





# KING COUNTY AUDITOR'S OFFICE

**DECEMBER 12, 2023** 

# King County Airport: Accountability and Transparency Could Strengthen Community Engagement

JUSTIN ANDERSON NASTASSJA CAMPBELL ANU SIDHU BROOKE LEARY

#### **EXECUTIVE SUMMARY**

Communities living around King County International Airport (KCIA) are largely Black, Indigenous, and People of Color, underscoring the importance of addressing environmental harms in line with King County's commitment to address racism as a public health crisis. However, KCIA has not documented goals and strategies to address environmental impacts on nearby communities, creating gaps in accountability. While KCIA leaders state an ambitious goal to be a world class green airport, they have not articulated how they will meet this vision, creating risk that they will not achieve their goals and will erode public trust. In addition, KCIA has no formal strategy to incorporate community input into its processes. As a result, community concerns may not be considered or addressed. We recommend that KCIA develop a strategic plan that incorporates goals, objectives, strategies, and performance measures to evaluate progress, and take steps to better incorporate community input into its planning and operations.

# Acknowledgment

We would like to thank leaders and staff of the King County International Airport (KCIA), Airport Advisory Roundtable members, and the KCIA Community Coalition for their collaboration during this audit. KCIA management made themselves available to answer questions, responded to document requests efficiently, and directed us to key staff such as the Federal Aviation Administration during the course of this audit. The agency's desire to improve its practices to align with county goals is notable and appreciated. Airport Roundtable members participated in the audit process in a variety of ways including through interviews and survey; we appreciate the time they took to engage with us. The KCIA Community Coalition met with us several times so we could better understand community perspectives and concerns related to airport operations. The coalition's input provided important context to our audit findings and recommendations.

#### KCIA is taking positive steps to implement equity and environmental considerations into its work.

For example, KCIA is implementing a locally targeted internship hiring process, installing electric vehicle charging stations and LED lights on runways, and has provided resources for noise insulation for homes surrounding the airport. KCIA is also pursuing carbon accreditation certification through the Airport Carbon Accreditation program with a goal to be carbon neutral by 2030. KCIA endeavors to be more proactive in its community engagement efforts and, to that end, airport leaders hired a community engagement liaison in 2022. There are several other ways KCIA tries to engage community and its stakeholders, which are detailed in section 3 of this report.

#### REPORT HIGHLIGHTS

#### What We Found

King County International Airport (KCIA) lacks a clear strategy to achieve its goal of becoming a world class green airport. Its last strategic plan expired in 2020, and KCIA cannot clearly demonstrate how its efforts align with larger county goals like the King County Strategic Climate Action Plan and the King County Equity and Social Justice Strategic Plan. KCIA leaders indicated that Federal Aviation Administration (FAA) requirements present a financial barrier to environmental and equity activities, but peer airports use strategic plans to advance these goals and, in some instances, are supported by FAA grants. In cases where the FAA is not funding a project, we found that the FAA does not prevent airports from pursuing environmental or equity activities supported and funded by an airport's respective jurisdictions.

KCIA has a variety of avenues to receive community input that could influence airport projects and operations but has no formal strategy to incorporate community input into its processes. Without a formal strategy, KCIA relies on project-based community engagement where communities may be engaged late in the capital project process. As a result, community concerns may not be considered or be addressed. Lastly, the KCIA Airport Advisory Roundtable, a body of community members and stakeholders intended to advise the airport and elected county leaders, is not performing key functions, consequently limiting community input in KCIA operations.

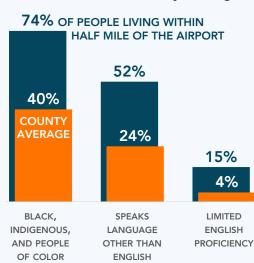
#### What We Recommend

We recommend that KCIA develop, document, and implement a new strategic plan that includes goals, objectives, strategies, and performance measures that align with county environmental and equity commitments. To close communication gaps, we recommend KCIA have better plans to effectively communicate its environmental and equity strategies and associated data to the surrounding community. We also make recommendations to help ensure KCIA's Roundtable is meeting its stated goals.

#### Why This Audit Is Important

Communities living around the airport are largely Black, Indigenous, and People of Color, underscoring the importance of addressing environmental harms in line with the County's commitment to address racism as a public health crisis. For example, the communities near KCIA have higher rates of poverty and greater racial diversity than King County as a whole. Airport operations have significant environmental impacts that can harm people, including impacts to air and water quality.

Communities living near King County International Airport are more diverse than county average.



Source: King County Auditor's Office analysis of American Community Survey data, 2010–2014

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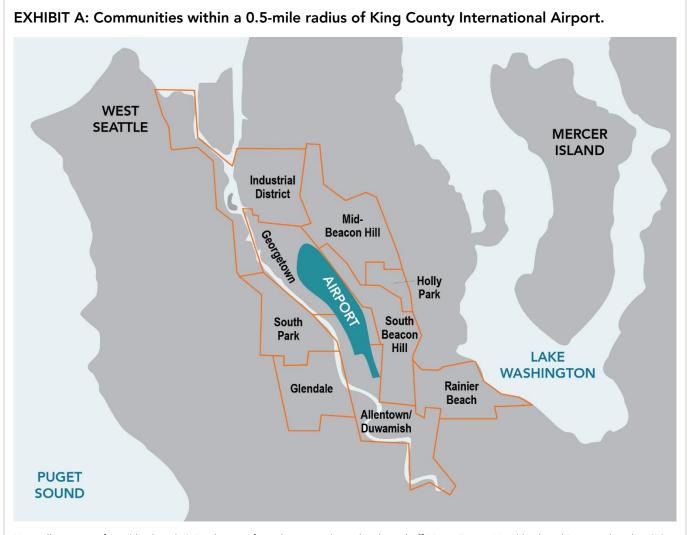
# Section 1: King County International Airport Q&A

#### **SECTION SUMMARY**

This section outlines the ways in which King County International Airport (KCIA) receives funds to operate, how airport operations may affect the people who live near the airport, and how KCIA manages relationships with stakeholders. KCIA operates south of downtown Seattle, near many residential neighborhoods, which exposes these communities to environmental harm. People living near the airport are among the most racially and linguistically diverse in King County. To conduct its operations, KCIA must balance the interests of multiple stakeholders, including its neighboring communities, the aviation community, tenants, and the Federal Aviation Administration (FAA). One of the ways KCIA manages its relationship with these stakeholders is through the Airport Advisory Roundtable (Roundtable).

## ? Where is KCIA and who does it serve?

**KCIA** is four miles south of downtown Seattle in the center of many residential neighborhoods (see exhibit A). The airport serves small commercial passenger airlines, cargo carriers, private plane owners, helicopters, corporate jets, and military aircraft for external entity tenants. KCIA tenants range from companies such as the United Parcel Service (UPS) and The Boeing Company, to flight schools, charter operations, and The Museum of Flight. As of 2019, KCIA averages roughly 500 takeoffs or landings daily, or about 180,000 per year. Most of these flights—roughly 80 percent—are general aviation flights, which means they are not scheduled commercial passenger or cargo flights.



Note: Illustration of neighborhoods 0.5 mile away from the airport boundary based off Metro Transit Neighborhood Data analyzed in GIS. Portions of the neighborhoods displayed in the map above fall within 0.5 mile of the airport, but not necessarily the entire neighborhood.

Source: King County Auditor's Office analysis of Metro Transit Neighborhood Data and City of Seattle Neighborhood Map Atlas



#### ? What are common environmental impacts of airports?

Airport operations create noise and air pollution and contribute to global climate change. Research shows that plane takeoffs, landings, and engine testing cause noise pollution that can affect a person's quality of life, especially for those who live close to an airport. The Environmental Protection Agency (EPA) found that noise has a direct impact on a person's health. Health concerns include

<sup>&</sup>lt;sup>1</sup> US Environmental Protection Agency, Clean Air Act Title IV - Noise Pollution, 1990, www.epa.gov/clean-air-act-overview/cleanair-act-title-iv-noise-pollution (accessed October 26, 2023).

stress-related illnesses, high blood pressure, hearing loss, and sleep disruption. In addition, engine emissions contribute to global climate change through greenhouse gas emissions and localized air pollution. For example, a 2019 study conducted by the University of Washington found elevated levels of ultrafine particles from aircraft in neighborhoods downwind of Seattle–Tacoma International Airport (Sea–Tac).<sup>2</sup> Smaller general aviation aircraft can pose heightened risk to communities because these planes often use leaded fuels. A study published in 2021 by Santa Clara County found elevated lead levels in children who live in neighborhoods near Reid-Hillview Airport.<sup>3</sup> Ground vehicles used at the airport for cargo and personnel can also contribute to airport emissions. In addition to noise and air pollution, runoff from fuel and chemicals can potentially contaminate public waterways.

# ? How else are KCIA neighboring communities impacted?

People living near KCIA are also exposed to environmental harms of Sea–Tac and contaminated waste sites. People living near the airport are exposed to environmental harms from operations of both KCIA and Sea–Tac, which is about two miles south of the KCIA boundary. Those who live near KCIA also live near the Duwamish River, which has been identified by the EPA as one of the most polluted rivers in the country. A study from the Duwamish River Cleanup Coalition shows that people who live in zip codes that are near KCIA also live near the greatest number of contaminated waste sites and have lower life expectancy rates compared to the rest of King County.<sup>4</sup>

# Who are the people most at risk of facing environmental harm from KCIA operations?

The people who live near KCIA are more racially and linguistically diverse than the county average. Seventy-four percent of people who live in census tracts within a half mile of the airport boundary are Black, Indigenous, and People of Color (BIPOC)—nearly two times higher than the county average (see exhibit B

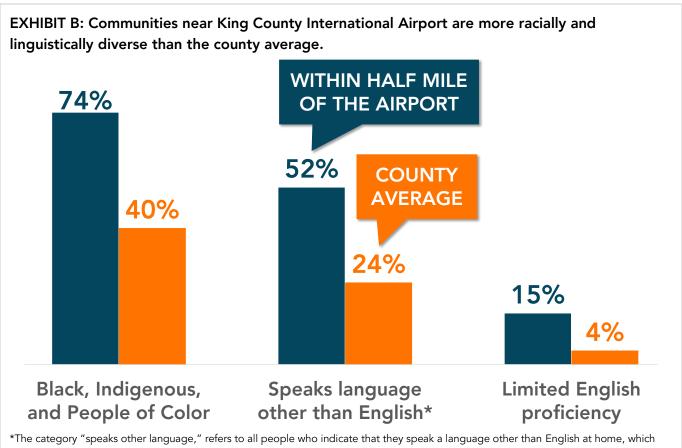
<sup>&</sup>lt;sup>2</sup> "Mobile Observations of Ultrafine Particles," University of Washington, December 2019.

<sup>&</sup>lt;sup>3</sup> "Leaded Aviation Gasoline Exposure Risk at Reid-Hillview Airport in Santa Clara County, California," Mountain Data Group, August 2, 2021.

<sup>&</sup>lt;sup>4</sup> "Duwamish Valley Cumulative Health Impacts Analysis: Community Fact Sheet," Duwamish River Cleanup Coalition, March 2013.

and appendix 1). The census tract with the highest concentration of BIPOC individuals in King County is located within this half-mile radius, with boundaries that cross into both Holly Park and Beacon Hill.

People around the airport have different language needs than the rest of King County.<sup>5</sup> Fifty-two percent of people speak a language other than English at home, which is more than two times higher than the county average.<sup>6</sup> Fifteen percent have limited English proficiency, which is more than three times higher than the county average.



includes both people with English proficiency and limited English proficiency.

Note: Averages are five-year estimates derived from 2012-2016 American Community Survey data.

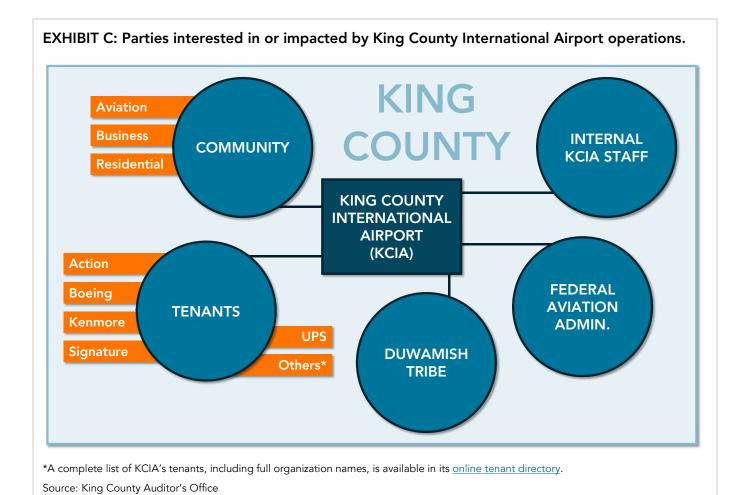
Source: King County Auditor's Office analysis of American Community Survey Data, 2010-2014

<sup>&</sup>lt;sup>5</sup> People around the airport are defined as those living in census tracts within a 0.5-mile radius of the airport.

<sup>&</sup>lt;sup>6</sup> The category "speaks other language," refers to all people who indicate that they speak a language other than English at home, which includes both people with English proficiency and limited English proficiency.

#### ? Who are the parties impacted by KCIA operations?

Parties impacted by KCIA operations include nearby residents, Indigenous people, airport tenants, businesses in the surrounding neighborhoods, the aviation community that uses the airport, and the FAA. Residents are defined as people who live in neighborhoods around the airport, including Indigenous communities such as the Duwamish Tribe. Tenants are external entities who use the airport's property for their own operations. This includes companies such as Skyservice, Modern Aviation, Signature Flights, and The Boeing Company. The aviation community includes general aviation pilots—some of whom created an organization to preserve the interests of general aviation in KCIA's planning. The FAA issues and enforces regulations covering manufacturing, operating, and maintaining aircraft. See exhibit C for a map of parties interested in, or impacted by, KCIA operations.



#### ? How does KCIA manage its relationships with impacted parties?

One way KCIA manages relationships is through the Roundtable, which is an advisory group with representatives from aviation-related businesses and residential communities. The Roundtable consists of 16 representatives. People who live in communities directly impacted by the airport make up half of the members. The Roundtable bylaws outline representation eligibility from these communities: Georgetown, Magnolia or North Seattle, Tukwila, Renton/Kent/South King County, Beacon Hill/Rainier Valley, West Seattle, unincorporated King County areas, and one at-large representative. The remaining members include four airport tenant representatives, two labor representatives, one Pilot's Association representative, and one off-site aviation-related commercial enterprise representative.

The Roundtable was initially established in 1997. The Roundtable's bylaws state its purpose is to "advise and make recommendations to the airport management, county executive and county on airport budget, programs, regulations, master plans, noise reduction strategies and other related matters." The group hosts monthly public meetings that Roundtable members and KCIA staff attend.

# ? Who regulates KCIA operations?

### The FAA regulates all United States civil aviation activities by enforcing regulations that include manufacturing, operating, and maintaining aircraft.

The FAA regulates air traffic control and oversees all takeoffs and landings for the airport. In addition to providing the system for safe and efficient air navigation, the FAA also issues standards for safe airport design, construction, and operation. It authorizes charges for passenger facilities and awards grants to airports for specific projects. It also regulates aircraft noise, both through setting and enforcing aircraft certification requirements and evaluation of noise from air traffic. KCIA must comply with FAA regulations in order to operate and to receive funding from the FAA.

# ? How are KCIA's operations and capital projects funded?

KCIA is funded through airport fees and grants from the FAA; the airport receives no direct funding from King County. KCIA generates revenue from lease agreements with airport tenants. For instance, The Boeing Company operates on KCIA property and pays KCIA for its operations based on the terms of its lease agreement. KCIA also receives funding from the FAA's Airport Improvement Program (AIP). The AIP provides grants for the planning and development of public-use airports. Projects eligible for funding include improvements that enhance airport safety, capacity, security, and eligible environmental concerns. Projects typically must improve the airport's physical assets to be eligible for AIP funding, and AIP grants also typically require returning the award amounts if future operations do not comply with the grant's terms. Airports can pursue projects beyond the FAA requirements, but these projects do not receive FAA funding.

# Section 2: Environmental and Equity Strategic Planning Would Increase Accountability

#### SECTION SUMMARY

Although KCIA has taken some actions to advance King County's sustainability and equity efforts, it has not defined goals or specified strategies to reach them, limiting its accountability and potential for positive change. KCIA has not had a strategic plan since 2020 and lacks specific objectives, strategies, and performance measures for its sustainability and equity efforts. Without these basic strategic planning elements, KCIA has limited accountability for advancing the County's commitments to environmental sustainability and equity—despite its proximity to the most diverse and environmentally burdened communities in King County. KCIA leaders believe the FAA requirements can be a financial barrier to sustainability and equity activities, but peer airports use strategic plans to advance these efforts, and are, in some instances, supported by FAA grants. Further, KCIA does not prioritize capital projects by their potential environmental and equity benefits, limiting its ability to ensure new projects further sustainability and equity goals. We recommend that KCIA develop a strategic plan that identifies specific sustainability and equity goals, objectives, strategies, and measures to focus its efforts and increase transparency.

KCIA does not have a plan to address the environmental and equity impacts of airport operations

KCIA has not defined goals and strategies to address the environmental and equity impacts of its operations. As a result, KCIA cannot ensure its efforts contribute to larger county goals, nor can it measure progress toward positive change. The King County Strategic Climate Action Plan (SCAP) and King County Equity and Social Justice Strategic Plan include goals directly related to the environmental and equity impacts of KCIA's operations. However, KCIA has not developed a plan to ensure its efforts support these goals. Moreover, although KCIA leaders reported that the airport is aligned with countywide environmental and equity goals, they could not identify how airport projects and actions directly support them. For example, one of the SCAP priority actions is to evaluate strategies to reduce aircraft emissions by integrating emission targets into KCIA's plans and operational decisions. KCIA leaders explained that its Airport Carbon Accreditation Program (ACAP) effort supports SCAP, but the work program for that effort does not implement the actions described in the SCAP or include the SCAP emission targets.

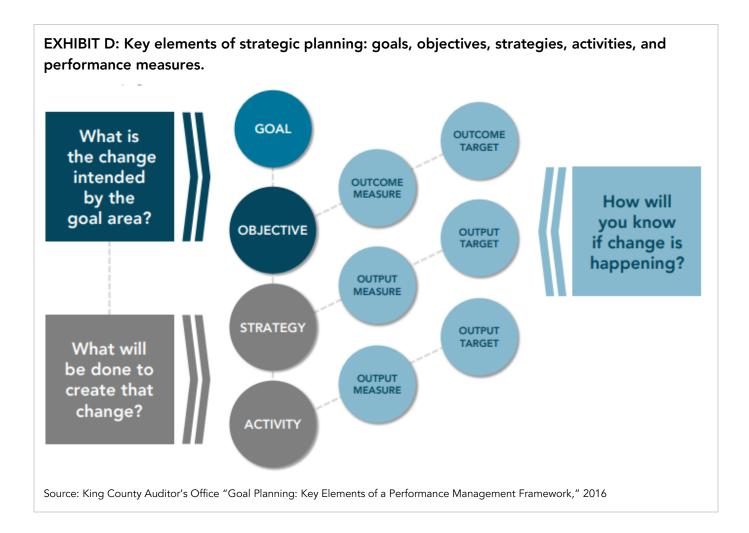
KCIA does not report on environmental or equityrelated performance

KCIA's performance monitoring is focused on regulatory compliance, and so it does not track or report on whether it is making progress addressing environmental and equity impacts. KCIA's performance measures for activities related to the environment and equity are limited to those necessary for compliance with county, state, and federal regulatory requirements. For example, managers explained how KCIA processes incorporate King County's requirements for equity impact reviews and compliance with its Green Building ordinance. They also described how projects address state and federal regulations for environmental permits and shared their performance measures related to timely completion of capital projects. However, KCIA does not have performance measures for advancing sustainability or equity goals, or a framework that shows how specific projects relate to sustainability or equity-related objectives. Without that framework—showing how KCIA's efforts contribute to county and KCIA goals by reporting how far it has advanced toward its intended impact—KCIA cannot assess or demonstrate its progress toward environmental or equity-related improvements.

Strategic planning helps create accountability for achieving results KCIA has not had a strategic plan since 2020, and its 2014–2020 strategic plan did not specify strategies or targets for its sustainability goals. Organizations use strategic planning to help ensure they achieve their priorities. Through strategic planning, agencies identify broad goals and specific objectives, develop strategies to achieve these goals and objectives, and create performance measures to track results and help leadership fine-tune future strategies. King County Code requires that agencies complete strategic planning to support continuous improvement and to help ensure accountability for county resources. Without a strategic plan, KCIA does not have a framework with which it can ensure its environmental and equity-related activities are linked to intended positive impacts, monitor and report on progress in achieving its goals, or adapt activities to improve outcomes. Exhibit D shows the relationship of these key elements of strategic planning.

<sup>&</sup>lt;sup>7</sup> King County Code 2.10.034

<sup>&</sup>lt;sup>8</sup> In May 2015, KCIA issued a 2014–2020 strategic plan that included an environmental stewardship goal, with objectives to enhance the noise mitigation program, align airport programs and services with county climate change goals, and incorporate environmentally sensitive design into its capital projects. However, the 2014–2020 plan did not specify strategies for accomplishing these objectives or identify performance targets to measure progress.



KCIA's leading environmental effort already includes elements of strategic planning

A primary KCIA environmental effort already includes elements of strategic planning, demonstrating the value of strategic planning to KCIA in advancing sustainability. Unique among KCIA's efforts is pursuing certification through the Airport Carbon Accreditation Program (ACAP). ACAP has six levels of certification, with the highest representing carbon neutrality for internal operations. KCIA is the first general aviation airport in Washington to seek ACAP accreditation and has developed a work program to accomplish full certification by 2030. KCIA's ACAP work program steps are similar to the steps of strategic planning—both require KCIA to document the strategies it will use to reach each objective, and performance measures to monitor and communicate progress.

The ACAP effort is unique, however, in that KCIA has no other documented, time-based, measurable commitments to sustainability or equity goals of its

**own**. <sup>9</sup> KCIA's present communications about its progress on ACAP focus on compliance (e.g., achieving level-two certification) rather than sustainability-related outcomes (e.g., amount of carbon emissions reduced). However, KCIA's ACAP effort could serve as an example for a future strategic planning framework. Appendix 2 includes an illustration of how the ACAP effort can be represented consistently with the elements of a strategic plan.

#### Recommendation 1

King County International Airport should develop, document, and begin implementing a strategic plan that includes goals, objectives, strategies, activities, and performance measures for accomplishing sustainability and equity goals, consistent with those in countywide strategic plans relevant to the airport.

Peer airports have sustainability goals and strategies that align with the FAA requirements

KCIA leaders expressed concern that the FAA requirements present barriers for environmental initiatives, but peer airports use the FAA guidance and grant programs to support environmental mitigation efforts. Given the importance of air safety, the FAA regulates airport operations and funds airport improvements through AIP grants. KCIA leaders expressed that the FAA regulatory requirements can limit KCIA's ability to respond to community interests and develop sustainability strategies to address airport environmental impacts. However, regional FAA leadership explained to us that they do not categorially exclude airports with sustainability or equity goals from consideration for AIP grants. Rather, the FAA awards AIP grants based on whether a proposed project qualifies with the specific grant terms. Barring direct conflicts with existing regulations or grant terms, airports are free to adopt sustainability or equity goals as they wish. Moreover, some airports have received FAA AIP grants to support sustainability-specific planning.

Peer airports have reduced planning challenges by creating stand-alone plans for sustainability and equity goals. In accordance with FAA requirements, KCIA has a master plan that addresses the long-term capital needs and forecasts of future airport traffic. KCIA leadership suggested to us that their ongoing master plan update

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<sup>&</sup>lt;sup>9</sup> KCIA also began the International Air Transport Association's Environmental Assessment certification program (IEnvA) in July 2023. IEnvA is a certification program that assesses KCIA's continuous improvement of its environmental and sustainability performance, and KCIA intends to initiate the IEnvA scope, policy, and program plan by the second quarter of 2024. When drafted, the IEnvA Plan may serve as second example of KCIA using a strategic planning approach to achieve sustainability goals.

process would address sustainability goals. However, other airports who considered this approach noted that the FAA's master planning requirements are more narrowly focused than the other airports' larger sustainability or equity goals. Accordingly, they reported that balancing these goals along with aviation needs in the FAA-required master plan can be challenging. For this reason, some airports have developed standalone plans for sustainability goals and implementation strategies. As KCIA leaders develop the strategic plan recommended above, they should consider the corresponding work already completed by peer airports.

Appendix 2 includes an illustration of how Centennial Airport in Colorado structures its sustainability planning consistent with the elements of a strategic plan.

#### Recommendation 2

King County International Airport should review the sustainability and equity goals of peer airports to aid in development of its strategic plan.

KCIA's criteria for selecting airport projects do not include environmental and equity impacts

KCIA does not currently prioritize capital projects according to their potential environmental and equity benefits, limiting its ability to ensure new projects further these goals. KCIA's process for selecting and prioritizing the projects in its current capital improvement program did not include scoring criteria that considers environmental and equity impacts. Rather, KCIA advanced capital projects based on their potential for AIP grant funding or perceived operational need. This means that while projects often had elements related to environmental regulation—such as stormwater mitigation—project choice and prioritization may not have been considered based on their potential to advance sustainability or equity goals. KCIA recently reorganized its capital project organizational structure to include planning and monitoring, and staff are developing project selection criteria that includes scoring for potential sustainability and equity benefits. Formalizing this process is essential in linking specific KCIA projects with documented sustainability and equity goals and strategies. By doing so, KCIA will be better able to identify and select individual projects that advance its objectives and King County's larger sustainability and equity goals.

King County International Airport should develop, document, and apply criteria for selection and prioritization of capital projects that support the strategies identified in its strategic plan.

# Section 3: Opportunities to Improve Community Engagement

#### SECTION SUMMARY

KCIA has a variety of avenues to receive community input that could influence airport projects and operations but has no formal strategy to incorporate community input into its processes. Without a formal strategy, KCIA relies on project-based engagement where communities are often engaged in the capital project planning process. As a result, community concerns may not be considered or get addressed. Unlike other airports we interviewed, KCIA does not clearly communicate its efforts to address environmental and community concerns to the broader public, such as its noise management program. This lack of transparency means that KCIA's positive work is often unrecognized, and the community's ability to identify issues and concerns is limited and may erode public trust over time. While KCIA's Roundtable (a body of community members and stakeholders who convene to discuss airport operations) receives updates on KCIA's efforts, the Roundtable is not performing key functions established in its bylaws, which limits community input in KCIA operations and may make it difficult for the airport to meet King County's equity goals.

KCIA has taken steps to engage community KCIA has taken initial positive steps to engage neighboring communities and its stakeholders (see exhibit E). For example, KCIA convenes a Roundtable of community members and stakeholders that meet monthly to discuss airport operations (see section 1 for more information on group composition). The Roundtable bylaws state the group's purpose is to advise and make recommendations to KCIA leadership, King County Council, and King County Executive. The Roundtable is described as a place where KCIA can share updates with community and where members can share concerns with KCIA leadership. KCIA also convenes working groups on some capital projects that KCIA leadership identifies as having an impact on the community. In 2022, KCIA hired a community engagement liaison to help coordinate relationships with local community organizations. The liaison attends community meetings and informs community members of changes in airport operations.

# EXHIBIT E: King County International Airport engages community and stakeholders in several ways.



#### **ROUNDTABLE**

Group of community members and stakeholders that meet monthly to discuss airport operations



# WORKING GROUPS

Convened at project charter phase of certain capital projects to provide community input



## COMMUNITY ENGAGEMENT LIAISON

Works with community organizations to inform them about airport operations

Source: King County Auditor's Office analysis

KCIA does not have a formal community engagement plan

KCIA does not have a clear and formalized plan to consistently and intentionally incorporate community input in airport planning and operations, meaning community concerns are not proactively addressed, frustrating some community members. King County declared racism a public health crisis in 2020, and the County outlines community engagement as one strategy to respond to this crisis. In addition, the King County Equity and Social Justice Strategic Plan outlines community partnerships as a goal area, reiterating that people impacted by county operations need to be involved in the decision-making process. King County community engagement guidance states that engagement "should offer opportunities for communities to express their views and have a meaningful role in decision-making. Effective engagement removes barriers that may have previously prevented residents from successfully working with county government." While KCIA has taken initial steps to engage its neighboring residents, it describes its community engagement strategy as an informal process. For example, KCIA

<sup>&</sup>lt;sup>10</sup> King County Community Engagement Guide. May 2011. <a href="https://kingcounty.gov/en/-/media/elected/executive/equity-social-justice/documents/CommunityEngagementGuideContinuum2011.pdf">https://kingcounty.gov/en/-/media/elected/executive/equity-social-justice/documents/CommunityEngagementGuideContinuum2011.pdf</a>

leadership decides whether and when a working group will be convened on projects they identify as impacting surrounding neighborhoods. Without a clear engagement strategy, KCIA may miss opportunities to proactively address community concerns which can lead to frustration among community members who may look to alternative outlets to address concerns.

As a positive first step, KCIA's community engagement liaison has started to develop a community participation plan which describes KCIA's community engagement objectives, strategies, and the federal requirements KCIA must comply with. A more thorough community engagement plan includes articulating the purpose of community engagement, identifying individuals and groups that are impacted by an entity's operations, and a clear communication strategy to inform the community of how their input is being considered.

#### Recommendation 4

The King County International Airport should develop, document, and implement a formal community engagement plan in alignment with county guidance.

#### Recommendation 5

The King County International Airport should seek, document, and incorporate community input in developing the strategic plan in Recommendation 1.

Community too late

KCIA engages communities too late in the capital project planning process which may be engaged may limit community perspectives. The FAA breaks down capital projects into five phases, from pre-planning to close-out (see exhibit F). FAA community engagement guidance states that communities should be involved as early as possible in projects, but in its existing process KCIA does not involve community until phase 3 of the planning phase. In contrast, the FAA recommends identifying community stakeholders and developing a community involvement plan as early as phase 1 during project preplanning. In addition, staff from peer airports we interviewed mentioned that early community input helps them better incorporate concerns as well as work with the FAA to proactively address community needs.



KCIA engages communities during the planning phase of the project life cycle, but there are opportunities to engage earlier. As described above, KCIA establishes working groups to facilitate community input on some capital projects that KCIA leadership identifies as impacting the community. KCIA indicated these groups are set up at the planning phase (phase 3 of the FAA project life cycle), after a capital project is selected and a project summary has been created. For example, KCIA convened a working group to help decide on the location of the new airport fuel farm, a group of tanks that store fuel for aircrafts. During the fuel farm working groups, KCIA asked community members to select from a set of four alternative locations for the tanks. Similarly, KCIA convened a working group for community members to help decide what type of fence to install in the area that borders the Georgetown neighborhood. While working groups provide important opportunities for community input, community members we spoke to expressed frustration with them, saying that they felt their input is being provided too late in the capital project planning process cycle.

#### Recommendation 6

As a part of the community engagement plan in Recommendation 4, King County International Airport should identify opportunities to engage community as early as possible in the capital project life cycle.

Limited communication hinders community relations

KCIA does not effectively communicate its efforts to mitigate its environmental impacts and address community concerns. This lack of transparency means community members may believe KCIA does not prioritize King County's equity and environmental sustainability values, potentially eroding public trust over time. For example, KCIA is pursuing carbon accreditation to help minimize the airport's carbon footprint and states that it monitors data on airport-related carbon emissions for this accreditation. However, KCIA does not document or share the steps and strategies it is taking to meet accreditation requirements, or the data associated with this process, on its website or elsewhere for community to easily see, making it difficult for those external to the airport to know what steps KCIA is taking to mitigate environmental impacts. The FAA *Community Involvement Manual* states that communicating airport efforts is important to help build trust with community.

While KCIA's Roundtable receives updates on KCIA's efforts, the County's Office of Equity, Racial, and Social Justice indicated that information should be communicated clearly to the broader public, not just people attending specific meetings. This is because information communicated to smaller groups may stay siloed and not reach community members more broadly. As a result, community members may believe the airport does not prioritize county values around equity and the environment—potentially eroding public trust over time.

#### Recommendation 7

As a part of the community engagement plan in Recommendation 4, King County International Airport should identify and document how it intends to:

- a. communicate the strategic plan in Recommendation 1, including goals, objectives, strategies, activities, and performance measures
- b. communicate and report on the status of sustainability and equity-related efforts, including the outcomes of recently completed efforts
- c. address concerns raised by the community.

# Noise data not publicly shared

KCIA's noise management program does not display key data publicly, making it difficult for community members and others to know whether efforts to mitigate noise are working. KCIA's noise management program includes goals to mitigate noise impacts from airport operations on the surrounding community. Program staff indicated they track noise level data internally. However, while KCIA

compiles reports on noise complaint data it does not publicly display this information, or data on noise levels, for community to see whether mitigation efforts are working. The National Business Aviation Association states that "Airports should provide communities with data to demonstrate current and historic airport noise levels and highlight continued efforts by the airport and aviation industry to minimize noise impacts." This information can help community understand in what way noise levels are changing and whether noise mitigation efforts are working as intended. Some airports we interviewed (Van Nuys and San Francisco airports) publicly display noise data for the community to easily access, in line with best practice. KCIA expressed it would like to have noise level data available on its website, but it will need to partner with King County Information Technology to help with technical challenges.

#### Recommendation 8

The King County International Airport should work with King County Information Technology to publish its noise level data on its website in alignment with best practice.

Roundtable not meeting its purpose

The Roundtable is not performing key functions specified in its bylaws, which limits community input in KCIA operations and may make it more difficult for the airport to meet King County's equity goals. KCIA's Roundtable bylaws state that "the purpose of the Roundtable is to advise and make recommendations to the airport," but KCIA leaders and Roundtable members indicated that the group does not make formal recommendations. Instead, the Roundtable functions as a place where members learn about airport operations rather than influence them. In a survey of Roundtable members, several respondents said that they do not feel the Roundtable has any influence on KCIA's operations. Several survey respondents also said that they see their role as learning about airport operations but not affecting change. These survey results show a disconnect between the Roundtable's stated purpose and how it works. This makes it more difficult for the airport to meet county equity goals since the Roundtable is a key place the airport can receive and incorporate community input. In addition, FAA describes roundtables as entities that can help influence airport operations through recommendations and help build community representation. One reason KCIA's Roundtable may not be making formal recommendations is because KCIA leadership has not provided opportunities for the Roundtable to make recommendations. For example, several 2022 Roundtable

agendas allotted time for airport updates and reports such as updates on budgets, staffing, and ongoing activities, but there was minimal time allotted to discussion items that could help the airport receive Roundtable member input.

#### Recommendation 9

King County International Airport (KCIA) leadership should work with the Airport Advisory Roundtable to develop, document, and implement a formal process ensuring Roundtable recommendations are proposed to and considered by KCIA leadership.

Roundtable lacks independent facilitator

The Roundtable does not have an independent third-party facilitator, which may make it difficult for both the airport and other Roundtable members to engage in meaningful dialogue about emerging issues. KCIA and Roundtable leaders indicated that there is limited debate and conversation during Roundtable meetings, and we observed this during two separate meetings we attended. Limited engagement may make it difficult to bring important concerns to the forefront, further hindering the group's ability to influence change. One reason limited engagement may happen is because KCIA staff is currently managing work related to the Roundtable, and the current Roundtable chair is a community representative. One peer airport we interviewed said they use a third-party facilitator for their Roundtable meetings to encourage engagement and to help ensure community does not feel that the airport is directing Roundtable conversations. KCIA and Roundtable leaders said they would be interested in having a third-party facilitator for KCIA's Roundtable meetings.

#### Recommendation 10

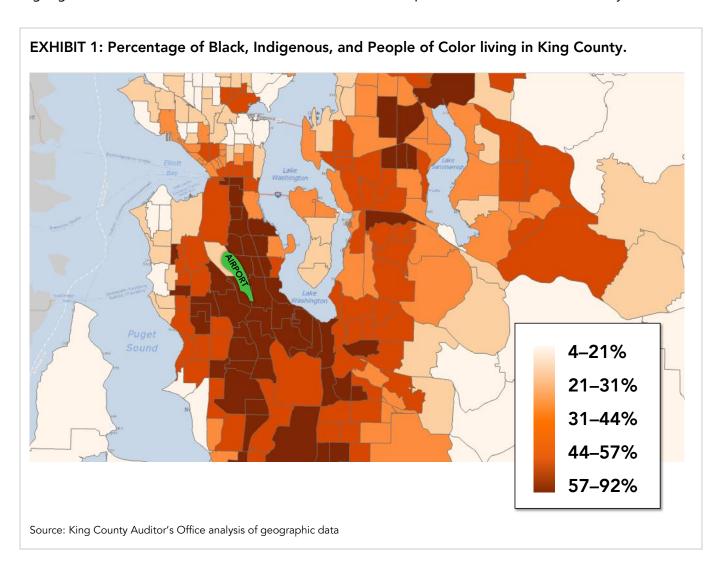
King County International Airport leadership should work with the Airport Advisory Roundtable to identify and use an external third-party to facilitate Roundtable meetings.

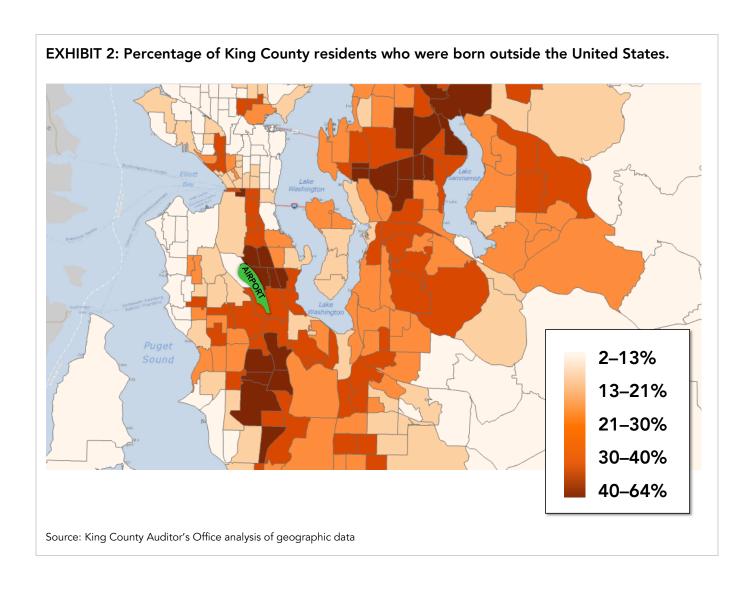
#### **CONCLUSION**

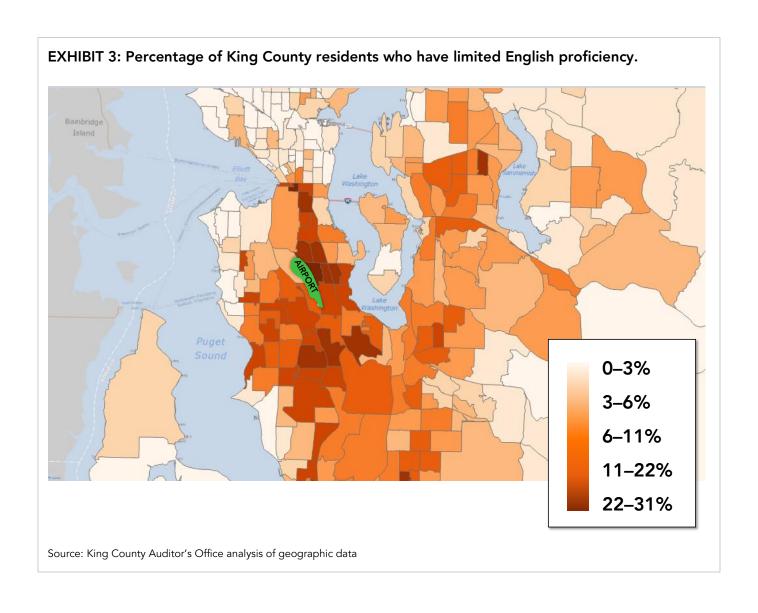
King County International Airport is a vital economic asset for the region, but its surrounding communities are some of the most environmentally burdened in King County. By adopting a thoughtful strategic plan, KCIA could amplify its efforts to mitigate its environmental impacts and advance sustainability and equity. Focused investment in a documented community engagement plan that considers how KCIA will communicate its efforts, share key data, and incorporate community interests will increase understanding, collaboration, and trust—improving its relationships with its neighbors. Perhaps most challenging, purposeful engagement with the Roundtable to help it meet its intended role as a deliberative advisory body would help KCIA, its users, and surrounding neighbors work through the challenge of balancing operational needs and environmental impacts together.

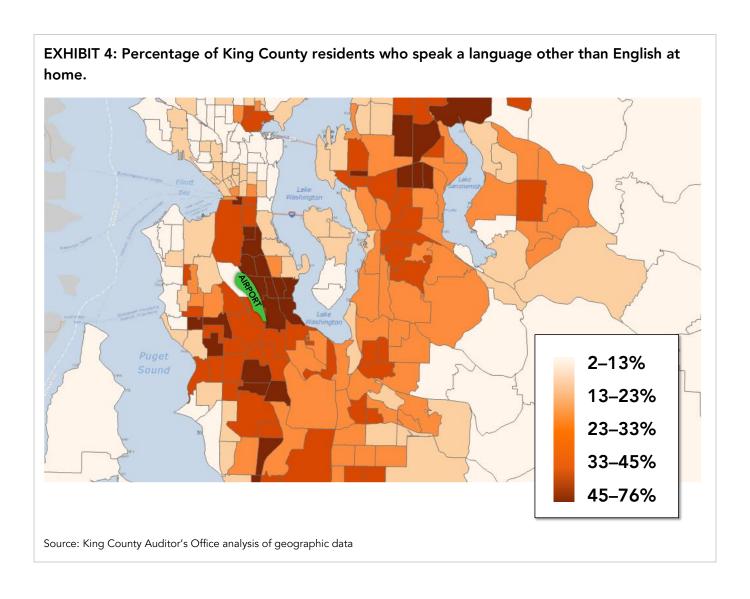
# Appendix 1: King County Community Demographics

The maps below illustrate demographic characteristics of people who live in King County by census tract, referenced in section 1. Each map shows the location of King County International Airport to highlight the distinction between census tracts near the airport and the rest of the County.





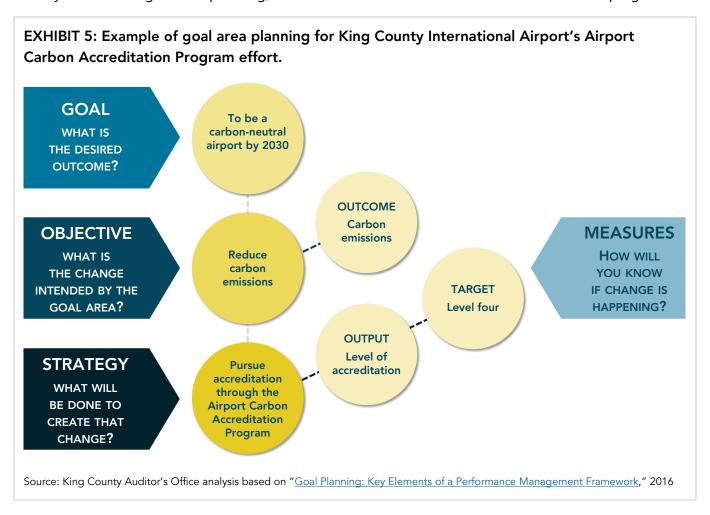




# Appendix 2: Examples of Airport Strategic Plans

This appendix provides examples of peer airport strategic plans that include environment and equity goals.

Goal area planning is the essential component of strategic planning. The graphic below shows how the King County International Airport (KCIA) Airport Carbon Accreditation Program (ACAP) effort aligns with the key elements of goal area planning; each of the circles includes an element of the ACAP program.



Centennial Airport, a public-use airport owned by the Arapahoe County Public Airport Authority in the Denver-Aurora metropolitan area in Colorado, is a peer airport specifically mentioned by KCIA leadership. Below is an excerpt from the Centennial Airport strategic plan. It demonstrates a Plan-Do-Check-Act structure consistent with King County strategic planning requirements.

#### **EXHIBIT 6: Centennial Airport sustainability plan excerpt.**

#### 9.1 Plan-Do-Check-Act Approach

Centennial Airport staff are employing the Plan-Do-Check-Act approach to implement their sustainability efforts. This is a reliable implementation process to help ensure that the Initiatives identified in this Airport Sustainability Plan are put into action. The process also provides a framework for airport staff to monitor and adjust the plan to find the most effective or reliable approach in the future.

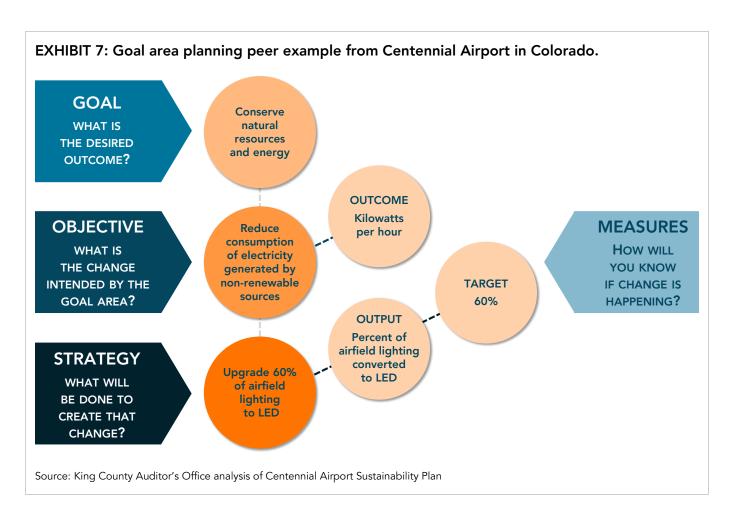
In alignment with the Plan-Do-Check-Act approach, airport staff have initiated the planning step for sustainability integration by developing this plan. Next, the airport staff will implement specific initiatives (Do), will track the outcome and progress of these initiatives (Check), and will adjust or reevaluate the sustainability approach based on the results (Act). **Figure 9.1** illustrates this approach.

Figure 9.1 Airport Sustainability Plan Sustainability Implementation Approach



Source: Centennial Airport Sustainability Plan

For reference, the goals in the Centennial Airport strategic plan also fit within the standard goal area planning structure. The exhibit below illustrates the structures by goal, objective, strategy, and related performance measures as depicted in the Centennial Airport strategic plan using the same format as that used in the body of the audit report.



Below are other examples of sustainability and equity planning across airports in the United States.



#### EXHIBIT 9: Los Angeles World Airports sustainability plan excerpt.

#### **FOCUS AREA**

#### **ACHIEVEMENTS TO DATE**

#### **GOALS & TARGETS**



ENERGY MANAGEMENT

- Continuous annual reduction in energy use on per passenger basis since 2011 at LAX – 44% total decrease per passenger
- Completion of the new Central Utility Plant, whose chillers are 20% more efficient, resulting in ~5 million kWh annual savings
- Installation of 152 EV chargers at LAX, with more to come
- Installation of a 1.5 MW solar photovoltaic power system at VNY
- Improve efficiency, green generation, resiliency and demonstrate leadership through:
- 100% Renewable electricity by 2045
- Further reduce energy use per passenger 15% by 2025, 30% by 2035, and 65% by 2045 over 2011 levels



#### WATER MANAGEMENT

- 23% decrease in total potable water use at LAX since 2011 – over 45% on a per passenger basis
- Converted ~95% of terminal water fixtures to low/ultra-low flow – resulting in average savings of 1.25 gallons/flush
- Replaced 2.42 acres of landscaping with drought tolerant plants or hardscape
- Completed new connection to Hyperion for stormwater and started construction on a groundwater infiltration facility on the LAX Northside to divert stormwater from the Santa Monica Bay

Increase recycled water use, reduce potable water use and demonstrate leadership through:

- Additional 25% reduction in potable water use per passenger by 2025 and 30% by 2035
- Increase recycled water use as a percentage of total water use 30% by 2035
- Eliminating potable water consumption for non-potable uses such as landscaping and the cooling towers by 2045



# MANAGEMENT

- Updated the LAX Alternative Fuel Vehicle Requirement mandating that medium and heavy-duty vehicles at LAX use clean fuel and be no older than 13 years
- Over 60 Chevy Bolts already delivered and 20 60-ft all-electric airfield buses on order, which are projected to reduce CO2 emissions by 308 tons annually
- Reduced emissions from Ground Support Equipment (GSE) by 45% since 2015 through the GSE Emissions Reduction policy
- Adopted GSE and AFV Incentive Programs to encourage zero-emission vehicles and equipment at LAX with \$1m funding
- Started construction on the LAMP

Reduce air emissions and demonstrate leadership by achieving:

- Carbon neutrality by 2045
- Upgrade to higher Airport Carbon Accreditation (ACA) Level by 2023
- 100% zero-emissions bus fleet by 2030
- Stronger GSE targets
- 100% compliance with LAX Alternative Fuel Vehicle Policy
- Complete gate electrification program for all cargo, hangar, maintenance, and remainover-night aircraft parking positions

Source: Los Angeles World Airports sustainability action plan

PROGRESS KEY

#### **EXHIBIT 10: Port of Seattle Environmental Scorecard excerpt.**



The Port is committed to reducing our environmental footprint while continuing to grow. Our scorecard tracks our results in reducing environmental impacts and informs future environmental initiatives.

AIR CLEANER AIR							Yellow light =	Significant progr = Some progress t o progress toward	-
	Baseline in metric tons 2005*	2011	2015	9 2016	6 REDUCE 2017	D	2019	2020	Century Agenda Goals
Diesel Particulate Matter - Maritime	149	<b>†15</b> %		82%					50%
Fine Particulate Matter - Aviation	26			<b>†62</b> %					50%
Port-Owned Greenhouse Gases	23,720	10%	<b>7</b> %	1%	<b>†</b> 5%	<b>†7.6</b> %	XX	XX	50%
Port-Influenced Greenhouse Gases	873,874			10%					50%
Airport GHG/Passenger	0.0257			<b>† 18</b> %					
Maritime GHG/Tons of Cargo	0.0185	<b>†12</b> %		8%					
Aircraft-related GHG	390,902			<b>†18</b> %					25%

Port-owned greenhouse gases are reported annually, and other emissions are reported every 5 years.

#### WATER CLEANER WATER Century Baseline Agenda 2018 2019 2015 2016 2017 2020 2011 Goals Maritime Stormwater Management: rehabilitation of 0% 0.02% 8.89% 17% ХΧ XX 0% 75% stormwater conveyance (% completed) Airport Stormwater Management (% acres) 100% ΧХ XX 100% 100% 100% 100% 100% Creosote Piling Removal (% of piles removed) ХΧ ХΧ 80%\*\* 0% 3% 8.7% 8.7% 38%

Source: Port of Seattle - Seattle-Tacoma International Airport Environmental Scorecard

# **Executive Response**



**Dow Constantine** 

King County Executive

401 Fifth Avenue, Suite 800 Seattle, WA 98104

**206-296-9600** Fax 206-296-0194

TTY Relay: 711 www.kingcounty.gov

December 4, 2023

Kymber Waltmunson King County Auditor Room 1033

Dear Ms. Waltmunson:

Thank you for the opportunity to review and comment on the proposed audit report titled "King County Airport: Accountability and Transparency Could Strengthen Community Engagement."

The enclosed recommendation table outlines responses to each of the 10 recommendations. The Department of Executive Services (DES) concurs with each of the recommendations. These recommendations will support DES and the King County International Airport Division to further strengthen accountability, transparency, and community engagement.

We appreciate the time and effort your staff have put into this thoughtful audit. We look forward to providing updates about our progress on the recommendations.

Sincerely,

Dwight Dively Chief Operating Officer

cc: Jennifer Hills, Deputy Chief Operating Officer, Office of the Executive Karan Gill, Chief of Staff, Office of the Executive Lorraine Patterson, Director, Department of Executive Services (DES) John Parrott, Division Director, King County International Airport, DES

King County International Airport should develop, document, and begin implementing a strategic plan that includes goals, objectives, strategies, activities, and performance measures for accomplishing sustainability and equity goals, consistent with those in countywide strategic plans relevant to the airport.

AGENCY RESPONSE		
Concurrence	CONCUR	
Implementation date	December 31, 2024	
Responsible agency	KCIA	
Comment	The Airport has entered a work order contract with Aviation Management Consulting Group to assist in developing a strategic plan for the Airport that includes the content recommendaed in this Audit.	

#### **Recommendation 2**

King County International Airport should review the sustainability and equity goals of peer airports to aid in development of its strategic plan.

AGENCY RESPONSE		
Concurrence	CONCUR	
Implementation date	December 31, 2024	
Responsible agency	KCIA	
Comment	This will be completed as a part of the work in recommendation 1.	

#### **Recommendation 3**

King County International Airport should develop, document, and apply criteria for selection and prioritization of capital projects that support the strategies identified in its strategic plan.

AGENCY RESPONSE		
Concurrence	CONCUR	
Implementation date	December 31, 2025	
Responsible agency	KCIA	
Comment	The Airport will complete this work when the related strategies are identified in the strategic plan.	

The King County International Airport should develop, document, and implement a formal community engagement plan in alignment with county guidance.

AGENCY RESPONSE		
Concurrence	CONCUR	
Implementation date	December 31, 2024	
Responsible agency	KCIA	
Comment	The Airport will work with the Department of Executive Services	
	Communications staff and the County Community Engagement	
	Workgroup to develop a community engagement plan.	

### **Recommendation 5**

The King County International Airport should seek, document, and incorporate community input in developing the strategic plan in Recommendation 1.

AGENCY RESPONSE		
Concurrence	CONCUR	
Implementation date	December 31, 2024	
Responsible agency	KCIA	
Comment	The strategic planning process will include multiple and explicit opportunities for the community to provide input.	

#### **Recommendation 6**

As a part of the community engagement plan in Recommendation 4, King County International Airport should identify opportunities to engage community as early as possible in the capital project life cycle.

AGENCY RESPONSE		
Concurrence	CONCUR	
Implementation date	December 31, 2024	
Responsible agency	KCIA	
Comment	This will be completed as a part of the work in recommendation 4.	

As a part of the community engagement plan in Recommendation 4, King County International Airport should identify and document how it intends to:

- a. communicate the strategic plan in Recommendation 1, including goals, objectives, strategies, activities, and performance measures
- b. communicate and report on the status of sustainability and equity-related efforts, including the outcomes of recently completed efforts
- c. address concerns raised by the community.

AGENCY RESPONSE		
Concurrence	CONCUR	
Implementation date	March 31, 2025	
Responsible agency	KCIA	
Comment	This will be completed as a part of the work in recommendation 4.	

#### **Recommendation 8**

The King County International Airport should work with King County Information Technology to publish its noise level data on its website in alignment with best practice.

AGENCY RESPONSE			
Concurrence	CONCUR		
Implementation date	June 1, 2024		
Responsible agency	KCIA/KCIT		
Comment	KCIA currently provides near-real-time noise data from five sites on its website via the PublicVue flight tracking tool. KCIA will work with the tool's vendor and KCIT to record, compile, and publish this data for review and download on a quarterly basis.		

King County International Airport (KCIA) leadership should work with the Airport Advisory Roundtable to develop, document, and implement a formal process ensuring Roundtable recommendations are proposed to and considered by KCIA leadership.

AGENCY RESPONSE			
Concurrence	CONCUR		
Implementation date	June 30, 2024		
Responsible agency	KCIA		
Comment	The Airport will work with the third-party facilitator to develop, document, and implement a formal process ensuring the Roundtable recommendations are proposed and considered by KCIA leadership.		

### **Recommendation 10**

King County International Airport leadership should work with the Airport Advisory Roundtable to identify and use an external third-party to facilitate Roundtable meetings.

AGENCY RESPONSE		
Concurrence	CONCUR	
Implementation date	June 30, 2024	
Responsible agency	KCIA	
Comment	The Airport will work with King County Procurement to identify a third-party facilitator to facilitate Roundtable meetings.	

# Statement of Compliance, Scope, Objective & Methodology

#### Statement of Compliance with Government Auditing Standards

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

#### Scope of Work on Internal Controls

We assessed the extent to which the King County International Airport (KCIA) has designed and implemented proper controls and monitoring to achieve its mission and relevant county equity and environmental goals. In performing our audit work, we identified concerns relating to control activities, monitoring, information, and communication.

#### Scope

This audit examines KCIA's processes and strategies for addressing the environmental, community, and equity impacts of its operations from 2015 through the present.

#### **Objectives**

- 1. To what extent are KCIA's goals and plans aligned with King County's strategic, equity, and environmental goals?
- 2. To what extent does KCIA identify and implement efforts to mitigate environmental impacts of its activities in line with leading practices and within its scope of authority?
- 3. To what extent does KCIA incorporate community input in its planning, strategies, and decision-making?

#### Methodology

Throughout the audit, we met with several KCIA staff members multiple times including KCIA leadership to understand KCIA's operations, operating environment, barriers, and strategies. We reviewed documentation of KCIA's capital project planning process and documentation related to KCIA's goals and activities. Under King County Code 2.10.034 and 2.10.14, all executive branch and separately elected

agencies are responsible for developing governance structures such as a mission and vision, as well as goals, objectives, strategies, and activities. As such, we reviewed best practice guidance on strategic planning, including the *Standards for Internal Control in the Federal Government*, also known as "The Green Book."

To understand the regulatory environment in which KCIA operates, we met with regional Federal Aviation Administration staff. We also identified and interviewed other airports across the United States that were comparable to KCIA or those we identified as leaders in advancing equity and environmental goals. To determine comparability to KCIA, we selected airports based on a variety of factors including airport size, whether they were general aviation airports, and their proximity to neighboring communities. We solicited input from KCIA on airports to interview. As a result, we met with or reviewed documentation for the following airports: Centennial airport in Englewood, Colorado; Dallas Fort Worth airport in Dallas, Texas; Los Angeles World Airports in Los Angeles, California; Massachusetts Port Authority in Boston, Massachusetts; San Francisco airport In San Francisco, California; San Diego airport in San Diego, California; Seattle—Tacoma International airport in Seattle, Washington; Teterboro airport in Teterboro, New Jersey; Truckee airport in Truckee, California; Van Nuys airport in Los Angeles, California; and Washington DC Reagan National airport.

To understand residential community and stakeholder perspectives, we interviewed community representatives from the KCIA Community Coalition. We interviewed several members of the KCIA Roundtable and administered a survey to understand how the Roundtable operates and any related barriers. We also attended two Roundtable meetings and one KCIA-hosted public forum on ongoing capital projects.

To understand who is impacted by KCIA operations, we analyzed census tract data from the 2010–2014 American Community Survey to determine the demographics of the people who live near KCIA and the neighborhoods they live in. We used a geographic information system (GIS) to conduct our analysis. Our analysis used both a half mile- and one-mile radius from the airport boundary to determine the people most impacted by KCIA operations.

# List of Recommendations

#### Recommendation 1

King County International Airport should develop, document, and begin implementing a strategic plan that includes goals, objectives, strategies, activities, and performance measures for accomplishing sustainability and equity goals, consistent with those in countywide strategic plans relevant to the airport.

#### Recommendation 2

King County International Airport should review the sustainability and equity goals of peer airports to aid in development of its strategic plan.

#### Recommendation 3

King County International Airport should develop, document, and apply criteria for selection and prioritization of capital projects that support the strategies identified in its strategic plan.

#### Recommendation 4

The King County International Airport should develop, document, and implement a formal community engagement plan in alignment with county guidance.

#### Recommendation 5

The King County International Airport should seek, document, and incorporate community input in developing the strategic plan in Recommendation 1.

#### Recommendation 6

As a part of the community engagement plan in Recommendation 4, King County International Airport should identify opportunities to engage community as early as possible in the capital project life cycle.

As a part of the community engagement plan in Recommendation 4, King County International Airport should identify and document how it intends to:

- a. communicate the strategic plan in Recommendation 1, including goals, objectives, strategies, activities, and performance measures
- b. communicate and report on the status of sustainability and equity-related efforts, including the outcomes of recently completed efforts
- c. address concerns raised by the community.

#### Recommendation 8

The King County International Airport should work with King County Information Technology to publish its noise level data on its website in alignment with best practice.

#### Recommendation 9

King County International Airport (KCIA) leadership should work with the Airport Advisory Roundtable to develop, document, and implement a formal process ensuring Roundtable recommendations are proposed to and considered by KCIA leadership.

#### Recommendation 10

King County International Airport leadership should work with the Airport Advisory Roundtable to identify and use an external third-party to facilitate Roundtable meetings.

# Advancing Performance & Accountability

KYMBER WALTMUNSON, KING COUNTY AUDITOR

MISSION Promote improved performance, accountability, and transparency in King County government through objective and independent audits and studies.

VALUES INDEPENDENCE • CREDIBILITY • IMPACT

The King County Auditor's Office is committed to equity, social justice, and ensuring that King County is an accountable, inclusive, and anti-racist government. While planning our work, we develop research questions that aim to improve the efficiency and effectiveness of King County government and to identify and help dismantle systemic racism. In analysis we strive to ensure that communities referenced are seen, not erased. We promote aligning King County data collection, storage, and categorization with just practices. We endeavor to use terms that are respectful, representative, and people- and community-centered, recognizing that inclusive language continues to evolve. For more information, see the King County Equity and Social Justice Strategic Plan, King County's statement on racial justice, and the King County Auditor's Office Strategic Plan.

ABOUT US The King County Auditor's Office was created by charter in 1969 as an independent agency within the legislative branch of county government. The office conducts oversight of county government through independent audits, capital projects oversight, and other studies. The results of this work are presented to the Metropolitan King County Council and are communicated to the King County Executive and the public. The King County Auditor's Office performs its work in accordance with Government Auditing Standards.



This audit product conforms to the GAGAS for independence, objectivity, and quality.