



King County
King County International Airport – Boeing Field
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Supporting Information Packet – Draft Minimum Standards

King County International Airport – Boeing Field

King County

May 2, 2025

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1. OVERVIEW

In early 2023, King County International Airport – Boeing Field (ICAO airport code KBFI), hereinafter referred to as “KCIA” or “Airport”, began a process to update the *Airport Minimum Standards* consistent with Federal Aviation Administration (FAA) regulations and guidance. This document helps ensure the safety of Airport tenants and users and detail enhancements to the overall operation, management, and administration of the Airport. KCIA hired Aviation Management Consulting Group (AMCG) to facilitate the update of KCIA’s existing *Airport Minimum Standards* in compliance with federal, state, and county regulations.

By way of background, when an airport sponsor (in this case, King County) obtains a grant for airport improvements under the FAA Airport Improvement Program, the airport sponsor is required to give certain assurances to the FAA known as Grant Assurances. Grant Assurance #22, Economic Nondiscrimination, states “*The sponsor may establish such reasonable, and not unjustly discriminatory, conditions to be met by all users of the airport as may be necessary for the safe and efficient operation of the airport.*”

In the Grant Assurances, the FAA identifies a number of Advisory Circulars (AC) that, when attached to or incorporated by reference into the grant agreement, become mandatory contractual obligations of the airport sponsor. In AC 150/5190-8, Minimum Standards for Commercial Aeronautical Activities, the FAA highly recommends the “*use and implementation*” of minimum standards “*as a means to minimize the potential for violations of Federal obligations at federally obligated airports.*” The AC states that “*The FAA objective in recommending the development of minimum standards serves to promote safety in all airport activities, protect airport users from unlicensed and unauthorized products and services, maintain and enhance the availability of adequate services for all airport users, promote the orderly development of airport land, and ensure efficiency of operations.*” The AC also suggests that “*airport sponsors establish reasonable minimum standards that are relevant to the proposed aeronautical activity with the goal of protecting the level and quality of services offered to the public.*”

It is significant to note this AC also states: “*The airport sponsor’s purpose in imposing standards is to ensure a safe, efficient and adequate level of operations and services is offered to the public*”. The FAA specifically indicates, in multiple instances throughout the AC that an airport sponsor should develop minimum standards to address the level and quality of general aviation aeronautical services provided at an airport.

Several documents provide the foundation for the development and implementation of Minimum Standards including: the Grant Assurances, AC 150-5190-6 *Exclusive Rights at Federally-Obligated Airports*, AC 150/5190-8 *Minimum Standards for Commercial Aeronautical Activities*, and Order 5190.6B Change 3 *Airport Compliance Manual*. All interested parties are encouraged to thoroughly review and carefully consider each of these documents and to view these Minimum Standards in totality.

Within this context, it is the desire of KCIA to: (1) protect the safety of Airport tenants and users, (2) foster development and redevelopment of existing Airport property, (3) promote quality aeronautical products, services, and facilities, (4) reduce the potential for conflict with Airport tenants and users, and (4) provide a platform for resolution of complaints. As such, KCIA and AMCG have prepared updated *Minimum Standards* that are: (1) relevant to the current (and/or anticipated) general aviation activities, (2) reasonable and appropriate for the airport and market, (3) necessary to meet the type and level of demand that exists (and/or is anticipated) at the airport and in the market, and (4) protects the public health, safety, interest, and general welfare of all users.

During the document development process, AMCG gathered and considered relevant information from current operators at the Airport and from airports considered comparable to KCIA. In addition, AMCG and the Airport staff considered the draft *Minimum Standards* from a consumer perspective.

The draft *Minimum Standards* were made available for public for review and comment from March 12, 2024 – January 31, 2025.

The following is a summary of the public review process consisting of a Summary of Comment Themes (Section 2), Summary of Changes (Section 3), Comment Response Log (Section 4), and Public Outreach Report (Section 5).

2. SUMMARY OF COMMENT THEMES

The comments received from tenants and community members (detailed in *Section 3. Comment Response Log*) encompassed the following major themes:

- Theme 1: 14 CFR Part 141/Part 145 Requirements,
- Theme 2: Lessee vs. Sublessee Requirements, and
- Theme 3: Independent Operators.

Theme 1: 14 CFR Part 141/145 Requirements – Based on several comments, there was some confusion pertaining to 14 CFR Part 141 and 14 CFR Part 145 requirements. 14 CFR Part 141 pertains specifically to Pilot Schools (flight training) while 14 CFR Part 145 pertains specifically to Repair Stations (aircraft maintenance). The draft *Minimum Standards* (dated February 1, 2024) did not require Flight Training Operators (Section 6.2) or Independent Flight Training Operators (Section 6.5) to be certified 14 CFR Part 141 school. Conversely, the draft *Minimum Standards* did require FBOs (Section 5) and Aircraft Maintenance Operators (Section 6.1) to be certified 14 CFR Part 145. Based on comments received from tenants and community members, the 14 CFR Part 145 requirement has been removed. As such, there are no 14 CFR Part 141 or 14 CFR Part 145 requirements in the draft *Minimum Standards*.

Theme 2: Lessee vs. Sublessee Requirements – Throughout the draft *Minimum Standards*, requirements for lessees and sublessees are identified and there appears to be some confusion in applying the requirements to current/future situations. For example, comments identified lessee requirements under what appears to be a sublessee situation. These terms are defined in the Appendix of the draft *Supplemental Rules and Regulations* as follows:

- Lessee: An entity that has entered into an Agreement (a written contract – lease agreement, license agreement, permit, etc. – enforceable by law, executed by both parties, between the County and entity transferring rights or interest in land and/or Improvements and/or otherwise authorizing the conduct of certain activities) to occupy, use, and/or develop land and/or Improvements.
- Sublessee: A entity that has entered into a Sublease (an agreement entered into by an entity with a Lessee that transfers rights or interests in the Lessee's Leased Premises and for which the County has given proper consent) with a Lessee that has been properly consented to by the County.

Essentially, a lessee is leasing land and/or improvements directly from the County while a sublessee is subleasing land and/or improvements from a Lessee. The minimum facility requirements vary based on the entities underlying classification (lessee vs. sublessee).

Theme 3: Independent Operators – The draft *Supplemental Rules and Regulations* and draft *Minimum Standards* create a framework for independent operators which is defined in the Appendix of the draft *Supplemental Rules and Regulations* as “an entity offering aeronautical service(s) but without an established place of business on the Airport.” The nature of this aeronautical activity is commercial. As such, the requirements to be an approved Independent Operator are outlined in the draft *Minimum Standards*.

The Independent Operator concept, while optional from the FAA perspective and not included in the existing Airport Minimum Standards (dated March 1, 2007), is outlined in Section 6.5 (Independent Aircraft Maintenance Operator) and Section 6.6. (Independent Flight Training Operator) of the draft *Minimum Standards*.

Independent Operators that are compliant with the draft *Minimum Standards* can provide aircraft maintenance services (Section 6.5) or flight training services (Section 6.6) as a commercial aeronautical operator for compensation. It is important to note Section 6.2 discusses an individual that “provides occasional flight training to an Aircraft Owners in the Aircraft Owner’s aircraft and is not compensated.” This portion of Section 6.2 illustrates that if a flight instructor is not compensated and does not make the training available to the public, then it is not deemed a commercial activity and thus not bound by the draft *Minimum Standards*.

Section 6.5 or Section 6.6 do not prohibit Independent Operators from compensation. Independent Operators (and all commercial aeronautical operators) are required to comply with the General Requirements outlined in Section 4 of the draft *Minimum Standards* as well as having a Commercial Operator Permit (outlined in Section 3.2. of the draft *Minimum Standards*).

3. SUMMARY OF CHANGES

Based on the comments received from tenants and community members (detailed in Section 3. Comment Response Log), revisions were made to the draft *Minimum Standards* (dated February 1, 2024). These changes include decreasing the minimum hangar size throughout Section 6 (from 6,400 square feet to 2,520 square feet – consistent with smallest Midfield Airpark Building hangar), revising submission of operator pricing in the event of a complaint, revising the time period for provision of unleaded fuel, defining disabled aircraft removal, removing FBO response time to customers' requests, revisions to the FBO ground transportation requirements, removal of the 14 CFR Part 145 Repair Station requirement (Theme 1), and removal of Section 6.7 (Commercial Flying Club). Additionally, the certain limitations pertinent to Independent Operators (Section 6.5 and Section 6.6) have been removed (Theme 3).

4. COMMENT RESPONSE LOG

This section contains a compilation of 118 comments received during the comment period along with KCIA’s response to each comment pertinent to the draft *Minimum Standards* (inclusive of 22 general comments).

Each comment submitted has been addressed in this document. Each comment is represented by a “C” and the Airport’s response is represented by an “R”. The numbering is utilized only as a method to identify and organize the submitted comments.

Also, if a comment leads to a change in the documents, the deleted language is identified using ~~striketrough~~ and added language is identified using **red** highlight. Any language identified in *italics* is taken verbatim from the draft documents.

General Comments

C1	How were the tenets, users, pilots, notified that the meetings on Rules and Regulations and Minimum Standards were taking place in 2023?
R1	The KCIA outreach team emailed meeting invitations to 20 community organizations and 43 airport tenants two weeks before the meetings. Meeting information was also posted on the KCIA Community Outreach project page, emailed to all airport tenants and leaseholders, shared on KCIA social media channels (Facebook and Instagram), and an announcement was made at the King County International Airport Community Coalition monthly meeting on March 9, 2023. Information pertinent to the documents, notifications, meeting summaries, and attendees is available in the Public Outreach Report in this Supporting Information Packet.
C2	You mentioned when we met on February 22, 2024 there would be an additional meeting besides the Public meeting, when is that scheduled for?
R2	Same response as R1: The KCIA outreach team emailed meeting invitations to 20 community organizations and 43 airport tenants two weeks before the meetings. Meeting information was also posted on the KCIA Community Outreach project page, emailed to all airport tenants and leaseholders, shared on KCIA social media channels (Facebook and Instagram), and an announcement was made at the King County International Airport Community Coalition monthly meeting on March 9, 2023. Information pertinent to the documents, notifications, meeting summaries, and attendees is available in the Public Outreach Report in this Supporting Information Packet.
C3	I have been teaching at KBFI since after getting my certificate in 2001 and have been at the KBFI airport at an average of at least 5 days a week every week and did not know the meetings in 2023 were taking place. How can this happen?
R3	Same response as R1: The KCIA outreach team emailed meeting invitations to 20 community organizations and 43 airport tenants two weeks before the meetings. Meeting information was also posted on the KCIA Community Outreach project page, emailed to all airport tenants and leaseholders, shared on KCIA social media channels (Facebook and Instagram), and an announcement was made at the King County International Airport Community Coalition monthly meeting on March 9, 2023. Information pertinent to the documents, notifications, meeting summaries, and attendees is available in the Public Outreach Report in this Supporting Information Packet.
C4	What is the demographics of the tenants and users at KBFI?
R4	Demographic data was not developed as part of this project.
C5	Who were the 6 tenants who were met with?

R5	<p>Same response as R1: The KCIA outreach team emailed meeting invitations to 20 community organizations and 43 airport tenants two weeks before the meetings. Meeting information was also posted on the KCIA Community Outreach project page, emailed to all airport tenants and leaseholders, shared on KCIA social media channels (Facebook and Instagram), and an announcement was made at the King County International Airport Community Coalition monthly meeting on March 9, 2023.</p> <p>Information pertinent to the documents, notifications, meeting summaries, and attendees is available in the Public Outreach Report in this Supporting Information Packet.</p>
C6	Who were the 26 people who attended the 2 meetings?
R6	<p>Same response as R1: The KCIA outreach team emailed meeting invitations to 20 community organizations and 43 airport tenants two weeks before the meetings. Meeting information was also posted on the KCIA Community Outreach project page, emailed to all airport tenants and leaseholders, shared on KCIA social media channels (Facebook and Instagram), and an announcement was made at the King County International Airport Community Coalition monthly meeting on March 9, 2023.</p> <p>Information pertinent to the documents, notifications, meeting summaries, and attendees is available in the Public Outreach Report in this Supporting Information Packet.</p>
C7	Were these 26 people pilots, airport users, tenants, Georgetown community representatives, etc.
R7	<p>Same response as R1: The KCIA outreach team emailed meeting invitations to 20 community organizations and 43 airport tenants two weeks before the meetings. Meeting information was also posted on the KCIA Community Outreach project page, emailed to all airport tenants and leaseholders, shared on KCIA social media channels (Facebook and Instagram), and an announcement was made at the King County International Airport Community Coalition monthly meeting on March 9, 2023.</p> <p>Information pertinent to the documents, notifications, meeting summaries, and attendees is available in the Public Outreach Report in this Supporting Information Packet.</p>
C8	Can you please provide the contact information for both the tenants and the 26 people who attended the meetings?
R8	<p>Same response as R1: The KCIA outreach team emailed meeting invitations to 20 community organizations and 43 airport tenants two weeks before the meetings. Meeting information was also posted on the KCIA Community Outreach project page, emailed to all airport tenants and leaseholders, shared on KCIA social media channels (Facebook and Instagram), and an announcement was made at the King County International Airport Community Coalition monthly meeting on March 9, 2023.</p> <p>Information pertinent to the documents, notifications, meeting summaries, and attendees is available in the Public Outreach Report in this Supporting Information Packet.</p>
C9	Who are the Aircraft Maintenance Operators (SASO)?
R9	Aircraft Maintenance Operators include Duncan Aviation, Immaculate Flight, Nano Flow, Northwest Helicopters. Other companies may have leases or subleases that allow aircraft maintenance operations.
C10	Is Galvin and Helicopters NW part of this group? Are these two companies the only ones?
R10	Helicopters NW is operating under a commercial lease with KCIA for flight training and maintenance. Galvin Flying was operating under a SASO permit for flight training and were a sublessee to Signature Flight Support.
C11	Who are all the Aircraft Rental or Flight Training Operators (SASO)? Galvin and Helicopters NW were identified in the meeting yesterday.
R11	Same response as R10: Helicopters NW is operating under a commercial lease with KCIA for flight training and maintenance. Galvin Flying was operating under a SASO permit for flight training and were a sublessee to Signature Flight Support.

C12	Are these two companies the only ones?
R12	Galvin Flying and Helicopters NW were the only flight training companies at the Airport with the approved leases and or permits for the associated operation.
C13	I just learned that the comment period is being extended to 12/31. Is this because another version is coming out before then? If so, please discard the previous comments. Would this timing be related to there being no flight training on the field at all now that Galvin is closing?
R13	The comment period was extended to permit the public additional time to comment on the draft documents.
C14	Where can I go to purchase a set of the documents that are being changed?
R14	<p>Same response as R1: The KCIA outreach team emailed meeting invitations to 20 community organizations and 43 airport tenants two weeks before the meetings. Meeting information was also posted on the KCIA Community Outreach project page, emailed to all airport tenants and leaseholders, shared on KCIA social media channels (Facebook and Instagram), and an announcement was made at the King County International Airport Community Coalition monthly meeting on March 9, 2023.</p> <p>Information pertinent to the documents, notifications, meeting summaries, and attendees is available in the Public Outreach Report in this Supporting Information Packet.</p> <p>Additionally, copies of all documents and meeting materials were available on the KCIA Community Outreach project page and available upon request at the KCIA Badge Office.</p>
C15	Stop pushing out GA activity from this airport. The airport's purpose is to serve all aspects of aviation including flight training and rental. It's unacceptable to slowly subvert this mission in favor of only jet traffic and large operators.
R15	Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.
C16	Two of the flying clubs that I was associated with at KBFI have either closed or were forced to move their operations. When and how are you going to assess the actual impact of your new policies and correct them so you don't actually kill small and medium flying clubs on the field? With Galvin closing, you've already done irreparable damage to a piece of Seattle aviation history.
R16	Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.
C17	Why do you call it KCIA when it's recognized as KBFI? That is the same airport? correct? Why make things more confusing. Pick a name please. the CIA is an agency here in DC
R17	The Supplemental Rules and Regulations and Minimum Standards refer to King County International Airport – Boeing Field as “Airport” or “KCIA” as that is an abbreviation for King County International Airport. The ICAO airport code “KBFI” has been added to Section 1.

C19	<p>As a long time-private pilot flying in and out of Boeing Field, I appreciate the opportunity to comment on the plan and share my concerns. I learned to fly at Boeing Field in the late 80's and continue to rent a tiedown and still fly in and out of the airport frequently. I appreciate the convenience of being close to downtown and the instrument approaches that permit safe year-round use despite our often gloomy weather.</p> <p>When I began my flying career there were several flight schools, maintenance facilities and other resources available to support private pilots and prepare the next generation of professional pilots. Over the years, the number of these facilities has decreased due to a variety of factors including cost and increasing demand for limited space from commercial operators of large turbine aircraft. This has come at the expense of private pilots who see very few options for aircraft maintenance and training. Private pilots have also suffered from waiting lists for hangars and tiedown spots that go to three years or more.</p> <p>Unfortunately, this plan will only accelerate these negative trends; the requirements to service light general aviation aircraft will be so high that operators will likely focus only on turbine and heavy commercial aircraft. The lack of maintenance options, rents and obligations imposed by the standards will make operating a flight school economically infeasible. Furthermore, young pilots and people of modest means who have been able to rent or co-own a small plane will see their options curtailed in favor of the large commercial operators.</p> <p>Instead, I encourage the County to seek ways to preserve competition for small business operators or single operator businesses on the field. Reduce the cost of services by creating self serve fuel facilities and using competition, rather than monopolies, to improve service and reduce cost and increase accessibility.</p> <p>An openness to small operators will hopefully foster improved relationships with the community who will see career opportunities and preserve safety for pilots and residents alike.</p>
R19	<p>Section 2.2 Purpose clearly sets forth the purpose of the Minimum Standards as follows: <i>“The purpose of these Minimum Standards is to encourage and promote: (a) the consistent provision of high quality Commercial Aeronautical Activities at the Airport; (b) the orderly development of land and high-quality Improvements at the Airport; (c) the safety, security, and efficiency at the Airport, and (d) the economic health of Operators at the Airport.”</i> Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p>
C20	<p>I support the proposed edits to both the minimum standards and rules and regulations put forth by the KCIA Roundtable. The proposed edits are reasonable, practical and important to ensuring that KCIA remains an airport that supports a broad range of users. Please include the proposed edits in the final documents. Thank you.</p>
R20	<p>Comment noted. No specific alternative language or deletions provided. As such, a change to the documents was not made.</p>
C21	<p>Hello - it is crucial that KBFI remain a county asset available to all with an interest in aviation, not just the ultra wealthy and UPS and the Boeing company. I learned to fly at Galvin (now shut down). Many people commute around the Puget Sound on Kenmore. General aviation pilots need access to an airport without having to drive for an hour.</p>
R21	<p>Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p>
C22	<p>would like to say i agree with the KCIA Roundtable Subcommittee Report Proposed Rules & Regulations, Minimum Standards</p> <p>1/13/2025. your Proposed Rules & Regulations, Minimum Standards are way to restrictive to allow general aviation to flourish at boeing field. to foster general aviation less restrictions are needed, not more. these regulations will make it much harder to get maintenance, instruction, or rental aircraft available. thank you.</p>

R22	Comment noted. No specific alternative language or deletions provided. As such, a change to the documents was not made.
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Draft Minimum Standards Comments

C23	What are the requirements, prerequisites, and how does a company obtain approval to be a SASO approved to be Aircraft Maintenance Operators?
R23	This information is outlined in Section 4 and Section 6.1 of the draft <i>Minimum Standards</i> . No specific alternative language or deletions provided. As such, a change to the document was not made.
C24	What are the requirements, prerequisites, and how does a company obtain approval to be a SASO approved to be a Aircraft Rental or Flight Training Operators?
R24	This information is outlined in Section 4 and Section 6.2 of the draft <i>Minimum Standards</i> . Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.
C25	<p>I am also concerned the draft Minimum Standards being created today by King County International Airport under 6.5 Independent Aircraft Maintenance Operator (SASO) page 31 contains LIMITATIONS that if passed by the King County Council as written will create a monopoly for Galvin Flying and Helicopters Northwest for aircraft maintenance by their A&P and A&P IA mechanics and discriminate against all other A&P and A&P IA mechanics at King County International Airport.</p> <p>6.5. Independent Aircraft Maintenance Operator (SASO) - Stan Kosko page 31</p> <p>Limitations</p> <p>As determined by the County in its sole discretion, if an Aircraft Maintenance Operator (Galvin Flying, Helicopters Northwest) is fully meeting the demand for Aircraft Maintenance, Independent Maintenance Operators (Stan Kosko) may be prohibited at the Airport.</p> <p>An Independent Maintenance Operator (Stan Kosko) shall only provide Aircraft Maintenance to Based Aircraft and shall not solicit Transient Aircraft for any reason. However, at the request of an FBO or Aircraft Maintenance Operator (Galvin Flying, Helicopters Northwest), an Independent Aircraft Maintenance Operator (Stan Kosko) may provide Aircraft Maintenance to Transient Aircraft from the FBO's or Aircraft Maintenance Operator's (Galvin Flying, Helicopters Northwest) Leased Premises.</p> <p>Location - Independent Maintenance Operator (Stan Kosko) shall only provide maintenance from an Aircraft Maintenance Operator (Galvin Flying, Helicopters Northwest) facility or in locations designated and approved in writing by the County. These locations (including any Improvements) must meet applicable Legal Requirements for the type of Aircraft Maintenance being provided</p> <p>Other than Aircraft Maintenance Operator (Galvin Flying, Helicopter Northwest) the proposed Minimum Standards (see below 1) eliminates existing and future A&P IA businesses by creating standards that cannot be met as there is no space available at Boeing airport to build on to meet these standards.</p> <p>This means current Airframe and Powerplant with Inspection Authority mechanics (A&P IA) like Stan Kosko (Independent Maintenance Operator) are being forced out of business at Boeing airport and any potential for new Independent Maintenance Operator businesses will never have the opportunity to exist.</p>

R25	<p>As stated in FAA Advisory Circular 150/5190-8 <i>Minimum Standards for Commercial Aeronautical Activities</i>, Section 1.3.2., “If individual operators are to be allowed to perform a single-service aeronautical activity on the airport (aircraft washing, maintenance, etc.), the airport sponsor should have a licensing or permitting process in place that provides a level of regulation and compensation satisfactory to the airport. Frequently, a yearly fee or percentage of the gross receipts fee is a satisfactory way of monitoring this type of operation.”</p> <p>While it is completely within the purview of KCIA to eliminate all independent operators, KCIA has developed Minimum Standards to allow this activity at the Airport (see Section 6.5 and Section 6.6 of the draft <i>Minimum Standards</i>). The General Requirements outlined ensure the related activities are conducted in a safe manner (e.g., approved facilities) by approved operators (e.g., COP requirement consistent with Section 3.2 of the draft <i>Minimum Standards</i>).</p> <p>Further, the draft <i>Minimum Standards</i> are developed consistent with guidance provided in FAA Advisory Circular 150/5190-8 <i>Minimum Standards for Commercial Aeronautical Activities</i>. Specific references from the Advisory Circular include:</p> <ul style="list-style-type: none"> • <u>Section 1.2.1. Objective</u>: The FAA objective in recommending the development of minimum standards serves to promote safety in all airport activities, protect airport users from unlicensed and unauthorized products and services, maintain and enhance the availability of adequate services for all airport users, promote the orderly development of airport land, and ensure efficiency of operations. • <u>Section 1.2.4. Sponsor Prerogative to Establish Minimum Standards</u>: Ensure standards are reasonable, not unjustly discriminatory, attainable, uniformly applied and reasonably protect the investment of providers of aeronautical services to meet minimum standards from competition not making a similar investment. <p>Section 6.5 <i>Limitations</i> (Bullet 1) has been deleted as follows: <i>As determined by the County in its sole discretion, if an Aircraft Maintenance Operator is fully meeting the demand for Aircraft Maintenance, Independent Maintenance Operators may be prohibited at the Airport.</i></p>
C26	<p>Sec 4.5 - Ramp tiedowns and associated equipment are required. I do not believe this should be required unless there is already a designated tiedown area such as Northeast parking.</p>
R26	<p>Consistent with FAA Advisory Circular 150/5190-8 Minimum Standards for Commercial Aeronautical Activities which states “Provide a list of the equipment and services (both above and below wing) that will be provided by the aeronautical service provider, including ground power units, overnight parking areas, towing equipment, starters, remote tie-down areas, jacks, oxygen, compressed air, tire repair, sanitary lavatory service, ticketing and passenger check-in services, office and baggage handling services and storage space.” It has been determined that minimum requirements for tiedowns and associated equipment are appropriate. Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p>
C27	<p>Sec 4.5 - Hangar size minimums for listed aircraft is unreasonable.</p>
R27	<p>Factors contributing to the establishment of minimum hangar size requirements included the type and size of aircraft that will be housed within the hangar, alongside local building codes and regulations, primarily governed by the National Fire Protection Association (NFPA) standard 409, which categorizes hangar types based on aircraft size and operational needs, dictating minimum dimensions for safe storage and maintenance; generally, a minimum hangar size for a small single-engine aircraft would be around 40 feet wide by 50 feet deep, while larger jets may require significantly larger dimensions depending on wingspan and tail height. Comment noted. The minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.</p>
C28	<p>Sec 4.6 – Under Grant Assurance it says if there is a complaint the Operator will need to submit pricing to the County. Pricing is confidential.</p>

R28	Section 4.6 has been revised as follows: <i>“In the event of a written complaint received by the Airport Director related to pricing of and upon request, Operator shall submit a schedule of products, services, or facilities, Operator shall provide evidence as requested pricing to the County Airport Director within 14 calendar days.”</i>
C29	Sec 4.9 – Transportation equipment for pilots/pax must have a 2 way radio to communicate with the tower. This needs to be for taxiways and runways use only. It is unreasonable to have a radio in every piece of transportation equipment especially if they are not being used in those areas.
R29	This section has been revised as follows: <i>“Operators shall be required to equip vehicles traversing the Movement Area with a two-way radio capable of communicating within the FAA Air Traffic Control tower (ATCT)</i>
C30	Sec 5.0 – It says fully transition to unleaded fuel within 12 months of ASTM certificate. I think it should say fully transitioning to unleaded fuel if there is an ASTM certificate that meets the needs for every piston aircraft/engine type.
R30	This section has been revised as follows: <i>“FBO shall have available (directly or through agreement – a copy of which must be provided to the Airport Director) fully transition to unleaded aviation gasoline within 12 calendar months of ASTM certification FAA Fleet Authorization.”</i>
C31	Sec 5.0 – Assistance to disabled aircraft. This is too vague and it also puts liability on the FBOs.
R31	The following language as been revised. <i>“Recognizing that aircraft removal is the responsibility of the Aircraft Owner or Aircraft Operator, FBO shall be prepared to lend assistance within 30 minutes from the time a request is made by the County, the Aircraft Owner, or Aircraft Operator to maintain the operational readiness of the Airport. FBO shall prepare an aircraft removal plan and have the necessary Equipment Readily Available to remove General Aviation aircraft normally frequenting the Airport (up to and including Group II)125,000 pounds maximum gross takeoff weight.”</i>
C32	Sec 5.0 – Aircraft MX. FBOs should not be required to have a Part 145 repair station or the specifies sf for that activity. The high ground rent at KBFI puts this airport at a disadvantage compared to every other airport in the region. Staffing, tooling, training, documentation, WA State sales tax and all other things associated with having a Part 145 certificate adds costs that can not be recovered. I also didn’t see anything referencing the mobile MX trucks that come onto the airport, do not pay ground rent or have any overhead costs that tenants have. This gives them an unfair advantage if we are required to have a 145 repair station.

R32	<p>The draft <i>Minimum Standards</i> reflect a detailed analysis of the existing commercial aeronautical facilities, infrastructure, and services provided at the Airport and at comparable/competitive airports. Part 145 requirement has been removed and replaced with a requirement of 1 A&P Mechanic, and 1 Customer Service Representative (in which an A&P Mechanic may fulfill the responsibilities of the Customer Service Representative) whom must be available during the required hours of activity. If Operator is providing annual or phase inspections, one A&P Mechanic shall have Inspection Authorization.</p> <p>AOG services providers are permitted to conduct approved service at the Airport in conformance with Section 6.5. Independent Aircraft Maintenance Operator (SASO). As such, a change to the document was not made.</p> <p>The Notes “box” in Section 5 FBO Schedule of Services has been corrected. The notes attributed to Aircraft parking and storage is in the wrong location and has been moved to the notes attributed to Aircraft maintenance which states as follows: FBO shall provide (either directly or through written agreement with an authorized Operator) readily available aircraft maintenance services to general aviation aircraft as can be performed efficiently on the Leased Premises unless otherwise waived in writing by the Airport Director.</p> <p>Additionally, Section 5, Page 16, (third paragraph) Aircraft Maintenance has been changed as follows: “Unless otherwise waived in writing by the Airport Director due to extenuating circumstances, FBO (either directly or through a written agreement with an authorized Operator), shall provide, upon request, Aircraft Maintenance in accordance with Section 6 of these Minimum Standards...”.</p> <p>Section 5, Page 16 (Aircraft Maintenance table) has been changed as follows: “FBO shall be certified as a 14 CFR Part 145 Repair Station for turboprop and turbojet aircraft. FBO shall provide Line Maintenance for up to Group III aircraft not exceeding 100,000 pounds maximum gross takeoff weight. FBO shall be able to provide including wheel, brake, and battery service.”</p>
C33	Sec 5.0 – What is line maintenance pertaining to Air Carrier turboprop/turbojet aircraft?
R33	<p>The draft <i>Supplemental Rules and Regulations</i> defines Aircraft Line Maintenance as “Aircraft Maintenance typically required to return an aircraft to service within a short period of time. Examples include, but are not limited to, replenishing lubricants, fluids, nitrogen, and oxygen; servicing of landing gear, tires, and struts; lubricating aircraft components; and avionics/instrument removal and/or replacement.” Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p>
C34	Sec 5.0 – FBO can not have more than 2 clear span facilities. I disagree with this.
R34	<p>Section 5.0 Leased Premises outline the minimum requirements. Pertinent to the comment, FBOs are required to have a minimum of 40,000 square feet of community hangar space which must be accommodated in no more than two clear span facilities. As stated in the Preamble, “a current or prospective Lessee may exceed these Minimum Standards...”. Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p>
C35	Sec 5.0 – Fueling permit can’t be transferable. How would this impact a sale of an FBO?
R35	<p>No entity is allowed to engage in fuel handling at the Airport without a fueling permit, as such, if an FBO were to be sold, the new entity would need to apply for and receive a fueling permit. Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p>
C36	<p>I think the limitations to the 2024 draft for Independent Flight Training Operator is bad. Specifically, I think these are unfair:</p> <ol style="list-style-type: none"> 1. As determined by the County in its sole discretion, if a Flight Training Operator is fully meeting the demand for flight training, Independent Flight Training Operators may be prohibited at the Airport.

R36	Section 6.6 <i>Limitations</i> (Bullet 1) has been deleted as follows: <i>As determined by the County in its sole discretion, if a Flight Training Operator is fully meeting the demand for flight training, Independent Flight Training Operators may be prohibited at the Airport.</i>
C37	2. Independent Flight Training Operators are prohibited from providing Flight Training in their own aircraft, including aircraft leased to or rented by the Independent Flight Training Operator.
R37	Section 6.6 <i>Limitations</i> (Bullet 2) remains in place as the County has the right to establish reasonable and not unjustly discriminatory requirements for commercial operators. Prohibiting Independent Flight Instructors from utilizing their own aircraft for flight training purposes is a reasonable and not unjustly discriminatory requirement that ensures a level playing field. As such, a change is not deemed necessary.
C38	<p>I would like to share my experience with years of operation at the King County Boeing Field. I got my private pilot certificate at Cliff Howard Aviation in 1987. BFI was a bustling successful airport with General aviation, charter, UPS freight and Boeing manufacturing. I have flight training, scenic tours and charter operations currently running from Skyservices. To disallow Seaplane Scenics- Adventures in Flight the use of the Airport via tenancy with Skyservice is unreasonable.</p> <p>The adoption of minimum standards that eliminate the opportunity for pilot, mechanic and flight school/club activity will destroy an already beaten down essential group. These people are the base of all operations; without them there will be no new pilots, mechanics or flight instructors.</p> <p>The thought that Amazon, UPS and Boeing company are the desired tenants for "big money gains" is like trying to have cream without the milk! General aviation in the "milk" without that there is no "cream". There will be no mechanics or pilots to support the operators. Federal funding dictates that access is equal to all. No preferential treatment or special consideration for a tenant or group of tenants is allowed. Through the requirement of space that is not available monopolies and preference has been given. The sharing or the space and partnership of mechanics, flight training and FBO operations is the key. The Jet traffic, cargo, and manufacture are a part not the whole.</p> <p>Please do not continue to close the door on aviation, dreams and opportunity for all users.</p>
R38	FAA Advisory Circular 150/5190-8 Minimum Standards for Commercial Aeronautical Activities States, "The FAA objective in recommending the development of minimum standards serves to promote safety in all airport activities, protect airport users from unlicensed and unauthorized products and services, maintain and enhance the availability of adequate services for all airport users, promote the orderly development of airport land, and ensure efficiency of operations." In an effort to achieve the aforementioned objectives, Minimum Standards at the Airport are deemed necessary. Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.
C39	<p>Regarding 6.6 Independent Flight Training Operator (SASO):</p> <p>A person holding a current FAA Flight Instructor certificate, who provides occasional Flight Training to an Aircraft Owner in the Owner's aircraft and is not compensated by the Aircraft Owner or any other party and does not make flight training available to the public, shall not be deemed a Commercial Activity...</p> <p>Comment: This unnecessarily prohibits pilots from hiring an instructor using compensation to provide training such as an Instrument Proficiency Check or advanced ratings such as an instrument rating that increase safety. It is not clear why a flight instructor should be expected to "volunteer" for this activity without compensation while instructing the pilot in the pilot's own airplane.</p>

R39	Section 6.6 does not prohibit pilots from hiring an instructor via the use of compensation. This section illustrates that if a Flight Instructor is not compensated and does not make the training available to the public, then it is not deemed a Commercial Activity and thus not bound by the requirements of this section. Entities desiring to be compensated for flight instruction shall comply with Section 6.2 of the draft <i>Minimum Standards</i> .
C40	<p>Regarding 6.7 Commercial Flying Club:</p> <p>1....Operator shall lease from the County or FBO an area of sufficient size, shape, and location as mutually agreed upon on which shall be erected a building providing sufficient space for Operator's activities and operations...Operator shall provide sufficient vehicle parking space to accommodate employees and customers parking with no on street parking...</p> <p>2. ...The operator shall have its premises open and available to meet public demand of its services at least eight (8) hours a day, five (5) days a week. Operator shall have an employee in the facility office or readily on call at all times during the required hours of activity...</p> <p>Comment: It is not clear how the requirement for office space, off-street parking, and continuous staffing improves aviation safety or security. Many clubs operate safely in the Puget Sound Region without these burdensome requirements even at busy, towered airports. These requirements could be interpreted to be written to prescribe smaller businesses from operating at the KCIA while providing an advantage to larger businesses. Often, these larger businesses have much higher costs that make pursuing aviation training much more difficult, especially for marginalized communities.</p>
R40	Consistent with King County Code Title 15.12.120 Section D., Section 6.7 <i>Commercial Flying Club</i> has been deleted in its entirety.
C41	§4.8 – “This designated person shall have at least five years recent and relevant experience managing similar Activities at a comparable airport, as determined by the Airport Director. “ This seems onerous as it could serve to prevent an FBO manager from a small airport like TIW from being “promoted” to work at a BFI FBO.
R41	This section has been revised as follows: <i>This designated person shall have at least five years recent and relevant experience managing similar Activities</i> at a comparable airport , as determined by the Airport Director.
C42	§6.1 – Aircraft Maintenance Operator – 22,000 square feet might be reasonable for a Modern or SkyService to work on jets, but it is onerous for a shop working solely on small piston aircraft. You don't need 22,000 sf to do an annual on a single-engine Cessna. This number should be set at the value equal to the smallest hangar presently available at BFI so that a sole-entrepreneur can service the needs of based piston aircraft. With John Reed retiring, BFI needs to incentivize one or more A&Ps to take his place.
R42	Section 6.1 of the draft <i>Minimum Standards</i> did not require 22,000 square feet of hangar. Section 6.1 of the draft <i>Minimum Standards</i> outlined requirements for Lessees and Sublessees (land, customer, administrative, maintenance, and hangar area). The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.
C43	§6.2 2 – Remove the words “...is not compensated by the Aircraft Owner of any other party...”. A pilot-tenant needs to have access to a CFI of his/her choosing. With the death of Galvin, there are no more FBOs or flight schools to serve the non-commercial pilot community. The key word here is occasional. If it's occasional, it needs to be permitted, regardless of whether it is compensated or uncompensated. BTW, how is BFI going to assess and enforce this provision?

R43	<p>This section illustrates that if a Flight Instructor is not compensated and does not make the training available to the public, then it is not deemed a Commercial Activity and thus not bound by the requirements of this section. Entities desiring to be compensated for flight instruction shall comply with Section 6.2 or Section 6.6 of the draft <i>Minimum Standards</i>.</p> <p>The fourth paragraph of Section 1. <i>Preamble</i> states as follows: <i>This document establishes Minimum Standards for all entities engaging in Commercial Aeronautical Activities at the Airport.</i> An independent flight training operator receiving compensation for services rendered is considered a commercial aeronautical operator subject to Section 6.6 <i>Independent Flight Training Operator (SASO)</i>. As such, a change to the document was not made.</p>
C44	<p>§6.3 – As in §6.1 (Aircraft Maintenance Operator), this provision envisions a large commercial operator. There needs to be a provision for a small avionics shop operating out of a hangar or a space similar to National Aviation. You don't need 11,000 square feet to fix a radio.</p>
R44	<p>The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.</p>
C45	<p>§6.5 (Independent Aircraft Maintenance Operator) – What is the difference between Independent Aircraft Maintenance Operator and Aircraft Maintenance Operator?</p>
R45	<p>The key difference between an Independent Aircraft Maintenance Operator and an Aircraft Maintenance Operator is a leased or subleased facility. By definition (see Appendix A of the draft <i>Supplemental Rules and Regulations</i>), an Independent Operator is “<i>An entity offering aeronautical service(s) but without an established place of business on the Airport.</i>”</p>
C46	<p>§6.5 – Remove limitation bullet #1. Applying this wording to the real world, if the County determines that Sky Service, for example, is fully meeting the demand for Aircraft Maintenance, then a John Reed-like A&P would not be permitted to operate at BFI. Please allow the market to determine how many A&Ps may operate at BFI. Please take note that while an A&P who services jets may be legally qualified to perform maintenance and repairs to a single-engine piston aircraft, (s)he often doesn't have the experience and type-specific knowledge to do so.</p> <p>§6.6 – What is the difference between this §6.6 and §6.2?</p>
R46	<p>Section 6.5 <i>Limitations</i> (Bullet 1) has been deleted as follows: <i>As determined by the County in its sole discretion, if an Aircraft Maintenance Operator is fully meeting the demand for Aircraft Maintenance, Independent Maintenance Operators may be prohibited at the Airport.</i></p> <p>Same response as R45: The key difference between an Independent Aircraft Maintenance Operator and an Aircraft Maintenance Operator is a leased or subleased facility. By definition (see Appendix A of the draft <i>Supplemental Rules and Regulations</i>), an Independent Operator is “<i>An entity offering aeronautical service(s) but without an established place of business on the Airport.</i>”</p>
C47	<p>§6.6 (paragraph 2) – Remove the words “...is not compensated by the Aircraft Owner of any other party...”. See comments to §6.2.</p>
R47	<p>Same response as R43: This section illustrates that if a Flight Instructor is not compensated and does not make the training available to the public, then it is not deemed a Commercial Activity and thus not bound by the requirements of this section. Entities desiring to be compensated for flight instruction shall comply with Section 6.2 or Section 6.6 of the draft <i>Minimum Standards</i>.</p> <p>The fourth paragraph of Section 1. <i>Preamble</i> states as follows: <i>This document establishes Minimum Standards for all entities engaging in Commercial Aeronautical Activities at the Airport.</i> An independent flight training operator receiving compensation for services rendered is considered a commercial aeronautical operator subject to Section 6.6 <i>Independent Flight Training Operator (SASO)</i>. As such, a change to the document was not made.</p>
C48	<p>§6.6 – Remove limitation #1. See comments to §6.2.</p>

R48	Section 6.6 <i>Limitations</i> (Bullet 1) has been deleted as follows: <i>As determined by the County in its sole discretion, if a Flight Training Operator is fully meeting the demand for flight training, Independent Flight Training Operators may be prohibited at the Airport</i>
C49	§6.6 – Remove limitation #2. A CFI giving instruction in his/her owned aircraft places no greater burden on airport facilities than does a CFI instructing in a tenant-owner's aircraft. At a minimum, please provide an exception for occasional instruction. Again, how is BFI going to assess and enforce the non-compensation provision? Two pilots get together and fly an airplane. Who's to know if it was an instructional flight or a \$100 hamburger ride?
R49	Section 6.6 <i>Limitations</i> (Bullet 2) remains in place as the County has the right to establish reasonable and not unjustly discriminatory requirements for commercial operators. Prohibiting Independent Flight Instructors from utilizing their own aircraft for flight training purposes is a reasonable and not unjustly discriminatory requirement that ensures a level playing field. As such, a change is not deemed necessary.
C50	Appendix A (Aircraft Service by Owner or Operator of Aircraft) states "No right or privilege granted herein shall operate to prevent any person or persons, firm, or corporation operating aircraft on the Airport from performing Self-Services (including, but not limited to, fueling, maintenance, or repair) specifically utilizing the Aircraft Owner or Operator's Employees, vehicles, equipment, and resources." This provision conflicts with §3.6 and §3.7 of the Supplemental Rules and Regulations which place many restrictions on fueling, maintenance and repair. See comments below.
R50	Draft Rules and Regulations sections 3.6 and 3.7 do not enact a blanket prohibition on the listed activities but rather requires that such activities, should they occur must be approved in writing by the Airport Director and must occur in an approved facility/location. Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.
C51	<p>6.1 Aircraft Maintenance Operator (SASO) The Leased Premises section of the Draft requires land, customer areas, and hangar square footage requirements for SASO's. There is currently no available space that meets those requirements and furthermore it doesn't follow FAA guidance.</p> <p>According to the FAA 5190.6B section 1.3 paragraph a. states "When specialized aviation service operations (SASOs), sometimes known as single-service providers or special FBOs, apply to do business on an airport, "all" provisions of the published minimum standards may not apply. This is not to say that all SASOs providing the same or similar services should not equally comply with all applicable minimum standards. However, AN AIRPORT SHOULD NOT, WITHOUT ADEQUATE JUSTIFICATION, REQUIRE THAT A SERVICE PROVIDER DESIRING TO PROVIDE A SINGLE SERVICE ALSO MEET THE CRITERIA FOR A FULL-SERVICE FBO. Examples of these specialized services may include aircraft flying clubs, flight training, aircraft airframe and powerplant repair/maintenance, aircraft charter, air taxi or air ambulance, aircraft sales, avionics, instrument or propeller services, or other specialized commercial flight support businesses."</p> <p>The way the Draft is currently written, the Leased Premises section sets minimum standards consistent with commercial activities as opposed to independent operators or SASO's. It would be more appropriate to have no minimum leased premises or customer areas for SASO's.</p>
R51	Consistent with Advisory Circular 150-5190-8, Minimum Standards for Commercial Aeronautical Activities, minimum leased premises are deemed appropriate to "promote the orderly development of airport land, and ensure efficiency of operations." The minimum leased premises requirements for the Airport were developed based upon an examination and analysis of the existing facilities at the airport and at other comparable/competitive airports. The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet .

C52	Independent Flight Instructors: Prohibiting independent flight instruction is a poor decision and has implications for pilot training and proficiency. Qualified and/or specialized flight instructors may not be available or permanently employed by an entity that leases land from the Airport. A few examples may include - - Specialized training in Mountain Flying. Given the small number of instructors with expertise, it is likely that some may visit for instruction from neighboring states or fields. Other specialized training, such as upset recovery, not likely based at KBFI. - Type-specific instruction, for example instruction for a type rating or training from a make-and-model specific instructor. Barring independent instruction is counter to proficiency and safety.
R52	<p>It is important to note Section 6.5 (Independent Aircraft Maintenance Operator) and Section 6.6 (Independent Flight Training Operator) pertain to Independent Operators which are defined in the draft Supplemental Rules and Regulations as “an entity offering aeronautical service(s) but without an established place of business on the Airport.” Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p> <p>Same response as R48: Section 6.6 <i>Limitations</i> (Bullet 1) has been deleted as follows: <i>As determined by the County in its sole discretion, if a Flight Training Operator is fully meeting the demand for flight training, Independent Flight Training Operators may be prohibited at the Airport</i></p>
C53	I don't agree with the limitations related to independent flight instructors. I've never heard of an airport restricting this, nor is it clear how this would be enforced. I've been an independent flight instructor for ~35 years and the instruction I provide is almost always in an owner's personal aircraft where I have a substantial amount of experience and am being asked to provide recurrency training , often for insurance purposes. There are often no qualified instructors at the local FBOs to provide the type of training I provide (jets, turbo-props, warbirds) and this suggested rule would simply force independent instructors to either operate out of other airports and buy their fuel from a location other than Bend, or simply maintain a low profile so as not to be noticed by airport staff. Neither of these seem consistent with promoting aviation and safety.
R53	<p>Same response as R48: Section 6.6 <i>Limitations</i> (Bullet 1) has been deleted as follows: <i>As determined by the County in its sole discretion, if a Flight Training Operator is fully meeting the demand for flight training, Independent Flight Training Operators may be prohibited at the Airport</i></p> <p>Same response as R49: Section 6.6 <i>Limitations</i> (Bullet 2) remains in place as the County has the right to establish reasonable and not unjustly discriminatory requirements for commercial operators. Prohibiting Independent Flight Instructors from utilizing their own aircraft for flight training purposes is a reasonable and not unjustly discriminatory requirement that ensures a level playing field. As such, a change is not deemed necessary.</p>

C54	<p>6.1 Aircraft Maintenance Operator (SASO) The Leased Premises section of the Draft is written as if all SASO's are commercial operators or FBO's, referencing customer, administrative, lounge, and restroom areas.</p> <p>According to the FAA 5190.6B section 1.3 paragraph a. states "When specialized aviation service operations (SASOs), sometimes known as single-service providers or special FBOs, apply to do business on an airport, "all" provisions of the published minimum standards may not apply. This is not to say that all SASOs providing the same or similar services should not equally comply with all applicable minimum standards. However, AN AIRPORT SHOULD NOT, WITHOUT ADEQUATE JUSTIFICATION, REQUIRE THAT A SERVICE PROVIDER DESIRING TO PROVIDE A SINGLE SERVICE ALSO MEET THE CRITERIA FOR A FULL-SERVICE FBO. Examples of these specialized services may include aircraft flying clubs, flight training, aircraft airframe and powerplant repair/maintenance, aircraft charter, air taxi or air ambulance, aircraft sales, avionics, instrument or propeller services, or other specialized commercial flight support businesses."</p> <p>The Draft's Leased Premises section is written as if all Specialized Aviation Service Operations (SASOs) are commercial operators or Fixed Base Operators (FBOs), referencing customer, administrative, lounge, and restroom areas. According to FAA 5190.6B section 1.3 paragraph a, not all provisions of the published minimum standards may apply to SASOs. An airport should not require a service provider desiring to provide a single service to meet the criteria for a full-service FBO without adequate justification. Examples of specialized services include aircraft flying clubs, flight training, aircraft maintenance, charter services, and more. The current Draft sets minimum standards consistent with commercial activities rather than independent operators or SASOs.</p>
R54	<p>The Draft Minimum Standards are applicable to commercial operators, as such, requirements for customer, administrative, lounge and restroom areas are deemed appropriate and comply with FAA policy. If an Operator cannot meet a requirement of the Minimum Standards, then as addressed in Section 2.7. Applicability, an exemption or variance may be granted by the County consistent with Section 1.20 of the Rules and Regulations.</p> <p>Same response as R51: Consistent with Advisory Circular 150-5190-8, Minimum Standards for Commercial Aeronautical Activities, minimum leased premises are deemed appropriate to "promote the orderly development of airport land, and ensure efficiency of operations." The minimum leased premises requirements for the Airport were developed based upon an examination and analysis of the existing facilities at the airport and at other comparable/competitive airports. The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.</p>

C55	<p>6.1 Leased Premises – The Draft currently has minimum square footage requirements that are not fair and reasonable to small service providers or SASO’s. Also, there is no available space that meets those requirements and furthermore it doesn’t follow FAA guidance.</p> <p>There are no square footage requirements from the FAA. FAA 5190.6B, Section 1.2 Developing Minimum Standards: a. Objective. The FAA objective in recommending the development of minimum standards serves to promote safety in all airport activities, protect airport users from unlicensed and unauthorized products and services, MAINTAIN AND ENHANCE THE AVAILABILITY OF ADEQUATE SERVICES FOR ALL AIRPORT USERS, PROMOTE THE ORDERLY DEVELOPMENT OF AIRPORT LAND, AND EFFICIENCY OF OPERATIONS. THEREFORE, AIRPORT SPONSORS SHOULD STRIVE TO DEVELOP MINIMUM STANDARDS THAT ARE FAIR AND REASONABLE TO ALL ON-AIRPORT AERONAUTICAL SERVICE PROVIDERS AND RELEVANT TO THE AERONAUTICAL ACITIVITY TO WHICH IT IS APPLIED. Any use of minimum standards to protect the interests of an exclusive business operation may be interpreted as the grant of an exclusive right and a potential violation of the airport sponsor’s grant assurances and the FAA’s policy on exclusive rights.</p> <p>The Draft's current minimum square footage requirements are deemed unfair and unreasonable for small service providers or Specialized Aviation Service Operations (SASOs). Additionally, there is no available space that meets these requirements, and they do not align with FAA guidance. The FAA does not impose square footage requirements. According to FAA 5190.6B, Section 1.2, the objective of developing minimum standards is to promote safety, protect airport users, ensure the availability of adequate services, promote orderly airport land development, and enhance operational efficiency. Airport sponsors should develop fair and reasonable minimum standards relevant to the specific aeronautical activity. Using minimum standards to protect exclusive business interests may violate the airport sponsor's grant assurances and FAA's policy on exclusive rights.</p>
R55	<p>Same response as R54: The Draft Minimum Standards are applicable to commercial operators, as such, requirements for customer, administrative, lounge and restroom areas are deemed appropriate and comply with FAA policy. If an Operator cannot meet a requirement of the Minimum Standards, then as addressed in Section 2.7. Applicability, an exemption or variance may be granted by the County consistent with Section 1.20 of the Rules and Regulations.</p> <p>Consistent with Advisory Circular 150-5190-8, Minimum Standards for Commercial Aeronautical Activities, minimum leased premises are deemed appropriate to “promote the orderly development of airport land, and ensure efficiency of operations.” The minimum leased premises requirements for the Airport were developed based upon an examination and analysis of the existing facilities at the airport and at other comparable/competitive airports. The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.</p>
C56	<p>6.2 Aircraft Rental or Flight Training Operator (SASO). Currently the Draft states – “Statement of Concept - An Aircraft Rental Operator is engaged in the rental of aircraft to the public and a Flight Training Operator is engaged in providing flight instruction to the public. These Minimum Standards apply to Operator’s that lease or Sublease land or Improvements on the Airport.</p> <p>A person holding a current FAA Flight Instructor certificate who provides occasional flight training to an Aircraft Owner in the Aircraft Owner’s aircraft AND IS NOT COMPENSATED by the Aircraft Owner or any other party and does not make flight training available to the public, shall not be deemed a Commercial Activity”.</p>

R56	<p>Same response as R43: This section illustrates that if a Flight Instructor is not compensated and does not make the training available to the public, then it is not deemed a Commercial Activity and thus not bound by the requirements of this section. Entities desiring to be compensated for flight instruction shall comply with Section 6.2 or Section 6.6 of the draft <i>Minimum Standards</i>.</p> <p>The fourth paragraph of Section 1. <i>Preamble</i> states as follows: <i>This document establishes Minimum Standards for all entities engaging in Commercial Aeronautical Activities at the Airport</i>. An independent flight training operator receiving compensation for services rendered is considered a commercial aeronautical operator subject to Section 6.6 <i>Independent Flight Training Operator (SASO)</i>. As such, a change to the document was not made.</p>
C57	<p>FAA 5190.6B paragraph a. "... HOWEVER, AN AIRPORT SHOULD NOT, WITHOUT ADEQUATE JUSTIFICATION, REQUIRE THAT A SERVICE PROVIDER DESIRING TO PROVIDE A SINGLE SERVICE ALSO MEET THE CRITERIA FOR A FULL-SERVICE FBO...Examples of these specialized services may include aircraft flying clubs, FLIGHT TRAINING, aircraft airframe and powerplant repair/maintenance, aircraft charter, air taxi or air ambulance, aircraft sales, avionics, instrument or propeller services, or other specialized commercial flight support businesses."</p> <p>The Draft's current statement of concept defines an Aircraft Rental Operator as one who rents aircraft to the public and a Flight Training Operator as one who provides flight instruction to the public. These minimum standards apply to operators leasing or subleasing land or improvements at the airport. An FAA-certified flight instructor providing occasional, uncompensated flight training to an aircraft owner in the owner's aircraft, and not offering training to the public, is not considered a commercial activity. According to FAA 5190.6B, an airport should not require a service provider offering a single service to meet the criteria for a full-service FBO without adequate justification. Examples of specialized services include flight training, aircraft maintenance, charter services, and more..</p>
R57	<p>The draft Minimum Standards do not require a SASO to meet the required criteria of an FBO. The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.</p>
C58	<p>6.2 Leased Premises, Employees, Equipment, Hours sections requiring minimum standards should not apply to SASOs as there is no FAA requirement:</p> <p>FAA 5190.6B 1.2 c. Developing Minimum Standards. When developing minimum standards, the most critical consideration is the particular nature of the aeronautical activity and operating environment at the airport. Minimum standards should be tailored to the specific aeronautical activity and the airport to which they are to be applied. For example, IT WOULD BE UNREASONABLE TO APPLY THE MINIMUM STANDARDS FOR AN FBO AT A MEDIUM OR LARGE HUB AIRPORT TO A GENERAL AVIATION AIRPORT SERVING PRIMARILY PISTON-POWERED AIRCRAFT. THE IMPOSITION OF UNREASONABLE REQUIREMENTS ILLUSTRATES WHY "FILL-IN-THE-BLANK" MINIMUM STANDARDS AND THE BLANKET ADOPTION OF STANDARDS OF OTHER AIRPORTS MAY NOT BE EFFECTIVE. Instead, the FAA has provided guidance in the form of questions and examples to illustrate an approach to the development and implementation of minimum standards. It is important that the reader understand that what follows does not constitute a complete model for minimum standards, but rather a source of ideas to which the airport sponsor can turn when developing minimum standards.</p>

R58	<p>Advisory Circular 150/5190-8 <i>Minimum Standards for Commercial Aeronautical Activities</i> outlines several questions to consider when drafting minimum standards including those questions pertinent to leased premises, number of fully training and qualified employees, equipment requirements, and hours of operation.</p> <p>Same response as R57: The draft Minimum Standards do not require a SASO to meet the required criteria of an FBO. The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.</p>
C59	<p>The sections on Leased Premises, Employees, Equipment, and Hours requiring minimum standards should not apply to Specialized Aviation Service Operations (SASOs) as there is no FAA requirement for these. According to FAA 5190.6B 1.2 c, minimum standards should be tailored to the specific aeronautical activity and the airport's operating environment. It would be unreasonable to apply the minimum standards for a Fixed Base Operator (FBO) at a medium or large hub airport to a general aviation airport serving primarily piston-powered aircraft. The FAA provides guidance through questions and examples to help develop and implement minimum standards, emphasizing that these should be fair, reasonable, and relevant to the specific aeronautical activity.</p>
R59	<p>Same response as R32: The draft <i>Minimum Standards</i> reflect a detailed analysis of the existing commercial aeronautical facilities, infrastructure, and services provided at the Airport and at comparable/competitive airports.</p> <p>Same response as R57: The draft Minimum Standards do not require a SASO to meet the required criteria of an FBO. The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.</p>
C60	<p>6.5 Independent Aircraft Maintenance Operator (SASO) Statement of Concept - Independent Aircraft Maintenance Operator – Operator engaged in providing limited Aircraft Maintenance for airframe and powerplant on the Airport for aircraft other than those owned, leased, and/or operated by (under the full and exclusive control of) Operator, but does not lease or sublease land or Improvements at the Airport. –</p> <p>The Draft's statement of concept for Independent Aircraft Maintenance Operators (SASOs) defines them as operators providing limited aircraft maintenance for airframe and powerplant at the airport for aircraft not owned, leased, or operated by the operator. However, it states that these operators cannot lease or sublease land or improvements at the airport. This is inconsistent with prior practices and is considered impractical.</p>
R60	<p>Independent Aircraft Maintenance Operator SASOs, by definition, do not lease or sublease land or improvements at the Airport. Based Aircraft Maintenance Operators lease or sublease improvements at the Airport and must conform with Section 6.1. Section 6.5 Statement of Concept has been changed as follows: <i>Operator engaged in providing limited Aircraft Maintenance for airframe and powerplant on the Airport for aircraft other than those owned, leased, and/or operated by (under the full and exclusive control of) Operator, but does not lease or sublease land or Improvements at the Airport.</i></p>
C61	<p>6.5 Limitations -As determined by the County in its sole discretion, if an Aircraft Maintenance Operator is fully meeting the demand for Aircraft Maintenance, Independent Maintenance Operators may be prohibited at the Airport.</p> <p>The Draft's section on limitations states that the County may prohibit Independent Maintenance Operators at the airport if an Aircraft Maintenance Operator is fully meeting the demand for aircraft maintenance. This paragraph should be deleted, especially considering the closure of Galvin. The concern is that if KBFI had determined Galvin was meeting demand when they suddenly closed we would be without any maintenance providers.</p>

R61	Section 6.5 Limitations (Bullet 1) has been deleted as follows: <i>As determined by the County in its sole discretion, if an Aircraft Maintenance Operator is fully meeting the demand for Aircraft Maintenance, Independent Maintenance Operators may be prohibited at the Airport.</i>
C62	<p>Location - Independent Maintenance Operator shall only provide maintenance from an Aircraft Maintenance Operator facility or in locations designated and approved in writing by the County. These locations (including any Improvements) must meet applicable Legal Requirements for the type of Aircraft Maintenance being provided.</p> <p>This paragraph needs to be revised. As written, it states that a SASO is not able to provide maintenance in an owner's hangar or in their leased facility. FAA 5190.6B g states...However, in all cases, THE AIRPORT SPONSOR MUST ENSURE THAT IN CHANGING MINIMUM STANDARDS FOR WHATEVER REASON, IT IS NOT APPLYING UNREASONABLE STANDARDS OR CREATING A SITUATION THAT WILL UNJUSTLY DISCRIMINATE AGAINST OTHER SIMILARLY SITUATED AERONAUTICAL SERVICE PROVIDERS.</p> <p>The Draft's location requirements state that Independent Maintenance Operators can only provide maintenance from an Aircraft Maintenance Operator facility or designated locations approved by the County. These locations must meet legal requirements for the type of maintenance provided. This paragraph needs revision as it currently prevents SASOs from providing maintenance in an owner's hangar or leased facility. According to FAA 5190.6B g, airport sponsors must ensure that changes to minimum standards do not apply unreasonable standards or create unjust discrimination against similarly situated aeronautical service providers. The FAA emphasizes that once minimum standards are established, they must be uniformly applied to all similar service providers.</p>
R62	SASOs are allowed to provide maintenance in an owner's hangar or leased facility provided that such facility is rated and approved for the type of maintenance being provided. Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.

C63	<p>6.2 Aircraft Rental or Flight Training Operator (SASO). Currently the Draft states – “Statement of Concept - An Aircraft Rental Operator is engaged in the rental of aircraft to the public and a Flight Training Operator is engaged in providing flight instruction to the public. These Minimum Standards apply to Operator’s that lease or Sublease land or Improvements on the Airport.</p> <p>A person holding a current FAA Flight Instructor certificate who provides occasional flight training to an Aircraft Owner in the Aircraft Owner’s aircraft AND IS NOT COMPENSATED by the Aircraft Owner or any other party and does not make flight training available to the public, shall not be deemed a Commercial Activity”.</p> <p>FAA 5190.6B paragraph a. "... HOWEVER, AN AIRPORT SHOULD NOT, WITHOUT ADEQUATE JUSTIFICATION, REQUIRE THAT A SERVICE PROVIDER DESIRING TO PROVIDE A SINGLE SERVICE ALSO MEET THE CRITERIA FOR A FULL-SERVICE FBO...Examples of these specialized services may include aircraft flying clubs, FLIGHT TRAINING, aircraft airframe and powerplant repair/maintenance, aircraft charter, air taxi or air ambulance, aircraft sales, avionics, instrument or propeller services, or other specialized commercial flight support businesses."</p> <p>The Draft's current statement of concept defines an Aircraft Rental Operator as one who rents aircraft to the public and a Flight Training Operator as one who provides flight instruction to the public. These minimum standards apply to operators leasing or subleasing land or improvements at the airport. According to FAA 5190.6B, an airport should not require a service provider offering a single service to meet the criteria for a full-service FBO without adequate justification. Examples of specialized services include flight training, aircraft maintenance, charter services, and more..</p>
R63	<p>Same response as R57: The draft Minimum Standards do not require a SASO to meet the required criteria of an FBO. The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.</p>
C64	<p>6.6 Independent Flight Training Operator (SASO)Statement of Concept - An Independent Flight Training Operator is an individual providing flight training to the general public originating from the Airport but does not lease or sublease land or Improvements at the Airport.</p> <p>The Draft's statement of concept for Independent Flight Training Operators (SASOs) defines them as individuals providing flight training to the general public from the airport but not leasing or subleasing land or improvements at the airport. This implies that a Certified Flight Instructor (CFI) cannot have an airplane, tiedown, or hangar at the airport if they are independent and not commercial, which is considered impractical and needs to be revised.</p>
R64	<p>Same response as R49: Section 6.6 <i>Limitations</i> (Bullet 2) remains in place as the County has the right to establish reasonable and not unjustly discriminatory requirements for commercial operators. Prohibiting Independent Flight Instructors from utilizing their own aircraft for flight training purposes is a reasonable and not unjustly discriminatory requirement that ensures a level playing field. As such, a change is not deemed necessary.</p>
C65	<p>6.6 Independent Flight Training Operators are prohibited from providing Flight Training in their own aircraft, including aircraft leased to or rented by the Independent Flight Training Operator.</p> <p>The Draft's section on Independent Flight Training Operators (SASOs) states that they are prohibited from providing flight training in their own aircraft, including aircraft leased to or rented by the Independent Flight Training Operator. What is the rationale behind this statement?</p>

R65	Same response as R49: Section 6.6 <i>Limitations</i> (Bullet 2) remains in place as the County has the right to establish reasonable and not unjustly discriminatory requirements for commercial operators. Prohibiting Independent Flight Instructors from utilizing their own aircraft for flight training purposes is a reasonable and not unjustly discriminatory requirement that ensures a level playing field. As such, a change is not deemed necessary.
C66	6.6 Independent Flight Training Operators are prohibited from advertising services in any manner on Airport property, including but not limited to posting signs, distributing business cards, or affixing an advertising decal or sign to its vehicle. Again, what is the purpose of this? Is there a reason this is prohibited?
R66	Section 6.6 <i>Limitations</i> (Bullet 3) has been deleted as follows: <i>Independent Flight Training Operators are prohibited from advertising services in any manner on Airport property, including but not limited to posting signs, distributing business cards, or affixing an advertising decal or sign to its vehicle.</i>
C67	6.6 Location - Independent Flight Training Operator shall only provide ground school instruction from an Aircraft Rental or Flight Training Operator's facility or in locations designated and approved in writing by the County. The Draft's location requirements state that Independent Flight Training Operators can only provide ground school instruction from an Aircraft Rental or Flight Training Operator's facility or in locations designated and approved in writing by the County. This is considered impractical and outdated, as pilots often meet with their flight instructors at various locations, such as restaurants, for briefings and debriefings.
R67	There is no prohibition on ground school instruction being provided at other off-airport locations – the restriction only applies to on-Airport ground school activities. Comment noted. As such, a change to the document was not made.
C68	6.6 Licenses and Certifications - Independent Flight Training Operator shall be properly certificated by the FAA, current, and hold the appropriate ratings and medical certifications for the aircraft being utilized and/or flight training being provided. Independent Flight Training Operator shall have a COP (as required in Section 3.2 of these Minimum Standards), an approved access agreement, and pay the fees or other charges on time, as specified by the County for engaging in Independent Activities. The Draft's section on Licenses and Certifications states that an Independent Flight Training Operator must be properly certificated by the FAA, current, and hold the appropriate ratings and medical certifications for the aircraft being utilized and/or flight training being provided. Additionally, they must have a Commercial Operator Permit (COP), an approved access agreement, and pay the required fees or charges on time, as specified by the County for engaging in Independent Activities. The question raised is why an independent flight training operator needs to have a commercial operator permit.
R68	All Operators conducting commercial aeronautical activities at the Airport are required to have Commercial Operator Permit (COP) regardless of the activity being conducted. Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.
C69	Aircraft owners and pilots require maintenance and flight instruction in order to operate safely. It's nearly impossible to get either at BFI.
R69	Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.
C70	The minimum standards to become an authorized operator providing maintenance, flight training and aircraft rental are so high as to be practically impossible to qualify

R70	The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.
C71	Regarding SASO Schedule of Services Statement of Concept - An Independent Flight Training Operator is an individual providing flight training to the general public originating from the Airport but does not lease or sublease land or Improvements at the Airport - Needs to be more specific as far as scope. An instructor who travels to provide service at multiple airports should not be bound by the same requirements as an instructor who operates solely out of BFI, even if they do "originate" from the airport occasionally. Also applicable to 3.12 in Supplemental Rules and Regulations for an outside CFI not being able to give a member of a non-commercial flying club instruction unless they are an approved Flight Training Operator.
R71	Section 6.6 has been revised as follows: <i>"An Independent Flight Training Operator is an individual providing flight training to the general public originating from originating at the Airport but does not lease or sublease land or Improvements at the Airport."</i>
C72	Regarding Minimum Standards 6.2 Leased premise requirements for aircraft maintenance operator (6.1) and aircraft rental or flight training operator (6.2): Specific numbers were based on Galvin's operation. There is no need to specify a minimum square footage, rather the leased premise should be of adequate size for the operator to perform the functions necessary to their business while being in compliance with fire code.
R72	Same response as R51: Consistent with Advisory Circular 150-5190-8, Minimum Standards for Commercial Aeronautical Activities, minimum leased premises are deemed appropriate to "promote the orderly development of airport land, and ensure efficiency of operations." The minimum leased premises requirements for the Airport were developed based upon an examination and analysis of the existing facilities at the airport and at other comparable/competitive airports. The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.
C73	Section 4.5 - This section would limit the ability of a small operator to service their own aircraft, especially if the operator doesn't have facilities this large as part of their standard operation (ie RFS) Resolution: Remove this minimum.
R73	Section 4.5 of the draft <i>Minimum Standards</i> applies to entities conducting a commercial aeronautical activity. If the entity elects to conduct self-service Aircraft Maintenance, the hangar requirement applies. The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.
C74	Section 4.12 - Insurance requirements may climb to unavailable levels. Resolution: Add language that specifies insurance shall be commercially available, standard and reasonable.
R74	Insurance requirements are set by the County's Risk Manager and reflect industry best practices and Legal Requirements. Section 4.12 has been revised as follows: In the event insurance coverage is not commercially available, Operator shall notify the County.
C75	Section 5 - FBO's have provided widely inconsistent and lengthy response times for small GA services. The FBO's are granted access to constrained public facilities and are monetarily incentivized to deprioritize small GA customers. Resolution: The RT would like to see this requirement remain and be strengthened by adding reporting requirements, metrics and penalties. This will ensure that operators provide fair and consistent service to all customer types.
R75	Section 5 <i>FBO Schedule of Services; Response Time</i> has been deleted as follows: Fifteen (15) minutes from time of customers' request during required hours, except in circumstances or situations beyond the control of the FBO

C76	Section 6.1- 1. There is currently a severe shortage of maintenance operators and potential large spaces to lease at the airport. 2. Multiple maintenance operators should be encouraged to start-up and compete at the airport. Resolution: Reduce the space requirement to a single T-Hangar. Reducing the barrier of entry will encourage multiple operators to compete at the airport and provide airport users with access to maintenance.
R76	It is deemed necessary to have minimum requirements for leased premises to encourage and ensure a high level of products, services and facilities are available at the Airport and to level the playing field. In addition to not meeting the size requirements, the T-Hangars are not approved for Aircraft Maintenance (due to building and fire codes) and do not provide direct landside access. The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.
C77	Section 6.1 – 1. An operator can't be a <i>Certified Repair Station</i> without a facility first, creating a catch-22 impossible situation. 2. Becoming a <i>Certified Repair Station</i> is a challenging and lengthy process that is unnecessary for safe and FAA compliant maintenance. Resolution: Remove language requiring operator to be a <i>Certified Repair Station</i> . Replace with language requiring that the operator have employees that meet the FAA requirements for the maintenance to be performed. Reducing the barrier of entry will encourage multiple operators to compete at the airport and provide airport users with access to maintenance.
R77	<p>Section 6.1 <i>Aircraft Maintenance Operator (SASO) Licenses and Certification</i> - has been changed as follows: - <i>Operator shall be properly certificated by the FAA as a Repair Station (as defined by 14 CFR Part 145).</i></p> <p><i>Employees</i> - Certification has been changed as follows: <i>Operator shall employ the number of Employees as required by Repair Station Manual. 1 A&P Mechanic and 1 Customer Service Representative (in which an A&P Mechanic may fulfill the responsibilities of the Customer Service Representative) whom must be available during the required hours of activity. If Operator is providing annual or phase inspections, one A&P Mechanic shall have Inspection Authorization.</i></p> <p><i>Equipment</i> – has been changed as follows: <i>Operator shall have necessary Equipment for the performance of services being provided in accordance with the manufacturer's specifications and as defined by 14 CFR Part 145.</i></p>
C78	Section 6.2 – 1. Ground school is typically provided in an online training environment. 2. There is a severe lack of potential spaces to lease. 3. Providing ground school in-person is of limited value to the public and requires the use of valuable on-airport space. Resolution: Remove this requirement. Reducing the barrier of entry will encourage multiple operators to compete at the airport and provide airport users with access to flight instruction while reducing the constraints on space availability.
R78	<p>Consistent with the purpose of the Minimum Standards being to encourage and promote the consistent provision of high quality Commercial Aeronautical Activities at the Airport, it is deemed necessary for Flight Training Operators to have a properly certificated instructor capable of providing on-demand ground school instruction.</p> <p>Same response as R67: There is no prohibition on ground school instruction being provided at other off-airport locations – the restriction only applies to on-Airport ground school activities. Comment noted. As such, a change to the document was not made.</p>
C79	Section 6.2 – Staffing levels, aircraft availability and business hours should be at the business owners discretion in order to offer the best value to customers depending on the size and operational specifics of the business. Resolution: Remove this section.

R79	Setting forth minimum aircraft availability and business hours is deemed necessary as it is the purpose of Minimum Standards to encourage and promote the consistent provision of high quality Commercial Aeronautical Activities at the Airport and consistent with the guidance outlined in Advisory Circular 150/5190-8. As such, a change to the document was not made.
C80	Section 6.6 – 1. The airport should not be involved with how a business advertises. 2. This limitation provides an unfair advantage on other businesses. Resolution: So long as advertising isn't placed directly on County property and is not disruptive to operations, it should be allowed.
R80	Same response as R66: Section 6.6 <i>Limitations</i> (Bullet 3) has been deleted as follows: <i>Independent Flight Training Operators are prohibited from advertising services in any manner on Airport property, including but not limited to posting signs, distributing business cards, or affixing an advertising decal or sign to its vehicle.</i>
C81	Section 6.7 – It is unclear how this differs from a commercial flight school or aircraft rental operator. Resolution: Provide additional detail in the statement of concept to differentiate it from other categories.
R81	Same response as R40: Consistent with King County Code Title 15.12.120 Section D., Section 6.7 <i>Commercial Flying Club</i> has been deleted in its entirety.
C82	Section 6.7 “Floor space requirements will be determined by the County” This is the only category with undefined floor space requirements. Resolution: Remove floor space requirements.
R82	Same response as R40: Consistent with King County Code Title 15.12.120 Section D., Section 6.7 <i>Commercial Flying Club</i> has been deleted in its entirety.

<p>C83</p>	<p>Section 6.6. Independent Flight Training Operator (SASO) notes that: A person holding a current FAA Flight Instructor certificate who provides occasional flight training to an Aircraft Owner in the Aircraft Owner's aircraft and is not compensated by the Aircraft Owner or any other party and does not make flight training available to the public, shall not be deemed a Commercial Activity. (p. 26).</p> <p>This limitation seems odd, and it's contrary to the FAA and industry/insurance initiatives that encourage ongoing training beyond the requirements for flight review and IPCs. See, for example, the introduction to the Wings Program on the FAA website:</p> <p>The WINGS - Pilot Proficiency Program is based on the premise that pilots who maintain currency and proficiency in the basics of flight will enjoy a safer and more stress-free flying experience.</p> <p>You select (in your Airman Profile) the category and class of aircraft in which you wish to receive training and in which you wish to demonstrate your flight proficiency. Requirements for each aircraft category and class include specific subjects and flight maneuvers. To ensure you receive a well-rounded learning experience, only certain flight activities fulfill specific credit requirements. More information about how these subject areas are selected is available on your MY WINGS page.</p> <p>The program encourages an on-going training program that provides you an opportunity to fly on a regular basis with an authorized flight instructor. The program is most effective if the training is accomplished regularly throughout the year, thus affording you the opportunity to fly in different seasons and in different flight conditions.</p> <p>This is also an issue for owners who seek (or because of insurance requirements) require type-specific training, annual flight reviews, IPCs, etc. Owner groups such as the American Bonanza Society, Piper M-Class Owners & Pilots Association (PMOPA), and Cirrus Owners and Pilots Association (COPA) have networks of recognized/approved CFIs to provide such training. Many flight schools don't have instructors with the experience or standardized training curricula to offer such training.</p> <p>If a CFI isn't holding out to the public, but is just providing dual instruction for an owner whose aircraft is based at KBFI, why should the airport maintain that the instructor cannot be compensated—even by the owner?</p>
<p>R83</p>	<p>Same response as R43: This section illustrates that if a Flight Instructor is not compensated and does not make the training available to the public, then it is not deemed a Commercial Activity and thus not bound by the requirements of this section. Entities desiring to be compensated for flight instruction shall comply with Section 6.2 or Section 6.6 of the draft <i>Minimum Standards</i>.</p> <p>The fourth paragraph of Section 1. <i>Preamble</i> states as follows: <i>This document establishes Minimum Standards for all entities engaging in Commercial Aeronautical Activities at the Airport.</i> An independent flight training operator receiving compensation for services rendered is considered a commercial aeronautical operator subject to Section 6.6 <i>Independent Flight Training Operator (SASO)</i>. As such, a change to the document was not made.</p>

C84	<p>The section about unleaded aviation fuel (see p. 16) is also potentially problematic. Aviation Fuels and Lubricants says:</p> <p>...For piston aircraft and shall comply with the quality specifications outlined in ASTM D 1910 as amended. FBO shall fully transition to unleaded aviation gasoline within 12 calendar months of ASTM certification.</p> <p>First, the reference to <i>ASTM D 1910</i> seems to be a typo. That's the spec for Methods of Test for Construction Characteristics of Woven Fabrics (Withdrawn 1981), at least according to a Google search. That reference probably should be ASTM D910, although that is Standard Specification for Leaded Aviation Gasolines.</p> <p>At any rate, the language cited above would seem to prohibit FBOs from providing GAMI's G100UL should it become available in the PNW. GAMI has, for its own reasons, chosen not to pursue ASTM certification, but as you know, it has been approved for all spark-ignition piston engines via an FAA STC. As far as I know, G100UL is the only unleaded fuel that has proven fully fungible with 100LL, and at present, it's the only unleaded fuel usable in high-compression engines.</p>
R84	<p>The table in question has been changed as follows: “<i>For piston aircraft and shall comply with the quality specifications outlined in ASTM D 1910 ASTM D 910 as amended.</i>”</p> <p>The requirements do not preclude an operator from providing other fuels. As stated in the Preamble, “<i>a current or prospective Lessee may exceed these Minimum Standards...</i>”. The minimum requirement is to comply with ASTM D 910. In addition, Section 5 has been revised as follows:</p> <p>“<i>FBO shall have available (directly or through agreement – a copy of which must be provided to the Airport Director) fully transition to unleaded aviation gasoline within 12 calendar months of ASTM certification FAA Fleet Authorization.</i>”</p>
C85	<p>A pilot needs to be free to choose the instructor of their choice. We recommend the removal of the requirement for independent flight instructors to be approved by the airport. If an instructor is qualified by the FAA, then there should be no need for the airport to approve or disapprove. This is an added barrier to getting access to training.</p>
R85	<p>Section 2.2 Purpose of the draft <i>Minimum Standards</i> includes “<i>the consistent provision of high quality Commercial Aeronautical Activities at the Airport.</i>” Consistent with Advisory Circular 150/5190-8 which includes an objective to “protect airport users from unlicensed and unauthorized products and services”, it is reasonable and appropriate for KCIA to require all commercial aeronautical activities be conducted under a Commercial Operator Permit (COP) as outlined in R68. As such, a change to the document was not made.</p>
C86	<p>An independent instructor should not be required to provide proof of insurance nor should the instructor be required to have their insurance policy name the airport as an additional insured. If a plane is based at the airport, they are already required to name the airport on their insurance policy. This provides responsible protection for the airport. Requiring the instructor to register, contact their insurance company, get the airport named and provide proof of insurance to the airport is unnecessary and overburdensome.</p>
R86	<p>Insurance requirements are set by the County’s Risk Manager and reflect industry best practices, as well as being consistent with Advisory Circular 150/5190-8. Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p>

C87	<p>The section about unleaded aviation fuel (see p. 16) is also potentially problematic. Aviation Fuels and Lubricants says:</p> <p>...For piston aircraft and shall comply with the quality specifications outlined in ASTM D 1910 as amended. FBO shall fully transition to unleaded aviation gasoline within 12 calendar months of ASTM certification.</p> <p>First, the reference to <i>ASTM D 1910</i> seems to be a typo. That's the spec for Methods of Test for Construction Characteristics of Woven Fabrics (Withdrawn 1981), at least according to a Google search. That reference probably should be ASTM D910, although that is Standard Specification for Leaded Aviation Gasolines.</p> <p>At any rate, the language cited above would seem to prohibit FBOs from providing GAMI's G100UL should it become available in the PNW. GAMI has, for its own reasons, chosen not to pursue ASTM certification, but as you know, it has been approved for all spark-ignition piston engines via an FAA STC. As far as I know, G100UL is the only unleaded fuel that has proven fully fungible with 100LL, and at present, it's the only unleaded fuel usable in high-compression engines.</p>
R87	<p>Same response as R84: The table in question has been changed as follows: “<i>For piston aircraft and shall comply with the quality specifications outlined in ASTM D 1910 ASTM D 910 as amended.</i>”</p> <p>The requirements do not preclude an operator from providing other fuels. As stated in the Preamble, “<i>a current or prospective Lessee may exceed these Minimum Standards...</i>”. The minimum requirement is to comply with ASTM D 910. In addition, Section 5 has been revised as follows:</p> <p>“<i>FBO shall have available (directly or through agreement – a copy of which must be provided to the Airport Director) fully transition to unleaded aviation gasoline within 12 calendar months of ASTM certification FAA Fleet Authorization.</i>”</p>
C88	<p>One area where we disagree with the recommendations of the subcommittee are the proposed requirement that FBOs provide fueling service within fifteen minutes of a customer's request during required hours (Section 5, Pg. 16). While we find it important for FBOs to provide timely fueling service, this proposed standard is overly restrictive and unrealistic in the context of an airport environment. Furthermore, we disagree with the subcommittee's recommendation that there be penalties for delays in delivery of fuel. We respectfully request that the service window be extended to at least thirty minutes and that punitive measures not be considered. It would also be beneficial to inform customers when they request fuel where they are in the queue and an ETA for the trip.</p>
R88	<p>Same response as R75: Section 5 <i>FBO Schedule of Services; Response Time</i> has been deleted as follows: <i>Fifteen (15) minutes from time of customers' request during required hours, except in circumstances or situations beyond the control of the FBO</i></p>
C89	<p>While it does not appear to be specified in the proposed MSARR's, self-serve fuel needs to be allowed and encouraged. Currently KCIA has the highest priced fuel in the region. Self-serve fuel generally lowers the cost by \$1.00 per gallon. It could be owned and operated by either an FBO or independent operator.</p>

R89	<p>Commercial aeronautical activity is regulated through the Airport's <i>Supplemental Rules and Regulations</i> and <i>Minimum Standards</i>. Independent Flight Training and Independent Maintenance Operators are governed by the draft <i>Minimum Standards</i> due to the commercial nature of their business.</p> <p>Commercial fueling is only permitted by an approved FBO consistent with the draft <i>Minimum Standards</i>. A self-serve fuel island, while not a required activity of an FBO, is not a prohibited activity. Comment noted. No specific alternative language or deletions provided. As such, a change to the documents was not made.</p>
C90	<p>I was unable to find the section in the Draft Minimum Standards which allows the Airport Director to provide a deviation to an existing minimum standard at his own discretion with no checks and balances provided.</p> <p>This process needs to be defined in the Minimum Standards, needs to be transparent, needs to provide the reason the Airport Director did not follow the Minimum Standards and it all need to be provided visually to all airport uses so they can see it 24 hours a day, 7 days a week, and 365 days a year.</p> <p>Recently a deviation was provided by the Airport Director allowing Rainier Aviation Services to obtain a hangar and 12 tie down spaces at KCIA with people on waitlists for tie downs and hangars.</p> <p>Additionally, the Airport Director placed Rainier Flying Service on the West side of the airport after creating these tie downs knowing NE Parking will be vacated do to FAA requirements due to Runway Protection Zone.</p> <p>There are no guarantees for the aircraft at NE parking to be placed anywhere else on the airport and this means the airplanes at NE parking would have to leave KCIA when they were at KCIA before Rainier Flight Services and I believe this is not right and discriminating.</p> <p>The ties downs on the West Side of the Airport should have been provided to Alternate Air and Alki Air first before they were provided to Rainier Flight Service who already has business at Tacoma, Everett, and Auburn.</p> <p>I would like to see the KCIA make an agreement in writing that Alternate Air and Alki Air will be the ones staying at KCIA if there are no tie downs to move to and Ranier Flying Services will relocate their aircraft to the other airports they serve.</p> <p>Transparency protects everyone at the airport.</p> <p>Additionally, AMCG tried to create an industry standard at KCIA using other airports when the AC 150/5190 says the min standards should be tailored to each airport. Can you get this changed please/</p>
R90	<p>Section 2.7. <i>Applicability</i> provides a method to deviate from the Minimum Standards as follows: <i>Unless provided for herein or within an Agreement, no entity shall be allowed to engage in Commercial Aeronautical Activities at the Airport under conditions that do not comply with these Minimum Standards, unless an exemption or variance has been approved in writing by the County consistent with Section 1.20 of the Rules and Regulations.</i></p> <p>Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p>

<p>C91</p>	<p>6.7. Commercial Flying Club page 33</p> <p>Current</p> <p>1. Operator shall lease from the County or FBO an area of sufficient size, shape, and location as mutually agreed upon on which shall be erected a building providing sufficient space for Operator's activities and operations. Floor space requirements will be determined by the County. Operator shall provide sufficient vehicle parking space to accommodate employees and customers parking with no on-street parking. Paved walkways with all points of access conforming to the criteria specified in the Americans with Disabilities Act (ADA) as required by the act will be provided by the Operator. Adequate hard surfaced aircraft ramp must be provided within the leased premises, sufficient to accommodate Operator's activities, operations, and adequate tiedown facilities. If Operator utilizes existing facilities, which may not meet the minimum sizes outlined in this section, the minimum square footage requirements may be determined by the availability of facilities and through written Agreement with the County</p> <p>Proposed</p> <p>1. Club operator shall lease from the County tie downs, hangars, office space, or other space as mutually agreed upon for Club's activities and operations. Club member parking will be on King County International Airport (KCIA) property outside of gate if Club member does not meet Tenant requirements to park inside the gate. Parking inside the gate is a privilege not a right and must be complied with at all times. Tenant requirements to park inside the gate currently include proof of auto insurance, proof that your auto insurance meets KCIA liability requirements, placing KCIA as one of the insured on your auto insurance policy, initial and annual training, driver's license copy submitted to KCIA, KCIA approval. Tenant Requirements to park inside the gate are determined by KCIA and need to be complied with when changed. Club members who park inside the gate may only drive from the gate entered to the club designated parking area and must drive back out to leave the club designated parking area on the same route entered in the opposite direction and thru the same gate entered to exit. Club members must wait for the gate to close completely behind them when entering or exiting gate to ensure security is maintained at KCIA at all times. If you are unsure about driving inside the gate at any time, park outside the gate and walk in. Contact the Club for questions regarding parking or gate not operating. If gate is inoperable, if you have an emergency, or if you have any questions contact Airport Operations or KCIA Police. Contact numbers for Airport Operations and KCIA Police are on the back your gate badge or posted on gate entering.</p>
<p>R91</p>	<p>Same response as R40: Consistent with King County Code Title 15.12.120 Section 6.7 <i>Commercial Flying Club</i> has been deleted in its entirety.</p>

C92	<p>Current</p> <p>2. Operator shall have available for use in its service, either owned or under written lease to the operator, one (1) certificated and currently airworthy aircraft. If the operator conducts flight training, it shall have in its employ or as members, sufficient flight instructors who have been properly certificated by the FAA. The operator shall have its premises open and available to meet public demand of its services at least eight (8) hours a day, five (5) days a week. Operator shall have an employee in the facility office or readily on call at all times during the required hours of activity. The operator may engage in the maintenance of only those aircraft either owned or under written lease.</p> <p>Proposed</p> <p>2. Club operator shall have available for use in its service, either owned or under written lease to the Club, one (1) certificated and currently airworthy aircraft. If the Club conducts flight training, it shall have sufficient flight instructors who have been properly certificated by the FAA. Club operator shall have its premises open and available to meet Club membership demand at all times. Club operator shall have a member at the Club Designated Area or readily on call at all times. Club operator may engage in the maintenance of only those aircraft either owned or under written lease as specified by the FAA.</p>
R92	Same response as R40: Consistent with King County Code Title 15.12.120 Section D., Section 6.7 <i>Commercial Flying Club</i> has been deleted in its entirety.
C93	<p>Current</p> <p>3. Operator shall provide certificates of insurance and endorsements evidencing all required coverage as specified in Club's Agreement.</p> <p>Proposed</p> <p>3. Club operator shall provide certificates of insurance and endorsements evidencing all required coverage as specified in Club's Agreement.</p>
R93	Same response as R40: Consistent with King County Code Title 15.12.120 Section D., Section 6.7 <i>Commercial Flying Club</i> has been deleted in its entirety.
C94	The airport has got trapped into controlling all things with maintenance and flight training by attaching the word commercial to them and creating excessive and onerous restrictions and requirements. Now, with the loss of Galvin, it is time to rethink commercial requirements that are practical and affordable. An airport as important as BFI not to have general aviation maintenance and flight training is very wrong. There needs to be small commercial category that allows individuals to perform light maintenance and flight training. This of upmost importance to the viability of general aviation at BFI and needs to be addressed while Minimum Standards are being rewritten. We all know that every inch of Boeing Field could be controlled directly or indirectly by the Seattle billionaires. It is important that general aviation remains and flourishes at Boeing Airport.
R94	It is important to note Section 6.5 (Independent Aircraft Maintenance Operator) and Section 6.6 (Independent Flight Training Operator) pertain to Independent Operators which are defined in the draft Supplemental Rules and Regulations as "an entity offering aeronautical service(s) but without an established place of business on the Airport." Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.
C95	<p>Issue: FBO's have provided widely inconstant and lengthy response times to AVGAS deliveries. The FBO's are incentivized to deprioritize small fuel orders.</p> <p>Resolution: The RT would like to see this requirement remain and be strengthened by adding reporting requirements and penalties.</p>
R95	Same response as R75: Section 5 <i>FBO Schedule of Services</i> ; <i>Response Time</i> has been deleted as follows: <i>Fifteen (15) minutes from time of customers' request during required hours, except in circumstances or situations beyond the control of the FBO</i>

C96	<p>Section 5. Response Time - This isn't always possible due to customers location on the airfield. Just driving from midfield parking to NE parking would take 15 minutes. Who would track the reporting and at what cost to do this? Who collects penalties? Are customers willing to pay more for fuel to offset the costs of additional trucks and employees?</p> <p>All customers are serviced equally as orders come in. The only exception is Airlift NW because they perform life critical services.</p>
R96	<p>Same response as R75: Section 5 <i>FBO Schedule of Services</i>; <i>Response Time</i> has been deleted as follows: <i>Fifteen (15) minutes from time of customers' request during required hours, except in circumstances or situations beyond the control of the FBO</i></p>
C97	<p>Issue: 1. There is currently a severe shortage of Aircraft Rental and Flight Instruction Operators. There is currently a severe shortage of potential spaces available to lease. 3. An operator does not need to offer this level of service to bring value to the public.</p> <p>Resolution: Remove the leased space minimum requirements in order to attract new operators and foster competition.</p>
R97	<p>Same response as R51: Consistent with Advisory Circular 150-5190-8, Minimum Standards for Commercial Aeronautical Activities, minimum leased premises are deemed appropriate to "promote the orderly development of airport land, and ensure efficiency of operations." The minimum leased premises requirements for the Airport were developed based upon an examination and analysis of the existing facilities at the airport and at other comparable/competitive airports. The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.</p> <p>Same response as R94: It is important to note Section 6.5 (Independent Aircraft Maintenance Operator) and Section 6.6 (Independent Flight Training Operator) pertain to Independent Operators which are defined in the draft Supplemental Rules and Regulations as "an entity offering aeronautical service(s) but without an established place of business on the Airport." Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p>
C98	Any construction of new fuel farms should be for avgas only
R98	Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.
C99	<p>I am strongly in favor of all of the comments (dated 1/13/25) to the KCIA Minimum Standards document made by the KCIA Roundtable. KCIA is at risk of becoming an airfield that caters only to very wealthy people- one look at the mega-hangars built by the many centi-billionaires who keep their fleets of aircraft at KCIA supports this view. If KCIA does not reverse the trends that have made it increasingly unfriendly to small GA owners and pilots, the community at large could reasonably wonder why a county resource appears to be primarily for the ultra-wealthy.</p> <p>I am in no way against owners and users of private aircraft- I own and fly a Cessna 185 as well as manage and operate three, soon to be four, Pilatus aircraft, all which reside at KCIA when not in use. My primary concern is that KCIA remains a thriving and important resource for all GA pilots, owners and users. Many communities across the U.S. have lost their GA airports due to agitation by small but highly organized anti-GA groups, and I think the best defense against such actors is to ensure that KCIA remains a great and easily accessible resource for all GA users, both large and small. Adoption of the KCIA Roundtable's comments to the Minimum Standards document would be an excellent step in this direction. Again, I am strongly in favor of all of the comments (dated 1/13/25) to the KCIA Minimum Standards document made by the KCIA Roundtable. Thank you for your consideration.</p>
R99	Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.

<p>C100</p>	<p>I am writing to express a few concerns regarding the proposed minimum standards update and an associated recommendation from the Airport Roundtable Advisory Committee at King County International Airport (KCIA). While we support measures that enhance safety, efficiency, and service quality, a few concepts being proposed present operational challenges and impose unreasonable burdens on Fixed Base Operators (FBOs) such as Signature Aviation.</p> <p>One area of concern is the proposed requirement that FBOs provide services within fifteen minutes of a customer's request during required hours (Section 5, Pg. 16). While we strive to provide timely service, this proposed standard is overly restrictive and unrealistic in the context of an airport environment. A fifteen-minute response window does not allow adequate time for our staff to respond safely and efficiently, particularly given the dynamic nature of airport operations. Considering that King County International Airport spans approximately 634 acres, with multiple operational zones and potential obstacles such as taxiing aircraft and ground traffic, consistently delivering fuel service within such a narrow timeframe would be logistically unfeasible and unsafe. Furthermore, the Roundtable's suggestion of imposing penalties for non-compliance adds an undue burden and could exacerbate operational challenges. We respectfully request that the service window be extended to at least thirty minutes and that punitive measures not be considered.</p> <p>Another concern is the requirement for FBOs to provide courtesy transportation for passengers, crews, and baggage within twenty miles of the airport (Section 5, Pg. 17). Signature Aviation already offers concierge services that include coordinating transportation through established partnerships with limousine, shuttle, and rental car providers. Expanding this requirement would necessitate hiring additional personnel and acquiring vehicles, creating a financial strain and operational inefficiencies, all while operating at KCIA is already relatively expensive in comparison to other airports in the region. This duplication of services is unnecessary and would place an undue burden on our operations. Signature is already incentivized to meet the unique needs of each of its customer on an individual basis without an adopted standard by KCIA. We urge for this section to be removed from the proposed standards.</p> <p>Finally, the proposal to require a minimum of 500 square feet of leased space for line and customer service activities poses an additional challenge (Section 5, Pg. 18). Signature Aviation currently provides sufficient space for these activities, tailored to meet the needs of our team members. Requiring additional space would necessitate significant investment in construction or leasing without any clear benefit to service quality. This requirement is both unnecessary and financially burdensome, and we ask that it be reconsidered.</p> <p>Signature Aviation remains committed to providing exceptional service to the King County community while ensuring safety and operational efficiency. We respectfully request you carefully review our concerns and consider adjustments to the proposed standards to ensure they are equitable and practical for all stakeholders.</p> <p>Thank you for your attention to this matter. We would welcome the opportunity to discuss these concerns further and work collaboratively to develop standards that are both effective and reasonable.</p>
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R100	<p>Same response as R75: Section 5 <i>FBO Schedule of Services</i>; <i>Response Time</i> has been deleted as follows: <i>Fifteen (15) minutes from time of customers' request during required hours, except in circumstances or situations beyond the control of the FBO</i></p> <p>The draft Minimum Standards under consideration are not applicable to an existing operator with an existing agreement as discussed in Section 3.3.</p> <p>Section 5 <i>FBO Schedule of Services</i>; <i>Courtesy transportation</i> has been changed as follows: <i>For passengers, crews, and baggage within 20 miles of the Airport</i> to Rental cars available for passengers and crews</p> <p>The <i>Line/customer service area</i> notes have been changed as follows: Shall include adequate space for line/customer service work areas and storage. Space requirement may be adjusted based upon physical limitations of existing leasehold premises.</p>
C101	<p>I am strongly in favor of all of the comments (dated 1/13/25) to the KCIA Minimum Standards document made by the KCIA Roundtable. KCIA is at risk of becoming known as an airfield that caters only to very wealthy people- one look at the mega-hangars built by the many centi-billionaires who keep their fleets of aircraft at KCIA supports this view. If KCIA does not reverse the trends that have made it increasingly unfriendly to small GA owners and pilots, the community at large could reasonably wonder why a county resource appears to be primarily for the ultra-wealthy.</p> <p>For clarity, I am in no way against owners and users of private jet aircraft- I own and fly a Cirrus SR22 and also have a part interest in a Citation X, both of which reside at KCIA when not in use. My primary concern is that KCIA remain a thriving and important resource for all GA pilots, owners and users. Many communities across the U.S. have lost their GA airports due to agitation by small but highly organized anti-GA groups, and I think the best defense against such actors is to ensure that KCIA remains a great and easily accessible resource for all GA users, both large and small. Adoption of the KCIA Roundtable's comments to the Minimum Standards document would be an excellent step in this direction.</p>
R101	<p>Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p>

C102	<p>I am reaching out as a pilot, an apprentice to a certified mechanic and inspector for general aviation aircraft, and a tenant at Boeing Field, where I house a small two-seater aircraft for my commercial pilot training.</p> <p>King County has recently proposed updates to the airport’s “minimum standards” of operation, and the changes are troubling. These new standards would make it nearly impossible for small training and maintenance operations to continue, endangering the safety of flights, reducing access to essential training, encouraging monopolized business practices, and even contravening federal guidelines tied to the funding that keeps Boeing Field operational.</p> <p>To provide context:</p> <p>I work with Southend Aviation, a small, operation led by Stan Kosko, an exceptional engineer and mechanic who has maintained aircraft at Boeing Field since the 1980s. Stan has kept thousands of aircraft airworthy with his expertise and dedication—an invaluable resource for the aviation community. Over the past four years, I’ve had the privilege of learning from Stan, gaining practical skills that no school could match. Together, we conduct inspections, repairs, and emergency assistance for aircraft, ensuring safety and treating every task with pride and precision.</p> <p>Southend Aviation operates from a single 1,800-square-foot hangar near the Museum of Flight, where space is tight but manageable. However, King County has now informed Stan that he can no longer conduct his operation from this space, citing the new minimum standards. These standards would require him to have a 6,000-square-foot facility with outdoor aircraft parking, a customer lounge, and a restroom—an unrealistic demand given Boeing Field’s layout and the lack of available spaces. This stipulation will effectively force Stan out of business, especially since the county has withheld his key card, leaving him dependent on customers and myself for access despite having paid over \$75,000 in rent and tie-down fees.</p> <p>The proposed changes don’t just affect maintenance operators. Independent flight instructors, like John LaPorta, who has tens of thousands of flight training hours, are also at risk. John’s independent instruction has trained countless pilots, many of whom now serve on commercial airlines. Yet, under these new standards, flight instructors would also be required to secure large facilities for their operations, even though modern flight training is primarily self-paced and computer-based, with little need for classroom space. These requirements would force John and other independent instructors off the field, leaving a single flight training operator and creating a monopoly.</p> <p>Boeing Field and Seattle are historically significant in the aviation world. Rather than stifling innovation and independent business, we should be supporting it. Boeing Field receives federal funding to sustain general aviation, yet these new standards undermine that goal. Independent operators like Stan and John are essential to meet the growing demand for flight training and maintenance services, and Boeing Field is already at capacity with large operators.</p> <p>I would welcome the opportunity to discuss this further. These standards have a profound impact on my life and on the lives of others dedicated to aviation at Boeing Field. I urge you to consider the broader implications of these proposed changes.</p> <p>For more information see proposed Minimum Standards Document (pages 26, 27, 31, 33, 35).</p> <p>Thank you for your time and consideration.</p>
R102	<p>Same response as R94: It is important to note Section 6.5 (Independent Aircraft Maintenance Operator) and Section 6.6 (Independent Flight Training Operator) pertain to Independent Operators which are defined in the draft Supplemental Rules and Regulations as “an entity offering aeronautical service(s) but without an established place of business on the Airport.” Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p>

C103	As an independent operator, I am concerned that limiting the ability of independent flight instructors and licensed mechanics to earn a living might not align with our shared goal of aviation safety. Providing local pilots with diverse options for flight instruction and maintenance is crucial. Could you please explain how preventing the compensation of independent aviation professionals benefits our flying community?
R103	Same response as R39: Section 6.6 does not prohibit pilots from hiring an instructor via the use of compensation. This section illustrates that if a Flight Instructor is not compensated and does not make the training available to the public, then it is not deemed a Commercial Activity and thus not bound by the requirements of this section. Entities desiring to be compensated for flight instruction shall comply with Section 6.2 of the draft <i>Minimum Standards</i> . Additionally, Section 6.6 <i>Limitations</i> (Bullet 2) remains in place as the County has the right to establish reasonable and not unjustly discriminatory requirements for commercial operators. Prohibiting Independent Flight Instructors from utilizing their own aircraft for flight training purposes is a reasonable and not unjustly discriminatory requirement that ensures a level playing field. As such, a change is not deemed necessary.
C104	<p>Good day,</p> <p>I appreciate the opportunity to make comments regarding the Draft Minimum Standards and would like to address two concerns regarding access by certain Specialized Aviation Service Operators.</p> <p>As Section 6.5, Independent Aircraft Maintenance Operator (SASO), is currently written, I am concerned that maintenance providers such as Gulfstream Field and Airborne Support Teams (FAST), Bombardier Mobile Response Team, Textron 1Call, and others (hereafter described as “AOG service providers”) could be restricted from providing maintenance actions for based and transient aircraft at Boeing Field.</p> <p>The AOG service providers listed above, and other like them, provide much needed maintenance activities for complex aircraft that require specialized training and certification that may not be available through Airport, based, maintenance providers. In some cases, the aircraft needing support from these types of providers may be in an Aircraft On Ground (AOG) situation which precludes them from departing Boeing Field to an airport where the necessary maintenance can be completed.</p> <p>In addition to limiting access to the Airport by AOG service providers, the requirements to conduct the maintenance activities only at an “Aircraft Maintenance Operator facility” is too limiting. Aircraft operators may have their own hangar facilities, or connections with other Operators with hangar facilities that they are willing to “lend out” for such work. This lending of space is in line with the best traditions of aviation.</p> <p>When an aircraft is AOG, even competing aircraft operators are willing to lend space, transfer ownership of parts, lend tools, and otherwise support the return the aircraft to service as quickly as possible. As written, Section 6.5 may impede this support.</p> <p>Further, these types of activities currently co-exist with Airport based maintenance providers, and as such, access to the Airport by AOG service providers should not interfere with the ability of Airport based maintenance providers to continue to provide their services to based and transient aircraft.</p> <p>I request that language be added to Section 6.5 of the Minimum Standards to specifically allow access to the Airport by AOG service providers, and to allow the use of any appropriate hangar or ramp space to complete the repairs. Further, that the AOG service provider shall be exempt from the leased premises requirements of Section 6.1.</p>

R104	Same response as R32: AOG services providers are permitted to conduct approved service at the Airport in conformance with Section 6.5. Independent Aircraft Maintenance Operator (SASO). As such, a change to the document was not made.
C105	<p>As Section 6.6, Independent Flight Training Operator (SASO), is currently written, I am concerned that flight training such as Upset Prevention and Recovery Training (UPRT), helicopter long-line training, and other specialized training may be negatively impacted.</p> <p>Training for these types of activities requires instructors with a specific, specialized, set of skills that often is not available at Airport based flight instruction facilities. The training may not necessarily take place at the Airport, but flights for specialized flight training could originate or terminate at the Airport.</p> <p>Specialized flight training may occur in the tenant's own aircraft, or an aircraft provided by the instructor as appropriate. For example, Upset Prevention and Recovery Training requires an aircraft that can operate in unusual attitudes for extended periods of time, and the use of the tenant's aircraft may not be permitted by virtue of the tenant aircraft's operating limitations, or insurance requirements.</p> <p>It is possible that the Independent Flight Training Operator may provide the aircraft, and it could be temporarily stored at a tenant's hangar during the training period.</p> <p>Allowing specialized flight training to originate at Boeing Field does not impede the ability of Airport based flight training providers to continue to provide routine, standardized, training for students seeking Private, Commercial, Instrument, Certified Flight Instructor, or Airline Transport Pilot certificates.</p> <p>It is fully expected that any fuel required for such aircraft would continue to be purchased through Airport based Fixed Based Operators. Therefore, the temporary storage of aircraft for such specialized training results in a de minimus loss of revenue to Fixed Based Operators due to loss of parking or hangaring of such aircraft.</p> <p>I request that language be added to Section 6.6 of the Minimum Standards to specifically allow for specialized flight training flights to originate or terminate at the Airport, that such flights be conducted by pilots not necessarily employed by Airport based flight training providers, and that aircraft to be used for specialized flight training may be temporarily stored at a tenant's ramp and/or hangar. Further, that the specialized flight training service provider shall be exempt from the leased premises requirements of Section 6.1, and the Location requirements of Section 6.6.</p>
R105	<p>Authorized Independent Flight Training Operators are permitted to originate/terminate flight training activity at the Airport.</p> <p>Same response as R49: Section 6.6 <i>Limitations</i> (Bullet 2) remains in place as the County has the right to establish reasonable and not unjustly discriminatory requirements for commercial operators. Prohibiting Independent Flight Instructors from utilizing their own aircraft for flight training purposes is a reasonable and not unjustly discriminatory requirement that ensures a level playing field. As such, a change is not deemed necessary.</p>
C106	This is ruining general aviation, and it is clear that KCIA is only interested in catering to the Bezos et al of the world. And even he gave you and the city the cold shoulder and left for South Florida. So who is your clientele? The occasional multimillionaire/billionaire who might come visit transiently, or the thousands of pilots within King County who are looking for places to train, fly, and rent hangar space from to store their personal aircraft. You have the opportunity to do the right thing here and *lower* the requirements and make aviation more accessible. You are choosing to do the opposite.

R106	Consistent with Advisory Circular 150/5190-8 Minimum Standards for Commercial Aeronautical Activities, “The FAA objective in recommending the development of minimum standards serves to promote safety in all airport activities, protect airport users from unlicensed and unauthorized products and services, maintain and enhance the availability of adequate services for all airport users, promote the orderly development of airport land, and ensure efficiency of operations.” The Airport has deemed the development of Minimum Standards necessary to assist in achieving this objective. Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.
C107	Requirements for Specialized Aeronautical Service Operators (SASOs) should be amended to provide a reasonable pathway for airport users to utilize the services of independent aircraft mechanics and independent flight instructors. Feedback from the airport users regarding their demand for these services will help the KCIA understand why they are needed.
R107	The purpose of the Minimum Standards, consistent with Advisory Circular 150/5190-8 Minimum Standards for Commercial Aeronautical Activities, is to encourage and promote the consistent provision of high quality Commercial Aeronautical Activities at the Airport. It is important to note that independent aircraft maintenance operators and independent flight training operators operate at the Airport as a privilege, and not a requirement. Advisory Circular 150/5190-8 Minimum Standards for Commercial Aeronautical Activities states, “If individual operators are to be allowed to perform a single-service aeronautical activity on the airport (aircraft washing, maintenance, etc.), the airport sponsor should have a licensing or permitting process in place that provides a level of regulation and compensation satisfactory to the airport.” The requirement for land has been removed and the minimum hangar size throughout Section 6 has been revised from 6,400 square feet to 2,520 square feet.
C108	<p>Something has gone horribly wrong at KCIA with the loss of Galvin flight training and maintenance. There is no longer a significant flight school at the airport.</p> <p>More importantly to me personally, we no longer have a maintenance facility to work on GA airplanes. Simple things like oil changes and seal replacements now require a flight to another airport, something that may not even be possible depending on the issue. For example, I have a small oil leak. Is it a big deal? Is the plane safe to fly? I have no idea and with Galvin gone I no longer have a reasonably priced (still expensive but not horrific) mechanic to do the evaluation. It's also unclear in the regulations if an external mechanic can come to the field, and even so, is not a solution for those in tie-downs (at least those with hangars would have a reasonable place for a mechanic to work).</p> <p>In reading the standards, KCIA should be supporting businesses that want to supply these services. I believe that it is important that KCIA understand why these services are no longer provided and move towards standards which encourage these businesses so that KCIA can continue to be an airport that supports general aviation.</p>
R108	Same response as R94: It is important to note Section 6.5 (Independent Aircraft Maintenance Operator) and Section 6.6 (Independent Flight Training Operator) pertain to Independent Operators which are defined in the draft Supplemental Rules and Regulations as “an entity offering aeronautical service(s) but without an established place of business on the Airport.” Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.

C109	Regarding limitations on independent instruction, I urge KCIA to eliminate language that restricts or controls independent instruction at KBFI. Not all instructors operate as schools or as a primary business, nor do they have lease arrangements or fixed operations. 1. Students at all levels need options, especially those with owner-provided aircraft, tailwheel, and for advanced ratings (instrument, CFI, CFII). I'm a CFI who specializes in low-wing pipers, backcountry, and tailwheel. 2. Pilots need ready access to CFIs who can cater to their style of flying, be it flight reviews, proficiency, or unusual hours. See FAA AC 61-98B for applicability of flight reviews. 3. Resident and lifetime pilots want long-term relationships with instructors, not transactions. 4. We need people who inspire, promote, and develop safe aviation as KCIA. 5. Students in clubs need dependable instructors incentivized with compensation. I urge you to strike limitations.
R109	<p>It is important to note that airport sponsors may choose to allow independent operators as a privilege - there is no right or requirement that this type of activity be allowed. This is consistent with FAA policy. The overarching purposes of Minimum Standards is to level the playing field and encourage and promote “the economic health of Operators at the Airport”.</p> <p>Same response as R48: Section 6.6 <i>Limitations</i> (Bullet 1) has been deleted as follows: As determined by the County in its sole discretion, if a Flight Training Operator is fully meeting the demand for flight training, Independent Flight Training Operators may be prohibited at the Airport</p> <p>Same response as R49: Section 6.6 <i>Limitations</i> (Bullet 2) remains in place as the County has the right to establish reasonable and not unjustly discriminatory requirements for commercial operators. Prohibiting Independent Flight Instructors from utilizing their own aircraft for flight training purposes is a reasonable and not unjustly discriminatory requirement that ensures a level playing field. As such, a change is not deemed necessary.</p> <p>Same response as R66: Section 6.6 <i>Limitations</i> (Bullet 3) has been deleted as follows: Independent Flight Training Operators are prohibited from advertising services in any manner on Airport property, including but not limited to posting signs, distributing business cards, or affixing an advertising decal or sign to its vehicle.</p>
C110	The development of this document was reckless and a waste of our tax dollars. A brief review of FAA document AC 150/5190-7 Section 1.2 c. will show that the FAA promotes the use of common sense when developing minimum standards. It specifically says that the minimum standards will not be discriminatory against a particular usage or class unless deemed a safety concern. It also specifically says that the FAA regional and district offices may advise airport sponsors on the appropriateness of the proposed standards to ensure the standards do not place the airport in a position inconsistent with its federal obligations. I do not believe that this FREE service was utilized by KCIA.
R110	The draft Minimum Standards comply with FAA policy, applicable Advisory Circulars (AC 150/5910-8 was updated December 7, 2023), Legal Requirements, and best management practices. Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.
C111	Why does KCIA think that they have the legal authority to BAN Independent Flight Instructors? Did they ask the FAA if that was OK? Most of my Flight Instructors during my approximately 3,000 hours of flight have been Independent Flight Instructors. How many flying schools will have flight instructors allowed by their insurance to give flight instruction in Light Sport Aircraft, or in Experimental Aircraft? How many flying schools will have instructors with the experience necessary to be insured to give flight instruction in high performance aircraft like the Epic, Evolution, PC-12, etc? Who does KCIA Imagine will provide flight instruction in those aircraft at the KBFI airport if not Independent Instructors???

R111	<p>Same response as R52: It is important to note Section 6.5 (Independent Aircraft Maintenance Operator) and Section 6.6 (Independent Flight Training Operator) pertain to Independent Operators which are defined in the draft Supplemental Rules and Regulations as “an entity offering aeronautical service(s) but without an established place of business on the Airport.” Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p> <p>Same response as R109: It is important to note that airport sponsors may choose to allow independent operators as a privilege - there is no right or requirement that this type of activity be allowed. This is consistent with FAA policy. The overarching purposes of Minimum Standards is to level the playing field and encourage and promote “the economic health of Operators at the Airport”.</p> <p>Same response as R48: Section 6.6 <i>Limitations</i> (Bullet 1) has been deleted as follows: As determined by the County in its sole discretion, if a Flight Training Operator is fully meeting the demand for flight training, Independent Flight Training Operators may be prohibited at the Airport</p> <p>Same response as R49: Section 6.6 <i>Limitations</i> (Bullet 2) remains in place as the County has the right to establish reasonable and not unjustly discriminatory requirements for commercial operators. Prohibiting Independent Flight Instructors from utilizing their own aircraft for flight training purposes is a reasonable and not unjustly discriminatory requirement that ensures a level playing field. As such, a change is not deemed necessary.</p> <p>Same response as R66: Section 6.6 <i>Limitations</i> (Bullet 3) has been deleted as follows: Independent Flight Training Operators are prohibited from advertising services in any manner on Airport property, including but not limited to posting signs, distributing business cards, or affixing an advertising decal or sign to its vehicle.</p>
C112	<p>Why does the City think that they have legal standing and justification to ban work by Independent Aircraft Mechanics? Not sure that the KCIA understands that FAA Certified Repair Stations do NOT work on Light Sport nor Experimental Aircraft. So who will be left to work on our light sport and experimental aircraft? Traditionally, Independent Aircraft Mechanics do such work.</p>
R113	<p>Same response as R52: It is important to note Section 6.5 (Independent Aircraft Maintenance Operator) and Section 6.6 (Independent Flight Training Operator) pertain to Independent Operators which are defined in the draft Supplemental Rules and Regulations as “an entity offering aeronautical service(s) but without an established place of business on the Airport.” Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p> <p>Same response as R49: Section 6.6 <i>Limitations</i> (Bullet 2) remains in place as the County has the right to establish reasonable and not unjustly discriminatory requirements for commercial operators. Prohibiting Independent Flight Instructors from utilizing their own aircraft for flight training purposes is a reasonable and not unjustly discriminatory requirement that ensures a level playing field. As such, a change is not deemed necessary.</p>
C114	<p>With the ongoing pilot shortage pervasive throughout our nation, please do not add to the shortage by preventing pilots from getting the needed instruction. The Part 61 schools fill a needed role in pilot instruction. Pilots going through the Part 61 schools must pass the EXACT same written and practical tests as to Part 141 students. Part 61 schools make it easier for the "little guy" who must schedule his flight instruction around work and family obligations. America has always been about giving everyone a fair chance, not just the ones who are fortunate enough to have their instruction paid by a grant or who are in other ways able to make the Part 141 schools work for them. We need to keep opportunities open to everyone!</p>

<p>R114</p>	<p>Same response as R52: It is important to note Section 6.5 (Independent Aircraft Maintenance Operator) and Section 6.6 (Independent Flight Training Operator) pertain to Independent Operators which are defined in the draft Supplemental Rules and Regulations as “an entity offering aeronautical service(s) but without an established place of business on the Airport.” Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p> <p>Same response as R109: It is important to note that airport sponsors may choose to allow independent operators as a privilege - there is no right or requirement that this type of activity be allowed. This is consistent with FAA policy. The overarching purposes of Minimum Standards is to level the playing field and encourage and promote “the economic health of Operators at the Airport”.</p> <p>Same response as R48: Section 6.6 <i>Limitations</i> (Bullet 1) has been deleted as follows: <i>As determined by the County in its sole discretion, if a Flight Training Operator is fully meeting the demand for flight training, Independent Flight Training Operators may be prohibited at the Airport</i></p> <p>Same response as R49: Section 6.6 <i>Limitations</i> (Bullet 2) remains in place as the County has the right to establish reasonable and not unjustly discriminatory requirements for commercial operators. Prohibiting Independent Flight Instructors from utilizing their own aircraft for flight training purposes is a reasonable and not unjustly discriminatory requirement that ensures a level playing field. As such, a change is not deemed necessary.</p> <p>Same response as R66: Section 6.6 <i>Limitations</i> (Bullet 3) has been deleted as follows: <i>Independent Flight Training Operators are prohibited from advertising services in any manner on Airport property, including but not limited to posting signs, distributing business cards, or affixing an advertising decal or sign to its vehicle.</i></p>
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<p>C115</p>	<p>My comments are regarding the Minimum Standard proposed that Fixed Base Operations (as opposed to SASO Part 145 Repair Stations) “...shall be certified as a 14 CFR Part 145 Repair Station for turboprop and turbojet aircraft. FBO shall provide Line Maintenance for up to Group III aircraft not exceeding 100,000 pounds maximum gross takeoff weight. FBO shall be able to provide wheel, brake, and battery service.”</p> <p>This proposed standard is outdated conceptually, and completely fails to recognize the past 50 years history in the FBO, MRO and Charter marketplace.</p> <p>Simply put, the business and general aviation industry has evolved away from a full-service model (which followed WWII). Years ago, a full service FBO provided virtually all services to the flying public including, but not limited to aircraft refueling, storage and tie down, aircraft sales, flight training, aircraft charter, and aircraft maintenance services. These service offerings were not due to mandates in minimum standards, for they didn’t exist then- neither did the FAA. Nor, for that matter did FBOs sell jet fuel; for no civilians owned jets then. Rather, general aviation was a nascent industry, and providing all these services helped ensured their survival at the time, to ward of seasonal fluctuations from their various business lines.</p> <p>Today, the industry has organized as specialty operators, in which FBOs provide only aircraft refueling, storage and tie down (Signature, Atlantic, Modern, etc.); whereas professionally-run MROs (Maintenance, Repair, and Overhaul) companies operate Part 145 Repair Stations (Duncan Aviation, West Star, Stevens, etc.); while still other specialized Charter/Management companies provide the public aircraft charter services (EJM, Solairus, Aerius, etc.). This industry reorganization began around 1981, when turbine aircraft sales, for the first time, outstripped piston aircraft sales in the US.</p> <p>As an aside, the proposed Minimum Standard that FBOs provide aircraft maintenance services also fails to consider that every Part 145 Repair Station at Boeing Field the past 20 years has ceased operations for financial reasons and been shut down by the entity operating it. In some cases, they became insolvent/bankrupt. In the past 20 years alone at Boeing Field, three large Part 145 Repair Stations have shut down, including Galvin Flying Services (twice, 2008 and 2024), Executive Flight, and American Avionics.</p> <p>In the modern incarnation, aircraft maintenance services as described in the proposed Minimum Standards “...wheel, brake, and battery service” is instead provided by Mobile Service Units (MSUs) which are the industry acronym for a dedicated van for Aircraft On Ground (AOG) needs, such as yes, “...wheel, brake, and battery service.” All these MSUs are subtenants of FBOs or SASOs, today these include Clay Lacy Aviation, Duncan Aviation, and DC Jet Services.</p> <p>Large Part 145 Repair Stations cannot exist on Boeing Field due to the ground lease costs (which are among the highest in the country), local area labor costs, and sales tax, and instead choose to locate at less-costly markets. Repeating a *past* Minimum Standard that an FBO must provide such services, in a market in which multiple MROs have shutdown, and the industry itself moved away from this model decades ago, demonstrates a lack of aviation industry understanding by King County International Airport.</p> <p>If King County desires to ensure that Boeing Field has viable, Part 145 MROs on field, ground lease discounts should be provided to operating business with multiple employees (such as an MRO), as aviation businesses (employers) cannot pay the same ground rent as corporate-only hangar tenants for whom ownership of a \$70M jet (or multiple) is a rounding error. Mandating an FBO provide a service it won’t or can’t, doesn’t bring aircraft maintenance back to Boeing Field.</p>
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	<p>Final case in point:</p> <p>How many MROs bid on the King County Jet Center RFP or the Vulcan (former Paul Allen) Hangar RFP? Zero, due to the cost structure offered. Both facilities (improvements) would have been ideal for retail, Part 145 aircraft maintenance activities. Instead, neither will be a retail MRO.</p> <p>It is recommended that any maintenance activities, or required/dedicate maintenance space, be dropped from FBO Minimum Standards, and instead are placed in the SASO-MRO section, only.</p>
R115	<p>Same response as R32: The Notes “box” in Section 5 FBO Schedule of Services has been corrected. The notes attributed to Aircraft parking and storage is in the wrong location and has been moved to the notes attributed to Aircraft maintenance which states as follows: FBO shall provide (either directly or through written agreement with an authorized Operator) readily available aircraft maintenance services to general aviation aircraft as can be performed efficiently on the Leased Premises unless otherwise waived in writing by the Airport Director.</p> <p>Additionally, Section 5, Page 16, (third paragraph) Aircraft Maintenance has been changed as follows: “Unless otherwise waived in writing by the Airport Director due to extenuating circumstances, FBO (either directly or through a written agreement with an authorized Operator, shall provide, upon request, Aircraft Maintenance in accordance with Section 6 of these Minimum Standards...”.</p> <p>Part 145 requirement has been removed and replaced with a requirement of 1 A&P Mechanic and 1 Customer Service Representative (in which an A&P Mechanic may fulfill the responsibilities of the Customer Service Representative) whom must be available during the required hours of activity. If Operator is providing annual or phase inspections, one A&P Mechanic shall have Inspection Authorization.</p>
C116	<p>The Friends of Boeing Field (FoBF) supports the recommendations of the Minimum Standards and Rules & Recommendations subcommittee of the Roundtable presented on January 18, 2025, with the following additions/changes. FoBF opposes the proposed new MSRR’s as written unless approved with the amendments contained herein.</p> <p>We have heard many pilots state that KCIA is “unfriendly” to Light GA. Light GA is critically important to the future of aviation. It is where most pilots are now trained and through which they gain experience “hours” towards becoming professional pilots. It supports the full spectrum of potential pilots including those from the local community and the county at large. Furthermore, Light GA supports the economy of King County by creating employment and career opportunities for manufacturing, mechanics, pilots and all forms of services. Furthermore, Light GA provides the residents of King County direct access to the marvel of aviation. The near extinction of Light GA and flight training in King County is detrimental to the county’s goals to support equity and equal access to opportunity.</p> <p>The primary reasons that KCIA is not considered friendly to light GA is the unavailability of services and the overall cost of operations and fuel. These services include training, aircraft rental, and aircraft maintenance and repair. We believe the airport needs to do more to encourage Light GA and not add restrictions or barriers to obtaining these services.</p>
R116	<p>The adoption of Minimum Standards and Rules and Regulations is in no way intended to harm light general aircraft, but rather to encourage high quality products, services and facilities at the Airport to all users. Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.</p>

C117	I am strongly in favor of all of the comments (dated 1/13/25) to the KCIA Minimum Standards document made by the KCIA Roundtable. I learned to fly at Galvin's 25 years ago, as did so many others. Lack of access to hangars, fbo's training and especially maintenance for smaller GA aircraft will greatly hamper the aviation industry and the reputation of KCIA
R117	Comment noted. No specific alternative language or deletions provided. As such, a change to the document was not made.
C118	<p>We urge the County/KCIA to rapidly offer unleaded fuel options for piston-engine aircraft and be a leader in our region at delivering on the promises of unleaded avgas to better protect local communities.</p> <p>This was the top priority for the Joint Aircraft Emissions Technical & Community Task Force Report and hopefully is already underway.</p> <p>Implementation: King County takes a leading role.</p> <ul style="list-style-type: none"> • Aggressively phase out leaded aviation gas at KCIA, addressing lead pollution.
R118	<p>KCIA is monitoring the development and certification of unleaded aviation fuels. The availability of such fuels is addressed in the draft Airport Strategic Plan.</p> <p>Same response as R30: This section has been revised as follows: "<i>FBO shall have available (directly or through agreement – a copy of which must be provided to the Airport Director) fully transition to unleaded aviation gasoline within 12 calendar months of ASTM certification FAA Fleet Authorization.</i>"</p>

5. PUBLIC OUTREACH REPORT

Summary of March 9, 2023 Public Meeting



Airport Rules and Regulations and Minimum Standards Update

Airport Tenant and Community Meeting Summary

March 9, 2023

In-person meeting: 12-1 p.m. | Flight Service Station, 6526 Ellis Ave. S.

Virtual meeting: 6-7 p.m. | Zoom Webinar

Purpose

In accordance with Federal Aviation Administration (FAA) regulations and guidance, King County International Airport (KICA) is updating the Airport Rules and Regulations and Minimum Standards documents. These documents enhance the overall operation, management, and administration of the Airport and help ensure the safety of Airport tenants and users. KICA hired Aviation Management Consulting Group to update KICA's existing documents in compliance with federal, state, and county regulations.

On March 9, KICA hosted in person and online meetings for Airport tenants and community members to get an introduction about the background, role, and purpose of these documents as well as provide early input to help inform these documents. These meetings were led by AMCG. A public review and comment period to provide input on the revised drafts of the updated documents will be held in Summer 2023.

Notification

The KICA outreach team emailed meeting invitations to 20 community organizations two weeks before the meetings. The AMCG team and KICA outreach team emailed 10 commercial aeronautical entities requests for interviews in February 2023 and March 2024. A total of six commercial and non-commercial entities were interviewed in March 2023. Meeting information was also posted on the KICA Community Outreach project page, shared on KICA social media channels (Facebook and Instagram), and an announcement was made at the King County International Airport Community Coalition monthly meeting on March 7, 2023. See Appendix for contact list.



March 9 afternoon meeting.

Format

The in person and online meetings were held on the same day at different times. The information was identical at each meeting which included a presentation and a question-and-answer session. A recording of the Zoom Webinar is available on the project website.

Attendance

Eight people attended the in-person meeting and 18 people attended the online meeting. See Appendix for full list of attendees.



Airport Rules and Regulations and Minimum Standards Update

Question and answer

A question was asked if any of the rules and regulations or minimum standards updates will affect local airport tenants?

David Benner (AMCG) responded that they're still looking at the documents, but don't think that minimum standards will apply to those tenants using the hangars, but the updated rules will apply to typical hangar activity and businesses operations.

The commentor followed up to say they heard airport hangars might be removed due to larger commercial business activity taking over space. David Decoteau (KCIA) responded that there will be some operational changes due to fueling on the ground. David added that these changes are related to Vision 2045, and other changes that are aimed at looking at the airport holistically and not specific to rules and regulations.

Stephen Ratzlaff (Friends of Boeing Field) asked if the project team would give some examples to describe what type of rules and regulations will be updated.

Bob Trimborn (AMCG) responded that the team doesn't have specifics yet but that they will review all rules and regulations at the beginning of the review process. Bob said that "Environmental Compliance" as an example of a category that will need to be updated.

Stephen Ratzlaff asked what the next step in the review process will be.

David Benner (AMCG) responded that the team is wrapping up informational meetings with tenants and then they will review all existing documents for language, definitions, and specific details related to airports, aircrafts, vehicles, and terminals that need to be updated. AMCG reviews documents and updates language using best management practices and industry standards.

Rick Lentz asked if the updated rules and regulations will discourage Boeing Field International from inviting new businesses to the airport.

Bob Trimborn responded no.

Next steps

- A public review and comment period will be held in Summer 2023.
- Additional questions and comments can be submitted on the project website at: KCIPlanning.com.
- A recording of the Zoom Webinar held on March 9, 2023, is available online at: kingcounty.gov/services/airport/community-engagement.aspx



Airport Rules and Regulations and Minimum Standards Update

	Affiliation	Name
1	Allentown Advocates	Lisa Krober
2	Beacon Hill Business Alliance	Angela Costaneda
3	Beacon Hill Council	Maria Batayola
4	Climate Reality	Ali Lee
5	Concord International Elementary	Suro Pierce
6	Cultivate South Park	Crystal Brown
7	Duwamish River Cleanup Coalition (DRCC)	Christian Poulsen
8	Duwamish Valley Safe Streets	Peaches Thomas
9	El Centro de la Raza	Estella Ortega
10	Georgetown Community Council	Holly Krejci
11	Got Green	Vera Hoang
12	King County International Airport Community Coalition	Velma Veloria
13	Manufacturing Industrial Council	Dave Gerring
14	Mini Mart City Park	John Sutton
15	Quieter Skies	Sheila Brush
16	South Park Neighborhood Association	Aley Thompson
17	SoDo Business Improvement Area	Erin Goodman
18	Villa Comunitaria	Analia Bertoni
19	White Center CDA	Sili Suvusa
20	350 Seattle	Sarah Shifley

Appendix – Airport Tenants

	Affiliation
1	Air Traffic Control
2	Leading Edge
3	Modern Aviation
4	Non-commercial tenant
5	Non-commercial tenant
6	Signature Flight Support



Airport Rules and Regulations and Minimum Standards Update

In-person meeting sign-in

[illegible]

Online meeting attendee list

	Name	Affiliation
1	Aaron Ison	
2	Alex Fefer	
3	Andrew Ouellet	
4	Bill Ayer	
5	Blair Delaney	
6	David Decoteau	KCIA
7	Evan Nelson	
8	John Parrot	KCIA
9	John Sandvig	
10	Lauren Wheeler	PRR
11	Neal Wilkinson	
12	Rick Lentz	
13	Sean Moran	
14	Stephen Ratzlaff	Friends of Boeing Field



Airport Rules and Regulations and Minimum Standards Update

15	Steven Domino	InterVistas
16	Tom Koney	
17	Tyler Pichette	
18	Mm	

Summary of March 12, 2024 Public Meeting



Airport Rules and Regulations and Minimum Standards Update

Airport Tenant and Community Meeting 2 Summary

March 12, 2024

Virtual meeting: 12- 1 p.m. and 6-7 p.m. | Zoom Webinar

Purpose

King County International Airport (KCIA) held two meetings on March 12, 2024, to share updates on the Airport Rules and Regulations and Minimum Standards projects. The meetings provided airport tenants and community partners an opportunity to hear the project team present on changes made to the documents since the last Airport Tenant and Community Meeting in March 9, 2023. These documents enhance the overall operation, management, and administration of KCIA and help ensure the safety of airport tenants and users.

KCIA hired Aviation Management Consulting Group to update KCIA's existing documents in compliance with federal, state, and county regulations. The updates to the Draft Rules and Regulations and Minimum Standards are made in accordance with Federal Aviation Administration (FAA) regulations and guidance. Participants at the meetings were able to:

- Learn about the purpose of Rules and Regulations and Minimum Standards and learn about key updates proposed in the draft copies available on the project webpage.
- Ask King County International Airport (KICA) and Aviation Management Consulting Group (AMCG) questions.
- Learn how to provide input prior to the official comment period anticipated to start in summer 2024.
- View the Draft Rules and Regulations and Minimum Standards available on the project website.
- Sign up to receive project updates.

Attendance

Thirteen people attended the afternoon and evening sessions. See **Appendix B: March 12, 2024 Meeting Attendees** for full attendee list.

Notification

The following tools and channels were used to advertise the meetings on March 12, 2024:

- Two weeks in advance of the Airport Tenant and Community Meetings, KCIA emailed invitations to 53 representatives from the Airport tenant and community groups listed in **Appendix A: Community Groups and Airport Tenants**.



The project website shares information in multiple languages.



Airport Rules and Regulations and Minimum Standards Update

- Email invites were sent to community organizations and airport tenants (i.e. airport manufacturing, cargo carriers, charter operations, flight schools, and hangar management).
- KCIA shared meeting information on the website three weeks in advance. Project website information is available in English, Korean, Simplified Chinese, Somali, Spanish, Tagalog, Traditional Chinese, and Vietnamese.

Meeting format

Online meetings were held on March 12, 2024, at different times to provide options for meeting participants to attend. The same information was shared at both meetings.

After welcome and introductions, the project team gave a presentation followed by a question-and-answer session. Throughout the meeting,

participants were encouraged to share questions and comments through the Zoom Q&A Tool. Participants also received information on where to view the Draft Airport Rules and Regulations and Minimum Standards documents and submit electronic comments through the project website. A copy of the recorded presentations are available on [KCIA Rules and Regulations and Airport Minimum Standards Update project webpage](#).



The meeting invitation and the website provided information on how to request language access needs for the meeting.

Questions received during the Q&A sessions

The following questions and comments were given during the online meetings:

Who are the six tenants that were part of the process?

David Benner (AMCG) responded that the project team will follow up with that information.

The project team interviewed the following Airport tenants to collect feedback that would inform the Draft Rules and Regulations and Minimum Standards updates:

- Air Traffic Control
- Leading Edge
- Modern Aviation
- Signature Flight Support
- Two non-commercial aeronautical tenants

Where do the Specialized Aviation Service Operations definitions come from?

David Benner (AMCG) responded that the Specialized Aviation Service Operations are defined by the Federal Aviation Administration.



Airport Rules and Regulations and Minimum Standards Update

How are KCIA Minimum Standards created?

David Benner (AMCG) responded that KCIA Minimum Standards are developed through recommendations made by the [Federal Aviation Administration Advisory Update](#). Additional analysis used to update the Minimum Standards comes from existing KCIA airport operations, airports with similar operations throughout the country, and the feedback shared from airport tenants.

If an existing business is negatively impacted by the updated Airport Minimum Standards, what protections will be made to ensure the business is allowed to continue to operate?

David Benner (AMCG) appreciated the question and requested the participant to submit their question again during the public comment period in summer 2024. David reinforced that the updates made in these documents help to ensure safety of airport tenants and users.

What guiding principles were used to update the KCIA Minimum Standards?

David Benner (AMCG) responded that AMCG followed Federal Aviation Administration (FAA) requirements and guidance. David highlighted that the KCIA Rules and Regulations and Minimum Standards have not been updated since 2007 and 2011. The project team updated these documents to align with contemporary FAA standards and requirements and current industry practices.

Aircraft Maintenance Operator require Repair Station certification. This would eliminate nearly all current maintenance shops in KCIA.

David Benner (AMCG) responded that this was correct, and the change is documented in the updated Airport Rules and Regulation and Minimum Standards. David reinforced that the updates made in these documents help to ensure safety of airport tenants and users. David encouraged additional questions or comments about this change to be submitted during the official comment period anticipated to be held in summer 2024.

If there is a request to incorporate community comments or edits, what is the appeal process if they are not incorporated?

David Benner (AMCG) and Robert Trimborn (AMCG) responded that there will be a public comment period later this summer. Comments and questions will be addressed by the team and responses will be provided once the public comment period ends. Following the comment period, additional questions or appeals should be sent directly to KCIA at: KCIACommunityOutreach@kingcounty.gov.

What engagement has been done to collect feedback from Airport tenants and users?

Matt Sykora (KCIA) responded that the KCIA project team engaged Airport tenants, users, and community groups through website and email updates. Notifications were emailed to Airport tenant and community groups in February 2023 and again in February 2024 in advance of the March 2023 and March 2024 meetings. See Appendix A for a list of invited contacts. Announcements were also made on KCIA social media channels and through the King County Internal Airport Community Coalition meetings.



Airport Rules and Regulations and Minimum Standards Update

In addition to the March 2023 meetings, the project team conducted 6 interviews with KCIA tenants and users in 2023 to collect information that could help inform the updates made to KCIA Rules and Regulations and Minimum Standards. To see a recording of the March 9, 2023 Airport Tenant and Community Meeting, please visit the [project website](#).

Who are the aircraft maintenance operators at KBFI?

Matt Sykora (KCIA) responded that KCIA can provide a formal list but have several based out of the FBOs and other commercial spaces.

Who are the aircraft rental and flight training at KBFI?

Matt Sykora (KCIA) responded that commercial leases and SASO permits are currently held by Galvin Flight Training and Helicopters Northwest.

Under the independent aircraft maintenance operators, it says there are limitations. Why was this statement included: "If an aircraft maintenance operator is fully meeting the demand for aircraft maintenance, Independent maintenance operators may be prohibited at the airport."?

Robert Trimborn (AMCG) responded that both draft documents are posted on the project website. Robert requested comments on the suggested edits in the updated drafts be submitted during the public comment period in summer 2024. Each submitted comment will be addressed by the project team.

Why has the Non-Profit Flying Club been eliminated from the standards?

David Benner (AMCG) responded that non-commercial flying clubs have been moved from the Minimum Standards document to the Rules and Regulations document to align with current Federal Aviation Administration recommendations. It was migrated to the non-commercial flying club at section 3.12 of the Rules and Regulations.

It does not look like the section on the Commercial Flying Club has been updated. Why has this section not been updated during this process?

David Benner (AMCG) responded that this is a good comment about the commercial minimum standards, and that this section can be looked at on a line-by-line basis during the formal review process.

Next steps

- A public review and comment period will be held in summer 2024.
- Additional questions and comments can be submitted on the [project webpage](#).
- Meeting recordings of the March 12, 2024, Zoom Webinar are available on the [Rules and Regulations and Minimum Standards Update website](#).



Airport Rules and Regulations and Minimum Standards Update

Appendix A: Community Groups and Airport Tenants

Below is a list of community groups and airport tenants who were emailed meeting invitations on February 20, 2024.

	Organization	Affiliation
1	350 Seattle	Community group
2	Air Traffic Control	Airport tenant
3	Airlift Northwest	Airport tenant
4	Allentown Advocates	Community group
5	Alternate Air	Airport tenant
6	Ameriflight	Airport tenant
7	AOPA	Airport tenant
8	Atomic Helicopters	Airport tenant
9	Aviation Partners	Airport tenant
10	Beacon Hill Business Alliance	Community group
11	Beacon Hill Council	Community group
12	Boeing	Airport tenant
13	CB-Air	Airport tenant
14	Clay Lacy Aviation	Airport tenant
15	Costco	Airport tenant
16	Duncan Aviation	Airport tenant
17	Duwarnish River Cleanup Coalition (DRCC)	Community group
18	Duwarnish Valley Safe Streets	Community group
19	El Centro de la Raza	Community group
20	Erin Air	Airport tenant
21	Executive Jet Management	Airport tenant
22	Friends of Boeing Field	Airport tenant
23	Galvin Flying	Airport tenant
24	Georgetown Community Council	Community group
25	Go Rentals	Airport tenant
26	Helicopters NW	Airport tenant
27	Hillwood Airways	Airport tenant
28	Immaculate Flight	Airport tenant
29	Kenmore Air Express	Airport tenant
30	King County International Airport Community Coalition	Community group
31	King County Jet Center	Airport tenant
32	Lake Washington Partners	Airport tenant
33	Leading Edge	Airport tenant
34	Mente	Airport tenant
35	Modern Aviation	Airport tenant



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36	Modern Aviation	Airport tenant
37	Net Jets	Airport tenant
38	Non-commercial airport tenant	Airport tenant
39	Non-commercial airport tenant	Airport tenant
40	Nordstrom	Airport tenant
41	Pistol Creek	Airport tenant
42	Quieter Skies	Community group
43	Saltchuk	Airport tenant
44	Signature Flight Support	Airport tenant
45	Sky Service	Airport tenant
46	South Park Neighborhood Association	Community group
47	The Flight Academy	Airport tenant
48	The Museum of Flight	Airport tenant
49	UPS	Airport tenant
50	Valkyrie	Airport tenant
51	Vulcan	Airport tenant
52	White Center CDA	Community group

Appendix B: March 12, 2024 Meeting Attendees

Afternoon session

	Name
1	Bradley McNamara
2	Chris Benz
3	Gil White
4	Ian Marks
5	John La Porta
6	Kim Frank
7	Lynda Wong
8	Robert Braunstein
9	Troy Scott
10	Tyler Pichette

Evening session

	Name
1	Bradley McNamara



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2	John La Porta
3	David Tennesen

Summary of October 30, 2024 Public Meeting



Airport Rules and Regulations and Minimum Standards Update

Airport Tenant and Community Meeting 3 Summary

October 30, 2024

In-person meeting: 1-2 p.m. | KCIA Flight Service Station, 6526 Ellis Ave. S.

Virtual meeting: 6-7 p.m. | Zoom Webinar

Purpose

In accordance King County's Department of Executive Services regulations and guidance, acting under the authority of King County Code sections 2.98 and 15.12.010, King County International Airport (KCIA) held two public meetings to provide the airport tenants, community members, and other interested parties an opportunity to review updated draft Airport Rules and Regulations and Minimum Standards, ask consultant and KCIA staff questions, and comment on the draft Rules and Regulations and Minimum Standards documents. The meetings took place with 64 days left in the 85-day comment period (October 6, 2024 - December 31, 2024). The KCIA project team will consider public comments gathered in the development of the final Airport Rules and Regulations and Minimum Standards updates.

Attendance

A total of 38 people attended the meetings; 19 people attended the in-person meeting held in the afternoon, and 19 people attended the virtual meeting in the evening. See Appendix B for the list of attendees.



Figure 1: The project website shares information in multiple languages.

Notification

The following methods were used to notify the public, airport tenants, and interested parties about the public meetings and comment period from October 6, 2024 - November 22, 2024. Due to community interest, KCIA extended the public comment deadline to December 31, 2024.

- Notice in the Seattle Times and Puget Sound Business Journal on October 6, 2024, more than 20-days prior to the public meetings. A copy of the notice is listed in Appendix C.
 - Published in Seattle Times online edition, October 6, 2024 - October 13, 2024.
 - Published in Puget Sound Business Journal print edition, October 11, 2024.
- Notice of extension in the Seattle Times on November 12 - 19, 2024 and in the Daily Journal of Commerce on November 8, 2024. A copy of the notice of extension is in Appendix C.
- Notice emailed to 689 KCIA email subscribers, October 8 - 28, 2024. A copy of the emailed notice can be found in Appendix C. Emailed subscribers are listed in Appendix A.
- Project email bulletin sent on October 17, 2024, to 2,729 KCIA subscribers and community members, airport tenants, and interested parties who were notified and/or participated during previous project meetings on March 9, 2023 and March 12, 2024. Email delivery results listed in Appendix A.



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- Social media posts shared on KCIA Facebook and Instagram accounts, see Appendix C.
- Emailed invitations were sent two weeks in advance to 52 airport tenants and community groups invited to project meetings on March 9, 2023, and March 12, 2024, listed in Appendix A.
- Project website information and links to draft Airport Rules and Regulations and Minimum Standards are available in English, Korean, Simplified Chinese, Somali, Spanish, Tagalog, Traditional Chinese, and Vietnamese.

Format

The Community and Airport Tenant meetings were offered at two different times on October 30, 2024, to provide options for attendees. An in-person meeting was held at the KCIA Flight Service Station from 1-2 p.m. and a Zoom Webinar was held online from 5-6 p.m. The same information was shared at both meetings. Meeting recordings are available on the [project website](#).

The meeting format included welcome, introductions, a presentation led by KCIA project consultants from AMCG, and a question-and-answer session. During the meetings, participants were encouraged to share questions and comments. A comment station was available during the in-person meeting for those who wished to leave hand-written comments. No hand-written comments were received. Following the presentation, meeting participants were invited to share comments and questions with the project team.



Figure 2: Presentation led by David Benner, Aviation Management Consulting Group, at the in-person meeting on October 30, 2024.

During the virtual meeting, attendees could unmute themselves to ask their question or comment or submit questions and comments through the Zoom Q&A Tool for a member of the project team to read out loud. Participants also received information on where to view the Draft Airport Rules and Regulations and Minimum Standards documents and submit electronic comments through the project website or via email sent to KCIACommunityOutreach@kingcounty.gov.

Handwritten comments can be mailed to King County Department of Executive Services – King County International Airport-Boeing Field, Attention: Matthew Sykora, 7277 Perimeter Road South, Suite 200, Seattle, WA 98108.

The meeting invitation and the website provided information on how to request language access for the meeting.

Questions and comments received

The project team received approximately 26 questions and comments at the in-person and virtual meetings on October 30, 2024. Topics received were related to project communications, review



Airport Rules and Regulations and Minimum Standards Update

process, airport operations, and general aviation operations. All questions and comments received by December 31, 2024 will be recorded, logged, and responded to.

Questions and comments received during the in-person and virtual meetings include:

Who were the six airport tenants the project team interviewed between March 2023 and now?

David Benner (AMCG) responded that interviews were held in March 2023 with commercial and non-commercial tenants: Air Traffic Control, Leading Edge, Modern Aviation, Signature Flight Support, and two non-commercial aeronautical tenants.

Did the project team talk with small maintenance operators or independent flight instructors in March 2023?

David Benner (AMCG) responded that the project team invited KCIA airport tenants to two Airport Rules and Regulations and Minimum Standards project meetings on March 9, 2023 and again on March 12, 2024. Meeting summaries and meeting recordings are available on the [project website](#).

How long were your meetings with FBOs and did you have a follow-up conversation with them to share what is being proposed in the updated Airport Minimum Standards?

David Benner (AMCG) recalls the FBO meetings were an average of 30 minutes. The purpose of the meetings was to understand FBO operations at the airport. Following preliminary meetings, airport tenants including FBOs were invited through project email to review updated drafts and attend project meetings held on March 9, 2024, March 12, 2024, and October 30, 2024.

At the KCIA Roundtable Advisory Committee meeting on October 21, 2024, a request was made to make the Rules and Regulations and Minimum Standards easier to read.

David Decoteau (KCIA) responded that the Airport Rules and Regulations and Minimum Standards are legal documents, enforceable by King County code, and are formatted to protect the rights and responsibilities of the parties involved in the agreement. Based on the comments received at the KCIA Roundtable Advisory Committee meeting, KCIA extended the public comment and review period from November 22, 2024, to December 31, 2024. Members from the Airport Rules and Regulations and Minimum Standards project team will attend the November Roundtable meeting to address specific questions and comments. The KCIA Roundtable Advisory Committee meets on the second Monday of each month. Visit the [Roundtable webpage](#) for future meeting details.

Bob Trimborn (AMCG) added that members from the project team are available to help airport tenants, community members, and interested parties decipher the Airport Rules and Regulations and Minimum Standards documents.

Consider conducting additional outreach to inform airport tenants and members of the KCIA Roundtable Advisory Committee about the Airport Rules and Regulations and Minimum Standards Updates.

Matt Sykora (KCIA) shared that this project has been a long process over multiple years. In between Airport Tenant and Community Meetings, the project team has been updating the documents based on input received through project channels, FAA guidance, and industry standards. Matt added that the methods KCIA has used to engage and get input from airport tenants, community members, and interested parties includes sharing project notices and meeting invites through the



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KCIA Everbridge listserv (approximately 696 tenants), KCIA Gov Delivery list (approximately 2,115 recipients); and those who have signed up to be part of the project website (six).

Stephen Ratzlaff (Friends of Boeing Field and KCIA Roundtable Committee Member) is a new member of the KCIA Roundtable Committee. At the last Roundtable meeting, committee members expressed concern that they didn't have enough information on the Airport Rules and Regulations and Minimum Standards project. The Roundtable Committee Chair, Erik Utter, proposed a sub-committee to help him review the Airport Rules and Regulations and Minimum Standards project. Stephen solicited invites from attendees in the room and added that a person does not need to be a Roundtable Committee member to participate. Following the meeting, Stephen connected with Lauren Wheeler (PRR) to get a list of meeting attendees emails he could invite to participate on the Roundtable sub-committee.

Consider extending the public comment review period to 2025 so the Roundtable Committee and airport tenants can have more time to review the documents.

The project team has extended the public comment period from November 22, 2024 to December 31, 2024. Comments and questions received by December 31, 2024 will be addressed by the project team and responses will be provided online once the public comment period ends. Following the comment period, additional questions or appeals should be sent directly to KCIA staff at: KCIACommunityOutreach@kingcounty.gov.

Will the project summarize what changes have been made in the updated Airport Rules and Regulations and Minimum Standards?

Bob Trimborn (AMCG) appreciated the comment and responded that the project team will consider posting a document that summarizes what areas of the Rules and Regulations and Minimum Standards have changed and make it available online.

Can you describe how the Airport Rules and Regulations and Minimum Standards have changed for tie-down tenants?

Bob Trimborn (AMCG) responded that the project team is not prepared to go through specific changes that have been made in the Airport Rules and Regulations and Minimum Standards documents. Bob suggested tiedown tenants and interested parties to review that section of the updated Rules and Regulations and Minimum Standards documents and ask the project team to address your questions and comments.

Matt Sykora (KCIA) gave examples of how the documents have been updated for tiedown tenants. Examples included adding storage boxes for tenants to store oil, rags, etc. in the hangars and updating the Rules and Regulations for when a tenant would need an airport badge to drive -on the airfield.

What are the criteria for evaluating what public input is incorporated into the draft Rules and Regulations and Minimum Standards documents?

David Benner (AMCG) responded that the project team will evaluate input received from airport tenants, community members, and interested parties using the following criteria: Complies with FAA guidelines, compares to industry standards, and complies with KCIA operations. The project team will respond to all comments submitted through the public comment period and describe



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how the input was incorporated. If it wasn't incorporated, the project team will address why. This information will be compiled and shared on the project website.

What opportunities do airport tenants, community members, or interested parties have if they disagree with the outcome of the updated Rules and Regulations and Minimum Standards?

David Benner (AMCG) responded that the project team will respond to all comments and questions received on the draft Airport Rules and Regulations and Minimum Standards following the end of the public comment period on December 31, 2024. Comments and questions received after that date will be considered, but not required to consider for further revision.

Matt Sykora (KCIA) added that the project team is following the rule-making process under the King County's Department of Executive Services regulations and guidance, King County Code sections 2.98 and 15.12.010. The code requires a minimum of a 45-day public comment period and publishing a public comment log of revisions.

What do you suggest airport tenants do when airports tenants can't comply with space needs (e.g. requiring independent contractors to have space for customer waiting areas)?

David Benner (AMCG) responded that there is an independent operator section of the Minimum Standards that addresses maintenance and flight training. David requested the commentor to review that section and submit their comment or question in writing.

What opportunities would a private flying club have if they don't meet the new Airport Minimum Standards?

David Decoteau (KCIA) responded that the KCIA Director has the authority to wave requirements for private businesses that can't meet the Airport Minimum Standards. A private business seeking approval to operate must describe in their application form the reasons they can't meet minimum standards and the KCIA Director will review their application.

Bob Trimborn (AMCG) added that this question and comment is the type of input the project team would find helpful in writing. Bob requested that all public comments page numbers, section numbers, and a description of the recommended change and why.

Can I get a copy of the meeting minutes from the Airport Tenant and Community meetings held on March 9, 2023, and March 12, 2024?

Lauren Wheeler (PRR) responded that she will send them after the meeting. They have since been added to the [project website](#).

Consider meeting with more FBOs to get their input on these documents.

The project team appreciated the comment.

Is KCIA considering what will happen to independent contractors who are now required to have service agreements?

Bob Trimborn (AMCG) responded that the updated Airport Minimum Standards addresses independent contractors, like mechanics and flight instructors. Please submit a public comment if you see anything in those draft requirements you would like to change and the project team will review your request and provide a response.



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Does an independent operator need as a mechanic need to have an office?

Bob Trimborn (AMCG) responded that a “non-based commercial operator” isn’t required to have an office. They can have a mobile van (i.e. for a mechanic) or they can drive onto the airport (i.e. a flight instructor). If you are a fixed operator with a business on the airport, you have to comply with the standards for a flight school or maintenance provider that has a fixed place of business on the airport.

What are the options for independent operators who are required to have a fixed business space at the airport if there is no space available?

Bob Trimborn (AMCG) responded that you have to be part of a hangar in order to comply with the updated Minimum Standard.

The updated Airport Rules and Regulations and Minimum Standards uses language that independent contractors can operate at the discretion of KCIA management. Where does that come from?

David Benner (AMCG) responded that it is within the airport’s discretion to allow independent activities. The language complies with the FAA and advisory circular: 150/5190-8.

Will the slide deck be made available?

Matt Sykora (KCIA) confirmed that the slide deck will be available for the public and that the meeting recordings will be available. Meeting recordings are available on the [project website](#).

Can the questions and answers from the first meeting be shared during this meeting?

Lauren Wheeler (PRR) responded by sharing a high-level overview of the main topics discussed during the early afternoon meeting. The topics included communications with the tenants and community members about the comment period and the length of official public comment period, that it follows King County Code of a minimum of 45 days and that the official period has been extended until the end of the year, through December 31. There was also discussion of the independent operators’ sections on the minimum standards and defining what that is and where the language resides.

There was mention that in the previous version of the documents, independent operators were not covered, have documents have been updated to cover independent operators? If not, when do you expect them to be updated?

David Benner (AMCG) responded that the language has been included in the revised document that is available for review. The sections that reference independent operators are sections 6.5 and 6.6. David also shared that independent operators are an entity that does not have a set place of business on the airport, they do not lease an office, hangar or place on the airport. Thus, any requirements for an office or hangar are not included within independent operators as that is not consistent with the FAA guidance.

Can you address the maintenance prohibition under section 3.7? The availability of maintenance operators on the field has been a significant issue, it can become impossible to use the airport based AMOs to ensure that the aircraft is air worthy at all times if the restriction is enacted.

David Benner (AMCG) suggests that this would be a great comment to submit as the project team can go through that language and provide a specific response.



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If an existing business is directly impacted by the standards, will there be provisions in place to ensure those businesses can continue to operate?

David Benner (AMCG) responded that if there is impact upon renewal of a lease agreement, the variance and exemption section of the Rules and Regulations delineate what the process would be and how that would work.

Will the airport provide a designated area for tie-down tenants to perform routine oil changes?

David Benner (AMCG) responded that this is outside of the purview of the Rules and Regulations and the Minimum Standards, as it is not the purpose of these documents to establish those areas. This comment will be discussed with airport leadership.

How do you deal with non-aviation county officials understanding aviation topics like engine replacement and insurance requirements?

David Benner (AMCG) responded that insurance requirements on a commercial basis are outlined in the Minimum Standards. There are portions of the Rules and Regulations that address types of questions like the length of time for aircraft maintenance within the section of maintenance and hangars. The Rules and Regulations and the Minimum Standards can be used as a reference, but it is outside of their purpose to be used as education materials.

David Decoteau (KCIA) added that insurance requirements are set by King County Risk Management.

Has any consideration been made to better support small business/small operators when drafting the rules and minimum standards?

Bob Trimborn (AMCG) responded that all operators of the airport were considered. David Benner (AMCG) added airport management took consideration by adding sections 6.5 and 6.6 for independent operators, as they created that framework for that type of operation.

Next steps

The public review and comment period ends on December 31, 2024. The project team will finalize Rules and Regulations and Minimum Standards in early 2025. A copy of the final versions and public comment response log will be available on the project website. Meeting recordings of the October 30, 2024, in-person meeting and Zoom Webinar are available on the [Rules and Regulations and Minimum Standards Update website](#).

Comments can be submitted:

- On the [project webpage](#)
- Emailed to: KCIACommunityOutreach@kingcounty.gov
- Mailed to:
King County Dept. of Executive Services – King County International Airport-Boeing Field
Attention: Matthew Sykora
7277 Perimeter Road South, Suite 200
Seattle, WA 98108



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Appendix A: Community Groups, Airport Tenants, and Meeting Attendees

List of community groups and airport tenants emailed meeting invitations on October 15, 2024.

Organization/Name	Affiliation
350 Seattle	Community group
Air Traffic Control	Airport tenant
Airlift Northwest	Airport tenant
Allentown Advocates	Community group
Alternate Air	Airport tenant
Ameriflight	Airport tenant
AOPA	Airport tenant
Atomic Helicopters	Airport tenant
Aviation Partners	Airport tenant
Beacon Hill Business Alliance	Community group
Beacon Hill Council	Community group
Boeing	Airport tenant
CB-Air	Airport tenant
Clay Lacy Aviation	Airport tenant
Costco	Airport tenant
Duncan Aviation	Airport tenant
Duwamish River Cleanup Coalition (DRCC)	Community group
Duwamish Valley Safe Streets	Community group
El Centro de la Raza	Community group
Erin Air	Airport tenant
Executive Jet Management	Airport tenant
Friends of Boeing Field	Airport tenant
Galvin Flying	Airport tenant
Georgetown Community Council	Community group
Go Rentals	Airport tenant
Helicopters NW	Airport tenant
Hillwood Airways	Airport tenant
Immaculate Flight	Airport tenant
Kenmore Air Express	Airport tenant
King County International Airport Community Coalition	Community group
King County Jet Center	Airport tenant
Lake Washington Partners	Airport tenant
Leading Edge	Airport tenant
Mente	Airport tenant
Modern Aviation	Airport tenant
Modern Aviation	Airport tenant



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Net Jets	Airport tenant
Non-commercial airport tenant	Airport tenant
Non-commercial airport tenant	Airport tenant
Nordstrom	Airport tenant
Pistol Creek	Airport tenant
Quieter Skies	Community group
Saltchuk	Airport tenant
Signature Flight Support	Airport tenant
Sky Service	Airport tenant
South Park Neighborhood Association	Community group
The Flight Academy	Airport tenant
The Museum of Flight	Airport tenant
UPS	Airport tenant
Valkyrie	Airport tenant
Vulcan	Airport tenant
White Center CDA	Community group

List of individuals who attended previous meetings on March 9, 2023 and March 12, 2024, and who were sent an invitation to attend on October 15, 2024.

Name
Steven
Steven Domino
Josh
Mikenzie
Neal Wilkinson
Blair
Steve
Jim
Troy
Alex Fefer
Bill Ayer
Tyler Pichette
Randall
John Sandvig
Ron
Evan Nelson
Antoine
Sven
Rick Lentz
Ali



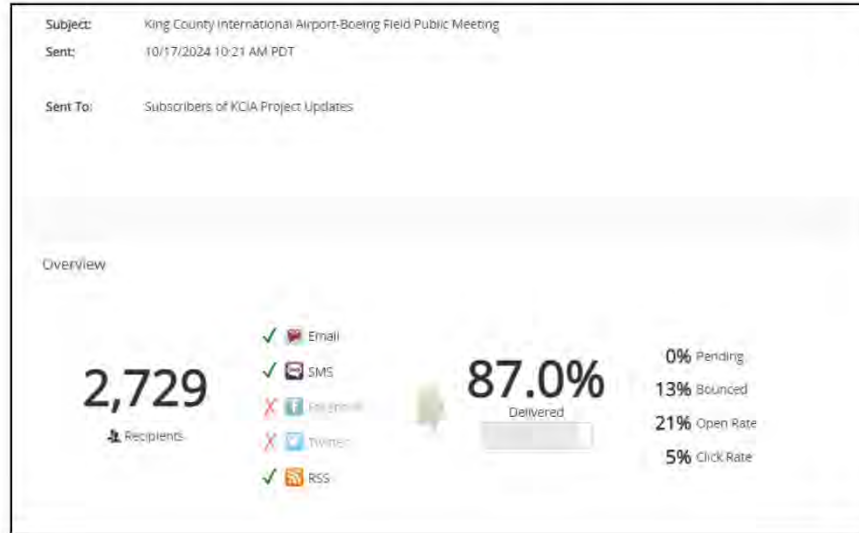
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Tony
Stephen Ratzlaff
Richard Brown; Boeing
Mason
Andrew Ouellet
Tom Koney
Ellen
Aaron Ison
Matthew Sykora
Sean Moran
Mark
Mm
dbp1027
Lauren Lasalle
Greg Thomas
Lynda and Bob Braunstein
Morgan Kaivo
Aaron Chindava
Ryan Johnson
Frank Raymond
Conny Garcia Gaitan
David Benner
Lorenzo Clara
Lauren Wheeler
John Parrott
Robert Trimborn
lynda wong
Bradley McNamara
Kim Frank
Gil White
Ian Marks
Chris Benz
John La Porta
Erik
Farah
Div
David Tennesen



Airport Rules and Regulations and Minimum Standards Update

The image below shows the delivery and open rate statistics of the email bulletin sent on October 17, 2024 to 2,729 KCIA subscribers, community members, airport tenants, and interested parties.



List of KCIA contacts emailed Notices for Rules and Regulations and Minimum Standards on October 8, 21, and 28, 2024.

	First Name	Last Name
1	River	Hatch
2	Kyle	Ferguson
3	Charlie	Footh
4	Hernan	Lara
5	Lance	McAuley
6	Jackson	Collins
7	jonathan	Asuncion
8	Elijah	Morales
9	Matthew	Harris
10	Silvana	Vasquez
11	Noah	Bennett
12	Joshua	Markovich
13	Dan	Holender
14	James	Crawford
15	Brian	Purvis
16	Nikki	Nicholson
17	Trent	Groth



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18	Peter	Dzyubak
19	Nichole	Wolfe
20	Tristan	Gossens
21	Lucas	Bowers
22	Colleen	Harrison
23	Casey	Newman
24	Jared	Waael
25	Colin	Cowger
26	Sonny	Jaber
27	Jayson	Lela
28	Matthew	Prendergast
29	Kari	Edwards
30	Jeff	Coleman
31	Zack	Neff
32	Caitlin	Hunter
33	Kyle	danielson
34	Karl	Larson
35	Ben	Alhadeff
36	Jared	Yanna
37	Brannon	Riceci
38	Richard	Guillen
39	Rosario	Maria
40	Michael	Cline
41	Andrew	Hirsh
42	Aaron	Jensen
43	Aaron	Balog
44	Alec	Chandler
45	Aaron	Chindavat
46	Adam	Crane
47	Adam	Schmid
48	Adam	Ellis
49	Donavin	Yamagishi
50	Aida	Salas
51	Stanley	Kosko
52	Robert	Braunstein
53	Aj	Kleinosowski
54	Aaron	Johnson
55	Andy	Perhach
56	Alyssa	Dean
57	Alejandro	Munoz
58	Alex	Barclay



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59	Alex	Fefer
60	Julie	Wilson
61	Allen	Wilcox
62	Anders	McAllister
63	Amie	Sinfuego
64	Ann Marie	Ward
65	Andy	Greenawalt
66	Andrew	McArthur
67	Andrew	Schumpp
68	Andrew	Ross
69	Andrew	Schiffer
70	Andrew	Ouellet
71	Andy	Wegman
72	Andy	Rottler
73	Anthonee	Gibbs
74	Anthony	Spelts
75	Anthony	Riley
76	Antoine	Leblond
77	Art	Reeck
78	Ashkan	Karimi
79	Ashley	Valent
80	Margarito	Astorga
81	KBFI AA	Flight Options
82	Austin	Wood
83	Brendon	Townshend
84	Michael	Trow
85	Earl	Baker
86	Barbara	Ramey
87	Earl	Barker
88	Bart	Kelly
89	Brian	Bartley
90	Bradley	Boeder
91	Bradley	Tilden
92	Brady	Duros
93	Ben	Pritchard
94	Ben	Ndjami
95	Bernhard	Nann
96	Bert	Shelley
97	Bradley	Falcetti
98	Signature	FBO
99	Modern	Aviation



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100	Signature Aviation	FBO
101	KBFI	NetJets
102	Scott	Lipsky
103	William	Bumback
104	Bill	Seth
105	William	Craven
106	Bill	Ayer
107	William	Schultheis
108	Billy	Muncy
109	Oleg	Glubochansky
110	Bjorn	Benson
111	Brian	Brian
112	Blair	Delaney
113	Brittany	Lee
114	Bryan	Nairn
115	Bo	Lund
116	Craig	Bomben
117	Bradley	McNamara
118	Brandon	Bowersox-Johnson
119	Brandy	Griffth
120	Breannan	-
121	Brenda	Nelson
122	Brian	Davies
123	Brian	Miller
124	Bridget	Neagle
125	Brooks	Dixon
126	Bruce	Williams
127	Bryan	Kaasa
128	Brycen	Lechner
129	David	Nelson
130	Robert	Widdekind
131	Cameron	Satterfield
132	Candice	Bushman
133	Charles	Piecuch
134	Jorge	Sanchez Yubero
135	Carl	Dennhardt
136	Carly	Elrod
137	Chad	Bronson
138	Corky	Culver
139	Christopher	Duros
140	Grant	Smith



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141	Crystal	Garcia
142	Carlo	Gimenez
143	Chad	Kiehn
144	Chad	Lundy
145	Chase	Dolliver
146	Clayton	Chase
147	Chiara	Rose Witt
148	Christian	Holtz
149	Christopher	Carey
150	Christopher	Jones
151	Christian	Poulsen
152	Christina	Rzeplinski
153	Chris	Shea
154	Christopher	Curtis
155	Chris	Mazza
156	Christopher	Saenz
157	Christy	Wilkins
158	Clint	Herman
159	Chad	Mackay
160	Connie	Collingsworth
161	Ben	Buehler
162	Matthew	Cooper
163	Boeing	Fuel Farm
164	William	Hones
165	Christina	Peters
166	Craig	Olson
167	Dagmar	Cronn
168	Craig	Sarber
169	CSR	Skyservice
170	Cindy	Wolanski
171	Cynthia	Grassie
172	David	Baugh
173	Dan	Sarusal
174	Darrell	Anderson
175	Daniel	Gonzales
176	Dara	Harrington
177	Dave	Fryles
178	David	Britton
179	David	Barabo
180	David	Garrison
181	David	Riddle



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182	Dave	Beauchene
183	David	Butler
184	David	Decoteau
185	Derek	Doell
186	Debbie	Morris
187	Debra	Hernke
188	DeVante	Daniels
189	Denise	Stecconi
190	Dennis	Beaver
191	Derick	Gowebis
192	David	Freeman
193	Daniel	Henry
194	Dirk	van der Meyden
195	Airpac	Airlines
196	Erin Air	Dispatch
197	Kenmore	Air Harbor
198	Douglas	Iverson
199	Mente	Airport Notifications
200	David	Longmire
201	Dave	Longmire
202	Donald	McClendon
203	Dave	Merdinyan
204	Donald	Kalbach
205	Doug	Wilson
206	Dennis	Schilling
207	Donald	Tingvall
208	David	Turner
209	Val	Allred
210	Dwayne	Myers
211	Derek	Weber
212	Donald	Gonzales
213	Erick	Araiza
214	Edwina	Sharp
215	Ali	Lee
216	Ernesta	Corcoran
217	Ed	Lutcavich
218	Evan	Elliott
219	Boeing Executive Flight	Operation
220	Ellen	Knowlen
221	Elijah	Barnes
222	Elizabeth	Loveness



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223	Stephen	Elop
224	Jason	Elrod
225	Emiliano	Ciarletti
226	Eric	Miller
227	Emma	Sivesind
228	Emmett	Esmond
229	Erick	Hall
230	Eric	Lynn
231	Erik	Utter
232	Erik	Schumy
233	-	-
234	Eric	Templin
235	Eric	Schneider
236	Evan	Larson
237	Deliz	Bonds
238	Vulcan	Flight Ops
239	Charlie	Fitzgerald
240	Boeing	Flight Dispatch
241	Doug	Davis
242	Reginald	Grantham
243	Francis	Zera
244	Frank	Raymond
245	Frank	Madison
246	Frank	Heffernan
247	Gabriel	De Gaalon
248	Gail	Hollings
249	Garrett	McAulitte
250	Garry	Martinez
251	Gary	Ryan
252	Geoffrey	Coyner
253	George	Pierce
254	Gerald	Stellyes
255	German	Alacron
256	Ghryn	Loveness
257	Ginger	Lake
258	Glen	Wilhelm
259	Glen	Simecek
260	Graham	Golbuff
261	Grant	Sakamoto
262	Graydon	Matheson
263	Gregory	Abbas



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264	Gregg	Allred
265	Greg	Vik
266	Karen	Mitchell
267	Jeffrey	Haas
268	Helen	Cernik
269	H. Hunter	Handsfield
270	Hamed	Khalili
271	Nick	Rios
272	Holly	Krejci
273	Howard	Wolvington
274	Hank	Thompson
275	Hung	Bui
276	Harold	Waxman
277	Ian	McKay
278	Ian	Marks
279	Carl	Huntington
280	Ilich	Vahimi
281	PNBAA	General Email
282	W. Clint	Kenner IV
283	Ivan	Miller
284	Jack	Mermis
285	James	Schultheis
286	Jason	Worbets
287	Jack	Bianchi
288	Jackie	S
289	J	Allen
290	Jamal	McCullers
291	James	Roush
292	James	Miller
293	James	Ward
294	Jim	Oien
295	James	Bush
296	Jamie	Roberts
297	Jamie	Valkyrie Leasing
298	Jesse	Archambault
299	Jason	Brown
300	Jason	Cunningham
301	Jason	Westlund
302	James	Claypool
303	John	DeFoe
304	John	DeFeo



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305	Jeff	Tjernagel
306	Jeff	Harrang
307	Jeffrey	Anthony
308	Jeffrey	McCullough
309	Jeffrey	Turnberg
310	Jeffrey	Larsen
311	Jennifer	Luce
312	Jenny Lynn	Mizner
313	Jeremiah	Lopez
314	Gerald	Spring
315	Jesse	Sorrells
316	Issac	Alexander
317	Chad	Baasch
318	John	Torode
319	Jeffrey	Hoch
320	John	Reed
321	John	Sandvig
322	Jana	Young
323	James	Evans
324	James	Young
325	Jim	Geiser
326	Justin	Julian
327	Jim	Bartley
328	Julie	Kim
329	John	Young
330	James	MacSkimming
331	Jacinda	McFeely
332	Joanne	Price
333	Joel	Eisenberg
334	John	Fennell
335	John	Hullett
336	John	Bryson
337	John	Howard
338	John	Odom
339	John	Pasola
340	John	MacDowell
341	John	Socha-Leialoha
342	John	Fiscus
343	John	Frischkorn
344	Johnny	Bianchi
345	Jon	Clark



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346	Jon	MacKenzie
347	Joseph	Emrick
348	Joseph	Hickel
349	Joshua	Eicher
350	John	Parrott
351	John	Pavel
352	James	Mathews
353	John	Reno
354	John	Hill
355	Jun	Morris
356	Josh	Whittall
357	John	Larson
358	James	Riley
359	Kapil	Vashisht
360	Katy	Asher
361	Kate	Kruller
362	Katherine	Polak
363	Katrina	Stengel
364	Kent	Cook
365	Ken	Koch
366	Kendall	Nolan
367	Ken	Horwitz
368	Kenneth	Tutino
369	Kenni	Brioso
370	Ken	Van Winkle
371	Kevin	Donahue
372	Kevin	Nolan
373	Kevin	Kinerk
374	Kevin	Shoblom
375	Kevin	Kopczynski
376	Kevin	Miller
377	Kevin	Nelsen
378	Kevin	Hughes
379	Kim	Goodspeed
380	Kevin	Hoffmann
381	Karen	Holscher
382	Kiersten	Rogowski
383	Kim	Alexander
384	Kimberly	Grass
385	Kristin	Cline
386	Kevin	Nuechterlein



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387	Kory	Keymer
388	William	Kramp
389	Kristen	Fowler
390	Ken	Snyder
391	Benjamin	Ellison
392	KBFI AA	Boeing Fuel Farm
393	Kurt	Withnell
394	Kevin	Wu
395	Kyle	Hennessey
396	Kylie	Giffin
397	Lance	Robertson
398	Larry	Green
399	Alain	Semet
400	Laura	Hill
401	Laura	Althoff
402	Lauren	LaSalle
403	LaVern	Puddy
404	Lorenzo	Clara
405	Landon	Conner
406	Lyle	Pfeifer
407	Melisa	Lea
408	Lee	Davis
409	Lee	Sterling
410	Lehman	Morris
411	Ted	Sullivan
412	Laurie	Haag
413	Lauren	Homme
414	Lee	Human
415	Liam	Cumming
416	Michael	Hemstey
417	Lynda	King
418	Leslie	Moore
419	Lauren	Maxted
420	Lockie	Christler
421	Lori	Maxfield
422	Lowell	Neal
423	Loy	Leiblie
424	Luke	Lysen
425	Lynda	Braunstein
426	Rosemary	Kanninen
427	Marc	Olson



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428	Mari	Schillios
429	Marie	Alvarado
430	Mark	Jackson
431	Mark	Hurd
432	Mark	Lawless
433	Mark	Robinson
434	Mark	McIntyre
435	Mark	Ranz
436	Marty	Rask
437	Marva	Semet
438	Marvin	Chargualaf
439	Marylynn	Walbaum
440	Matt	Dalme
441	Matthew	Wallitner
442	Matthew	Giese
443	Matthew	Thomas
444	Matthew	Yeazel
445	Matthew	Smith
446	Stefan	Maxfield
447	Maria	Batayola
448	James	McCrum
449	Noel	McDermott
450	Mel	Landquist
451	Michael	Crawford
452	Matthew	Dill
453	Ryann	Gantt
454	Melanie	Jordan
455	Melody	Estes
456	Mente	Scheduling Team
457	George	Coiner
458	Matt	Hayes
459	Mitchell	Hymowitz
460	Mia	Ayala-Marshall
461	Michael	Bol
462	Michael	Dukes
463	Michael	Durkin
464	Michael	Manning
465	Michael	Youens
466	Michelle	Krall
467	Michelle	Brower
468	Mike	Ives



Airport Rules and Regulations and Minimum Standards Update

469	Michael	Lee
470	Michael	Worden
471	Michael	Clements
472	Michael	Steen
473	Michael	Walsh
474	Mikenzie	Matteson
475	Milo	Morelli
476	Miron	Vranjes
477	Kent	Rhodes
478	Mark	Kaehler
479	Morgan	Kaivo
480	Knight	Morgan
481	Mark	Moynihan
482	Manju	Mayachar
483	Marty	Mehl
484	Tracy	Monica
485	Jonathan	Moseley
486	Lynda	Wong
487	Michael	Pecore
488	Mark	Schuster
489	Matthew	Sykora
490	Matthew	Webb
491	Edward	Lansinger
492	Narain	Gambir
493	Nathan	Strachila
494	Nancy	Devito
495	Ned	Landers
496	Neenous	Youhanna
497	Tim	Neill
498	Nathen	Hamill
499	Neal	Wilkinson
500	Nicholas	Cenci
501	Nick	Eberling
502	Nick	Soldin
503	Nick	Elliott
504	Nic	Kowaleski
505	David	Tennesen
506	Jacob	Libby
507	Nate	Spilker
508	Robert (Bob)	Rinker
509	Omo	Esemuede



Airport Rules and Regulations and Minimum Standards Update

510	Stacy	O'Neal
511	Bjorn	Hermann
512	Jetstream	OPS
513	Oscar	Contreras
514	Oscar	West
515	Bridget	Cooley
516	Pam	Kuehl
517	Pamela	Oyanagi
518	Patrick	Courtney
519	Pat	Reightley
520	Patricia	Beckman
521	Patrick	Viehoever
522	Paul	Larson
523	Paul	Duffy
524	Paul	Walton
525	Paula	Cracknell
526	Peter	Dumaliang
527	Peter	Gaylord
528	Peter	Mucklestone
529	Patrick	Guilfoy
530	Philip	Cane
531	Peter	Hoffman
532	Joseph	Edwards
533	David	Christiani
534	Paul	Maritz
535	Priya	Gupta
536	Peter	Powell
537	Richard	Kellum
538	Raleigh	Salazar
539	Olay	Louangrath
540	Richard	Bangert III
541	Ron	Davis
542	Vihaan	Maheshwari
543	Chris	Collins
544	Rebecca	Hansen
545	Renato	Salas
546	Ryan	Hubbard
547	Ricci	Coon
548	Dean	Richardson
549	Ricky	Buchanan
550	Richard	Utarnachitt



Airport Rules and Regulations and Minimum Standards Update

551	Richard	Carter
552	Rick	Payment
553	Richard	Fant
554	Rick	Payne
555	Rick	Turner
556	Gina	Bellisario
557	Riley	Wagner
558	Ray	Wallitner
559	Randy	Aspelund
560	Rachel	Manning
561	Rodrigo	Mutchi
562	Robert	Spitzer
563	Rob	Smith
564	Robert	Fishman
565	Rodney	Ragsdale
566	Roger	Hanson
567	Ron	Fincher
568	Ron	Mitchell
569	Ronald	Capalungan
570	Ronald	Darnall
571	Ron	McKune
572	Velma	Veloria
573	Jason	Roth
574	Rowena	Smith
575	Ruth	Mork
576	Ryan	Gingles
577	Saba	Rahman
578	Sameth	Mell
579	Sandy	Angers
580	Sandra	Viall-Watts
581	Sandra	Trevino
582	Sarah	Love
583	Sarah	Feller
584	Scott	Fuller
585	Scott	Magee
586	Scott	Peterson
587	Scott	Vickers
588	Scott	Helms
589	Scott	Schlag
590	Scott	Coomes
591	Scott	Dove



Airport Rules and Regulations and Minimum Standards Update

592	Susie	Cruise-Holloway
593	Scott	Curtis
594	Rebecca	Stankard
595	Geoffery	McKenzie
596	Sean	Bacon
597	Sean	Smith
598	Charlie	Beswick
599	Sean	Moran
600	Seth	Grant
601	Linwood	Robinson
602	Shawn	Flowers
603	Timothy	Heier
604	Shawn	McAuliffe
605	Shawn	Smith
606	Shawn	McDuffy
607	Shafali	Mishara
608	Sheila	Doane
609	Shon	Henshaw
610	Scott	Harrison
611	Stephen	Keyser
612	Roger	Hanson
613	Scott	Muirhead
614	Ryan	Smith
615	Spencer	Oveson
616	William	Phillips
617	Steven	Shestag
618	Stanford	Tran
619	Ron	Stence
620	Stephanie	Dickman
621	Stephen	Atheam
622	Stephen	Ratzlaff
623	Steven	werthwein
624	Steve	Lannen
625	Steve	Carkeek
626	Steven	Derengowski
627	Stephen	Taylor
628	John	La Porta
629	Ed	Sullivan
630	Susan	McKee
631	Susan	Starkey
632	Sanjay	Varma



Airport Rules and Regulations and Minimum Standards Update

633	Sven	Freitag
634	Aaron	Swain
635	Kym	Anton
636	Ted	Tax
637	Takashi	Nelson
638	Boeing	EFO
639	James	Smith
640	Timothy	Carner
641	UW	Transfer Center
642	Tony	Eayrs
643	Terry	Meyer
644	Thomas	Foster
645	Thomas	Morgan
646	Tom	Dynes
647	Thomas	Baksay
648	Tim	Lawson
649	Todd	Loomer
650	Teresa	Mason
651	Tony	Mason
652	Todd	Stabler
653	Todd	Thomas
654	Tom	Chandler
655	Tony	Eayrs
656	Tyler	Peterson
657	Taylor	Worth
658	Travis	Ugaitafa
659	Tricia	Butler
660	Trish	McGuire
661	Thomas	Roberts
662	Troy	Wagner
663	Tingyu	Wang
664	Tyler	Pichette
665	Luke	Martinsons
666	Vanessa	Chin
667	Grant	Bever
668	Victor	Mueller
669	Vincent	Calvin
670	Vitaliy	Shokur
671	Mike	V
672	Raquel	c
673	Warren	Jewell



Airport Rules and Regulations and Minimum Standards Update

674	Ryan	Giles
675	Doug	Weik
676	Wes	Gustafson
677	Wesley	Hebert
678	Joshua	Wevley
679	Bill	Clogston
680	Will	McHugh
681	Zhiyu	Chen
682	Yoichiro	Hibino
683	Zachary	Thomas
684	Zachary	Barborinas



Airport Rules and Regulations and Minimum Standards Update

Appendix B: October 30, 2024 Meeting Attendees

In-person meeting: 1-2 p.m.

Virtual Zoom Webinar: 5 - 6 p.m.

	Name
1	Douglas Iverson
2	Masner Registre
3	Brian Algiers
4	Jun Morris
5	Cohn Douglas
6	John La Porta
7	Jim Young
8	Stephn Ratzlaff
9	Bridget cooley
10	Frank Raymond
11	Jesus Brian Rivas
12	Hernan Lara
13	Brian Pennon
14	Scott Helms
15	Lynda Braunstein
16	Bob Braunstein
17	Maciej Borhowski
18	Jason Roth
19	Sun Koslo

	Name
1	Zach Dugovich
2	Andrew Ouellet
3	Brad Schuster
4	Bradley McNamara
5	Kristen Fowler
6	Cameron Satterfield
7	John La Porta
8	Skip Moshner
9	Ken Moninski
10	brm brm
11	James Mahoney
12	Joe Edwards
13	John Socha-Leialoha
14	jerry spring
15	Erik Utter
16	Bhargav Mistry
17	Bob Franks
18	Alex Barclay
19	Seema Gupta



Airport Rules and Regulations and Minimum Standards Update

Appendix C: Notifications

Asset Name	Image
<p>Notice of Intent; Published in Seattle Times online edition (October 6, 2024 - October 13, 2024) and Puget Sound Business Journal print edition (October 11, 2024)</p>	<p>NOTICE OF PROPOSED ADMINISTRATIVE RULE AND OPPORTUNITY TO COMMENT</p> <p>The director of King County's Department of Executive Services (DES), acting under the authority of King County Code sections 2.98 and 15.12.010, proposes adopting a rule concerning the establishment of Minimum Standards providing minimum qualifications and standards for the issuance of licenses and leasehold interests for commercial aeronautical activities at King County International Airport-Boeing Field (KCIA).</p> <p>In accordance with the Airport and Airway Improvement Act of 1982, 49 United States Code (U.S.C.) § 47101, et seq., and the Airport Improvement Program Sponsor Assurances, the owner or operator of any airport that has been developed or improved with federal grant assistance or conveyances of federal property assistance is required to operate the airport for the use and benefit of the public and to make it available for all types, kinds, and classes of aeronautical activity. The Surplus Property Act of 1944 (as amended by 49 U.S.C., §§ 47151-47153) contains a parallel obligation under its terms for the conveyance of federal property for airport purposes (collectively, the "Federal Obligations").</p> <p>The Federal Obligations require the owner or operator of an airport to make its facilities available for public use for aeronautical activities. The business terms imposed on those who use KCIA and its services must be reasonable and applied without unjust discrimination to any licensee or lessee who has been granted a right by the airport owner or operator to offer services normally offered to aeronautical users of the airport. Key updates to meet current Federal Obligations include changes to:</p> <ul style="list-style-type: none"> • Policy statement and exclusive rights • Agreements and amendments • Commercial Operator Permit requirements • Leased premises and security • Personnel and hours of operation • Licenses and certifications • Independent operators <p>Draft Minimum Standards Availability: The Draft Minimum Standards will be available for public review and comment beginning on October 9, 2024. An electronic copy of the Draft Minimum Standards is available at: https://publicinput.com/Customer/File/Full/f66dd09e-f15a-4de1-af01-008738e7a182. A physical copy of Draft Minimum Standards is available at the Airport Administration Reception desk, located at KCIA Main Terminal Administration Desk, located at 7277 Perimeter Rd. S., Suite 200, Seattle, WA 98108-3844.</p> <p>Public Meeting: A public meeting will be held in person and online to provide an opportunity for airport tenants and community members of the public to receive information on key revisions made in the Draft Minimum Standards and provide public comments. The in person public meeting will be held on Wednesday, October 30, 2024, 1 p.m. to 2 p.m. (Pacific Daylight Time) at the KCIA Flight Service Station, 6526 Ellis Ave S., Seattle, WA 98108. The online public meeting will be held on Wednesday, October 30, 2024, 5 p.m. to 6 p.m. (Pacific Daylight Time) via Zoom Webinar. Register for the online event here: us02web.zoom.us/join/981083844. No decisions on the Draft Minimum Standards will be made at the public meetings. Official comments on the Draft Minimum Standards must be submitted in writing as described under "comments" below.</p> <p>Comments: Comments on the Draft Minimum Standards will help King County in making an informed decision about the proposed project. Written comments can be submitted by U.S. Mail to Matt Sykora, Airport Business Manager, King County Department of Executive Services – King County International Airport-Boeing Field, 7277 Perimeter Road South, Seattle WA 98108. Written comments may also be submitted through the project website at: https://publicinput.com/u4213 or via email to: kciacommunityoutreach@kingcounty.gov. Handwritten and emailed comments, as well as comments through the project website, must be received by 5 p.m. (Pacific Daylight Time) Friday, November 22, 2024 to be considered.</p> <p>Lorraine Patterson-Harris Director, Department of Executive Services</p>



Airport Rules and Regulations and Minimum Standards Update

Notice of Intent for Rules and Regulations;
Emailed to 689 KCIA contacts on October 8, 21, and 28, 2024.

Title: KCIA Notice of Intent: Rules and Regulations



King County International Airport / Boeing Field

NOTICE OF PROPOSED ADMINISTRATIVE RULE AND OPPORTUNITY TO COMMENT

The director of King County's Department of Executive Services (DES), acting under the authority of King County Code sections 2.96 and 15.12.010, proposes adopting a rule concerning the establishment of Supplemental Rules and Regulations providing standards for facility maintenance and storage and access, badging, and escorting for commercial aeronautical activities at King County International Airport-Boeing Field (KCIA).

In accordance with the Airport and Airway Improvement Act of 1982, 49 United States Code (U.S.C.) § 47101, et seq., and the Airport Improvement Program Sponsor Assurances, the owner or operator of any airport that has been developed or improved with federal grant assistance or conveyances of federal property assistance is required to operate the airport for the use and benefit of the public and to make it available for all types, kinds, and classes of aeronautical activity. The Surplus Property Act of 1944 (as amended by 49 U.S.C., §§ 47151-47153) contains a parallel obligation under its terms for the conveyance of federal property for airport purposes (collectively, the "Federal Obligations").

The Federal Obligations require the owner or operator of an airport to make its facilities available for public use for aeronautical activities. The business terms imposed on those who use KCIA and its services must be reasonable and applied without unjust discrimination to any licensee or lessee who has been granted a right by the airport owner or operator to offer services normally offered to aeronautical users of the airport. Key updates to meet current Federal Obligations include changes to:

- Policy statement and authority
- Self-service and prohibited activities
- Variance and rejection policy
- Facility maintenance and storage
- Aircraft maintenance in hangars
- Non-commercial flying club
- Access, badging, and escorting

Draft Supplemental Rules and Regulations Availability: The Draft Supplemental Rules and Regulations will be available for public review and comment beginning on October 9, 2024. An electronic copy of the Draft Supplemental Rules and Regulations is available at: <https://publicinput.com/Customize/File/Full/ed478952-862f-477d-a460-58c7358ac64d>. A physical copy of the Draft Supplemental Rules and Regulations is available at the KCIA Main Terminal, Administration Desk, located at 7277 Perimeter Rd. S., Suite 200, Seattle, WA 98108.

Public Meeting: A public meeting will be held in person and online to provide an opportunity for airport tenants and community members of the public to receive information on key revisions made in the Draft Supplemental Rules and Regulations and provide public comments. The in person public meeting will be held on Wednesday, October 30, 2024, 1 p.m. to 2 p.m. (Pacific Daylight Time) at the KCIA Flight Service Station, 6526 Ellis Ave S., Seattle, WA 98108. The online public meeting will be held on Wednesday, October 30, 2024, 5 p.m. to 6 p.m. (Pacific Daylight Time) via Zoom Webinar. Register for the online event here: us02web.zoom.us/join/register/WN_HkgWti_mQNu4ExAdiQFUCQ. No decisions on the Draft Supplemental Rules and Regulations will be made at the public meetings. Official comments on the Draft Supplemental Rules and Regulations must be submitted in writing as described under "comments" below.

Comments: Comments on the Draft Supplemental Rules and Regulations will help King County in making an informed decision about the proposed project. Written comments can be submitted by U.S. Mail to Matt Sykora, Airport Business Manager, King County Department of Executive Services – King County International Airport-Boeing Field, 7277 Perimeter Road South, Seattle WA 98108. Written comments may also be submitted through the project website at: <https://publicinput.com/ed4213> or via email to: kciacommunityoutreach@kingcounty.gov. Handwritten and emailed comments, as well as comments through the project website, must be received by 5 p.m. (Pacific Daylight Time) Friday, November 22, 2024 to be considered.

Lorraine Patterson-Harris

Director, Department of Executive Services



Airport Rules and Regulations and Minimum Standards Update

Notice of Intent for Minimum Standards;
Emailed to 689 KCIA contacts on October 8, 21, and 28, 2024.

Title/KCIA Notice of Intent: Minimum Standards



King County International Airport / Boeing Field

NOTICE OF PROPOSED ADMINISTRATIVE RULE AND OPPORTUNITY TO COMMENT

The director of King County's Department of Executive Services (DES), acting under the authority of King County Code sections 2.98 and 15.12.010, proposes adopting a rule concerning the establishment of Minimum Standards providing minimum qualifications and standards for the issuance of licenses and leasehold interests for commercial aeronautical activities at King County International Airport-Boeing Field (KCIA).

In accordance with the Airport and Airway Improvement Act of 1982, 49 United States Code (U.S.C.) § 47101, et seq., and the Airport Improvement Program Sponsor Assurances, the owner or operator of any airport that has been developed or improved with federal grant assistance or conveyances of federal property assistance is required to operate the airport for the use and benefit of the public and to make it available for all types, kinds, and classes of aeronautical activity. The Surplus Property Act of 1944 (as amended by 49 U.S.C., §§ 47151-47153) contains a parallel obligation under its terms for the conveyance of federal property for airport purposes (collectively, the "Federal Obligations").

The Federal Obligations require the owner or operator of an airport to make its facilities available for public use for aeronautical activities. The business terms imposed on those who use KCIA and its services must be reasonable and applied without unjust discrimination to any licensee or lessee who has been granted a right by the airport owner or operator to offer services normally offered to aeronautical users of the airport. Key updates to meet current Federal Obligations include changes to:

- Policy statement and exclusive rights
- Agreements and amendments
- Commercial Operator Permit requirements
- Leased premises and security
- Personnel and hours of operation
- Licenses and certifications
- Independent operators

Draft Minimum Standards Availability: The Draft Minimum Standards will be available for public review and comment beginning on October 9, 2024. An electronic copy of the Draft Minimum Standards is available at: <https://publicinput.com/Customize/Full/1686008e-1159-4d41-a6f1-d06739a7a192>. A physical copy of Draft Minimum Standards is available at the Airport Administration Reception desk, located at KCIA Main Terminal, Administration Desk, located at 7277 Perimeter Rd. S., Suite 200, Seattle, WA 98108-3644.

Public Meeting: A public meeting will be held in person and online to provide an opportunity for airport tenants and community members of the public to receive information on key revisions made in the Draft Minimum Standards and provide public comments. The in person public meeting will be held on Wednesday, October 30, 2024, 1 p.m. to 2 p.m. (Pacific Daylight Time) at the KCIA Flight Service Station, 6526 Ellis Ave S., Seattle, WA 98108. The online public meeting will be held on Wednesday, October 30, 2024, 5 p.m. to 6 p.m. (Pacific Daylight Time) via Zoom Webinar. Register for the online event here: https://us02web.zoom.us/join/zoom/register/WN_HkqWli_mQNu4EkAdiQFUCQ. No decisions on the Draft Minimum Standards will be made at the public meetings. Official comments on the Draft Minimum Standards must be submitted in writing as described under "comments" below.

Comments: Comments on the Draft Minimum Standards will help King County in making an informed decision about the proposed project. Written comments can be submitted by U.S. Mail to Matt Sykora, Airport Business Manager, King County Department of Executive Services – King County International Airport-Boeing Field, 7277 Perimeter Road South, Seattle WA 98108. Written comments may also be submitted through the project website at: <https://publicinput.com/v4213> or via email to kciacommunityoutreach@kingcounty.gov. Handwritten and emailed comments, as well as comments through the project website, must be received by 5 p.m. (Pacific Daylight Time) Friday, November 22, 2024 to be considered.

Lorraine Patterson-Harris

Director, Department of Executive Services



Airport Rules and Regulations and Minimum Standards Update

Instagram post;

Published on October 17, 2024



kingcountyairport



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kingcountyairport KCIA is updating Airport Rules and Regulations and Minimum Standards documents to ensure safety in the overall operation, management, and... more

October 17

Instagram post;

Published on October 21, 2024



kingcountyairport



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kingcountyairport Join us at the Draft Airport Rules and Regulations and Minimum Standards Airport Tenant and Community Meeting (in person and online) on Oct. 30. Meeting info and registration are available here: publicinput.com/u4213

October 21



Airport Rules and Regulations and Minimum Standards Update

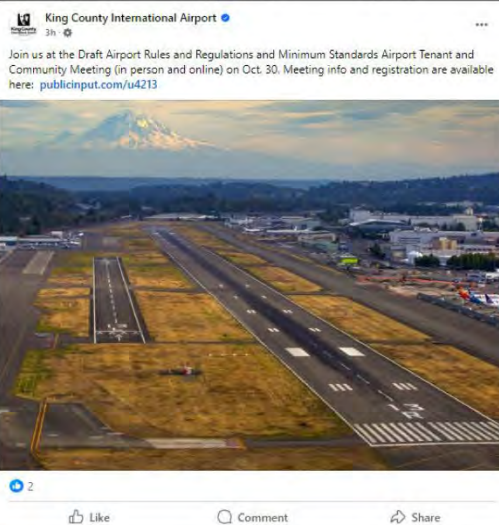
Facebook

post;
Published on
October 17,
2024



Facebook

post;
published on
October 21,
2024





Airport Rules and Regulations and Minimum Standards Update

Notice of Extension of Public Comment Period for Rules and Regulations; Published in Daily Journal of Commerce print edition (November 8, 2024)

DAILY JOURNAL OF COMMERCE ADVERTISING PROOF

Date: 11/08/2024
Adnum: 433373
Custid: 6735

Customer: KING COUNTY INTERNATIONAL AIR.
Ad Title: Rules and Regulations
Lines: 102

NOTICE OF EXTENSION OF PUBLIC COMMENT PERIOD CONCERNING PROPOSED ADMINISTRATIVE RULE

The director of King County's Department of Executive Services (DES) is extending the public review and comment period for a proposed rule concerning the establishment of Supplemental Rules and Regulations providing standards for facility maintenance and storage and access, badging, and escorting for commercial aeronautical activities at King County International Airport-Boeing Field (KCIA).

Under federal law, the owner or operator of any airport that has been developed or improved with federal grant assistance or conveyances of federal property assistance is required to operate the airport for the use and benefit of the public and to make it available for all types, kinds, and classes of aeronautical activity. Federal law requires the owner or operator of an airport to make its facilities available for public use for aeronautical activities. The business terms imposed on those who use KCIA and its services must be reasonable and applied without unjust discrimination to any licensee or lessee who has been granted a right by the airport owner or operator to offer services normally offered to aeronautical users of the airport. Key updates to meet current federal obligations include changes to:

- Policy statement and authority
- Self-service and prohibited activities
- Variance and rejection policy
- Facility maintenance and storage
- Aircraft maintenance in hangars
- Non-commercial flying club
- Access, badging, and escorting

Extension of Public Comment Period: On October 9, 2024, DES made available for public review the Draft Supplemental Rules and Regulations and set a November 22, 2024 deadline for submitting written comments. In response to community interest, DES is extending the public comment period. An electronic copy of the Draft Supplemental Rules and Regulations is available at <https://publicinput.com/CustomerFile/Fulltext418992-8244114-4490-89c7258ac64d>. A physical copy of the Draft Supplemental Rules

and Regulations is available at the Airport Administration Reception desk, located at KCIA Main Terminal, Administration Desk, located at 7277 Perimeter Rd. S., Suite 200, Seattle, WA 98108-3844. Written comments can be submitted by U.S. Mail to Matt Sykora, Airport Business Manager, King County Department of Executive Services - King County International Airport-Boeing Field, 7277 Perimeter Road South, Seattle WA 98108. Written comments may also be submitted through the project website at <https://publicinput.com/433373> or via email to kingcountyreach@kingcounty.gov. Handwritten and emailed comments, as well as comments through the project website, must be received by 5 p.m. (Pacific Daylight Time) Tuesday, December 31, 2024 to be considered.

Lorraine Patterson-Harris
Director, Department of Executive Services

Date of first publication in the Seattle Daily Journal of Commerce, November 12, 2024.
11/19/433373



Airport Rules and Regulations and Minimum Standards Update

Notice of Extension of Public Comment Period for Minimum Standards; Published in Daily Journal of Commerce print edition (November 8, 2024)

DAILY JOURNAL OF COMMERCE ADVERTISING PROOF

Date: 11/08/2024
Adnum: 433372
Custid: 6735

Customer: KING COUNTY INTERNATIONAL AIR.
Ad Title: Minimum Standards
Lines: 68

NOTICE OF EXTENSION OF PUBLIC COMMENT PERIOD CONCERNING PROPOSED ADMINISTRATIVE RULE

The director of King County's Department of Executive Services (DES) is extending the public review and comment period for a proposed rule concerning the establishment of Minimum Standards providing minimum qualifications and standards for the issuance of licenses and leasehold interests for commercial aeronautical activities at King County International Airport-Boeing Field (KCIA).

Federal law requires the owner or operator of an airport to make its facilities available for public use for aeronautical activities. The business terms imposed on those who use KCIA and its services must be reasonable and applied without unjust discrimination to any licensee or lessee who has been granted a right by the airport owner or operator to offer services normally offered to aeronautical users of the airport. Key updates to meet current federal obligations include changes to:

- Policy statement and exclusive rights
- Agreements and amendments
- Commercial Operator Permit requirements
- Leased premises and security
- Personnel and hours of operation
- Licenses and certifications
- Independent operators

Extension of Public Comment Period: On October 9, 2024, DES made available for public review the Draft Minimum Standards and set a November 22, 2024 deadline for submitting written comments. In response to community interest, DES is extending the public comment period. An electronic copy of the Draft Minimum Standards is available at: <https://publicinput.com/Customer/File/FullReadRuleFileId=433372>.

Public Input: A physical copy of Draft Minimum Standards is available at the Airport Administration Reception desk, located at KCIA Main Terminal, Administration Desk, located at 12711 Perimeter Rd. S., Suite 200, Seattle, WA 98108-3844. Written comments can be submitted by U.S. Mail to Matt Sykora, Airport Business Manager, King County Department of Executive Services – King County International Airport-Boeing Field, 12711 Perimeter Road South, Seattle

WA 98108. Written comments may also be submitted through the project website at <https://publicinput.com/433372> or via email to: kciacomcommunityoutreach@kingcounty.gov. Handwritten and emailed comments, as well as comments through the project website, must be received by 5 p.m. (Pacific Daylight Time) Tuesday, December 31, 2024 to be considered.

Lorraine Patterson-Harris
Director, Department of Executive Services

Date of first publication in the Seattle Daily Journal of Commerce, November 12, 2024.
11019(433372)



Airport Rules and Regulations and Minimum Standards Update

Notice of
 Extension of
 Public
 Comment
 Period;
 Published in
 Seattle Times
 print edition
 (November
 14, 2024)

