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Sent: Sunday, January 4, 2026 2:27 PM

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

Dear Deputy Airport Director Decoteau,

I am writing to provide a **further clarifying supplement** to my prior correspondence regarding the **Airport-Sponsored FAA Submission Request addressing Runway Protection Zone (RPZ) interpretation and existing Light General Aviation (GA) facilities** at King County International Airport (Boeing Field). I am writing on behalf of **SAVE SMALL GENERAL AVIATION AT KING COUNTY INTERNATIONAL AIRPORT (KBFI) and Washington State Airports Political Action Committee** to transmit a **Clarifying Supplement and Revised Draft** related to the Vision 2045 Airport Master Plan and its implications for existing Light General Aviation (GA) facilities at Boeing Field / King County International Airport.

This Clarifying Supplement and Revised Draft is provided to consolidate and refine prior correspondence into a single, sponsor-ready submission. The revisions do not introduce new requests, but clarify the advisory and non-codified nature of RPZ guidance, quantify documented General Aviation capacity impacts, and formally request an interim planning safeguard pending FAA review and written determination. This revised draft is intended to supersede prior versions to support clear sponsor transmittal, FAA review, and NEPA-consistent planning coordination.

As previously advised by the FAA Seattle Airports District Office (SEA ADO), matters involving Runway Protection Zone (RPZ) interpretation, application, and recognition of existing facilities must be advanced through the airport sponsor, and Advisory Circulars reflect national policy rather than airport-specific amendments.

Current RPZ guidance is advisory in nature and non-codified, allowing reinterpretation that may enable access-altering planning decisions without formal FAA rulemaking or a codified FAA determination applicable to existing aeronautical facilities. If applied retroactively, such

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reinterpretation could result in the removal of approximately **185 to 206 existing Light GA tiedowns and hangars** at King County International Airport, leaving approximately **12 remaining tiedowns**, absent FAA codification or written acknowledgment permitting continued tiedown and hangar use within RPZs.

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.

Accordingly, we respectfully request that **King County International Airport, as airport sponsor**, submit the attached **Revised Draft – Sponsor FAA Submission Request (RPZ Codification, Vision 2045 Alternatives, and GA Capacity Impacts)** to the FAA Seattle Airports District Office for formal review and written guidance.

This sponsor-submitted request asks FAA to review and clarify:

- Continued use and formal recognition of existing, pre-established Light GA tiedowns and hangars located within RPZs
- Application of RPZ guidance to long-standing, pre-existing aviation facilities
- Appropriate treatment of these facilities within the Vision 2045 planning process, including cumulative-impact evaluation
- Interim safeguards to prevent irreversible GA displacement prior to FAA review, codification, and determination

The revised draft further requests FAA concurrence that implementation of Vision 2045 alternatives reliant upon RPZ reinterpretation be **suspended to begin on or before February 28, 2026, pending FAA codification and written guidance**, including:

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

Without such suspension, Vision 2045 implementation could result in irreversible displacement of long-standing GA facilities before FAA review, materially altering airport access and capacity.

We respectfully request notification once this sponsor-submitted request has been transmitted to the FAA, or guidance on any additional information that would assist in supporting the submission. If helpful, I am happy to provide a draft FAA transmittal email once the County determines how it wishes to proceed.

Thank you for your consideration and continued coordination.

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Respectfully,

John R. La Porta

Save Small General Aviation at
King County International Airport (KBFI)
and Washington State Airports
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