

## PERTINENT COMMENTS SUBMITTED DURING PROPOSED AIRPORT REGULATIONS UPDATE PUBLIC REVIEW PERIOD

Watsonville Municipal Airport (KWVI) has completed the biennial review and update of the Airport's Regulations and Minimum Commercial Standards. Airport Management appreciates those who reviewed the proposed regulations (see below) and commented.

As previously stated, the review is a continuous improvement effort with a focus on enhancing the overall operation, management, and administration of the airport. Such effort ensures the safety and service of airport tenants and users.

The proposed edits to the Airport Regulations and Minimum Commercial Standards are listed below:

1. Instituting Vehicle/Pedestrian Access Training Program
2. Implementation of Gate Card access technology
3. Vehicular traffic along the transient ramp fence line is prohibited.
4. Speed Limits on Ramp and around aircraft
5. An eviction process for failure to pay account balances.
6. Eliminating charges for non-aviation storage within Middle Room and End Rooms
7. Permit holders may designate other individuals or entities to pay monthly invoices.
8. Implementation of mandatory "Welcome Aboard Orientation" for new permittees

Airport Minimum Commercial Standards update include:

1. Instituting SASOs Vehicle/Pedestrian Access Training Program
2. Certificate of Insurance and endorsements required for CAA permit renewal.

The requirement for "Dilapidated aircraft with no restoration progress after two years to Bone Yard" has been removed.

Over the forty-five-day review period (October 16 – November 30, 2023) a total of twenty-three (23) comments were submitted. Twenty-two (22) of those comments were considered significant and relevant public comments. For each comment the airport has offered a response providing the basis of the regulation change/addition or edit.

**Comment #1:** *"While it may not be the norm, it is entirely possible to have a Pilot Certificate without having a driver's license. There should be some method for a person who does not drive to access their hangar/aircraft, without needing to pass the driver training course."*

**Response:** From a historical and practical perspective, it's the Airport view that the overwhelming method of accessing the Airport Operations Area (AOA) is by motor vehicle.

The Airport's prime objective is to ensure individuals or entities accessing the AOA, regardless of method, are: (1) Valid Aviation Storage Unit permittees, (2) escorted (Permittee is Permittee is responsible for allowing entry/exit) guest of Permittees or leasehold or (3) individuals or entities previously approved by the airport. The description of "Driver's Training Course" as proposed in the 2024 Regulations update was not haphazardly created by the airport, but is in accordance with FAA Advisory Circular 150/5210/A ([https://www.faa.gov/documentLibrary/media/Advisory\\_Circular/150-5210-20A.pdf](https://www.faa.gov/documentLibrary/media/Advisory_Circular/150-5210-20A.pdf)).

To quote the AC: "Airport operators are ultimately responsible for establishing procedures and policies for vehicle access and operation on the movement and safety areas of the airport." To ensure the Airport is communicating as clearly and concisely as possible we will recast this proposed Regulations update as "Vehicles/Pedestrian Access Training" in accordance with Appendix A of AC 150/5210/A.

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**Comment #2:** *"Pedestrian gates at the South and East hangers, as well as at the terminal need to remain accessible to guests. Just last weekend, a group of us walked to lunch at the Beer Mule area from the South hangers. It is not always the case that a tenant is part of every walking group."*

**Response:** A key objective of the Security Gate Project upgrade is to ensure that only those individuals or entities that hold a valid ASU permit have access to the AOA. Pedestrian gates at the South and East hangars, as well other locations will remain accessible to guests as long as those guests are: (1) escorted (Permittee must ensure escorted individuals or entities comply with regulations) by an ASU permittee, (2) possess an airport issued Security Gate Card or (3) have been provided other means of entry to the AOA by the airport.

**Comment #3:** *"While implementation details and cost are yet unclear, the airport access rules could become onerous. I've been known to arrive at the airport without items I meant to bring (including access cards). It also is common to have my family come to the airport to help me with maintenance or join me for a trip. And occasionally, they need to go to the hanger to retrieve something I left there, or to "swap cars". Can the rule include all hours access assistance (at least via field staff, and perhaps aided by the onsite security patrol?) for tenants and their guests?"*

**Response:** Implementation details are undergoing review and the Fee for an access card (\$50.00 annually) has been published on the 2023-2025 Rate and Fee Schedule. At a high level the current implementation proposed is as follows: (1) The Security Gate Project upgrade will begin construction in Q1 of 2024. (2) The physical gate locations will remain as is except for Gate 4 (South end) which will be relocated for improved entry/egress. (3) Card Reader Pedestals will be installed requiring credential entry upon entry and egress. (4) Current access via a four-digit code will continue for some time as technical assessments and refinement are completed. (5) During a period, likely in Q2 a "Vehicle/Pedestrian Access Training" program will be developed. (6) A Tenant Review Committee will be selected to provide input regarding the program roll-out. (7) Prior to the Security Gate Project going live all ASU permit holders must complete V/PAT Program, either on-line or at the airport offices.

The program is not a "driving test" nor a practical test, but will require permittees to: (1) Be familiar with the differences between the Airport Operations Area, Non-Movement Area and Movement Area, (2) Airfield Layout (runways/taxiways), (3) Airport signage and markings (taxiway/runway signs, roadways), (4) How to identify where the movement area begins (runways, taxiways, & safety areas), so they may avoid unauthorized area implemented. Regarding arriving at the airport without items a permittee may contact the airport during business hours. After hours assistance will incur a call back fee.

**Comment #4:** *"Unclear if "dilapidated" has a legal definition. For purposes of protecting the airport against litigation, perhaps substitute "unairworthy"? May be helpful to include optionality as well? Ie: "Aircraft continuously unairworthy for 3 years, may, at the airports option, be moved to "boneyard" storage. After 4 years, the airport can ask the owner to vacate the airport. After 5 years, the airport may initiate a sale of the aircraft with net proceeds, after costs, to credit to the owners account."*

**Response:** Section 3.4 of the current Airport Regulations uses the terms "Inoperable, Derelict or Dilapidated" aircraft. The Airport bases these definitions as follows: Inoperable is defined as "not able to perform its normal function". Derelict is a synonym of Dilapidated. "Derelict" is abandoned, forsaken; given up or forsaken by the owner. (We have had aircraft literally meet this description.) The airport considered "Dilapidated" has fallen into a state of disrepair or deterioration, especially through neglect. (We have had aircraft literally meet this description.) The Airport instituted a process to address aircraft meeting these definitions by working with tenants over time as defined in Section 3.4.

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**Comment #5:** "What is the incremental cost of a single gate access card? Is it small enough that each applicant could have the option to receive two cards?"

**Response:** We are still early in determining if more than one card will be issued as part of the annual \$50.00 fee. The Security Gate Project upgrade will be run as a "cost center" within the Airport Enterprise Fund.

**Comment #6:** "Gate access for tenants should be included in their rent. No need for an additional fee, additional accounting, additional collection. It's hard to imagine anyone NOT requiring access to their hanger, tiedown, or end room. My hope would be the cost of the system is small enough to be absorbed as a cost of doing business, but if not, it could be rolled into a future rent adjustment."

**Response:** The improved level of security, by establishing control and restricting entry to the AOA Access to only permittees, or those escorted (Permittee must ensure escorted individuals or entities comply with regulations) by permittees comes at a cost. The Gate Key Cards provide more than controlled access and will not be included in the ASU monthly rates.

**Comment #7:** "Suggest adding the conditions under which delinquency based eviction proceedings would begin (for example, 3 months in arrears?)"

**Response:** Section 2.11 Storage Unit Payment Terms, Delinquent Accounts, Sub-paragraph C (4) states: "Accounts remaining unpaid after the 10th day of the third month are deemed 'Habitual Delinquent Accounts' subject to the following procedure..." The airport has determined that sub-paragraph C (4) requires a clearly defined and published Eviction process in accordance with applicable California Law.

**Comment #8:** "Aircraft under Construction: I was under the impression that aircraft under construction was going to be defined in more detail when the new rules come out. Particularly in the assignment of kit aircraft to hangar storage permit documents. I also heard that the "rule" for building is 7 years for completion, but I don't see that listed in the current airport regulations. Section 2.7B. Also, the criteria for kit building progress is a little vague in the current rules. Is it a form, an inspection, a verbal update? The hangar storage unit permit should probably be updated to include kit aircraft info for satisfying the lease requirements as we have no registration or N number. If there's going to be yearly progress inspections, there should be a formal progress update form or inspection criteria, so we know what type of progress is expected of us."

**Response:** Section 2.10B Aircraft under Construction Sub paragraph B (3) states: Permittee shall be required to show proof of ownership and that they have vested interest in the aircraft under construction. Given the vagaries of aircraft construction/reconstruction the airport has not established a definitive time frame for construction/reconstruction. After consultation with the Experimental Aircraft Association (EAA) the airport has stated seven (7) years as a reasonable time frame for construction or reconstruction of an aircraft. Section 2.7 B is aligned with this time frame, and as such the airport requires any construction or reconstruction effort to establish a start date, defines the process to review progress with the goal of completing construction within a reasonable time.

**Comment #9:** "Multiple Aircraft in Hangar: I've heard from people that have airworthy aircraft in their hangars and are building a side project getting charged a monthly fee for storing two aircraft in the hangar. In one case, the second aircraft project wasn't even airworthy or registered. While this is secondhand info, and perhaps I missed it, where in the rules or the fee schedule does it list the fees for storing/building more than one aircraft/kit in a T hangar? If these rules and fees are not published, it seems like an arbitrary assessment on tenants. I would expect that some people finish and fly the first airplane and want parts to another kit to tinker on... I don't believe that should be assessed a fee if that's occurring. Line 12 of the storage unit permit is as close to referencing anything along these lines and doesn't mention a fee for extra kits or aircraft."

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**Response:** Multiple Aircraft in Hangar: Exhibit "D" Line 12 of the storage unit permit states: "Permittee may store more than one owned aircraft, consistent with safety, in the hangar. At least one of the stored aircraft must be operational. There is no additional charge for a second aircraft.

**Comment #10:** "SOLUTION IN SEARCH OF A PROBLEM The proposed driver education program, and the new gate security system, are very costly, and frankly not necessary. RFID cards are used at other airports, but those have tall security fences around the perimeter, and an employee in attendance and monitoring 24/7. WVI has low perimeter fencing easily climbed over at any point. There is no barb wire on top. Do we really have a security issue at WVI? No, except for the occasional citizen who climbs over the low fence or goes through one of the many gaping holes along the fence.

*A 24/7 attendant is needed because transients coming into the airport may be able to exit (that remains to be seen) but will not be able to return without an RFID card. If they return, say at 3 a.m. to fly out, who lets them back into the airport? Then there is the problem of lost, misplaced, or defective RFID cards. Who lets people/tenants in or out in those situations, especially after hours."*

*The current gate key code system has worked well. The real issue is that the code should be changed periodically so that it remains somewhat confidential and only known to airport users and tenants. The walk-thru gates should have their codes changed weekly, if not daily. The multitude of security cameras that have been placed around the airport should be a hindrance enough to prevent unauthorized airport admittance. This was covered during trial testimony regarding the barricades where it was pointed out that the administration had not changed the code in 10 years! It was changed shortly after that courtroom testimony and had not even one incident of any wrongdoing captured on videotape!*

*Do we really need to be paying for more airport staff and staffing hours. This is not a military base (i.e. Fort Williams) nor does it have scheduled air carriers (and won't). Homeland security is not needed here. This airport used to be a friendly, welcoming airport under previous administration, but not now. It is basically empire building by the Director, who may use the new rules as retaliatory restrictions against those that have opposed him successfully in the recent past. Does he really need a bigger office as is shown on the newly adopted Airport Master Plan?*

*Install more CCTV's, keep the 15-mph speed limit, and paint some automobile travel routes (exit routes) to/from the main gate so transients, at least, won't pose a hazard to parked and operating aircraft.*

*Lastly, the driver training, testing, and licensing program is not needed as the tenants of airport know their way around. The exposure comes from transient aircraft, who currently have no way of knowing where the proper driving routes are on the airport. Insurance requirements are not necessarily met by, nor enforced, against transient aircraft and autos. That is one of the logic flaws in the new rules.*

*Ah, but one more point: What is the cost breakdown for all of these new rules? The OMB requires the FAA to set force the costs of proposed new rules and regulations. Since the money for these new WVI rules and systems will be sucked from the Airport Enterprise Fund "AEF" (which is funded mostly by the tenant rents), should not the Director disclose to the public the expected costs of installation and for upkeep? Is there a priority of needs that the funds could be put to better use? We believe so. More hangars come to mind, which, btw, the FAA does not fund, but must come from the AEF. Please reject the new rules and systems until the need for each is supported by documented facts."*

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**Response:** The proposed Security Gate Upgrade Project and associated Ground Vehicle Access Program are necessary. The Security Gate Project and Vehicle/Pedestrian Access Training program is funded via the FAA's Bipartisan Airport Infrastructure Grant (AIG) program.

Watsonville Muni does have a security issue when our gate access code is not only widely known but shared with individuals and entities that have no legitimate need/reason to access the AOA.

A 24/7 attendant will not be required as the Security Gate project will include technology allowing Transient pilots access. Regarding card access, in today's world card key access is ubiquitous. The current gate key code system has not worked well. Suggesting changing the code, even periodically has proven to be a challenge for tenants and it should be obvious that "somewhat confidential" is not confidential.

To state the "multitude" of security cameras should be hindrance enough again confirms a failure to understand viewing unauthorized access is too late to prevent unauthorized admittance.

Implementation of the Security Gate Project will not require additional airport staff or staffing hours. Again, we refer the commentor to the AC: "The overall responsibility for the operation of vehicles on an airport rest with the airport operator."

Additional cameras will be installed at the entry and exit pedestals. The 15 mph per speed limit will remain, but the limit will be further reduced to 5 mph when near aircraft, taxi lanes will be refreshed in accordance with the Airport Design criteria, AC 150/5300-13B.

As stated above the rationale for the Security Gate Project is clear. There is no "driving training or licensing" effort.

**Comment #11:** *"The keypad for Gate 4 near the W hangars is in a position that doesn't allow drive-up access when approaching from the north. If a card reader is positioned in the same location, it will create a burden when accessing the gate. There isn't a safe place to park while exiting a vehicle, which is generally required when using the keypad."*

*The remote controls alleviate the problem of accessing the keypad. Every card/keypad system I've used requires close access to the keypad, so I see a problem if a remote isn't available.*

*Additionally, the sensor for Gate 4 won't allow a car to stop to block the gate on exit. Waiting for the gate to close requires moving out into the traffic lane or parking across the street, which leaves the gate open for anyone else approaching. The gate needs to be moved back from the street to allow an existing car to wait for the gate to close. I would suggest not updating gate 4 to a key card until the keypad location is addressed, or a remote-control solution is available. It might be a good time to address the sensor issue as well."*

**Response:** As noted in Response to Comment #3 Gate 4 will be relocated as part of the Security Gate Project update.

**Comment #12:** *"In regard to proposed regulation instituting a driver's training program, the Department of Motor Vehicles is the only agency permitted to assess drivers' competency. In regard to the proposed regulation requiring a gate card and PIN, there is no reasonable argument that such a system will enhance ramp and hangar security. It will only delay access for emergency vehicles, impose unnecessary costs to the airport, unnecessary delays and inconvenience to those needing to access their valuable property at the airport, and decrease the utility of a public and uniquely valuable resource."*

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**Response:** As noted above the proposed Vehicle/Pedestrian Access Training Program is not a driving competency exercise. The proposed regulation requiring training will educate and enhance ramp vehicular and pedestrian operation. The Security Gate Upgrade project will not delay access for emergency vehicles as the technology provides immediate access for such vehicles, nor does this impose unnecessary costs to the airport. The perception of "unnecessary delays and inconvenience" to those needing to access their valuable property at the airport is in conflict with the fact that the upgrade project provides improved safe guards of "valuable property".

**Comment #13:** "Airport Motor Vehicle Driver Training will be mandatory for all ASU permittees. A practical driving test is unnecessary without equipment requirements. What about those without driver's licenses?"

**Response:** As noted in Response to Comment #1 and #12 the proposed Vehicle/Pedestrian Access Training Program is not a driving competency exercise.

**Comment #14:** "Access to Airport restricted to holders of Airport issued Gate Cards. Curious about provisions for transient pilots and passengers. ASU permittees include all family members? Movement of guests and passengers of ASU permittees possible without an escort? Guests and passengers can remain at ASU location without permittee presence?"

**Response:** As noted in Response to Comment #10 the Security Gate Project upgrade will make provisions for Transient Pilots and their passengers. As noted in Response to Comment #2 ASU permittees may escort individuals or entities (*Permittee must ensure escorted individuals or entities comply with regulations*). Individuals not affiliated with an ASU permittee may apply for an Airport Gate Access Card. Cards are issued at the airport's discretion.

**Comment #15:** "Cost of cards should be part of tie down/hangar rent. Isn't this change funded by Federal funds?"

**Response:** FAA Airport Improvement Program (AIP) grants don't cover on-going maintenance costs.

**Comment #16:** "Dilapidated aircraft with no restoration progress after two years to" Bone Yard" Consideration should be given for owner's payment history, record of completion of projects, and clear intent. Aircraft building/restoration should have clear progress documentation/inspection process so there is no ambiguity. If there is at least one airworthy aircraft in an ASU, parts of another one wouldn't be considered, right? Relocated to the "Bone Yard", Grid location-14, 15." does not mean confiscation or eventual auction of such aircraft if airport fees, taxes and registration are up to date, correct?"

**Response:** See responses to Comment #8. Aircraft are not confiscated. Aircraft may be subject to auction if, after eviction, the account is in arrears.

**Comment #17:** "Are EAA Chapter 119 and WEACT volunteers considered SASO employees?"

**Response:** No. Members of Special interest Groups (SIGs) are not considered Specialized Aviation Support Organization as defined by the Airport's Minimum Commercial Standards. Special Interest Group members who are not ASU permittees, and require recurring/continued access to the AOA, must apply for a Security Gate Card and pay the appropriate fee. Members of Special interest Groups may be escorted (*Permittee must ensure escorted individuals or entities comply with regulations*) as guests of Permittees.

**Comment #18:** "By way of replying to the Airports 2024 proposed regulations update I would like to provide my input regarding the "Dilapidated aircraft with no restoration progress after two years to the " Boneyard" topic. As a small business owner, I have traveled all over the state of California searching for dilapidated aircraft that are candidates for restoration. My first aircraft was N7181A which was based at Watsonville. I restored this aircraft to flying status and then proceeded to give instructions in the aircraft until 2023. The second aircraft was N3006D, a 310 aircraft that sat dormant for 15 years. I returned that aircraft to flying

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*status. The third aircraft that I restored was an 182 N3089P, an aircraft that was brought to Watsonville and returned to flying status. The fourth was a 172 N6995X which has been returned to flying status. The last aircraft that I have to restore is my N3089P, my Piper Apache. The airport has determined that the restoration of that aircraft has taken too long, Ignoring the fact that I come out to the airport almost every day and work on some aspect of aviation. Please find some comments below. The actual regulations updates that are going to be applied have not been submitted, and therefore cannot be reviewed. How can we comment on them? There no standards that have been established to determine the qualifications of this status. The airport will determine the people/aircraft that it doesn't like and then condemn them. This regulation will have a chilling effect on me and people like me who make an effort to bring commerce to the Watsonville region. I have been offered other aircraft, but knowing that the airport's position of returning aircraft to the skies I have declined because I do not know what and why the airport's next regulations will be on their ongoing effort to have me leave Watsonville.*

*The airport has more than sufficient parking for all the aircraft on the field. The airport has generated a crisis regarding aircraft parking for 1. The purposes of shortening/destroying the 9/27 runway, and 2 harassing me. This is evident because 1. There is no waiting list for tie-downs at Watsonville. 2. There is no process or procedure for being added to the waiting list. 3. There is ample transient parking (Admitted by the airport in the recent lawsuit with United Flight) plus overflow parking, plus all the parking of cars on the field, it must be clear that if the airport wanted to find a solution there clearly is one, therefore it must not. Moving aircraft to the bone yard makes sense for abandoned aircraft for there is no clear intent. I pay a monthly fee to store my aircraft, why does the airport single me out and target me, while at the same time taking my full rent and then religiously me to a second class owner by forcing my aircraft to the boneyard parking, where the aircraft is subject to theft and vandalism. To my knowledge, there is no video surveillance of the area. By my count, there is only one aircraft that qualifies for this regulation at this time. Why has the airport targeted me? It should be pointed out that the Quickie that Robert has recently restored to flying status would have been relegated to the boneyard and likely destroyed along with the Commander, Bonanza, Cessna, and Lake, why is the airport so committed to the destruction and removal of aircraft from the airport, perhaps there is an alternative explanation. I do not see any proposed discount available to tenants. Perhaps instead of burdening tenants with throughout regulations, the airport could encourage them with discounted parking. The Airport wants all the revenue it can get and at the same time wants to reduce the rights of those tenants. In the past, it should be noted that the airport has exempted all the FBOs on the field from these proposed regulations. Will the airport go into those facilities and determine which aircraft do not meet the non-standard proposed or will this regulation only apply to an individual? Due to the airport monopoly on the airfield, why are they providing an unfair advantage to some and not others? Will the EAA be exempted from this regulation? What will happen when an aircraft is donated to them? Will the clock start ticking. As with many of the airport's activities, when they attempt to seize my property, I will be forced to sue them. Another needless lawsuit hopefully ending the further loss for the airport will encourage them to once again raise your rates and fees to pay for a third airport settlement that we will all have to pay."*

**Response:** Under the Airport's Minimum Commercial Standards, Specialized Aviation Support Operations (SASOs) can perform aircraft restorations within their City Council approved leaseholds. This ability does not apply to Aviation Storage Units as no commercial activity is permitted within Aviation Storage Units. Aircraft owned by a SASO, who is also an ASU permittee, may perform maintenance in accordance with 14 CFR Part 43 within ASUs within the ASU. Additionally in accordance with Section 2.10 B of the Airport's regulations a SASO, who is also an ASU permittee, may submit a request to construct/reconstruct a personally owned aircraft within an ASU. Section 2.10B Aircraft under Construction Sub paragraph B(3) states: Permittee shall be required to show proof of ownership and that they have vested interest in the aircraft under construction. Given the vagaries of aircraft construction/reconstruction the airport has not established a definitive time frame for construction/reconstruction. After consultation with the Experimental Aircraft Association (EAA) the airport has stated seven (7) years as a reasonable time frame for construction or reconstruction of an aircraft. Section 2.7 B is aligned with this time frame, and as such the airport requires

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any construction or reconstruction effort to establish a start date, defines the process to review progress with the goal of completing construction within a reasonable time.

**Comment #19:** *"SIDA badges and driving and riding tests are totally inappropriate. Nobody on the airport staff is a law enforcement officer or a DMV official and therefore nobody there is qualified to administer driving tests. This is nothing more than another attempt to harass and control the customers so that the airport manager can see when each tenet enters the airport and does nothing for safety. The big glaring safety concern is still the skydivers in the traffic pattern. Why can't you address that before someone gets killed? The only vehicles that have hit airplanes have been driven by airport staff. They are the ones who need the training. Some airports do have those requirements, but those are big airports with a lot of jet traffic and airline service. It is inappropriate for and small recreational airport that shuts down for fireworks. All this will do is further drive away guests who are interested in coming to the airport and going flying and hanging out with us. I find it interesting that we the tenets weren't even made aware of these new, proposed changes. I guess it doesn't matter since our input is never considered anyway."*

**Response:** Security Gate card access and Vehicle/Pedestrian Access Training Programs are appropriate. Airport staff are not administering "Driving" tests. The Airport is restricting AOA access to permittees, ensuring only authorized permittees have access to the field. There are several non-scheduled service GA airports with gate card access (RHV, SNS, HWD) and/or driving programs. It's the Airport's view that this modernization is long overdue and will be embraced by transient pilots and visitors alike. The Security Gate card Project was brought before the Watsonville Airport Advisory Committee in 2022 and progress has been updated during quarterly meetings since then.

**Comment #20:** *"I see the proposed driving class and test for airport tenants has a waste of tax dollars. Is there any documentation supporting the necessity for this driving class and test?"*

**Response:** The "Driver's Training Course", as proposed in the 2024 Regulations update, has been misinterpreted as a DMV type test. This is not accurate. The requirement is in accordance with FAA Advisory Circular 150/5210/A ([https://www.faa.gov/documentLibrary/media/Advisory\\_Circular/150-5210-20A.pdf](https://www.faa.gov/documentLibrary/media/Advisory_Circular/150-5210-20A.pdf)). To quote the AC: "Airport operators are ultimately responsible for establishing procedures and policies for vehicle access and operation on the movement and safety areas of the airport." Several nearby airports, Hayward and Reid Hill View, have implemented such programs.

**Comment #21:** *"Is there a history of significant intrusions by unauthorized individuals to justify this effort? I understand that the FAA wants to up security across the board, but if people truly want in for nefarious purposes isn't the perimeter fence an easier target? When it comes to improving airport safety, changing the entry areas around the most eastward and westward gates would be a better use of funds. Both these gates (especially on the west side) force vehicles to stick out into traffic while attempting to enter and exit. Move both gates inward 20' to avert collision and additional gate damage."*

Permit holders may designate "Entities" to pay on their behalf: Thanks for compromising on this rule per the discussion with the Watsonville Pilots Association and the Airport Manager and City Manager last spring.".

**Response:** There is a history of unauthorized individuals entering the field. From vandalism and theft to sight-seeing and curiosity seekers. Additionally, ASU permittees have provided gate code credentials to individuals who have demonstrated no understanding of aircraft operations. As noted above Gate 4 will be relocated as part of the Security Gate Project update.

**Comment #22:** *"What is the process for the public to review which airplanes that airport finds are derelict. Is there going to be a public list that can be reviewed. If not, how can the public be assured that the airport is acting in good faith and ensuring that the airport is following its own policies fairly. Let us assume that we do not have complete and total faith in an opaque process."*

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**Response:** Airport Regulations, Section 3.4, uses the terms "Inoperable, Derelict or Dilapidated" aircraft. Each year, during the annual Aviation Storage Unit Inspections, Airport Operations accesses aircraft as follows: Inoperable is defined as "not able to perform its normal function". "Derelict" is abandoned, forsaken; given up or forsaken by the owner. The Airport does not publish a list of aircraft determined as "Inoperable, Derelict or Dilapidated".