



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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January 21, 2005

The Honorable Royce Pollard
Mayor
City of Vancouver
P.O. Box 1995
Vancouver, WA 98668-1995

RE: CPZ 2004-00009/APL 2005-00002 (Killian)

Dear Mayor Pollard:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of more than 403,000 members, over two-thirds of the nation's pilots. Nearly 12,000 of our members live in the state of Washington. On behalf of our membership, AOPA is committed to ensuring the future viability and development of general aviation airports and their facilities as part of a national transportation system.

We are writing to ask you to uphold the Vancouver Planning Commission's December 14, 2004 decision to not rezone the 13 acres known as the Killian property from Light Industrial (IL) to General Commercial (GC) zoning. It is the Association's strong belief that local government needs to make good compatible land use decisions with regard to airports and encroachment. Allowing a higher density land use underneath the approach to Pearson Field Airport (VUO), we believe, is not good public policy and could ultimately lead to unreasonable restrictions at the airport.

Both the Federal Aviation Administration (FAA) and the Washington State Department of Transportation Aviation Division (WSDOT) recommend against the practice of allowing high population densities under the runway approach zones. In the FAA's guidance on airport design, Advisory Circular 150/5300-13, Chapter 2, they recommend that "Existing and planned airspace required for safe and efficient aircraft operations should be protected by acquisition of a combination of zoning, easements, property interests and other means." Further in Chapter 2, paragraph 212, there is a discussion of the Runway Protection Zone (RPZ), a trapezoidal shaped area that "enhances the protection of people and property on the ground." The FAA recommends that the following land use criteria be applied within the RPZ, "Land uses prohibited from the RPZ are residences and places of public assembly. (Churches, schools, hospitals, office buildings, shopping centers, and other uses with similar concentrations of persons typify places of public assembly.)" The western edge of the Killian property falls under the RPZ for Runway 26 at VUO and would therefore be subject to the FAA's criteria.

At airports where federal airport improvement funding is in place, the FAA requires the airport sponsor protect the airspace necessary for instrument and visual operations to the airport and also to ensure that compatible land use exists adjacent to or in the immediate vicinity of the airport. These requirements are set forth in the grant assurances that are part of every FAA Airport Improvement Program (AIP) grant. The specific assurances are number 20 “Hazard Removal and Mitigation^{1[1]}” and number 21 “Compatible Land Use.^{2[2]}”

The WSDOT Aviation Division published its current guidelines for compatible land use in 1999, <http://www.wsdot.wa.gov/aviation/planning/AirportsLandUse.pdf>. Basing much of their guidance on studies completed for other states, the WSDOT developed an aircraft accident safety zone diagram and airport compatible land use matrix.^{3[3]} These WSDOT guidelines recommend that in safety zone 1 (Runway Protection Zone) and safety zone 2 (Inner Safety Zone) population density be 0-5 people per acre; land uses should be relatively unoccupied by people such as mini-storage or parking lots; airport sponsor should obtain aviation and obstruction easements; and, during site development process, shift all structures away from the runway centerlines if possible. Safety zone 1 is part of the western-most part of the Killian property and safety zone 2 covers the property from the middle down to the south.

The northern half of the property falls under safety zone 3 (Inner Turning Zone) and allows a little less strict population density but still requires prohibition of all residential land uses, limits storage of large quantities of hazardous or flammable material and avoid land uses which concentrate people indoors or outdoors. It is still best to site all structures away from the runway centerlines and keep the height in accordance with FAA guidelines found in 14 CFR Part 77, “Objects Affecting Navigable Airspace.” These

^{1[1]} Assurance 20 – Hazard Removal and Mitigation. It will take appropriate action to assure that such terminal airspace as is required to protect instrument and visual operations to the airport (including established minimum flight altitudes) will be adequately cleared and protected by removing, lowering, relocating, marking, or lighting or otherwise mitigating existing airport hazards and by preventing the establishment or creation of future airport hazards. FAA Airport Sponsor Assurances, <http://www.faa.gov/arp/pdf/assrnap.pdf>.

^{2[2]} Assurance 21 – Compatible Land Use. It will take appropriate action, to the extent reasonable, including the adoption of zoning laws, to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with normal airport operations, including landing and takeoff of aircraft. In addition, if the project is for noise compatibility program implementation, it will not cause or permit any change in land use, within its jurisdiction, that will reduce its compatibility, with respect to the airport, of the noise compatibility program measures upon which Federal funds have been expended. FAA Airport Sponsor Assurances, <http://www.faa.gov/arp/pdf/assrnap.pdf>.

^{3[3]} *Airports and Compatible Land Use, Volume 1*, Washington State Department of Transportation, Aviation Division; 1999 – Appendices A & B.

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guidelines require objects to be no higher than a 20:1 slope extending from the approach end of the runway out to 5,000 feet.

It is our experience over more than 65 years of advocating for general aviation airports, that if compatible land use measures are applied correctly, many concerns that airports and neighbors might have never become problems. In summary AOPA respectfully requests that the City of Vancouver in consideration of the FAA and WSDOT guidelines, and its responsibilities as the airport sponsor under the grant assurances uphold the Planning Commission's decision to keep the zoning of the Killian property as Light Industrial. We would further encourage the City to continue to practice compatible land use planning around the Pearson airport and other airports within the City limits in accordance with WSDOT guidance.

AOPA appreciates your consideration of our views on this matter. If we can be of further assistance, please contact us at 301-695-2200.

Sincerely,



Bill Dunn
Vice President Airports
Aircraft Owners and Pilots Association

cc:

Ms. Pat Jollota, City Council Member, City of Vancouver, WA
Mr. Dan Tonkovich, City Council Member, City of Vancouver, WA
Ms. Jeanne Harris, City Council Member, City of Vancouver, WA
Ms. Jeanne Stewart, City Council Member, City of Vancouver, WA
Mr. Tim Leavitt, City Council Member, City of Vancouver, WA
Mr. Larry Smith, City Council Member, City of Vancouver, WA
Mr. Pat McDonnell, City Manager, City of Vancouver, WA
Mr. John Manley, City Planner, City of Vancouver, WA
Mr. John Shambaugh, Senior Planner, WSDOT Aviation Division
Mr. Wade Bryant, Manager, FAA Seattle Airports District Office
Mr. Mike Ferguson, AOPA Northwest Regional Representative