February 10, 2015

Mr. John Pederson
Planning Director
Spokane County Public Works Building
1026 W. Broadway Ave.
Spokane, WA 99206

RE: Chapter 14.700 Overlay Zones

Thank you for the opportunity to provide comment on proposed revisions to Spokane County’s Draft Zoning Code Chapter 14.700 Overlay Zones. The Washington State Department of Transportation (WSDOT) Aviation Division appreciates the County’s efforts and recognizes the substantial time and resources this product represents.

RCW 36.70.547 and 36.70A.510 requires local jurisdictions to formally consult with airport owners, managers, private airport operators, general aviation pilots, ports, and the Aviation Division of the Washington State Department of Transportation prior to adoption of comprehensive plan policies or development regulations that may affect property adjacent to public uses airports. The main goals of formal consultation are to avoid, minimize, and resolve potential land use conflicts with airports through the comprehensive plan and development regulations. WSDOT strongly recommends that formal consultation be initiated by local jurisdictions as early as possible in the planning process. This is to assure that all parties have an opportunity to work together to find comprehensive solutions of mutual benefit that fulfill the intent of the legislation, consistent with local jurisdictions’ land use planning authorities and obligations under law.

The following is a general summary of WSDOT’s observations and recommendations regarding the draft Chapter 14.700 Overlay Zones:

- WSDOT has no position regarding the elimination of the Airfield Noise Zone.
- Allowing amendments to the comprehensive plan and zone reclassification to increase residential densities south of Interstate 90 is not consistent with best management practices found in the Airports and Compatible Land Uses Guidebook, January 2011. The use of Interstate 90 to determine land use compatibility with Spokane International Airport is arbitrary in nature. Using Interstate 90 as land use compatibility geometry doesn’t rely upon the best available science, and would be difficult to defend.
• Permitting non-aviation related museums, horse racing tracks, speedways, stadiums arenas and high intensity uses in ACZ-5 is not consistent with WSDOT Aviation’s best management practices.
• WSDOT has no position regarding the elimination of sound insulation requirements.
• According to best management practices, hazardous uses may be permitted in ACZ-5 without a conditional use permit. However, avoidance of such uses or ensuring that the facilities are adequately protected against the consequences of an aircraft accident are recommended.
• WSDOT Aviation is available for further consultation.

The importance of Spokane International Airport, Felts Field and Deer Park Airport to the region and state's transportation system and economy cannot be overstated. It is critical that every effort be made to discourage incompatible land uses that impair the airports’ ability to operate as essential public facilities. We thank you again for the opportunity to formally consult, and remain available to provide technical support and assistance. Please don’t hesitate to contact me at 360-651-6312 or timmerc@wsdot.wa.gov if you have any questions.

Sincerely,

Carter Timmerman
Aviation Planner
WSDOT