



October 6, 2021

Walla Walla County Community Development
Department Second Floor, Suite 200
310 W. Poplar Street

Dear Lauren Prentice,

Thank you for the opportunity to review the proposed comprehensive plan amendments for the proposed adoption of airport compatibility zoning around Martin Field Airport. This is an important step to protect the airport from incompatible development and ensure its ability to serve as an essential public facility.

The Growth Management Act (GMA) 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 (RCW 36.70.547 and RCW 36.70A.200). The encroachment of incompatible land uses upon Washington state airports diminishes their ability to function as essential public facilities and often leads to operational impacts and closures. One of the most effective methods of protecting airports is adopting Airport Compatibility Zoning. This is done to protect the airport and pilots as well as the citizens on the ground.

With 134 public-use airports throughout the State, these essential facilities contribute to our economy, play a unique and important role in our transportation system, and promote quality of life. Compatible land use planning is a key component to the long term-viability of these valuable resources. Martin Field Airport is a regional asset, and we encourage the County's efforts to adopt zoning to protect it.

In a November 28, 2018 letter, WSDOT Aviation recommended the following recommendations to Walla Walla county and the City of College Place comprehensive plans:

- 1) 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 (<http://www.wsdot.wa.gov/NR/rdonlyres/ABD4EF80-A01B-4BFF-8E0A-96AA4008A4F7/0/AppendixF.pdf>) for inclusion into the county and city's comprehensive plan and development regulations.
- 2) Ensure new residential structures within or close proximity to the Airport Development – Rural (Martin Field) 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. (See Attachment 2)

- 3) 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. An example of Part 77 imaginary airspace structure is provide in Attachment 3.
- 4) 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."

We appreciate Walla Walla County's commitment to working with stakeholders to achieve a compatible outcome and adopt zoning to protect the Martin Field Airport. It is critical that every effort be made to discourage incompatible land uses that impair the airport's ability to operate as an essential public facility. We thank you again for the opportunity to comment and remain available to formally consult and provide technical assistance. Please don't hesitate to contact me at 360-890-5258

Sincerely,

T.S. "Max" Platts
WSDOT Aviation Division