

Applicant Response to Following Questions and Comments

October 14, 2021

Staff and Planning Commission Preliminary Docket questions and comments that should be addressed by the applicant prior to Final Docket review (if the application is placed on the Final Docket).

STAFF NOTE: These are general comments. Answers or responses may overlap. Staff would recommend that the applicant provide a new application packet, replacing the original submittals. Providing a response document referencing these questions may be helpful, but it will also be critically important (and required) that the applicant submit a complete revised proposal showing just the new proposal in its entirety so that the full extent of the revised amendments can be understood.

1. The application packet does not provide sufficient information or analysis on what the practical impact of these regulations would be. How does this compare to existing regulations? What is the need to do this, what types of development are occurring or allowed under current zoning that could cause hazards? In their public hearing testimony and their additional memorandum, the applicant provided some clarification. For example, in their October 14, 2021 submittal the applicant appears to state that the only obstructions that would be a concern within Zone 4 would be those that penetrate the imaginary horizontal surface at 150-feet. There are not very many uses allowed in the County's rural and agricultural zoning districts that allow those types of uses (e.g. cell towers). If the existing regulations don't allow most of the uses that would be a concern, maybe the proposed amendments can be simplified? **The concern is protecting the airport influence area from future development. The Airport Overlay District will ensure that current and future zoning changes will not allow obstructions and safety hazards to pilots.**
2. The applicant has repeatedly referenced the WSDOT Airports and Compatible Land Use Guidebook which provides detailed, step-by-step instructions for analyzing an airfield's use patterns, needs, encroachment risks, etc. to create overlay zones and it appears from the application that none of that analysis was undertaken by the applicant. The applicant's representatives also told the Planning Commission that they based their proposal on regulations from Sequim. Was there a plan developed in accordance with the guidebook or did the applicant rely on the Sequim standards? If this planning has not been done, should it be completed prior to Final Docket review? If not, why? **The applicant has utilized the WSDOT Airports and Compatible Land Use Guidebook. A link to the WSDOT Executive Summary for airport land use compatibility is provided here for reference [WSDOT Airports and Compatible Land Use Guidebook M 3074 Executive Summary \(wa.gov\)](#). The process includes a six-step process.**
 - a. **Step 1 - Gather Airport and Land Use data.**
 - b. **Step 2 - Delineate the Airport Influence Area**
 - c. **Step 3 - Identify Compatibility Concerns**
 - d. **Step 4 - Prepare Comprehensive Plan**
 - e. **Step 5 - Adopt the Comprehensive Plan**
 - f. **Step 6 - Implement the Airport Land Use Compatibility Policies**

The applicant has completed steps 1-4 and is currently in process of step 5. Step 6 will be completed when the County adopts and implements the application.

3. The applicant has stated that they have been working on this proposal for two years, please provide information on this planning process, which will presumably support the proposal and provide clarification. The applicant stated that the work on this process is the Airport Layout Plan (which includes Land Use Compatibility) began two years ago. On September 9, 2019, the applicant employed WH Pacific, an NV5 company, to begin work bringing Martin Field Airport into compliance with Washington State standards for a general aviation airport including the following scope :
 - a. Study, Design, and Initiation
 - b. Existing Conditions Baseline per WSDOT requirements
 - c. Basic Aviation Forecasts
 - d. Facility Requirements
 - e. Airport Plans
 - f. Coordination, Approval, and Final Documentation
4. Prior to submittal of this application, did the applicant engage in any outreach to inform surrounding property owners of the risks associated with living close to the runway and ways to decrease risk? The Development Regulations Amendment Process 14.15.060 includes requirements and provisions for public review and comment.
5. Would the proposed overlay regulations result in any existing residential lots being rendered completely undevelopable? If so, what are the legal ramifications of enacting these restrictions? As illustrated in sheet 3 of the revised Martin Field Aviation Zoning maps, portions of Parcel 350727524216 and 350726524300 would have the most restrictions placed in areas of the parcels. No residential lot will be rendered completely undevelopable.
6. How does the applicant propose to address nonconforming situations that will be created if the overlays are adopted? What happens to properties with existing residences that want to expand or replace old/outdated/damaged residential structures? Information on how the proposed overlay would impact existing uses should be provided. The proposal does include an Exemptions section which states that existing nonconforming uses would be limited pursuant to WWCC 17.36. But it also has an exception. The proposed amendments state that existing uses, structures, and activities are exempt, "except as may be compelled by State or federal regulations." What State or Federal regulations is this referring to? Would this exception apply to residential uses? Applicant will address in revised application.
7. How were the boundaries of proposed Zone 3 established, seems that it is arbitrary to the function of the airport/safety and appears to just follow property/zoning lines? The applicant revised the attached maps and proposes to exclude the area in Zone 3 as upon further review it does not fall into the areas of concern illustrated in the WSDOT letters. The areas of concern per the WSDOT letters are the following areas:
 - a. Zone 1 Runway Protection Zone
 - b. Zone 2 Extended Runway Centerline Zone
 - c. Zone 4 Airport Influence Area

8. The proposed overlay zone extends into incorporated areas that are not within County zoning jurisdiction (in Zone 4). The proposed amendments to the County’s plan and development regulations must be modified to exclude those areas and the applicant should communicate with the City of College Place. For example, in their October 14, 2021 memo, they talk about the Homestead PUD and incorrectly state that the County imposed a notice requirement. This would have been the City of College Place, not the County. In proposed Zone 4, the area within Walla Walla County jurisdiction is zoned agricultural and rural. In the future, more intensive uses in proposed Zone 4 are more likely to occur within City jurisdiction than unincorporated Walla Walla County. **The applicant is submitting revised maps that include only County and exclude the City.**

Preapplication Meeting PRE21-011: Martin Airfield Runway Project @ 511 N. 2nd St.

Organizer Tamara Carolli <tcarolli@co.walla-walla.wa.us> Sent Tue 3/16/2021 3:48 PM

Time Wednesday, March 31, 2021 8:30 AM-9:15 AM

Location [Online Webex Meeting/ Call In Information: https://wwwco.webex.com/wwwco6.php?MTID=m72b6d8b66844c1a9dd3a23c6da356226](https://wwwco.webex.com/wwwco6.php?MTID=m72b6d8b66844c1a9dd3a23c6da356226)

Response Accepted [Change Response](#)

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| 2020-12-01 Martin Field ALP.pdf 5 MB | MARTIN AIRFIELD RESURFACING 3-10 SITE PLAN.pdf 3 MB | Martin Airfield SEPA Checklist.docx 66 KB |
| Preapplication and TRC Roundable Request Form_Martin Airfield_SIGNED.pdf 416 KB | CDD Cisco Webex Tips for Meetings and Hearings.pdf 196 KB | |

During the meeting, the County requested that the applicant include the ALP with the Site Development Permit Application SDP21-001 which the applicant submitted on April 21, 2021.

The screenshot shows the eTRAKT web application interface. The browser address bar displays the URL: etrakit.co.walla-walla.wa.us/eTRAKIT3/Search/project.aspx?activityNo=SDP21-001. The page header includes navigation links: HOME | DASHBOARD | VIEW/EDIT PROFILE | VIEW CART | LOG OUT | LOGGED IN AS: TARRAGON NW.

The main content area is titled "Project Search" and shows the search results for "Project #SDP21-001". The search criteria are: Search By: Project Number, Contains, [input field], and a SEARCH button.

The project details are as follows:

- Description:** Runway Resurfacing
- Type:** SITE DEVELOPMENT PERMIT
- Subtype:** CO SITE DEV PERMIT
- Planner:** Tamara Ross
- Status:** APP RECEIVED
- Applied:** 4/21/2021
- Approved:**
- Closed:**
- Expired:**
- Status:** 5/3/2021
- Complete:**

Linked Activities:

- Parent Project: PRE21-011 PRE APPLICATION MEETING CLOSED
- Project(s): SEPA21-008 SEPA APP RECEIVED

Attachments:

- Airport layout plan1 2021-04-21 SDP21-001 Airport layout plan1 2021-04-.pdf
- App1 VOID 2021-04-21 SDP21-001 App1 2021-04-21.pdf
- Legal Desc1 2021-04-21 SDP21-001 Legal Desc1 2021-04-21.pdf
- Site plan1 2021-04-21 SDP21-001 Site plan1 2021-04-21.pdf
- Submittal email1 2021-04-21 SDP21-001 Submittal email1 2021-04-21.msg
- App2 2021-05-13 SDP21-001 App2 2021-05-14.pdf

Also, Stephens mentioned future use of the airport by commercial jets larger than the typical hobbyist planes currently using Martin Field. **[small private jets; not commercial jets]** Would accommodating larger aircraft require the runway to be lengthened? Or increase the proposed restrictions in the proposed overlay zones? Or increase the proposed overlay zones? The consultant also stated that the runway has been/will be shifted southwest. If the runway must undergo a “complete reconstruction” why can it not be shifted southwest to remove/reduce the danger that the present runway location puts the residents of Whitman Drive and the surrounding area in? **The County shifted the runway 500 feet southwest during the County Whitman Drive West project number CRP 17-04. Plans are attached for your reference. Martin Airfield Sheets CD-109, C-125, and C-126 illustrate the construction the county provided.**

10. Revised application packet should include:
 - a. Sample of the title restrictions/language to be recorded on properties in select proposed overlay zones.
 - b. Scaled maps with road names, north arrow, legend, etc. for overlay zones and height zones. Height maps should incorporate the 3D topography of the area of concern.
 - c. Rendering of the area using FAA's FAR Part 77.
 - d. Maps that show the existing obstructions/endangering elements in their respective zones: existing residences, towers, surface water greater than ½ acre.

- e. Maps must delineate the jurisdictional boundaries. The maps that should be presented to the County should only include the areas over which Walla Walla County has jurisdiction.

A 3D topography of the airport influence area including structures is far above the WSDOT Land Use Guidelines Checklist. Applicable WSDOT requirements have been provided by the applicant.

Map of noise contours (if applicable)

Overall boundary of the Airport Influence Area.

Map of the Airport Influence Area.

Airport airspace map showing FAR Part 77 Imaginary Surfaces and Elevations.

Map of compatibility zones applicable to each runway end.

Applicant has revised the maps to include County lands only and extracted City land.

11. The submitted SEPA Environmental Checklist is incomplete; the response to most questions is 'Not Applicable.' Once a revised proposal is developed, a new SEPA Environmental Checklist should be prepared. Applicant agrees to revise and resubmit a new SEPA with a revised proposal.
12. It is the opinion of staff that the Comprehensive Plan would need to be amended in order to implement an overlay zone. Although none were included in the application, the applicant did propose minor amendments to the Comprehensive Plan in their October 14, 2021 submittal which may be appropriate.
13. Changes may need to be made to ensure that it is consistent with other sections of the code and can be implemented/administered by County staff.
14. 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. Applicant agrees to provide additional detail to define review criteria. Applicant removed the word "dust" from the text amendment application.
15. The proposed amendments to WWCC 17.16.014, Permitted Uses Table, to make three uses permitted in the LI district: (1) *Airport and Aircraft Landing Field – Agricultural*, (2) *Aircraft Landing Field – Private*, and (3) *Airports*. To make Martin Airport a conforming use, it may be necessary only to make 'Airports' an allowed use. Airport is defined in WWCC 17.08.022 as "a place where aircraft can land and take off, usually equipped with hangars, facilities for refueling and repair, and various accommodations for passengers." The applicant states in their October 14, 2021 that "allowed future expansion should include landing fields, accessory uses of a general airport including a business office, restaurant, airport-related housing, hangars, and maintenance operations which are considered accessory uses as well as agricultural aircraft landing." Agricultural aircraft can take off at an 'Airport.' The separate Agricultural Airport use classification is a separate provision for agricultural-only airports allowed in agricultural zones. Applicant agrees that "Airports and Accessory Uses" is the most appropriate change to the Permitted Uses Table.

16. The fact that Runway 23 is mere feet from Whitman Drive looks quite dangerous. What has the airport done in the past to increase the safety of the people traveling on Whitman Drive or living on across Whitman Drive that are at risk if an aircraft does not take off/overshoots the end of runway 23? Aside from the zoning amendments, what is being done to address this safety issue?



The photo included with comment number 16 is a dated photo prior to the improvements made to displace the runway during the County Whitman Drive West project number CRP 17-04. The photo below shows the right-of-way improvements including a sidewalk and fence.



Runway Surface Paint altered to displace runway 23 to 500 feet southwest.



The applicant is actively consulting with airport design consultants, flight schools, and pilots in planning future safety features in accordance with FAA and WSDOT recommendations for Martin Field Airport.