

Sponsor FAA Submission Request

RPZ Codification, Vision 2045 Alternatives, and GA Capacity Impacts

King County International Airport (Boeing Field – KBFI)

From:

King County International Airport (Boeing Field – KBFI)
King County, Washington

To:

Federal Aviation Administration
Seattle Airports District Office (SEA ADO)

Date: [Insert Date]

Subject: Clarifying Supplement and Revised Draft – Sponsor FAA Submission Request (RPZ Codification, Vision 2045 Alternatives, and GA Capacity Impacts)

1. Executive Summary

King County International Airport (Boeing Field – KBFI), as airport sponsor, respectfully submits this **Clarifying Supplement and Revised Draft** requesting FAA review and written guidance regarding the continued use and formal recognition of existing Light General Aviation (GA) tiedowns and hangars located within established Runway Protection Zones (RPZs) at KBFI.

Current RPZ guidance is advisory and non-codified, allowing reinterpretation that may enable access-altering planning decisions without formal FAA rulemaking or codified determinations applicable to existing aeronautical facilities. If applied retroactively, such reinterpretation could result in the loss of approximately **185 to 206 Light GA tiedowns and hangars**, leaving

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approximately **12 remaining tiedowns**, absent FAA codification or written acknowledgment permitting continued tiedown and hangar use within RPZs.

This submission seeks FAA clarification and written guidance consistent with safety objectives, FAA Grant Assurances, and NEPA requirements, while avoiding irreversible displacement of long-standing airport users prior to FAA review.

2. Background

King County International Airport supports commercial, cargo, military, and general aviation operations. Certain Light GA tiedowns and hangars currently located within RPZ boundaries were established prior to current RPZ dimensional standards and contemporary policy interpretations.

Vision 2045 planning assumptions have expanded RPZ boundaries to encompass these pre-existing aviation facilities. FAA SEA ADO staff have advised that RPZ interpretation and recognition of existing facilities must be addressed through the airport sponsor.

3. Existing Facilities and Operations

Facilities subject to this request include:

- Low-profile Light GA tiedowns and hangars
- Primarily serving single- and multi-engine piston aircraft
- Aviation-related and operationally controlled
- Not used for non-aeronautical purposes

These facilities provide essential GA access and cannot be readily relocated without significant capacity and economic impacts.

4. Safety and Compatibility Considerations

- Facilities do not penetrate Part 77 surfaces
- Outside critical approach and departure paths
- No documented incidents involving RPZ-located GA facilities at KBFI

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- Existing operational controls are maintained

Continued use aligns with RPZ policy intent to discourage future incompatible development; not retroactive removal of existing aviation uses.

5. Planning and Policy Context

This request supports:

- Grant Assurance 19 (Compatible Land Use)
 - Grant Assurance 21 (Safe and Efficient Use)
 - Non-discriminatory access under AC 150/5190-23
 - Proper NEPA cumulative-impact evaluation
 - Avoidance of irreversible commitments prior to FAA review
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6. GA Capacity Displacement and Limited Recovery Potential

Vision 2045 alternatives reliant upon RPZ reinterpretation could displace approximately **185 to 206 Light GA tiedowns and hangars**, materially reducing GA capacity.

Under **LU/AA 4 – Location 7**, if Location 7 were reclaimed by King County International Airport, it may be possible to recover up to approximately **34 Light GA tiedowns**, subject to FAA review, safety evaluation, and ALP approval. This potential recovery does not offset the scale of displacement absent FAA codification.

7. Requested FAA Actions

This sponsor-submitted request asks FAA to:

1. **Review and consider codifying, through written FAA guidance or determination, the continued use and formal recognition of existing, pre-established Light General Aviation (GA) tiedowns and hangars located within Runway Protection Zones (RPZs) at King County International Airport.**

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2. **Determine the applicability of RPZ guidance to long-standing, pre-existing aeronautical facilities**, including whether such facilities may be recognized as grandfathered based on historical establishment and continuous aeronautical use.
3. **Provide written guidance and codification, as appropriate**, applicable to King County International Airport, including written acknowledgment recognizing the continued or grandfathered status of existing Light GA tiedowns and hangars within RPZs.
4. **Identify any necessary or appropriate mitigation measures**, if required, to support continued use of existing facilities consistent with safety considerations.
5. **Clarify the appropriate treatment of these facilities within Airport Layout Plan (ALP) updates and Vision 2045 planning actions**, including cumulative-impact evaluation.
6. **Concur that Vision 2045 alternatives dependent upon RPZ reinterpretation be temporarily suspended to begin on or before February 28, 2026**, pending FAA review, codification, and written determination.
7. **Concur with interim safeguards preventing irreversible General Aviation displacement** prior to FAA review, codification, and written determination.

This requested suspension applies to:

- **Visibility Minima Alternatives (VMA) 1A–1D**
- **Land Use / Airside Alternatives (LU/AA) 1–4**

8. Next Steps and Coordination

King County is prepared to provide additional documentation, participate in FAA review, and implement reasonable mitigation measures if identified. FAA guidance is requested to support safe, compliant, and balanced long-term planning while preserving essential GA access.

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