

Tamara Ross

From: Ric Stephens <Ric.Stephens@nv5.com>
Sent: Thursday, October 14, 2021 2:07 PM
To: Lauren Prentice
Cc: Katie Daniel Kintner; John Shute; Kari Laib
Subject: Martin Field Airport Overlay District
Attachments: Martin Field Airport Overport Overlay District Cover Ltr.docx; Martin Field Airport.zip

You don't often get email from ric.stephens@nv5.com. [Learn why this is important](#)

Hi, Director Prentice-

Attached are a cover letter, hearing comments /responses, and airport maps as requested by the Planning Commission.

Sincerely,

Ric Stephens | Senior Aviation/Land Planner

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October 14, 2021

Ms. Lauren Prentice, Planning Director
County of Walla Walla Community Development
310 West Poplar Street
Walla Walla, WA 99362

Martin Field Airport Overlay District Memo

Responses to Planning Commission Comments, October 6, 2021

Director Prentice-

Per direction from the recent Planning Commission hearing, we have listed the comments from the staff report and concerns of the Commissioners and provided responses. Also attached are maps which may be enlarged for further reference.

If accepted, the application will be amended with the underlined red text revisions.

Thank you for distributing these items to the Planning Commission, and we look forward to the hearing on October 20, 2021.

Sincerely,
Ric Stephens
Senior Aviation Planner

Martin Field Airport Overlay District

County of Walla Walla Comments and Applicant Response

Memo

Comment 1

Walla Walla County Development Code

Comment included in Staff Report Dated October 6, 2021, page 1, Background Section

“The proposal would also create a new chapter in Title 17 - Zoning and amend WWCC Section 17.16.014 – Permitted uses table to make Airport and Aircraft Landing Field – Agricultural a use permitted outright in the Light Industrial zoning district. Currently the airport is a nonconforming use, which would limit expansion of the facility.”

Applicant Response

The applicant proposes to add Aircraft Landing Field-Private, Airports and Accessory Uses, and Airports and Aircraft Landing Field – Agricultural to WWCC Section 17.16.014 (page 18 of 34) outright in the Light Industrial zoning district. Currently the airport is a nonconforming use and does limit the expansion of the facility. Allowed future expansion should include landing fields, accessory uses of a general airport including a business office, restaurant, airport-related housing, hangers, and maintenance operations which are considered accessory uses as well as agricultural aircraft landing. The applicant is requesting that all three of these specific uses are included in the allowed Light Industrial zoning as these specific uses are already a part of the WWCC Section 17.16.014 (page 29 of 34) Agricultural Resource Lands.

Image of WWCC Section 17.16.014 (page 18 of 34) with additional text highlighted with red lettering.

Exhibit A – Amendments to Walla Walla County Code

SPECIFIC USE	Zone									
	Industrial and Commercial								Misc.	
	IA-M	IA-H	HI	LI	I/BP	NC	CG	BC	BR	PR
* Apparel and Other Textile Products	P	P	P	P	P					
Acid, manufacture of sulphurous, sulfuric, nitric, hydrochloric, and other similar acids	C	C	C							
* Aircraft Landing Field—Private				P						
* Airports and Accessory Uses				P						
* Airports and Aircraft Landing Field—Agricultural				P						
Arsenals	C	C								
Asphalt Plant	P	P	P							
* Brewery, Type I										

Image of WWCC Section 17.16.014 (page 29 of 34) with existing Specific Uses text highlighted in black lettering for reference.

	Zone																		
	Resource				Rural								Urban Residential				Misc.		
	PA-40	EA-120	GA-20	AR-10	RR-40	RR-20	RA-10	RA-5	RRMC-5	RR-2	RR-5	R-96	R-72	R-60	RM	RD-R	RD-CI	RFC	RAC
Specific Use																			
* Aircraft Landing Field—Private				C															
* Airports and Accessory Uses																			
* Airports and Aircraft Landing Field—Agricultural	P	P	P	P															
Bus Passenger Stations																			
College or Universities, public or private										C	C				C				C

Additionally, Commissioner Caruthers expressed concerns that the “Airport Board” would have authority or power to approve or deny future developments within the Airport Influence Area. This language is **not** a part of our proposal. The language he referred to is a part of the existing WWMC 17.16.015 as shown in the image below. The existing Airport development district pertains to the Walla Walla Municipal Airport and no changes are proposed to this section of code.

The approving authority for development in the Airport Overlay District will remain Walla Walla County.

17.16.015 Permitted uses—Airport development district.

- A. The airport development district permits the full range of agricultural, aviation, industrial, office and commercial, public and quasi-public uses and incidental accessory uses.
- B. Specific use or uses of buildings and sites will be permitted by approval of the airport board, based on its land use and development plan. (Ord. 187 (Exh. A (part)), 1986)

(Ord. No. 371, § III(Exh. A, Pt. D), 8-3-2009)

Staff Procedural and Record Issue 1

Walla Walla Comprehensive Plan

Comment included in Staff Report Dated October 6, 2021, page 2, Analysis and Summary of the Proposal

The applicant has proposed a number of amendments to the County’s development regulations which are described herein, but no specific Comprehensive Plan amendments were submitted. Although the application may be generally consistent with general Comprehensive Plan goals, it is the opinion of staff that the Comprehensive Plan would need to be amended in order to implement an overlay zone.

Response

The Airport Overlay District implements Walla Walla County Transportation Policy 7.13 K. “Protect airports and their associated clear zones and flight paths from encroachment of incompatible land uses and densities.” The Walla Walla Comprehensive Plan amendment for inclusion of Martin Field Airport includes the following proposed text [underlined]:

The Airport Overlay District is consistent with and implements several Growth Management Act planning goals:

- Transportation. Encourage efficient multimodal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans.

- Economic development. Encourage economic development throughout the state that is consistent with adopted comprehensive plans; promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons; promote the retention and expansion of existing businesses and recruitment of new businesses; recognize regional differences impacting economic development opportunities; and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.
- Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.
- Historic preservation. Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance. ([Walla Walla Comprehensive Plan, 2018](#))

The Growth Management Act recognizes public use general aviation airports as essential public facilities and requires cities and counties to discourage incompatible land uses adjacent to them through their comprehensive plan policies and development regulations (RCW36.70.547 and RCW 36.70.A.200).

5.2.6.8. Airport

The Airport land use designation includes the Martin Field Airport. This airport provides essential public services and serves as a Type III Community Airport in the Washington Aviation System Plan. Martin Field Airport has an Airport Overlay District with Safety Zones reflecting Washington State Department of Transportation Aviation recommendations.

8.2.8.2. Air

Within the Walla Walla Valley, there are two heliports and six additional airports, with most of them in private hands. Martin Field Airport, located west of College Place, is a privately owned, public-use airport, which reported 5,000 local operations in 2016. Lower Monumental Field is a State-owned, gravel-surfaced, emergency airfield located near Lower Monumental Dam at the northern edge of the county. No services or facilities are located at the site.

Policy CF 1.3

The Walla Walla Regional Airport and Martin Field Airport shall be designated as essential public facilities pursuant to RCW 36.70A.200. Land use designations and development on lands adjacent to the airport shall be evaluated for consistency with the recommendations contained in the Washington State Department of Transportation (WSDOT) Aviation Division's "Airports and Compatible Land Use" publications prepared pursuant to RCW 36.70.547 and RCW 36.70A.510. Height restrictions shall be governed by Federal Aviation Administration (FAA) regulations found in 14 CFR Part 77. Noise impacts and mitigation shall be governed by FAA regulations found in 14 CFR Part 150. Mitigation measures including, but not limited to, land use or site plan restrictions, buffering, aviation easements or other notices to buyers and sellers shall be required on development projects located within the safety zones identified in the WSDOT criteria.

Staff Procedural and Record Issue 2

City of College Place

Comment included in Staff Report Dated October 6, 2021, page 2, Analysis and Summary of the Proposal. Commissioner Langford and others were interested in the airport's status with the City of College Place.

The proposed overlay zone extends into incorporated areas which are not within County zoning jurisdiction (in Zone 4), like the landfill and much of the City of College Place. (October 6, 2021 Staff Report, Page 3)

Response

The City of College Place has been in communication with WSDOT and received the 2018 letter recommending specific County and City actions to regulate airport land use compatibility. It is the intention of the airport sponsor to coordinate with the City of College Place to establish a City overlay district. In the event of future development the sponsor will be required to initiate annexation into the City and coordinate utility extension. Approval of a County Airport Overlay District will help establish the foundation for future airport master planning with the City and WSDOT. The Walla Walla County Airport Overlay District is an important first step as most of the Airport Influence Area is within the County's jurisdiction.

Staff Procedural and Record Issue 3

Maps

Comment included in Staff Report Dated October 6, 2021, page 2, Analysis and Summary of the Proposal

As discussed at the workshop, the proposed maps are simplistic.

Response

There are two essential maps for the Airport Overlay District: a site plan showing Safety Zones and a map showing the FAA Airport imaginary surfaces within the Airport Influence Area. Both of these exhibits reflect WSDOT Aviation and FAA standards for airport land use compatibility. The original exhibits are prepared at A-1 size (~24x36") and may be reduced to full-page exhibits for use in the Comprehensive Plan. The images are linked to full-size posters for increased accessibility.

Airport Commissioners were interested in an exhibit to illustrate the structures and topography within the Airport Influence Area. The airport will comply with WSDOT requirements for Airport Layout Plans and Airport Master Plans which address imaginary surfaces and mapping for obstructions. Note: The Horizontal Surface begins at 150' above ground level which would only be penetrated by a 15-story building or tower.

Staff Procedural and Record Issue 4

Walla Walla County Development Code

Comment included in Staff Report Dated October 6, 2021, page 2, Analysis and Summary of the Proposal

Changes may need to be made to ensure that it is consistent with other sections of the code. For example, under regulated activities, the first section of the proposed overlay district, it states in (2) that only permits required by Chapters 18.04 and 18.08 are subject to these requirements. These are the

SEPA and critical areas chapters. So, it implies that other building permits don't have to be reviewed under this overlay. But then there's a list of uses in (3) that doesn't directly correspond to permit or use types, so it's unclear how this review would be implemented/administered within the existing framework.

Response

The following red text revision expands the permit review to all relevant County permits.

17.xx.xxx Regulated activities.

Uses and activities within the Airport Overlay District that are subject to the requirements of this chapter include:

- (1) Land divisions pursuant to Title 16 - Subdivisions.
- (2) Any building, land use, or environmental permit, action, or license required by Walla Walla County which may adversely impact airport operations.
- (3) Any use that creates potential hazards to aircraft in flight within the Airport Overlay District, including but not limited to:
 - (a) Electrical interference with airport radio communications or navigational signals;
 - (b) Lighting or other installations that cause glare that could be mistaken for airport lighting;
 - (c) Installations or activities which could result in impaired visibility near an airport;
 - (d) Emissions of fly ash, ~~dust~~, vapor, gases or other forms of emissions that pose a hazard to airport operations in Zones 1, 2, and 3 or that penetrate the imaginary surface as illustrated by the FAA Part 77 imaginary surfaces in Zone 4.;
 - (e) Areas of standing water greater than one-half acre; and/or
 - (f) Structures, trees, or other objects that cause an obstruction to navigable airspace as defined in Title 14 Code of Federal Regulations Part 77, Imaginary Surfaces.

The new Airport Overlay District does not propose to give an airport board authority for land use review. Instead, land use and permit applications will continue to be reviewed by the County.

Staff Procedural and Record Issue 5

SEPA Compliance

Comment included in Staff Report Dated October 6, 2021, page 2, Analysis and Summary of the Proposal

The application packet and SEPA Environmental Checklist does not provide any information or analysis on what the practical impact of these regulations would be. For example, how does this compare to existing regulations? What is the need to do this, what types of development is occurring or allowed under current zoning that conflicts which cause hazards?

Response

The practical impact of the Airport Overlay District is to regulate land uses within the District to ensure a safe environment for aviation and the public. The proposed Airport Overlay District creates conforming code for long-time existing uses and additional regulations to ensure airport land use compatibility. The FAA and WSDOT recommend local governments undertake this action to prevent encroachment of incompatible land uses that create hazards to airport operations. The zoning text amendment identifies the practical impacts within the four protected zones. It also addresses non-conforming, lawfully permitted, and established land use, buildings, or structures. The applicant agrees to include these

impacts within the SEPA environmental checklist. The applicant proposes that the revised SEPA environmental checklist be required as a condition of approval.

Staff Procedural and Record Issue 6

SEPA Area/Site Information

Comment included in Staff Report Dated October 6, 2021, page 2, Analysis and Summary of the Proposal

The SEPA Environmental Checklist should be revised to include area/site information. Too many questions were answered Not Applicable or answered incompletely. For example, the following states that the overlay would not affect (i.e. restrict) land use, but it is assumed that it would limit uses or development in the future, since it is a proposed new development regulation.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

The proposed zoning overlay will not affect land or shoreline, nor will it allow or encourage land or shoreline uses incompatible with existing plans.

Response

The Airport Overlay District will not affect existing land uses but will place additional regulations on proposed development in the airport zones, notification to adjacent properties, and height restrictions over 150 feet in the airport influence area. There are no current regulatory provisions to protect the airport from adjacent development, and WSDOT has noted that the northeastern area is of concern from new development. The SEPA Checklist responses will be expanded to reflect these considerations.

Staff Procedural and Record Issue 7

Aviation Notice

Comment included in Staff Report Dated October 6, 2021, page 2, Analysis and Summary of the Proposal. Commissioner Caruthers and others expressed an interest in clarifying the Airport Influence Area and FAA airspace authority.

In several places, like on Page 6 in the Zone 4 description (4) the proposed language states that the purpose is to “inform... residents, business, and landowners...” of noise and aviation-related disturbances and to “avoid” uses that would create hazards. This type of language is not generally used in development regulations, unless a specific notice requirement is included, like a plat note.

Response

The Airport Influence Area is the area in which current or future airport-related noise, overflight, safety, and/or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses. This area extends 9,000’ around Martin Field Airport to ensure safe aviation by regulating the Safety Zones and overflight area. It is important to note that beyond the Safety Zones, the Airport Influence Area does not begin until **150 feet above** the airport elevation. [see attached maps]

The primary purpose of the Airport Influence Area is to prohibit structures from penetrating the Horizontal Surface and creating a potential aviation obstruction. “Ensure structures built within the airport influence zone should remain free of man-made and naturally occurring objects that penetrate the imaginary airspace surfaces (FAA’s FAR Part 77) of Martin Field Airport.” (WSDOT, 2018) **No other land use regulations are proposed for the Airport Influence Area beyond the Safety Zones.**

The secondary purpose is to define an area that should receive notification of airport activities in the vicinity. WSDOT recommends the following approach to notification: “A notice should be placed on titles for all lots within the close proximity to the airport that states that:”

The subject property is located adjacent to Martin Field Airport and may be impacted from a variety of aviation activities. Such activities may include but are not limited to noise, vibration, odors, hours of operation, low overhead flights and other associated activities. (WSDOT, 2018)

Most jurisdictions apply this notification to all properties within the Airport Influence Area. WSDOT’s recommendation specifies “close proximity” and the Airport Overlay District proposes that notification/disclosure be provided by all properties within 5,000 feet of the airport property. If the Planning Commission wishes to provide notification to property owners within the entire Airport Influence Area, this text could be amended accordingly.

The revised [red] text is as follows:

(4) Airport Influence Area (Zone 4). The Airport Influence Area (Map 33.08.020 (1a)) covers Airport Land Use Compatibility Overlay Zones 1 through 4 and approximates the area subject to the regular or potential traffic pattern of the airport. The purpose of this zone is to inform current, future, and prospective residents, businesses, and landowners of potential impacts from aircraft and aviation-related disturbances, and to avoid uses that may create potential hazards to aircraft in flight. Notice shall be placed on titles for all lots within 5,000 feet of the airport property that states that: *The subject property is located in close proximity to Martin Field Airport and may be impacted from a variety of aviation activities. Such activities may include but are not limited to noise, vibration, odors, hours of operation, low overhead flights and other associated activities. Structures built within the airport influence zone should remain free of man-made and naturally occurring objects that penetrate the imaginary airspace surfaces (FAA's FAR Part 77) of Martin Field Airport.*

Staff Procedural and Record Issue 8

Airport Influence Area

Comment included in Staff Report Dated October 6, 2021, page 3, Analysis and Summary of the Proposal. Commissioner McCaw and others expressed concern over the impacts to agriculture by prohibiting uses that generate dust.

Zone 4, the Airport Influence Area, is the largest area, but the proposed Zone 4 protection standards are not very specific. No use restrictions are proposed, but a number of general impacts, rather than specific uses or activities, are prohibited. For example, in (b)(ii) it appears to state that “no land use, building, or structure shall emit emissions of.... Dust... within the Airport Influence Area that may conflict with any current and planned operations of the airport.” Without more detail, this would be very difficult for Community Development Department staff to implement. There should be specific criteria so that we know what to look for when we’re reviewing development proposals.

Response

The Airport Overlay District specifically designates *agriculture* as a permitted use in all Safety Zones. As many agricultural practices generate emissions within the Airport Overlay District at a distance that does not impact the airport, the proposed code is revised as follows [red]:

(d) Emissions of fly ash, ~~dust~~, vapor, gases, or other forms of emissions that pose a hazard to airport operations in Zones 1, 2, and 3 or that penetrate the imaginary surface as illustrated by the FAA Part 77 imaginary surfaces in Zone 4.

This revision would allow for all agricultural uses generating dust and other emissions far enough from the airport as to not impact airport safety. For closer agricultural uses there is an exemption to allow the generation of emissions near the airport: (3) Temporary uses lasting no more than five consecutive days within any 180-day period when located within Airport Land Use Compatibility Overlay Zones 1, 2, 3, and 4, subject to approval by the Department of Community Development or applicable review authority for consistency with the intent of this chapter.

Planning Commissioner Comment 1

Airport Community Services and Benefits

Several Planning Commissioners were interested in the community benefits provided by a public airport.

General aviation is defined as all forms of aviation except commercial and military. Small General Aviation airports provide the following services:

- Advanced Air Mobility*
- Agricultural monitoring and crop dusting
- Air ambulance (medevac)
- Disaster reconnaissance
- Education and training
- Fire fighting
- Law enforcement
- Mapping and photogrammetry
- Personal and business transportation
- Recreation and tourism (air shows, flight-seeing, fly-ins, sailplaning...)
- Small businesses

Martin Field Airport has provided the following community benefits:

- Aerial Tours
- Civil Air Patrol
- Community Activities and Events
- Experimental Aircraft Association Chapter 604
- General Aviation
- Pilot Training
- Sailplane Instruction and Tours
- Ultralight Operations
- Youth Programs

*NASA's vision for Advanced Air Mobility (AAM) is to help emerging aviation markets to safely develop an air transportation system that moves people and cargo between places previously not served or underserved by aviation – local, regional, intraregional, urban – using revolutionary new aircraft that are only just now becoming possible. AAM includes NASA's work on Urban Air Mobility and will provide substantial benefit to U.S. industry and the public. ([NASA](#))

Planning Commissioner Comment 2

Airport Land Use Compatibility

Commissioners McFarland and others were interested in clarification of the airport's relationship with existing and future residential development.

Response

"One of the main challenges facing aviation today is the encroachment of incompatible land uses near and around airports. Development of incompatible land uses can degrade airport operations, impede airport expansion, and reduce quality of life for airport neighbors. Encroachment is a key factor contributing to escalating operating costs and restriction of airport operations. It has even resulted in closures of numerous general aviation airports in the United States." (WSDOT *Airport and Compatible Land-Use Program Guidebook*)

Martin Field Airport is a privately owned, public-use General Aviation airport designated by WSDOT as a Community Airport in the Washington Aviation Systems Plan. The original airfield was built in the 1940s as a training facility for US Navy aviators. The area was agricultural and rural residential for 60 years until suburban development occurred adjacent to the airport to the east in 2008. The County responded by including a disclosure to be included on the title:

1. Martin Field: The PUD will be held to the Washington State Department of Transportation's "Airport and Compatible Land Use Volume One" publication which defines zones around airports. An Aviation Notice shall be placed on the final plat stating: The subject property is within close proximity to the runway and flight paths of Martin Field. This subdivision is located adjacent to an airport and is routinely subject to overflight activity by low flying aircraft. Residents and tenants may experience inconvenience, annoyance, or discomfort from noise, odor, vibration or other effects of aviation activities. (Resolution 782, No. 3) [Homestead Village PUD Phase 2 – Conditions of Approval]

The airport responded by publishing an advisory for pilots to redirect landings and takeoffs away from the residential development: "Noise sensitive area. If wind is calm, take off on runway 23 and land on runway 05." ([Martin Field S95](#)) More recently a residential addition was built within Safety Zone at the northeastern end of the runway. The runway was already shifted to the southwest to improve safety, and this new development creates an additional obstruction. WSDOT has advised the County to initiate this effort to develop airport land use compatibility regulation and noted the [northeastern] area of concern in their 2018 letter. "WSDOT is primarily concerned with the safety and compatibility of placing incompatible development adjacent to the airport and within the airport operating environment." (WSDOT, 2018) This application implements creating the airport land use compatibility regulations recommended by WSDOT. In addition, the Airport Overlay District conforms to the Federal Aviation Administration's recommendations for airport land use compatibility.

Without an Airport Overlay District, unregulated development will continue to reduce aviation safety for air transportation passengers and residents; impact economic and social airport services; and prevent Martin Field Airport from fulfilling its role as a Community Airport in the Washington Aviation Systems Plan. The proposed Airport Overlay District helps ensure the viability and safety of aviation at Martin Field Airport.

Planning Commissioner Comment 3

FAA Regulation and Funding

Commissioner McFarland and others were interested in clarifying federal and state regulations and airport funding related to compatibility and safety.

Regulation

Response

“FAA encourages and assists local airport sponsors and their community land use planning authorities with undertaking their best efforts to secure compatible land use development and planning within the airport environs.” ([Airport Land Use Compatibility Planning](#)) The WSDOT Aviation airport requirements reflect this direction, and Martin Field Airport is complying with State airport guidance to help the County an Airport Overlay District to prevent new incompatible development. [see next comment response]

For airports in the National Plan of Integrated Airport Systems (NPIAS), there are grants available through the Airport Improvement Program (AIP). These grants provide funding for airport improvements such as runway paving, navigational aids, and planning that includes local government Airport Overlay Districts. NPIAS airports routinely receive AIP grants that are essential for maintenance and development. As a public airport that is privately owned, Martin Field Airport is not eligible for FAA grants, and the project sponsor is paying for this Airport Overlay District application.

Planning Commissioner Comment 4

WSDOT Regulation and Funding

Commissioner Rudnick and others were interested in clarifying the Washington County Department of Transportation (WSDOT) Aviation's role in airport regulation and funding.

Response

WSDOT recommends that Walla Walla County “Adopt the Airport Compatibility Zoning structure and recommended development guidelines around the Martin Field Airport as outlined in the *WSDOT Airports and Compatible Land Use Guide* for inclusion into the county and city's comprehensive plan and development regulations.” (WSDOT, 2018) The proposed Airport Overlay District conforms to the *Guide* and WSDOT recommendations.

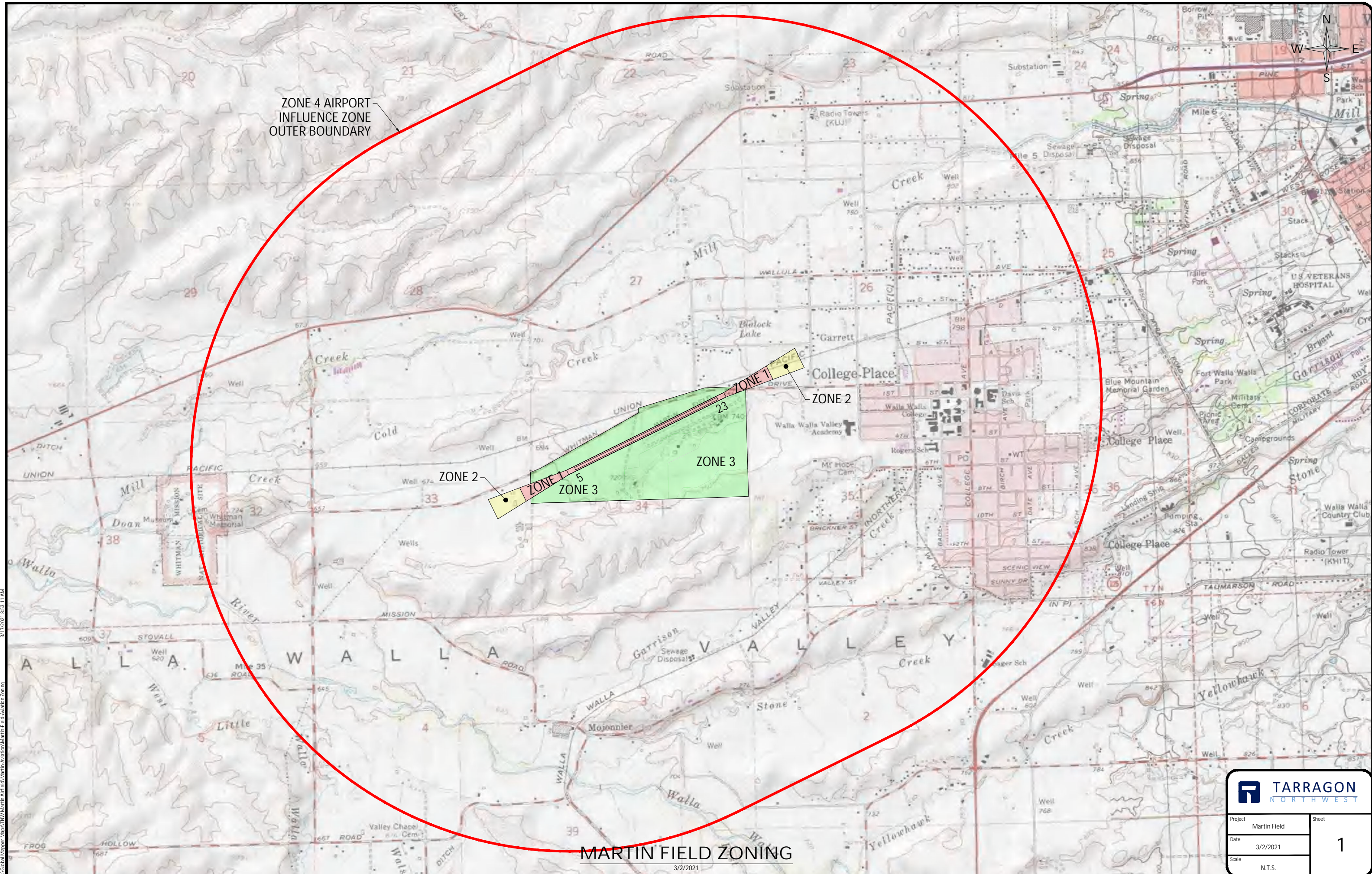
WSDOT recommends that Walla Walla County “Ensure new residential structures within or close proximity to the Airport Development - Rural (Martin Field Airport) are constructed as far away as possible from the extended runway centerline (Zone 2 and Zone 3 of the WSDOT Guidebook). The majority of off-airport property aircraft accidents occur along the extended runway centerline. (WSDOT, 2018) The proposed Airport Overlay District addresses this by amending the current zone and creating an overlay with Safety Zones.

“Airports are vital to Washington State, fueling its economy and providing critical links to the state and national transportation system. WSDOT Aviation has been charged with the general supervision over the Airport Aid Grant Program pursuant to [RCW 47.68](#) in which the program provides crucial financial assistance to public-use airports in the preservation of Washington's system of airports.” ([WSDOT Airport Grants Program](#)) As noted above, NPIAS airports regularly receive Federal government funding

for airport maintenance and development. Washington State recognizes the value of non-NPIAS airports and provides similar maintenance and development funding through its Airport Grants Program. The Airport Grants Program is vital to ensure the safety and viability of all airports throughout the State.

Please recommend the Airport Overlay District be moved to the final docket. There may be a need for further minor adjustments, but delaying this amendment jeopardizes the safety and viability of the airport from further development encroachment.

Thank you for your support of Martin Field Airport community services, and County, State, and National aviation.



ZONE 4 AIRPORT
INFLUENCE ZONE
OUTER BOUNDARY


ZONE 2

ZONE 2

ZONE 3

MARTIN FIELD ZONING

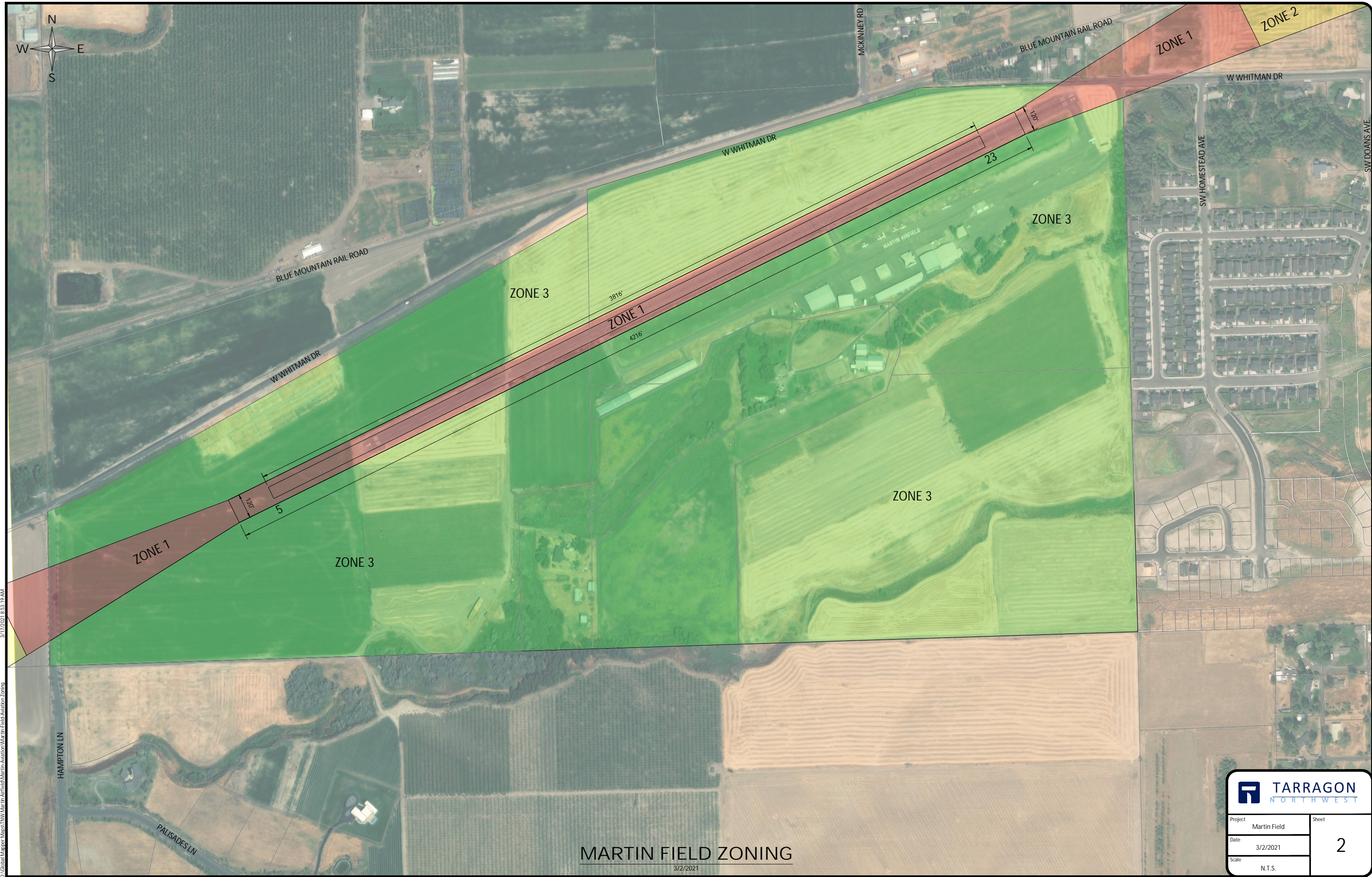
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TARRAGON
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Project	Martin Field	Sheet 1
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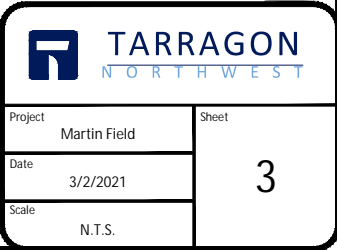
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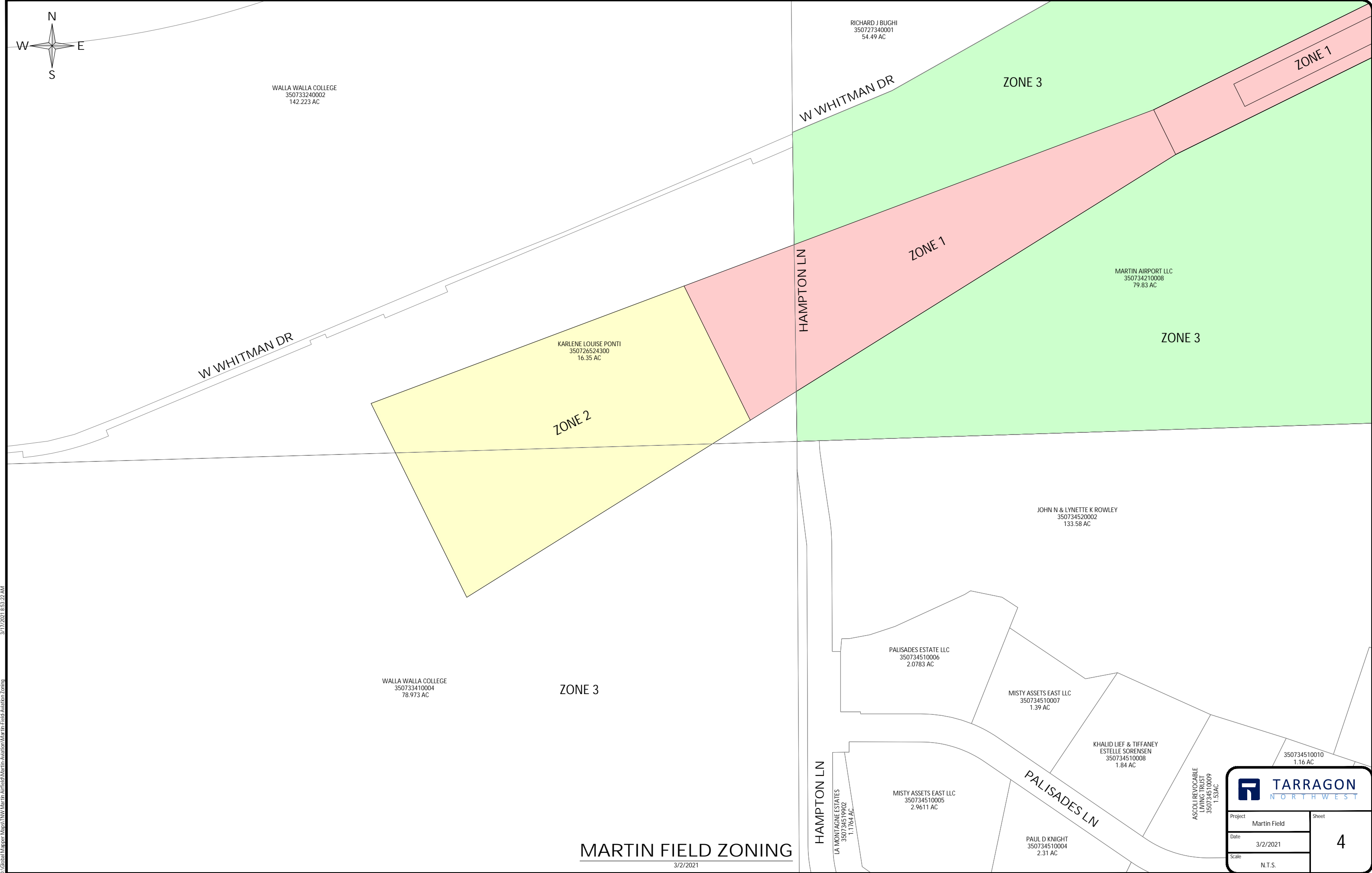
MARTIN FIELD ZONING

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**TARRAGON**
NORTHWEST


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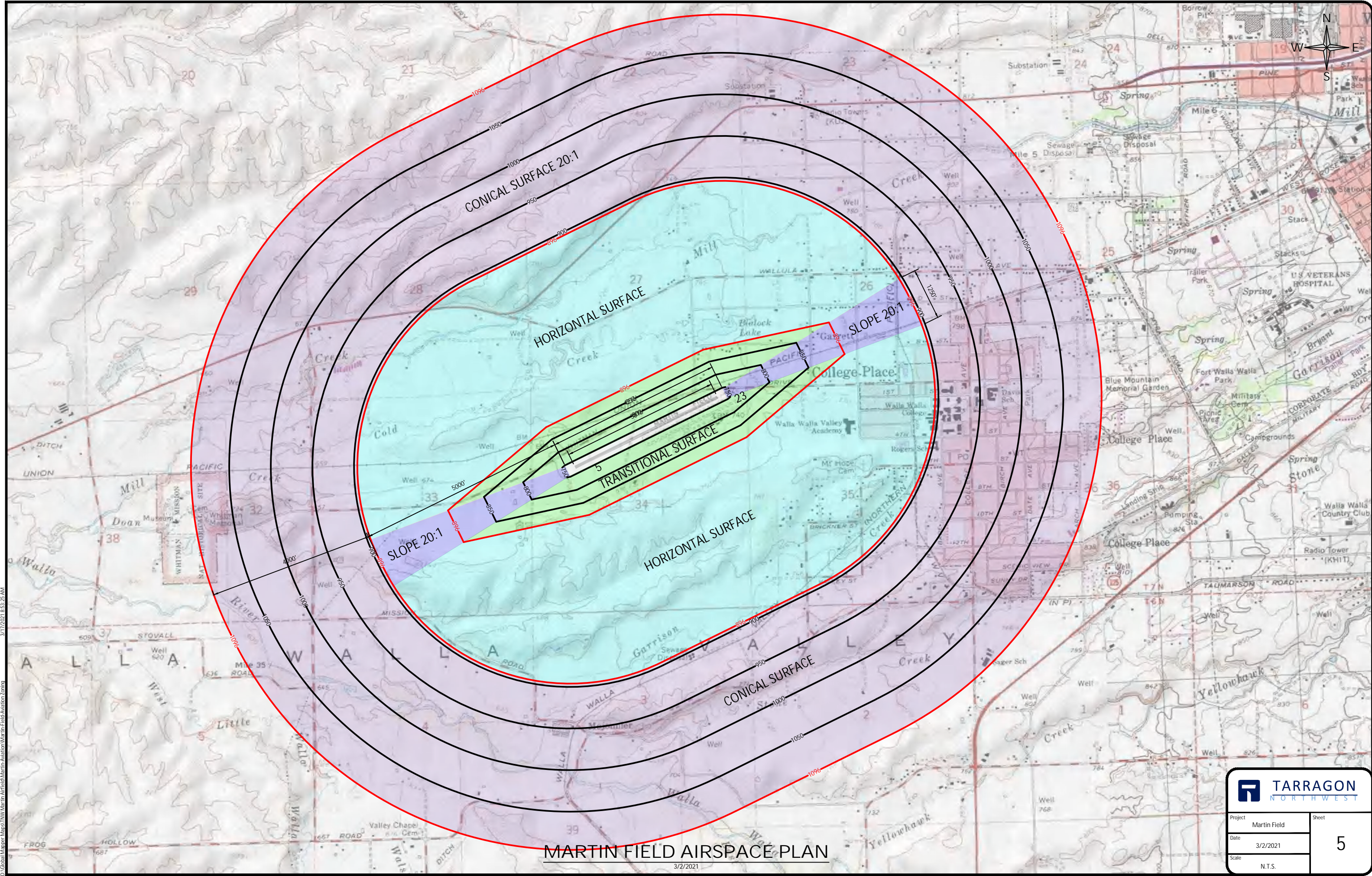
MARTIN FIELD ZONING

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MARTIN FIELD AIRSPACE PLAN

3/2/2021

**TARRAGON**
NORTHWEST

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