

PUBLIC COMMENT PERIOD CLOSED October 30, 2021: 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. WMC Sec.7-18.300 (a) and (j). Such operation is a violation of FAR 91.13(a) and subject to fine citation 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	Administrative 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	Administrative 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: <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>
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 much 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	Administrative Citation	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.	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.
30	General Question regarding update process	What is the schedule for the rulemaking process discussed in the last WAAC meeting of July 28 2021? Will tenants be receiving notice of these meetings from the Watsonville airport? The effective date for rule updates of December 1st 2021 leaves very little time for review and finalization. How would volunteers get involved with the review process? Will it be by email alert or? I just signed up for email alerts just in case.	The schedule for the reugulation update process was noticed to permit holders, leaseholders and users on September 29, 2021. Based on the scope of proposed updates Airport Management determined providing the proposed document, posting comments. commenting on comments and working with the WAAC as the review committee would be the most effective and efficient method to gather input and implement updates.
31	General Question regarding Housekeeping	Please state the standards for access through the hangar area and "housekeeping". Most tenants want to know just what is needed to comply. Are airport employees trained and approved to inspect hangars? If so, it should not be necessary to burden the fire department with hangar inspections. In addition, the fire Marshall is only inspecting for fire hazard issues. If tenants are expected to keep their hangars in order, airport employees certainly are capable to make good judgments in all inspections, fire hazards and also airport requirements. Most important is to educate a tenant that did not comply as to exactly what is needed to comply	"Aviation Storage Utility" means the fitness for storing aircraft(s) and requires the ability to: (1) store an operable, permitted aircraft, (2) move the aircraft(s) into and out of the unit without obstruction and (3) ensures adequate space, around the aircraft, for first responder access, airport inspection or maintenance access.
32	General Question regarding Operational Aircraft	Does this apply to additional aircraft or aircraft parts properly stored along with the airworthy aircraft owned by the ASU permittee?	All aircraft must be listed on the ASU permit. Parts must not impact the ability to store an operational aircraft.
33	General Question regarding Vehicles	Some vehicles may not have any registration related to them such as a small scooter or golf cart type vehicle. These vehicles are appropriate transportation around the airport but should be exempt from the registration requirement.	We will revisit this provision in Section 4.2

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34	General Question regarding Regulations	This regulation says it all and is sufficient. Please omit all other references to citations and fines on the other regulations. Repeating the threat of citation repetitively creates an unneeded ominous tone to these regulations. Some persons may even take this as condescending.	We will review the repeated references to citation issuance.
35	1.2 I. No person, except Permittees, Permittee's escorted guests, SASO's or those with airport approval may enter the Airport Operations Area, via walk-through or drive-through gates or any other means.	This appears restrictive to the point of not being able to fully utilize the airport. Transient users will need access and it may be at night or on weekends. Other situations will be sure to come up as well. An approval process of entry/exit that allows full use of the airport is needed here. Perhaps a phone number that can be published for 24/7 approval for airport use? A system that would give immediate verbal approved access. Can the new security card system allow the use of a temporary use code for transients and intermittent users? Security is important but not to the extent of limiting legitimate airport use.	The Municipal Airport's implementation of Gate Card access and associated technologies will ensure based permit holders and transient users have access as required.
36	2.5 L. Storage units may not be utilized as a place of business, either aeronautical or non-aeronautical, (aeronautical business operations are subject to the Airport's Minimum Commercial Standards.) nor serve as a business office or for storage of business inventory. Storage Units shall be kept clean free of trash, debris and floors free of grease and/or oil. No absorbent floor material under aircraft (i.e., carpeting, rags, kitty litter).	The last part of this rule pertaining to housecleaning of hangars would be best kept with the other rules describing keeping a hangar in order.	This Section is intended to be broad in scope and provide guidance on multiple fronts.

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37	2.5 U. Propane bottles or tanks are prohibited per City of Watsonville Fire Code. Compressed gas cylinders must be approved by City Fire Marshall and their storage inspected annually. Portable and on-board aircraft O2 bottles are permitted.	Perhaps "Compressed gas cylinders" is meant to mean flammable gas cylinders, or oxygen cylinders? Would a small compressed gas cylinder of dry nitrogen for tire inflation need City Fire Marshall approval	There is no proposed change to Section 2.5 U. This regulation has been in place since at least July 1, 2019.
38	2.5 V. Touch-up priming or painting, with small tipped brushes or similar sized application devices, are permitted. No other painting, rolling, airbrushing or spray finishing inside aviation storage units are allowed without airport approval. Violation of this section results in citation. restitution for damage and eviction.	It would be helpful to describe the issues painting operations cause (overspray, air standards). State what is permissible as well. Such as "touch up with a spray paint can for small areas is permissible (such as painting a prop for preventive maintenance) as long as no overspray exist and in compliance with any air standards". Delete "Violation of this section results in citation." See above comments of repeating citation rules.	We can delete the "and subject to citation".
39	2.5 W. No alteration of storage unit structure, floors, doors, walls or lighting, installation of electronic devices without written permission of the airport. Violation of this section results in fine citation.	It looks like keeping the hangar in original condition and not modifying it is the point with this rule. Mentioning the installation of electronic devices does not make sense here. It seems to imply installing a stereo would be a violation (by setting it on a bench and not drilling and bolting anything) Best to delete mention specific devices. Drilling, and modifying the hangar without approval appears to be the issue addressed here. And again with " Violation of this section results in fine citation." Airport management has already spelled out the approval for this. Please please delete this.	See item # 23

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40	<p>2.7 G. "Passenger vehicles", as that term is defined by California Vehicle code section 465, may be stored in aviation units providing vehicle(s) are operating and do not adversely impact aviation storage utility impede aircraft movement in and out of the hangar. Permittee's right to store operational passenger vehicles are conditioned upon permittee's maintaining an ownership interest in the permitted aircraft and the stored vehicle(s). Stored vehicles must be in operational condition (i.e. running, able to remove under its own power). Vehicles stored on behalf of owners other than the permittee are prohibited require non-owned vehicles name the airport as additionally insured.</p>	<p>Suggest wording the definition of vehicles just as "passenger carrying vehicles" DMV uses the definition of pickup trucks as commercial vehicles which are commonly used for personal transportation</p>	<p>We will confer with City Legal regarding implementing this suggestion.</p>

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41	2.8 A. Activities or storage that adversely impact aviation storage utility. impedes movement of aircraft in and out of hangar or displaces aeronautical contents of hangar or impedes access to aircraft or other aeronautical contents of hangar.	This is could be part of the other rules that describe use of hangars (B).	No comment.
42	2.8 B. Storage of non-operational vehicles or non-aeronautical items (e.g. major household appliances and fixtures, furniture, automotive assemblies and parts, derelict equipment or machinery, construction supplies, etc.) that are considered items that adversely impact aviation storage utility. Such items are considered excessive storage, which limit accessibility are prohibited and subject to citation.	"and subject to citation" is again redundant, adding to an ominous feel for the citation process that is not needed or helpful.	We can delete the "and subject to citation".

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43	2.8 C Storage of conveyances (e.g. Jet Ski, Snowmobiles, Boats, Fifth Wheels), that could not be reasonably utilized to arrive to or depart from the airport are considered items that displace aeronautical contents. Commercial vehicles and Recreational Vehicles (RV's), may not be stored inside aviation storage units as long as such storage does not adversely impact aviation storage utility. Storage of commercial vehicles is prohibited.	Suggest to reword "Storage of commercial vehicles is prohibited" Instead use "Storage of commercial USE vehicles". So as not to include and imply commercial registered vehicles are commercial vehicles. Such as pickups.	We will confer wit City Legal regarding implementing this suggestion.

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44	2.8 F. Aircraft painting, to include painting preparation, rolling, stripping, masking interior structures for painting and any painting requiring application per local air standards is prohibited and subject to citation.	Quantify "Aircraft painting" that is prohibited. The sentence part "any painting requiring application per local air standards is prohibited. This makes sense. Suggest deleting specific mentions such as "masking interior structures". Masking external structures is okay? Is the point of this rule about sanding dust getting in to everything and others hangars? If so, prohibit that. Small items sanded and prepped such as preventive maintenance painting of a propeller, touching up small areas for corrosion control should be okay and there be an understanding of that. These small painting operations normally use spray cans. As long as local air standards are okay with the paint operation and it does not have the possibility of causing damage (overspray, fumes) it would be reasonable. Delete "and subject to citation" That was spelled out specifically already.	This regulation was updated as a result of permit holders attempting to paint aircraft, in hangars, and stating the regulations did not explicitly restrict aircraft painting. Aircraft painting, to include painting preparation, rolling, stripping, masking interior structures for painting and any painting requiring application per local air standards is prohibited.

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45	<p>2.8 G. Aircraft maintenance, regardless of ownership, in furtherance of a commercial activity is prohibited. Operation of a business, Commercial activity such as e.g., limousine service, storage of inventory, aeronautical (e.g flight instruction) or non-aeronautical business office is prohibited.</p>	<p>I am not understanding part of this. Is the maintenance on a commercially operated aircraft prohibited? No maintenance allowed on a banner towing plane? Or is the performance of maintenance the commercial activity in question? An A&P cannot perform work in a hangar? If a flight instructor does a BFR in my plane that is prohibited? Of course none of that would make sense. The rest of the examples make sense describing commercial use of a hangar</p>	<p>Aviation Storage Units are dedicated for storing aircraft, not serving as a facility for commercial aircraft maintenance. Maintenance by permittee directed mechanics has long been permitted and will continue.</p>

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46	<p>3.1 D. No aircraft shall utilize AOA areas between taxiways and runways for taxi, takeoffs or landings. WMC Sec.7-18.300 (a) and (j). Such operation may be is a violation of FAR 91.13(a) and subject to fine citation per Exhibit "K"</p>	<p>Watsonville has areas that are currently used for takeoff and landing off of the runway/taxiways by aircraft (helicopters). Aircraft that are suited for off pavement operation are able to use off pavement areas for safe operation. Just as some large aircraft would be unable to use paved runways of Watsonville safely, some aircraft would not be able to safely use grass areas. A dedicated area would be good to make sure any ground hazards are avoided. I see this regulation is subject to fine citation per Exhibit "K". Is it necessary to spell that out repeatedly? I am sure the regulations not noted for citation would still be subject to penalty if needed. This rule is imposing limits that are not necessary.</p>	<p>See responses to items #1, #2 and #3 above.</p>
47	<p>3.2 A. Non-commercial aircraft preventive maintenance, as defined in FAR Part 43, Appendix A (c), may be performed in a hangar or tie-down, by the aircraft owner. Aircraft maintenance in furtherance of commercial activities is prohibited. Tenant or Tenant directed maintenance cannot damage hangar floor or structure, impact or restrict airport operations or cause any environmental impact. [WMC Sec.7-18.301 (a)]</p>	<p>Aircraft maintenance in furtherance of commercial activities is prohibited? See comments on 2.8 G, /tenant or tenant directed maintenance cannot damage the hangar? I think the tenant is responsible for what goes on in the hangar. How about saying that?</p>	<p>See Item #45</p>

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48	<p>3.2 B. Use of heavy electrical equipment (i.e. large compressors, large electrical tools, parking lifts, etc.) within hangars is prohibited. Each hangar is equipped with limited electrical amperage and breakers may only be reset by Airport Operations. Attempting to or resetting the circuit breaker is prohibited.</p>	<p>The descriptions of heavy electrical loads are informative but vague. Best would be to describe the maximum load each hangar should experience (I don't know what the capacity is for my hangar but assume it is the same as a single residential receptacle of 15 amps maximum. If a compressor is operated (I know the load it uses and is way less than 15 amps), other loads are not used. Are all hangars of the same capacity? I have never tripped a breaker in my hangar.</p>	<p>There is no proposed change to Section 3.2 B. This regulation has been in place since at least July 1, 2019.</p>
49	<p>3.2 C. Maintenance performed at a tie-down must be confined to the Tie Down area, performed during daylight hours and maintenance must conclude by dusk unless prior approval is granted. Maintenance is prohibited in the transient Tie Down area.</p>	<p>At times emergency maintenance does need to be performed. How about a person to call 24/7 for immediate verbal approvals for items like this? Transient tie down area often has aircraft in need of repairs such as a no start or flat tire etc. Is it intended that this rule would not cover this type of operations? Is the word "maintenance" here also to include repairs? Or the rule intends to address both? It is important to not restrict the efficient operations of the airport. At the same time abuses need to be addressed.</p>	<p>There is no proposed change to Section 3.2 C. This regulation has been in place since at least July 1, 2019.</p>

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50	<p>3.5 B. Aviation gasoline (AvGas) and Aviation turbine fuel (Jet "A") is solely intended for sale and use in aircraft either based at the airport or conducting transient operations at the airport. Purchase of aviation fuel for other purposes or removal from the field is strictly prohibited. Violation of this section results in fine citation.</p>	<p>I understand this would be a violation and subject to citation. Again can this be removed "Violation of this section results in fine citation". If this is a situation that will result in citation with no chance of a warning how about saying "No warnings", although who knows what kind of situations can come up. Management should be able to apply penalty as needed. Good judgement should prevail.</p>	<p>The self service fuel island has placards and signage noting the prohibition. Violation of this section will result in a citation without warning.</p>
51	<p>3.5 C. 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>Is the last sentence here "Violation of this section results in fine citation" specifying that a citation with a resulting fine is mandatory for this rule? Is it necessary to spell this out again here? I see that this rule only applies to automotive gas. If aviation fuel is used to self fuel that would be permissible. If it was needed to add fuel to an aircraft with a 5 gallon gas can (avgas), say for the purpose of verifying a fuel gauge indication, this would not fall under this rule, correct? Similar to removing fuel from an aircraft fuel tank for a maintenance purpose and then putting that fuel back into the aircraft tank (5 gal gas containers). The comment here is to add information so this rule is not misunderstood</p>	<p>There is no proposed change to Section 3.5 C. This regulation has been in place since at least July 1, 2019.</p>

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52	3.6 A. ASU permit holders are authorized to wash owned aircraft in the designated wash rack area.	<p>Reword the above. Only owners are to wash their own aircraft? If a friend assists the owner in washing their aircraft it is a violation of this rule? A flying buddy washes the owners plane that is not a ASU permit holder? Only ASU permit holders are to use the wash rack area? What is the root issue being addressed here. Hard to comment on this without knowing what the problem is</p>	<p>Airport has observed use of the Wash Rack area for other than tenant aircraft.. Goal of this proposed update is to ensure the wash rack area is dedicated to permit holders.</p>
53	<p><i>Administrative Citation</i></p>	<p>I am writing to express my concern and opposition to the proposal to enact administrative citations.</p> <p>Before the airport can consider imposing citations, the rules and regulations must be written where an airport tenant or visitor acting in good faith and following reasonable practices does not violate the rules and regulations. The airport rules and regulations contain ambiguity, confusion, and in some cases, it is not possible to follow the combination of regulations and airport signage as written.</p> <p>I had previously communicated a very specific example of this regarding aircraft and vehicle parking. This comment has not been responded to.</p> <p>Recent litigation between the airport, local businesses, and the WPA has proven that enacting changes quickly results in court losses, legal fees to the city, and a sense of distrust between airport customers and management. Please take this opportunity to slow down, or stop, take a breath, and enact changes in a deliberate and collaborative manner.</p>	<p>See Items #8, #9, #10, #11, #26 and #29</p>

Item #	Regulation	Original Public Comment	Airport Response to Original Comment
54	<p><i>General Comment and reference to an Alternate Landing Area</i></p>	<p>I contend that in general the airport rule creation process is flawed, and this had led to creation of rules that are often unnecessary and/or excessive. I routinely evaluate potential hazards in my capacity as a test engineer for the US Air Force at Moffett Field. Our procedure is as follows, and I propose that it be used at WVI:</p> <ol style="list-style-type: none"> 1. identify a potential hazard. 2. Assess the hazard using a standard risk matrix which uses the perceived severity and probability of occurrence to determine the unmitigated risk level (low to high). 3. Present the assessment to a review board (management, customers, and local representative organizations) where potential mitigations (including possible creation of rules) are considered. Rules are only created for hazards with moderate or high risks and where other mitigation strategies are not possible. I believe that many of the existing and proposed hazards at WVI would be assigned a low risk if properly considered, and would not warrant a rule as mitigation. Proposed hazard example: operations (specifically landing and T/O) in turf areas: while the potential severity could be high, the probability of occurrence is very low, resulting in a low risk. A rule prohibiting operations would not be justified. At most, some other mitigations like the following options might be warranted: <ol style="list-style-type: none"> 1. publish guidelines or NOTAM for use of turf area, 2. emphasize operations are at pilots own risk, 3. restrict operations to local pilots with local knowledge of operating area and appropriate big tire STOL aircraft. <p>This is just one of many examples where unnecessary or excessive rules have been created due to lack of proper consideration of the origin risk.</p>	<p>No Comment. See Item #1, #2 and #3.</p>
55	<p><i>Administrative Citation</i></p>	<p>Watsonville Municipal Airport Administrative Citation:</p> <p>The appeal process is too complex, cumbersome and subjective. Who represents the Administrative Processing Agency? I believe that most appeals will never reach the hearing office appointed by the city manager. This process should be overseen by a impartial third party (ie judge or jury of our peers).</p> <p>The citations listed are vague and overreaching. Without going into a discussion on our second amendment rights, for the pilots that use their airplane for hunting trips, or back country flying transporting firearms would be under violations according to administrative citations. This administrative citation process should be reviewed by the Santa Cruz County Grand Jury.</p>	<p>See Items #8, #9, #10, #11, #26 and #29. Note Section 1.2 B which states: Any notice, order or revocation may be appealed. Initiation of appeal requires the Person(s) receiving notice to appeal, in writing, within ten (10) business days to the Airport. Within ten (10) business days of receipt of appeal by Airport Management a set time and place for a meeting with the City Manager's Office will be scheduled.</p>