

**As of October 18, 2021: PUBLIC COMMENTS AND AIRPORT RESPONSES ARE POSTED HERE.**

Item #	Regulation	Original Public Comment	Airport Response to Original Comment
1	<p>3.1D. No aircraft shall utilize AOA areas between taxiways and runways for taxi, takeoffs or landings. <b>WMC Sec.7-18.300 (a) and (j).</b> Such operation is a violation of FAR 91.13(a) and subject to fine <b>citation</b> per Exhibit "K"</p>	<p>FAR 91.13(a) does not prohibit this activity. It prohibits reckless behavior. Take-off, landing, and taxi operations in the turf can, and have been, conducted safely in the past at WVI. This type of activity occurs at airports all around the US on a routine basis at both controlled and uncontrolled fields. No accidents or incidents have been cited as the reason for imposing this rule at WVI. STOL pilots used the area between the beginning of Runway 27 and the taxiway only when other aircraft or ground operations were not present. It was not a safety issue. It is an issue for bush wheel tire wear and tear. Operating on pavement significantly shortens the life and consequently the safety of these tires.</p>	<p>The following section of the proposed regulation will be removed. "... a violation of FAR 91.13(a)...". Given the runway and taxiway infield configuration prohibiting aircraft from utilizing these areas is reasonable. The regulation states these areas cannot be used for such operations.</p>
2	<p>3.1. D (Airport Operations)</p>	<p>I agree that FAR 91.13(a) refers to reckless operations and does not specify that use of any particular landing surface is reckless. How can grass landings be considered reckless at Watsonville, but not at CA66 or Frazier Lake?</p>	<p>The infield infrastructure at WVI includes areas with signage, lighting, electrical conduit and drainage. In some areas such objects are not visible and potential hazards. Allowing such activity does not align with the airport's focus on ensuring safe operations.</p>
3	<p>3.1. D (Airport Operations)</p>	<p>There are many examples of airports that allow use of the AOA between the taxiway and the runway. Why does Watsonville prohibit this use?</p>	<p>See above. The Airport Master Plan update is reviewing the potential for an "Alternate Landing Site" (FAA term for "Turf Landing Strip") at WVI.</p>
4	<p>3.5C. No aircraft owner shall fuel their aircraft with automotive gas (MoGas) without obtaining a permit allowing them to fuel their own aircraft. The method of transporting, dispensing and the design of the fueling system are specified in the self-fueling permit (Exhibit H). Violation of this section results in fine citation.</p>	<p>Comment on 3.5C - This one seems inconsistent. Section 3.5A allows owners to "transport or deliver aviation fuels on the airport or dispense fuels" for their own aircraft. What is special about MoGas?</p>	<p>There is not inconsistency between the 3.5A and 3.5C. 3.5A requires authorization to bring aviation fuel onto the field. 3.5C requires Fire Department approval due to regulations for dispensing fuel into aircraft per Exhibit "H" and City Council Resolution 31-95.</p>

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5	2.5T. No more than ten (10) gallons of any fuel type, stored within approved containers, are permitted in storage units. No fuel is permitted in End Rooms or Middle Rooms. Portable fuel containers or storage tanks must be stored in accordance with Section 7-18.207 (d) (1) of City Municipal Code.	Comment on 2.5T - this rule assumes that storing fuel in an approved, sealed container is less safe than storing it in a vented aircraft tank. Based on this assumption, a Beech Baron owner can have 152gal (142gal + 10gal) in their hangar; a Cub owner only 35gal (25 + 10). I understand the need to keep fuel amounts to a minimum, but is this assumption justified or equitable? Is an approved container more likely to be a fire source than an aircraft? Is 50 gal in an approved container more likely to sustain a fire than 50 gal in a thin, aluminum aircraft wing?	This rule was implemented at the recommendation of the Watsonville Fire Departments and has been in place at WVI since 1991.
6	3.5 (Fueling)	There is a comment about fueling with Mogas and the amount of fuel permitted in a hangar. When more discussion of this issue occurs, can we have a fire department representative available to address questions?	This rule was implemented at the recommendation of the Watsonville Fire Departments and has been in place at WVI since 1991.
7	2.5 (Fueling)	S. Does returning test fuel to the airplane's tanks constitute refueling, if performed in the hangar?	No.
8	Adminstrative Citation	The airport should not have the authority to issue citations. That should be reserved to the Watsonville Police Department. Rayvon should not be granted the authority that a law enforcement officer has. He is a manager/ director, not a policeman!	The referenced Citations are "administrative". An administrative citation should not be confused with a criminal citation. The majority of tenants and users comply with the regulations. However some don't. The issuance of administrative citations parallels City Code Enforcement Citations (e.g. "Red Tag", homeowner sidewalk in need of repair, a business back-flow preventer failure, etc). These violations don't rise to the level of bringing WPD to the field. Chief among these is redirecting law enforcement from serious life safety issues and crimes to the Airport for Regulations violations. This is not likely given PD staffing. Secondly, WPD's priorities will not afford an opportunity to arrive on the field in a timely manner to issue an administrative citation. Finally WPD's involvement in the issuance of these Citations is contrary to the City Muni Code. See City Municipal Code Section 1-2.07. Any concern regarding staff's managing enforcement and conflict resolution is understandable but we believe it is the Airport Staff who: (1) know the airport rules, (2) are familiar with the tenants and (3) are likely to issue a warning first and Citation issuance second. We've found that once a permittee, tenant, leasehold or user is made aware of the regulation that compliance follows. In simplest terms our goal is to educate first and enforce second.
9	Adminstrative Citation	These appear to incur progressively expensive monetary fines. I am writing as an airport tenant concerned with proposed changes to the airport rules and regulations. Numerous changes in the proposed rule changes are related to enforcement via "Administrative citation" or "citation". These appear to incur progressively expensive monetary fines. The concern I have is that the airport rules and regulations, as written, contain numerous areas in which a tenant or airport visitor acting in good faith and safe operation practices will violate the rules and regulations. This would subject them to citation. Consider the regulations surrounding parking of aircraft and vehicles as an example: "Park" or "Parking" means "standing of an aircraft, vehicle, trailer (or like wheeled conveyance) whether occupies or not. Attended parking means the Owner/ Operation can relocate aircraft, vehicle or trailer immediately."	

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10	<i>Administrative Citation</i>	Citations. Comments suggest this is heavy-handed and unnecessary. Why is it necessary? How has the airport survived without it? Are there other options?	See above. As noted the Municipal Airport has issued requests for continued compliance, yet violations continue. We are at a point where this is the next logical step.
11	<i>Administrative Citation</i>	This is a misuse of the word 'citation' and a mean-spirited authoritarian approach to management.	The airport's use of the word "Citation" is based on Municipal Code, Chapter 2, Article 1 (Administrative Remedies) and sub-section 1-2.102 (Definitions)
12	<i>Definitions: Airport Operations Area</i>	3.1 A: "No aircraft shall be left unattended unless properly secured at a tie-down or within a hangar."  4.2 B: "No person shall drive a vehicle within the Field Area in such manner as to cause damage, distraction, create an obstruction to aircraft, pedestrian traffic or authorized vehicles or park in front of, or upon "No Parking" signage. (WMC Sec 7-18.401)"	These regulations, 3.1A and 4.2B have been in effect since 2017.
13	<i>General Comment</i>	Instead of levying financial fines, why not use a point system which ultimately results in an eviction if required.	This change is consistent with City policy.
14	<i>Definitions: Aviation Storage Permit</i>	Aviation Storage Permit. If you're a person sharing a hangar with a permittee, but not on the permit, are you restricted from access to the AOA?	At the present time individuals or entities who share joint ownership of a "permitted aircraft" have access to the AOA given a four digit gate code. In 2022 access to the AOA will be restricted to individuals or entities with a yet to be defined Card access.

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15	Transient Parking Area	"... a parking area dedicated for aircraft not based at the airport for occasional transient tie down purposes" is vague and unenforceable. Proper markings and signage is necessary.	Transient aircraft parking is identified by "Green T's. Additional signage is planned to clearly define where Transient Parking is located.
16	1.2 (General Regulations)	I. This language prohibits transient pilots and passengers, their invitees, and persons sharing hangars who are not storage permit holders.	The current gate code configurations allow access to and from the field for transient pilots and their passengers. The same is currently true for "Invitees" and persons sharing aircraft ownership. Once the new card access system is implemented access will be more secure.
17	2.2 (Hangar Waitlist Administration)	B. Why aren't name changes permitted? Why should the airport involve itself in an owner's or owners' decisions regarding the appropriate legal means of holding title in an aircraft, particularly given the ubiquity of entity ownership and the length of time associated with the waitlist? Thoughtful decisions that facilitate aircraft ownership should be encouraged, not made more difficult.	The airport has a responsibility to the waitlist position holders, who are paying to maintain a position on the ordered wait list. Allowing individuals to simply change a name on a permit is effectively providing others, who may have some relationship with a permit holder, to "skip the line". Watsonville had a long history of hangar waitlist stagnation, primarily due to hangar sublets, a secondary market in hangars and other questionable methods to secure a hangar.
18	2.5 (General provisions aviation storage units)	H. 90 days can be too short, particularly given the nature of the aircraft market. At the very least, the manager should have discretion to exceed that period.	The airport's experience is that individuals who are replacing aircraft know well in advance. In the unfortunate event an aircraft is subject to accident or incident the airport would review on a case-by-case basis.
19	2.8 A-C Prohibited uses in storage units)	I agree with comments that "adversely impact aviation storage utility" is vague.	See Definition of "Aviation Storage Utility"

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20	2.9 (Inspections)	There's a comment about notifying tenants that doors will be opened wide and the contents photographed (and maybe more?). What's done with the photos? If they are retained for more than 90 days in the normal course, aren't they public records that anyone can request copies of? The security of hangar contents should not be compromised by the inspection process.	Photos are stored on secure City servers. Per the City Clerk and City Attorney the Airport is not obligated to provide information from the hangar inspections unless required by law. Airport policy is to delete photos after two inspection cycles (every two years).
21	2.11 (Delinquent accounts)	3b. Why eliminate the requirement of registered mail notices of delinquency? How else do you prove notice was sent?	This change is consistent with City policy.
22	3.6 (Washing)	There's a comment about washing airport vehicles. I assume airport personnel do not wash personal vehicles.	Airport personnel do not wash personal vehicles.
23	2.5W (No Alterations)	Why do electronic devices require permission . . . and specifically, what is the concern? So a citation will be issued for plugging in a radio?	The Municipal Airport receives inquiries to modify hangar structures or attach to the hangar structure. Most recently antennae and other electronic devices have been requested. Any such modifications/installations requires airport approval which may include assessment by City IT or Watsonville Fire Department.
24	3.2 (Aircraft Maintenance)	A. If I request one of the aircraft maintenance operations on the field to inspect my plane, in my hangar, am I in violation of this rule? Why	No. Aircraft maintenance operations on the field adhere to the Airport's Minimum Commercial Standards and operate per permit.
25	General Question regarding Airport's Sept 29th letter to Tenants	A letter dated September 29, 2021 states that starting in 2022 the airport will have a card key system installed and that users must obtain driver training before they can receive a card. This does not seem to be addressed in the current change proposal. What is the nature of this training?	The Municipal Airport's Driver's training requirement is currently in development. Regulation Article Four, Section 4.1 notes "airport authorization" and that will be basis for implementation. The "training" will most likely be a web-based (On-line) program. Similar to nearby GA airports the training will be required to obtain (and renew) a Gate Card. Tenants can expect a review of gate operation, escorting, field markings, delineation of taxiways for vehicular traffic, speed limits and WVI field specific configuration.

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26	General Question regarding proposed Administrative Citation	I was in contact today with our FSDO office. The inspector I spoke with knew of no other airport that has an ADMINISTRATIVE CITATION process. The Airport director's citation-based approach to airport tenants is an outdated heavy-handed, weak management approach. It has been recognized time and time again that education is the best practice to promote safety and lasting change. The citation process as proposed is only a means for misuse by an unconstrained airport director.	The FAA is organized in two basic groups; Headquarters and various Field and Regional offices dispersed geographically. Within the siloed offices the functions and responsibilities are varied. AJO is responsible for ATC, FSDOs are responsible for Flight Standards and Airports are responsible for Airports. Individuals reaching out to the FAA regarding Watsonville Airport are best served by contacting the San Francisco Airports Office in Brisbane (650 827 7600). Relative to the Safety Inspector's "...no other airport..." comment, it is also true that no other airport (at least that Airport Management is aware of) discounts self serve fuel on a monthly basis. As noted in Item #9 above: <b><i>"We've found that once a permittee, tenant, leasehold or user is made aware of the regulation that compliance follows. In simplest terms our goal is to educate first and enforce second."</i></b>
27	2.8 Prohibited Uses Within Aviation Storage Units ("C")	Are all trucks prohibited?	"All trucks" are not prohibited. See Section 2.7 G. A key point of this Regulation is to ensure commercial vehicles, in support of on-going business concerns, are not utilizing aviation storage units as garages.
28	General Question regarding pending Gate Key Cards	Physical cards as access control sound problematic.  Top level: too easy to lose, too easy to drive to the airport without, and too hard to actually use, especially when it's raining and the geometry of the gate doesn't allow an easy reach from the window. Clickers are <u>much</u> friendlier and allow programming many modern vehicles so they don't get lost. Typed codes allow folks to be authorized over the phone (eg: pick up my jacket from the hanger on the way home please, honey!)	We certainly expect there will be comments regarding the planned implementation for Gate Cards. Please note we are in the midst of vetting a number of potential solutions and visiting nearby airports to survey their operations/configurations. Speaking of other airports, we recently reached out to members of the Association of California Airports (ACA), and members of the American Association of Airport Executives (AAAE) to query if other general aviation airports (such as WVI) have implemented gate card solutions.  As of October 6th thirty-four airports replied. Twenty-four (72%) have a Gate Card/Gate Fob configuration and ten (29%) continue to use keypads similar to Watsonville.  Implementation of Gate Card technology aligns with the TSA guidance for General Aviation airports, will allow the airport to more confidently ensure individuals entering the field are authorized and as a by-product allow management to determine the actual numbers of vehicles entering the ramp.

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29	Adminstrative Citation	<p>I'm especially concerned about airport staff being put in the adversarial role of issuing citations and recommend strongly against this measure. For egregious problems, the WPD is likely the better avenue. Not least because they're trained in enforcement and conflict resolution and don't need to interact with tenants on a daily operational basis. I know there were other comments received along similar lines.</p>	<p>As noted above (Item #9) issuance of citations for violations of Airport Regulations don't rise to the level of bringing WPD to the field. WPD's priorities will not afford an opportunity to arrive on the field in a timely manner to issue an administrative citation. WPD's involvement in the issuance of these Citations is contrary to the City Muni Code. See City Municipal Code Section 1-2.07. Regarding staff's managing enforcement and conflict resolution we believe it is the Airport Staff who: (1) know the airport rules, (2) are familiar with the tenants and (3) are likely to issue a warning first and Citation issuance second. We've found that once a permittee, tenant, leasehold or user is made aware of the regulation that compliance follows. Again, in simplest terms our goal is to educate first and enforce second.</p>