

Walla Walla Community Development Dept.

310 W. Poplar St #200

Walla Walla, Wa. 99362

October 4, 2021

To: Lauren Prentice, Director

From: Ray Bankes, pilot

Re: Martin Field Overlay District

Members of the Commission:

I wish to give a pilot's input to the proposed Overlay District for Martin Airfield.

I have been a private pilot since the late 70s and flew with Lifeguard Medical Transport in Pendleton in the early 90s. I lived across the street from Martin Field from 2003-20017. I have been an active member of the EAA 604 at Martin and ramp coordinator for fly-in events since 2005.

As most of you know this airport has been here since World War II and was operated for many years by Bob Martin as a successful Piper dealership, and maintenance facility until sometime in the late 1970s.

Airports, such as this are known as "Privately Owned-Public Use" airports that are open to the flying public. They are difficult to "site" when planning, for a number of reasons, yet they are important to the wellbeing of the communities where they are located.

I found a short history and definition of the importance of this airport to Walla Walla County:

***Aviation:***

- *The Walla Walla Regional Airport located directly N.E. of Walla Walla has been an active aviation center since World War II. It is run by the Port of Walla Walla and provides passenger and cargo services.*
- *The Privately owned-public use Martin Field located just West of College Place on Whitman Dr. has been an active airport since the early 1940s. Originally the airport provided flight training for World War II [Naval] Aviators.*
- *The airport's elevation is 750' allowing the field to be used as an alternative landing site when the Walla Walla Airport at 1250' elevation is below minimums. Martin Field has a paved runway length of [4,300'] x 60' wide, with pilot-controlled [runway] lighting. There is a parallel 2600' grass runway. (Published proposed plans are for a RNAV-GPS instrument approach.)*
- *Based on a Washington State Dept. of Transportation study, it is estimated that Martin Field produces an economic benefit to Walla Walla County of more than \$ 1,000,000 annually.*
- *Currently, approx. 54 privately owned airplanes are based at Martin Field. Maintenance, fuel, and inflight instruction are also provided onsite. The [former] owners instituted various noise abatement procedures to help minimize aircraft noise over the housing areas.*
- *The airfield was included in the College Place Urban Growth Area in 2005. Further development in the area will include protection from incompatible development.*

*(emphasis added) CP trans appendix 2014*

Public and privately owned-public use airports have been recognized for some time by the legislature of Washington State in the Growth Management Act of 1990.

RCW 36.70.547 states

*"Every County... in which there is located a general aviation airport that is operated for the benefit of the general public, whether publicly owned or privately owned public use, shall, through its comprehensive plan and development regulations, discourage the siting of incompatible uses adjacent to such general aviation airport."*  
2001

Also, RCW 36.70A.200 in siting of essential public facilities states

*"Essential public facilities include...airports..."*

As I see it Walla Walla County has an obligation to plan in such a way as to not allow incompatible development that hinders or prevents the airport from functioning as it should safely do so.

This is not a new idea to Walla Walla County as in the Code there are two districts already in place for the Walla Walla Regional Airport that do just that. They are found at: 20.50.090- Airport Development District. This addresses the development around the airport and 20.50.100- Airport Approach Overlay Zone-the imaginary surfaces, more directly.

***Airport Approach- Overlay Zone** is intended to protect certain runway approaches of the Walla Walla County Airport from land uses and structures which would tend to impair full utilization of the runways. It is further the purpose of this zone to protect the health and lives of the public by preventing the undue concentration of population subject to airport hazards..."*

I hope this is informative in alleviating some of the concern of this overlay district as being an overreach. The issue here from my view is one for the safety, of the pilots and passengers as well as those living near the airport.

I would think similar language can be used when implementing such a safety district over Martin Field. It is my understanding that at sometime in the future it is anticipated that the Martin Field Property will join the City of College Place.

The City of College Place has also addressed this subject back in 2014, as found in their Comprehensive Plan of 2014. In part they state:

**AVIATION:**

*Goal TR5- Recognize Martin Field as an essential public facility and protect Martin Field from adjacent development.*

*Policy TR5B-Discourage land uses that may promote incompatible development adjacent to the airport*

*Policy TR5C-Encourage adoption of development regulations that protect the airport from Height Hazards by developing a Height Overlay District that will prevent buildings or structures from penetrating the Federal Aviation Regulations (FAR) part 77, "Imaginary Surfaces"*

*(emphasis added)*

In 2018 and 2019 there was an attempt to remove the Martin Airport property from the Urban Growth Area of College Place. In reading the filings and correspondence between the parties involved there was a very instructive letter from the Washington Department of Transportation Aviation Div. I would recommend this committee be in consultation with them in addressing the needs and safety issues at play here.

The Growth Management Act of 1990 *“requires that the County formally consult with the Washington Department of Transportation Aviation Division, and airport owners, among others prior to adopting Comprehensive Plan amendments that affect general aviation airports.”*

*RCW 36.70.547*

One item brought my attention to this was last winter. I had not been at the airport for a while and when I did come out, I saw the foundation laid out and poured for a house at 1354 W. Whitman Dr. This is on the same property where I used to live. I was astounded that they had been given a permit to build so close to the Runway. The new house is right in the Runway Protection Zone—the area just off the east end of where the runway almost touches Whitman Dr. I called the building permit office and spoke with the man that had issued the permit. He told me they had not considered the closeness in issuing the permit or that the house would pierce the imaginary overlay—at that point it is flat with the runway. The house is now built and from my view and other pilots I have spoken to, it is a huge hazard to a plane in trouble and to the occupants of the house.

Had the overlay district been in place, the current owner would have known when they purchased the property that they would not be able to build there, and those in the permitting office would have known they could not issue a permit there as it directly impacts the safety and possible the future development of the runways and approaches.

I encourage members to drive out and look at the proximity of the new house to the end of the runway.

The new Overlay District will give guidance and notice in protecting Martin Field from future encroachments such as this.

I hope the members of this committee to contact WDOT Aviation and start the negotiations with them for guidance, with the current airport owners, and the pilots and public at large. On a side note, many people in this town come out for the Young Eagles events for youth to get their 1<sup>st</sup> flights. Their interest is here too along with the safety of their children.

Thank you for hearing my concerns and input on this important issue.