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April 23, 2010

Mr. Dan Valoff  
Kittitas County Development Services  
411 N. Ruby St. Suite 2  
Ellensburg, WA 98926

RE: Marian Meadows Planned Unit Development and Subdivision Draft Environmental Impact Statement

Dear Mr. Dan Valoff,

Thank you for the opportunity to provide comment on the Marian Meadows Planned Unit Development and Subdivision Draft Environmental Impact Statement (EIS). The Washington State Department of Transportation (WSDOT) is concerned that the proposed Planned Unit Development and Subdivision, if approved, would allow significant incompatible development adjacent to Easton Airport.

WSDOT's Airport Land-Use Compatibility Program addresses elements of safety, airspace hazards, noise and land use in relation to public-use airports. These factors must be considered when addressing compatibility adjacent to public-use airports. WSDOT is primarily concerned with the safety and compatibility of placing single-family residential development adjacent to the airport and within the airport operating environment.

Easton State Airport is strategically located on the eastern approaches to Stampede Pass and Snoqualmie Pass and is one of 17 airports operated by WSDOT Aviation. The primary purpose for state-operated airports is to provide emergency landing areas along highly traveled routes, but they are also used for firefighting operations, emergency medical access, disaster emergency management and recreational use.

Homes constructed in this area would be exposed to noise, light, vibration, glare, low-flying aircraft and other activity generated by normal airport operations. Such activity could have an adverse impact on safety and the quality of life residents experience, and it could contribute to conflict between neighbors and the airport. As we have seen in other

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communities, such situations often lead to conflict that ultimately disrupts operations of airports as essential public facilities. We offer the following observations and recommendations:

- (RCW 36.70547, RCW 36.70A.510) Requires that towns, cities and counties adopt comprehensive plan policies and regulations to discourage development of incompatible land uses adjacent to public use airports. The Growth Management Act (GMA) also identifies airports as essential public facilities.
- Kittitas County has adopted the following related comprehensive plan policies:
  - GPO 4.15E Recognize airports as essential public facilities
  - GPO 4.15F Protect Kittitas County Airport (Bowers Field), Cle Elum Municipal, DeVere Field and Easton State airports from adjacent incompatible land uses and/or activities that could impact the present or future use of the airports as essential public facilities.
  - GPO 4.15G A notice of title or disclosure statement should be required for new or substantial redevelopment of lots, buildings, structures and activities located adjacent to public use airports. The notice should indicate that the property is located adjacent to the airport and may experience low overhead flights, odors, vibrations, noise and other similar aviation impacts.
  - GPO 4.14H Protect public use airports from height hazards by developing a height overlay district that will prohibit buildings or structures from penetrating the Federal Aviation Agency (FAA) Part 77 “Imaginary Surfaces”.
  - GPO 4.16A To adopt plans and regulations in compliance with RCW 36.70.547, or as amended thereafter, to protect airport operations.
- Given the proposed development’s proximity to the airport, residents would be exposed to noise, vibration, light, glare, fumes and extremely low-flying aircraft activity. Such activity would have adverse impacts on safety and the residents’ quality of life. This would inevitably contribute to conflicts between neighbors and the airport.
- As stated in the Kittitas County Zoning Ordinance Section 17.36.010, the purpose of a PUD is to provide for and encourage a harmonious mixture of land uses with greater flexibility in land use controls. This PUD will not result in a more harmonious mixture of land uses, but will most likely produce conflict and a

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significantly diminished quality of life for the residents. As a result of this conflict, the long-term viability of aviation facilities will be impacted.

**Alternatives 1, 2, 4 and 5:** propose an incompatible residential density, and are inconsistent with state law, and the goals and policies of Kittitas County.

**Alternative 3:** The density proposed in alternative 3 exceeds recommend residential density found in WSDOT's Airports and Compatible Land Use Vol. This alternative places single-family residential development in the approach to Easton State Airport.

WSDOT Aviation recommends that EIS address:

- Residential density
- Stormwater facilities - best management practices are found in WSDOT's Airport Stormwater Design Manual
- Airport operational characteristics in relation to the proposed alternatives
- Approach and departure phases of flights in relation to the proposed alternatives
- The elevation of the proposed development in relation to aircraft operations
- Firefighting operations

Safety:

- The majority of off-airport accidents occur along the extended runway centerline during the approach and departure phases of flight. The EIS should address this fact.
- All alternatives exceeded recommended residential densities
- The airport is often used as an emergency landing facility

Nuisance Noise

- This noise level constitutes a nuisance and continual irritant. Often, people experience a diminished quality of life as a result of nuisance noise. For example, unwanted noise can:
  - Disrupt sleep patterns
  - Be an aggravation
  - Cause conflict between neighbors

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- Raise blood pressure

We thank you again for the opportunity to comment, 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](mailto:timmerc@wsdot.wa.gov) if you have any questions.

Sincerely,



Carter Timmerman  
Aviation Planner  
WSDOT

CC:  
Dan Valoff, Kittitas County  
Doug Peters, CTED