required for non-Federally funded projects.

(1) Current FAA policy does not require the ADO conduct a review of a CSPP for a non-Federally funded project.

(2) The Sponsor of a non-Federally funded project must provide notice (Part 77) to the FAA for the development itself as well as the temporary construction objects (work area, haul roads, equipment, etc.). This notification allows the FAA to evaluate the impact to existing navigable airspace and air navigation facilities.

(3) While there is no requirement to prepare a CSPP for a non-Federally funded project, an airport operator who elects to prepare a CSPP for such a project may inquire as to whether or not the FAA desires a copy. The PM shall indicate to the airport owner that there is no required FAA action regarding the CSPP. They may further advise them to consider providing a copy of the CSPP as reference document attachment to the Part 77 submittals (7460-1) for temporary construction objects. This same guidance is applicable to CSPP's prepared for 100% PFC funded projects.

b. Airfield Project with Combined AIP and PFC funding: When the proposed airfield project has both AIP and PFC funding, the FAA review requirements for the AIP supersede the review requirements for the PFC project. Project that include any amount of AIP funding require the FAA PM to review the Sponsor's CSPP to determine conformance to the standards presented in AC 150/5370-2.

A.6. FAA Joint Order 7400.2 – Procedures for Handling Airspace Matters

Abstract:

This order establishes FAA roles, responsibilities and requirements for administering and processing aeronautical studies. One key requirement established within this Order is that each object must have a separate aeronautical study to facilitate the use of the automated obstruction programs within OE/AAA. In order to be effective, the automated formulas require input of sufficient and accurate data.

Objects that are large in area create an issue. One point will not always effectively characterize an entire area. To determine the aeronautical impact of large objects, such as equipment operating in a work area, it may be necessary for the proponent to submit multiple points-of-interest. When combined, such points can adequately characterize a large object making it possible to determine the actual aeronautical affect.

A prime objective of the FAA in conducting aeronautical studies is to ensure the safety of air navigation and the efficient utilization of navigable airspace by aircraft (49 U.S.C § 44718). In the event of an adverse effect to air navigation, the first consideration should focus on modifying the proposal. For airfield construction operations, controls are necessary to ensure that temporary construction equipment does not present a hazard to air navigation. This may include closing runway and taxiway pavements, limiting construction activity during low visibility conditions, adjusting IFR minimums, controlling construction vehicle movements and marking/lighting construction equipment.

For AIP and PFC funded projects, the review of the CSPP through OE/AAA primarily represents the FAA internal coordination of the project with other Lines-of-Businesses (LOB). Each LOB will review the CSPP to determine potential adverse impact to air navigation in their area of responsibility.

The coordination of the CSPP document through the OE/AAA system does not represent a complete and comprehensive determination of the actual aeronautical impact construction operations may have on the existing state. The evaluation of a CSPP in OE/AAA generally addresses the location, character and safety detail of the proposed project. The CSPP review comments that result from each LOB will typically be limited to identifying the **potential** for adverse effects as opposed to identifying **actual** impacts. A study of individual construction objects (i.e. points-of-interest) is necessary to determine the actual impact temporary construction activity will have on air navigation.

A.7. Title 14 CFR Part 77

Abstract:

14 CFR Part 77 establishes:

- a.** Standards for determining obstructions in navigable airspace;
- b.** Requirements for notice to the Administrator of certain proposed construction or alteration;
- c.** Provisions for aeronautical studies of obstructions to air navigation for the purpose of determining their effect on the safe and efficient use of airspace;

Part 77 does not require the proponent of a construction project on an airport to prepare and submit a CSPP for FAA review. Part 77 instead requires the proponent to file separate

notification to the FAA for the purpose of conducting an aeronautical study of individual objects, both **temporary** and **permanent**.

Temporary construction objects include such items as construction access routes, staging areas, construction equipment, material stockpiles, and batch plants. This notification is required regardless of funding source. The aeronautical study of temporary construction objects is complementary to the preparation of a CSPP. The timing of these studies is significant for the development of the CSPP. Completing these studies prior to CSPP development allows for early identification of the aeronautical impacts and thus the incorporation of appropriate safety mitigation measures. However, waiting until after bids are received may introduce unanticipated outage of an aeronautical aid (i.e. approach procedure) or an unacceptable loss of an airfield pavement surface (i.e. runway). Delaying such studies may also result in costly contract modifications that would not have been necessary if the Sponsor had submitted the notice during the design phase.

Permanent objects associated with the end state development (e.g. building, vault, pole etc.) require a Part 77 study that is separate from the submittal for temporary construction objects. The Sponsor must submit appropriate information for the permanent object even if the approved ALP already depicts the object. The coordination of an ALP through OE/AAA **does not** address an aeronautical study of all proposed objects and structures shown on the ALP. The proponent must submit a Part 77 notification for individual objects at least 45 days prior to construction. The resulting aeronautical study will determine if the permanent object will have an adverse aeronautical affect. To avoid costly delays, Sponsors of AIP funded development should submit the Part 77 notification for the permanent objects early in the design phase.

A.8. Title 14 CFR Part 139

Abstract:

Part 139 prescribes rules governing the certification and operation of airports serving; (1) Scheduled passenger-carrying operations of an air carrier operating aircraft designed for more than 9 passenger seats, as determined by the aircraft type certificate; and (2) Unscheduled passenger-carrying operations of an air carrier operating aircraft designed for at least 31 passenger seats, as determined by the aircraft type certificate.

Subpart D of Part 139 establishes operational requirements a certificate holder must meet. The certificate holder documents their compliance with Part 139 requirements by maintaining an Airport Certification Manual. The Part 139 operational requirements range from every day elements to unique and occasional conditions such as weather events and construction activity.

Section 139.341 addresses requirements for identifying marking and lighting construction and other unserviceable areas as well as the protection of existing underground utilities. The requirements of this section do not alter the certificate holder's obligation to meet other applicable Part 139 sections such as safety areas and airfield lighting, marking and signage.

Although Part 139 does not explicitly require the preparation of a CSPP conforming to AC 150/5340-2, the preparation of a CSPP does represent an acceptable method the certificate holder may use in order to comply with Part 139 requirements during an airfield construction project.

A.9. FAA Advisory Circular 150/5370-2 – Operational Safety on Airport During Construction

Abstract:

This Advisory Circular sets forth guidelines and standards for operational safety on airports during construction. The airport operator's CSPP along with the contractor's Safety Plan Compliance Document (SPCD) are essential tools that ensure safety compliance when coordinating construction activities within the AOA. Together, these documents identify all aspects of the construction project that pose a potential safety hazard to airport operations and establish appropriate mitigation measures for each hazard.

The preparation and submittal of a CSPP is a condition of receiving funds under the AIP and PFC programs. For projects at a Part 139 airport, the preparation of a CSPP represents an acceptable method the certificate holder may use to ensure compliance with Part 139 requirements. For non-Federally funded projects at non-Part 139 airports, the preparation of a CSPP is a Sponsor best practice.

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APPENDIX B. ROLES OF OTHER FAA OFFICES DURING CSPP REVIEW

For the benefit of the PM and new employees, the following summarizes the roles and responsibilities of the various offices. The provision of this appendix does not assign or establish responsibilities for the listed FAA offices. The indicated responsibilities originate within J.O. 7400.2.

B.1. Air Traffic – Operations Support Group, Obstruction Evaluation Group, ATCT (J.O. 7400.2)

- a.** Identifying the effect on existing aeronautical operations, air traffic control procedures, and airport traffic patterns including pavement closures, revised taxi routes, traffic flow, and line of sight.
- b.** Making recommendations for mitigating adverse effect including marking and lighting recommendations.
- c.** Identifying whether construction objects will adversely affect published helicopter route operations and notify Flight Standards.

B.2. Flight Procedures (J.O. 7400.2)

- a.** Identifying the effect upon terminal area IFR operations, including transitions; radar vectoring; holding; instrument departure procedures; any segment of a standard instrument approach procedure (SIAP).
- b.** Indicating what adjustments can be made to the procedure or object to mitigate or eliminate any adverse effects of the object structure on an instrument flight procedure.

B.3. Flight Standards (J.O. 7400.2)

- a.** Identifying the effect on fixed-wing and helicopter VFR routes, terminal operations, and other VFR traffic.
- b.** Reviewing any proposal with runways, taxiways, and/or ramp surfaces underlying threshold-siting surfaces and proposals for declared distance concepts.
- c.** When requested by air traffic, evaluate the mitigation of adverse effect on VFR operations for marking and/or lighting of structures

B.4. Technical Operations (J.O. 7400.2)

- a.** Identifying any electromagnetic or physical effect on air navigation and communications facilities, including underground cables.
- b.** Reviewing and evaluating ATCT line of sight shadow studies.

B.5. Military (J.O. 7400.2)

Military Services (Air Force, Army and Navy) evaluate the effect on airspace and routes used by the military.

B.6. System Support Center (SSC)

The SSC certifies, operates, maintains and restores the NAS system infrastructure, including navigational facilities. Although the SSC does not have an assigned OE/AAA responsibility, due to the potential for adverse impacts to existing air navigational facilities, the SSC may have an interest in obtaining a copy of a CSPP.

B.7. Runway Safety Office

A primary goal of the Runway Safety Office is to decrease the number and severity of surface incidents and runway incursions at U.S. airports. Although the Runway Safety Office does not have an assigned OE/AAA responsibility, they may have an interest in obtaining a copy of the CSPP for a specific project.

B.8. ATO Quality Control Group (SMS Specialist)

The Quality Control Group (QCG) supports the ATO Service Areas with oversight and facilitation of ATO SMS administration. Although QCG does not have an assigned OE/AAA responsibility, they will require a copy of the CSPP as part of their responsibilities for conducting safety risk assessments for ATO.

APPENDIX C. PART 77 – IDENTIFYING TEMPORARY CONSTRUCTION OBJECTS

Part 77 requires a proponent of airfield construction provide separate notification to the FAA for the purpose of conducting an aeronautical study of individual objects, including both temporary and permanent objects. This notification is required regardless of project funding source. Temporary construction objects include elements such as construction access routes, staging areas, construction equipment, material stockpiles, and batch plants.

Limitations of the current OE/AAA system complicate the evaluation of objects better defined as areas or volumes. The current system only permits evaluation of individual points (i.e. “sticks”). FAA Order JO 7400.2 establishes that each object requires a separate aeronautical case. This creates an issue when trying to evaluate the aeronautical effect of an object that encompasses a large area. To address this limitation, it is acceptable to define such areas of space by identifying select “points-of-interest”. These points can approximate the footprint of an area as well as identify critical locations within the area.

The review of a CSPP through the OE/AAA system does not fully establish whether or not construction objects will have an adverse effect on navigable airspace. It is a subjective review that identifies the potential for adverse effects. To make use of automated formulas, OE/AAA requires data input for each individual object. CSPPs that include a data table for points-of-interest create a potential weakness. The OE/AAA system cannot evaluate the information within the data table unless someone manually creates individual NRA cases for each point. The study of these individual construction objects assists with determining the extent of actual impact to existing navigable airspace or air navigation facilities.

The selection of points-of-interest is qualitative in nature. It relies on knowledge, experience and input from appropriate subject matter experts. Mitigating measures such as closure of a runway will lessen the number of points-of-interest. Even for projects that appear to have no discernible aeronautical effect, the study of a few select points-of-interest will demonstrate due diligence in the event an incident does occur on the airfield during a period of airfield construction activity.

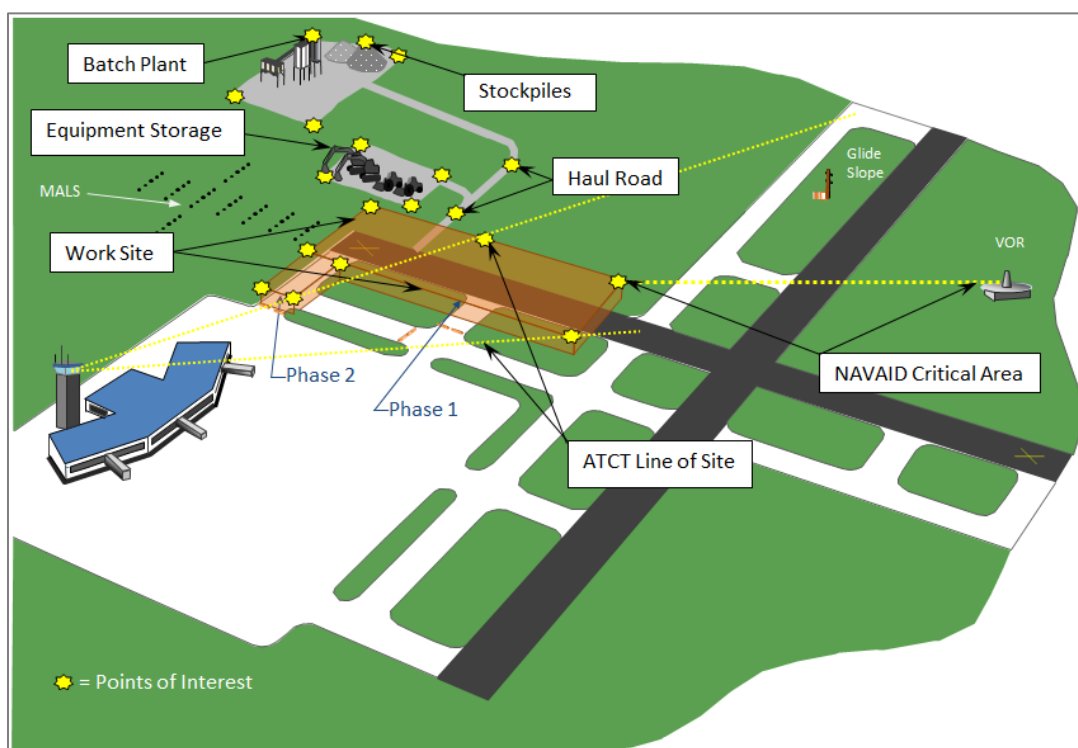
The following table and graphic provides guidance for Project Managers to assist them in determining whether the Sponsor has identified an adequate number of points-of-interest. Each point should have a unique identification such as HR-1 for haul road point #1. While the project manager may assist the Sponsor with the identification of points-of-interest, it is the proponent’s obligation and responsibility to submit this notice in conformance with Part 77.

Table C-1 – Guidance for Identifying Objects for Temporary Construction Activity

Object/Group	Points-of-Interest	Height	Remarks
Work Site Area	<ul style="list-style-type: none"> – Corners of work area boundary – Phase boundary limits – Select points based on terrain change or proximity to other airfield elements 	<ul style="list-style-type: none"> – Height of highest piece of equipment (as extended) that is anticipated to operate in various locations of the work area (e.g. 25' agl) 	<ul style="list-style-type: none"> – Encourage Sponsor to initiate these studies prior to submittal of CSPP to FAA – If project is phased, identify the area boundaries per phase limits – Identify areas that may still have work activities after runway is re-opened
Equipment Parking	<ul style="list-style-type: none"> – Corners of parking area 	<ul style="list-style-type: none"> – Height of highest piece of equipment (e.g. 15' agl) 	<ul style="list-style-type: none"> – Encourage Sponsor to initiate these studies prior to submittal of CSPP to FAA – May be combined with staging area
Staging area	<ul style="list-style-type: none"> – Corners of staging area 	<ul style="list-style-type: none"> – Height of highest piece of equipment or material stockpile 	<ul style="list-style-type: none"> – Encourage Sponsor to initiate these studies prior to submittal of CSPP to FAA – May include batch plant information
Stockpile	<ul style="list-style-type: none"> – Corners of area designated for material stockpiles 	<ul style="list-style-type: none"> – Height of anticipated stockpile (e.g. 25' agl) – If equipment operates on top or above stockpile, add height of equipment to stockpile elevation 	<ul style="list-style-type: none"> – Encourage Sponsor to initiate these studies prior to submittal of CSPP to FAA – Recommend Sponsor establish contractual limits on stockpile heights (e.g. “must not exceed 25' agl”)
Batch Plant	<ul style="list-style-type: none"> – Corners of area reserved for batch plant. 	<ul style="list-style-type: none"> – Height of the highest appurtenance on the 	<ul style="list-style-type: none"> – Typically submitted by contractor – Assume highest point occurs at all

Object/Group	Points-of-Interest	Height	Remarks
		batch plant	boundary corners – Sponsor may submit estimated batch plant information to determine impact prior to bid solicitation
Element	Points-of-Interest	Height	Remarks
Haul Road	<ul style="list-style-type: none"> – Minimum of two points to define orientation of roadway – Include additional points if roadway is in close proximity to existing Navaid critical areas or if there is a change in the pathway or elevation 	<ul style="list-style-type: none"> – Height of highest vehicle or equipment that will traverse the roadway. (e.g. 12' agl) 	<ul style="list-style-type: none"> – Encourage Sponsor to initiate these studies prior to submittal of CSPP to FAA – Not necessary for portions of road located within a work area the FAA has evaluated; except when the road will remain in use after work area activity is complete
ATCT Line or Site	<ul style="list-style-type: none"> – Identify select locations that may impact ATCT line-of-site to runway ends and other critical movement area locations 	<ul style="list-style-type: none"> – Height of equipment or material between ATCT and select movement area points 	<ul style="list-style-type: none"> – Encourage Sponsor to initiate these studies prior to submittal of CSPP to FAA – Request FAA Air Traffic to identify other points of concern in their response – Have Sponsor prepare a line-of-sight study/graphic
NAVAID	<ul style="list-style-type: none"> – Identify select points that are in close proximity to the critical areas of existing navigational aids 	<ul style="list-style-type: none"> – Height of equipment that is closest to the Navaid equipment 	<ul style="list-style-type: none"> – Encourage Sponsor to initiate these studies prior to submittal of CSPP to FAA – Request ATO Tech Ops to identify other points of interest in their NRA response
Tall and slim profile equipment (cranes, boom trucks, and concrete pumps).	<ul style="list-style-type: none"> – Spot locations where operation is required 	<ul style="list-style-type: none"> – Height of equipment 	<ul style="list-style-type: none"> – The project manual should establish the submittal of these points through OE/AAA as a contractual requirement

Figure C-1 – Identifying Potential Points-of-Interest for Airfield Construction Activity



APPENDIX D. REQUESTED INFORMATION OF SUBJECT MATTER EXPERTS

The review of a CSPP through the OE/AAA system is unlike the review of a specific object or structure. Joint Order 7400.2 - *Procedures for Handling Airspace Matters* does not go into great detail about what other FAA lines-of-business should review when evaluating a CSPP. The review of a CSPP in OE/AAA typically addresses the general location, character and overall safety mitigation detail of the proposed project. Conversely, the study of an individual object however addresses the exact geodetic location, site elevation and height of the object.

The review comments that result often reflect this difference. The comments for a CSPP review tend to be subjective, addressing the potential for adverse effect. The comments for the review of a specific object tend to be more objective, addressing the actual effect an object will have. This contrast in response can lead to differing expectations and misunderstandings of what the review of a CSPP should yield.

PMs may be able to avoid such misunderstanding by **requesting** specific information from the LOBs that identify concerns and potential impacts the construction activity may have in their area of expertise. PMs should consider including the following “CSPP Request for Information” as an attachment to the CSPP NRA case. This list of requested information generally paraphrases the assigned responsibilities established under Chapter 11 of J.O. 7400.2.

D.1. CSPP Request for Information

When conducting your aeronautical review of the subject Construction Safety and Phasing Plan (CSPP), we request you provide information that addresses your concerns for the potential adverse impact the proposed construction activity may have in your area of expertise and responsibility. Please note this review of the CSPP does preclude the Sponsor’s obligation to submit Part 77 notification for temporary construction objects (equipment, haul routes, stockpiles etc.).

D.1.1. Air Traffic

- a. Identify additional points-of-interest that you believe require aeronautical study.
- b. Identify possible unacceptable adverse effects on existing aeronautical operations, air traffic control procedures, and airport traffic patterns including:
 - (1) Pavement closures
 - (2) Revised taxi routes
 - (3) Traffic flow
 - (4) Line of sight
 - (5) Resource limitations (facilities, equipment and personnel)
- c. Identify possibility for construction objects to have an adverse effect on published helicopter route operations.
- d. Identify recommendations for mitigating any adverse effect, if applicable.

D.1.2. Technical Operations

- a. Identify additional points-of-interest that you believe require aeronautical study.

- b.** Identify the possibility for electromagnetic or physical effect on air navigation and communications facilities
- c.** Evaluate the need for an ATCT line of sight study (as applicable)
- d.** Identify the potential for impacts to facility and equipment operation due to disruption of underground power and communication cable.

D.1.3. Flight Procedures

- a.** Identify additional points-of-interest that you believe require aeronautical study.
- b.** Identify potential for unacceptable adverse effects on terminal area IFR operations including:
 - (1) Instrument departure procedures;
 - (2) Standard instrument approach procedure (SIAP) or special SIAP.
- c.** Identify possible recommendations for mitigating any adverse effect such as:
 - (1) Can temporary adjustments be made to the procedure to mitigate adverse effect?
 - (2) Are there limitations on construction activity that may be implemented to reduce any adverse effects on an instrument flight procedure?

D.1.4. Flight Standards

- a.** Identify additional points-of-interest that you believe require aeronautical study.
- b.** Identify potential for unacceptable adverse effect on fixed-wing and helicopter VFR routes and terminal operations.
- c.** Identify any concerns you may have regarding temporary declared distance implementation (if applicable).

APPENDIX E. SAMPLE FAA LETTERS FOR CSPP REVIEW AND APPROVAL

E.1. Correspondence #1. FAA Review of CSPP

The following represents suggested correspondence language that the Project Manager (PM) may use when transmitting their review comments to the Sponsor. This language is appropriate for the early draft stage (i.e. 30-50% design stage) and is not appropriate for the final approval letter (Refer to Correspondence #2). The general purpose of this correspondence is to transmit the PM's initial review comments and to establish required actions of the Sponsor. The PM may apply this language in a letter format or an e-mail format. The use of this sample language is not mandatory.

The identification of "points-of-interest" for temporary construction objects is a primarily a Sponsor responsibility. The PM and other LOBs, may request the study of additional "points-of-interest" for the purpose assuring a comprehensive evaluation of possible impacts to navigable airspace and air navigation facilities. As applicable, identify such additional points within the review comments. [Appendix C](#) provides additional information regarding the identification of construction objects and associated points of interest.

Disapproval letters shall follow a format similar to correspondence #1.

Project:

AIP Project: X-XX-XXXX-XX

Description: Reconstruct Runway 6-24 and associated connecting taxiways

Airport: Municipal Airport

CSPP Stage: 50%

FAA Review Comments

We have completed our review of the Construction Safety and Phasing Plan (CSPP) for the subject project. Our comments are an attachment to this letter. Please review each comment and then provide us a written annotated response that addresses each comment. Your response must clearly indicate the action you have taken to resolve the comment.

Required Action

Once you have satisfactorily addressed all comments, please submit one copy of the final CSPP and one copy of your annotated response to our office. We request you identify any significant additions or deletions made to the CSPP since our review.

Limitations

Be advised that our review is limited to an evaluation for general conformance to standards and guidelines established within AC 150/5370-2. Please do not construe this review by the FAA as a quality control check. You remain fully responsible for the accuracy and completeness of the CSPP.

Aeronautical Review of Construction Objects

As required by 14 CFR Part 77, you must provide notice to the FAA for temporary project construction objects (work area, equipment, haul roads, stockpiles etc.) by submitting form FAA form 7460-1 on-line through the FAA [Obstruction Evaluation / Airport Airspace Analysis \(OE/AAA\)](#) system.

A separate study is necessary for each construction object. Note that each object may require the submittal of multiple “points-of-interest” in order to define the object and facilitate the FAA aeronautical study. The study of construction objects and the associated points-of-interest allows the FAA to determine whether or not there will be an adverse effect to navigable airspace or air navigation facilities.

Please initiate these studies in a timely manner. This will make it possible for the results of the study to be available at the same time you submit the pre-final CSPP. Please contact our office if you have any questions regarding the identification of construction objects and the associated “points-of-interest”

Attachment: FAA CSPP Review Comments (*Attach copy of review comments.*)

E.2. Correspondence #2. FAA Approval Letter

The following represents correspondence language that the Project Manager (PM) shall use when preparing their CSPP approval letter to the Sponsor. Disapproval letters shall follow a format similar to correspondence #1. While the PM may customize the format of the letter, the content must include language that addresses the following elements:

- 1) Action Taken by FAA
- 2) Conditions of Acceptance (As Applicable)
- 3) Limitations of FAA Action
- 4) Required Sponsor Actions

This template applies plain language methods such as paragraph headings, bulleted items, active voice and short paragraphs. Incorporating such methods improves the Sponsor's comprehension by conveying FAA comments in clear and unambiguous manner.

Project:

Municipal Airport

AIP Project: X-XX-XXXX-XX

Reconstruct Runway 6-24 and associated connecting taxiways

CSPP (Conditional) Approval

FAA Action

Based upon our review of your Construction Safety and Phasing Plan (CSPP), the FAA (*approves/conditionally approves*) the use of this CSPP for the proposed AIP) funded project.

Our evaluation of your CSPP included an assessment for general conformance to the standards and guidelines established in AC 150/5370-2 "Operational Safety on Airports". Our evaluation does not preclude your obligation to submit Part 77 notification for temporary construction objects associated with this project.

Conditions of Acceptance

Our approval of your CSPP is contingent upon proper resolution of the actions listed (*below/as an attachment*). Please prepare and submit a written annotated response that indicates how you resolved each applicable condition:

a. (SAMPLE) At the time of this review, the aeronautical study (7460-1) of the temporary construction objects is not complete. Our acceptance of the CSPP is contingent upon proper resolution of any valid comments that result from the aeronautical study of these objects.

b. (SAMPLE) Verify NOTAM closing Runway 6/24 is in effect prior to commencing construction activity

c. (SAMPLE) Seven (7) days prior to implementation of construction phase No, 2, the Airport Manager must contact the FAA Flight Procedures Office (FPO) at (###) ###-#### to schedule issuance of a FDC NOTAM due to the temporary relocated threshold.

d. (SAMPLE) Lower all high profile equipment such as cranes when not in use.

Limitations of FAA Action:

The purpose of our review is to establish whether your CSPP conforms to the requirements of AC 150/5370-2 and other applicable FAA standards. Our approval action does not:

- a. Relieve you of the responsibility for the accuracy, completeness, and technical content of the CSPP.
- b. Pre-empt or modify your responsibilities to comply with obligations established by 14 CFR Part 139.
- c. Negate or modify your obligations and responsibilities as they relate to compliance with applicable AIP statutory and regulatory requirements.
- d. Represent an approval for modification of a FAA standard.

Required Sponsor Actions:

You must take appropriate action to assure the following:

- a. Verify the successful bidder prepares a Safety Plan Compliance Document (SPCD) that outlines how they intend to comply with the established CSPP requirements.
- b. Verify the submittal of a 7460-1 for additional point-of-interests for any contractor equipment (i.e. crane, batch plant, concrete pump) or material stockpile that exceeds the height and lateral dimension of previous aeronautical studies for construction objects associated with this project.
- c. Provide advance coordination with our office if there is any proposed material change to the approved CSPP. (Note: Any proposed change to the approved project CSPP may require further FAA evaluation, including additional aeronautical review through the OE/AAA system.)
- d. Monitor the contractor's compliance with the approved project CSPP
- e. Take immediate and appropriate corrective action to address any CSPP deficiency discovered subsequent to our approval action.
- f. Complete a *Strategic Events Submission* form and forward to appropriate FAA ATO P&R office for any project that requires temporary shutdown of an FAA Navaid facility.

APPENDIX F. CHECKLIST FOR FAA CSPP REVIEW

This checklist provides the Project Manager (PM) and the Airport Certification Safety Inspector (ACSI) a useful tool when reviewing a Sponsor's CSPP for conformance to the standards present within AC 150/5370-2. A completed CSPP checklist is not a required grant document.

For projects funded under the AIP and PFC programs, the FAA Project Manager's issuance of an approval or non-approval letter represents the **official documentation** that the FAA has conducted a review of CSPP that confirms conformance to the requirements of AC 150/5370-2. The completion of this checklist is not a required AIP or PFC record.

F.1. Checklist for FAA CSPP Review

Airport Name: _____ LOCID: _____

Associate City: _____

Project No. _____

F.1.1. AC 150/5370-2F

This checklist identifies the main elements and sub-elements established under Section 2, Chapter 2 of Advisory Circular 150/5370-2F. Project Managers (PM) are encouraged to use this checklist as an aid when reviewing a Sponsor's CSPP for conformance to the safety standards. Because the PM's approval/disapproval letter represents the official FAA action, a completed checklist is not a required record the PM must sign or archive in the grant file.

CSPP Element	Element Addressed?			Remarks
	Yes	No	N/A	
Coordination (Section 205)				
– Contractor Progress Meetings				
– Addresses necessary actions when changes are proposed to CSPP				
– Provisions for FAA ATO Coordination				
Phasing (Section 206)				
– Phase Elements				
– Construction Safety Drawings				
Area and Operations Affected by Construction Activity (Section 207)				
– Identification of affected Areas				
– Mitigation Affects				
Navigation Aid Protection (Section 208)				
– Operational NAVAID Critical areas				
Contractor Access (Section 209)				
– Location of Stockpiles Construction Material				
– Vehicle and Pedestrian Operations				
Wildlife Management (Section 210)				
– Trash				
– Standing Water				
– Tall Grass				
– Fencing and Gates				
– Disruption of Wildlife Habitat				
Foreign Object Debris (Section 211)				
– FOD Control Measures				
Hazardous Material Management (Section 212)				
– Hazardous Material Controls				

CSPP Element	Element Addressed?			Remarks
	Yes	No	N/A	
Notification of Construction Activities (Section 213)				
– List of Responsible Representatives				
– NOTAMs				
– Emergency Notification Procedures				
– Coordination with ARFF				
– Notification to the FAA (Part 77, NAVAIDs....)				
Inspection Requirements (Section 214)				
– Daily Inspections				
– Final Inspections				
Underground Utilities (Section 215)				
– Procedures for protecting existing underground utilities				
Penalties (Section 216)				
– Penalty provisions for noncompliance with safety plan provisions				
Special Conditions (Section 217)				
– Unique conditions that may affect the operation of the airport				
Runway and Taxiway Visual Aids (Section 218)				
– General – Convey Clear Meaning; Secured from movement; Frangible				
– Markings				
– Lighting and Visual NAVAIDs				
– Signage				
Access Routes - Marking and Signage (Section 219)				
– Haul Road Demarcation				
Hazard Marking, Lighting and Signage (Section 220)				
– Areas Impacted by Construction Operations				
– Equipment				
Protection Runway and Taxiway Areas, Zones and Surfaces (Section 221)				
– Runway Safety Area (RSA)				
– Runway Object Free Area (ROFA)				
– Taxiway Safety Area (TSA)				
– Taxiway Object Free Area (TOFA)				
– Obstacle Free Zone (OFZ)				
– Approach and Departure Surfaces				
Other Limitations on Construction (Section 222)				
– Prohibitions				
– Restrictions				

F.1.2. 14 CFR Part 139

This listing highlights sections of 14 CFR Part 139 that specifically address requirements of a certificate holder whenever construction operations occur on their airfield. This listing was established by searching 14 CFR Part 139 for the following key terms; “construct”, “contract” and “protect”. The provision of this listing does not preclude or diminish the ACSI’s enforcement of other Part 139 requirements.

While the PM shall be cognizant of these Part 139 requirements when reviewing the CSPP for conformance to the standards presented under AC 150/5370-2, such review does not supersede the ACSI’s oversight of the certificate holder’s compliance with Part 139.

14 CFR Part 139 Section	Element Addressed?			Remarks
	Yes	No	N/A	
§139.327 Self-inspection program				
– Daily Inspection				
– Final Inspection				
§ 139.329 Pedestrians and ground vehicles – Training				
– Safe and orderly access to work area				
– Communication with ATCT				
– Training – Vehicle and Pedestrian				
§139.333 Protection of NAVAIDs				
– Protection of NAVIADS against Damage				
– Prevent interruption of visual or electronic signal from NAVAID				
§ 139.335 Public protection				
– Safeguards to prevent inadvertent entry to the movement area by unauthorized persons or vehicles				
– Protection of persons and property from aircraft blast				
§ 139.339 Airport condition reporting (NOTAMs)				
– Notify airport users of construction or maintenance activity on movement areas, safety areas, or loading ramps and parking areas				
§ 139.341 Identifying, marking, and lighting construction and other unserviceable areas				
– Mark (and light) construction areas and unserviceable areas				
– Mark (and light) equipment and haul route				
– Mark (and light) NAVAID critical areas.				
– Locate and protect existing utilities				