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5 Nov, '13

Skagit County Planning Commission
1800 Continental Place
Mount Vernon WA 98273

Re: Bayview Ridge Subarea Plan

Dear Commissioners:

I am writing you to express my support for the industrial rezoning of approximately 110 acres of land in the Bayview Ridge Subarea. This rezoning will help buffer the airport from incompatible use and also will help answer our community's shortfall of available industrial land. At the same time I would like to register my opposition to the concept inherent in this Subarea Plan that a new town should be built in close proximity to the airport.

First of all, I have some expertise in aviation and airport planning. I was a Marine Corps A-4 pilot. In the 1980's I managed Skagit Regional Airport. I then moved on to become the Director of the Airport Division of Reid Middleton, a noted engineering and planning firm in our region. I was the project manager on a number of important projects, including the Airport Master Plans for Renton Municipal Airport, Bremerton National Airport, and NAS Whidbey Island.

Why would we want to build a new town, half the size of Sedro-Woolley, denser than any town in Skagit, right under the flight pattern of a growing, regionally important airport?

Fifteen years ago when this concept started, population growth in Skagit was strong and forecast to continue. The cities were reportedly unwilling to accept all the people forecasted for their GMA share. This, along with property owner interest in their land development, led the County to propose that a new town be built on Bayview Ridge. It had to be a complete town with schools, parks, and retail to pass muster with GMA, as the act frowns on less-than-complete housing subdivisions as simply rural sprawl. The presence of the airport nearby was not considered very incompatible, in part because the airport then had no particular mission from the Port of Skagit, and was seen as a sort of aviation "marina" for mooring single-engine Cessnas.

Changes Since BVR was Conceived

Population growth is much flatter than expected- The housing bubble bursting in 2009 had great consequences for Skagit County. Population growth now is less than half the rate it was a decade ago.[1] Projected growth rates are much flatter.
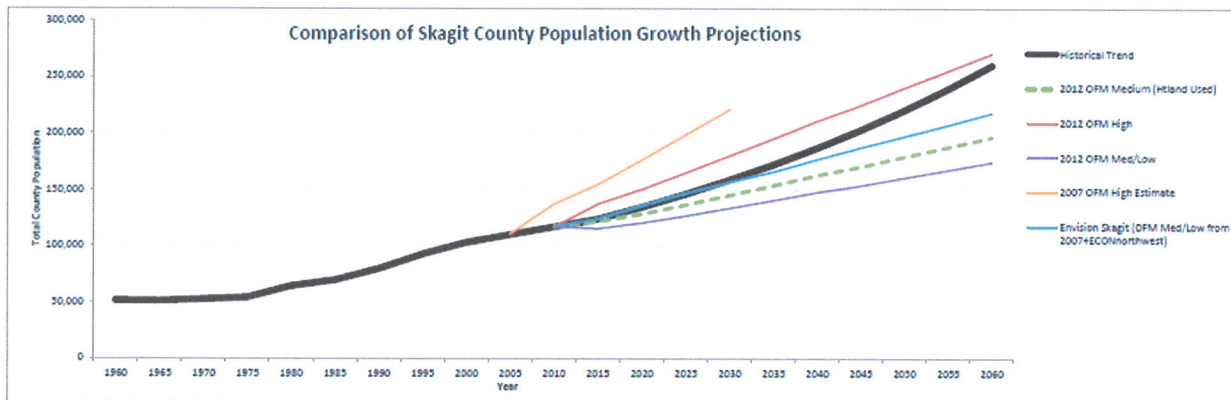
Washington State Office of Financial Management (OFM) figures from 2012 show a Medium/Low forecast for Skagit County that actually has population <u>decreasing</u> here over the next few years before it rises again. This represents a difference from the last used growth projections of about 25,000 fewer people settling here in the next 20 years.

Furthermore, the assertion made at the last Comprehensive Plan update that the cities would not take the expected population over the last decade has turned out to be not very correct. The existing urban areas have taken 83% of the recent growth.[2]
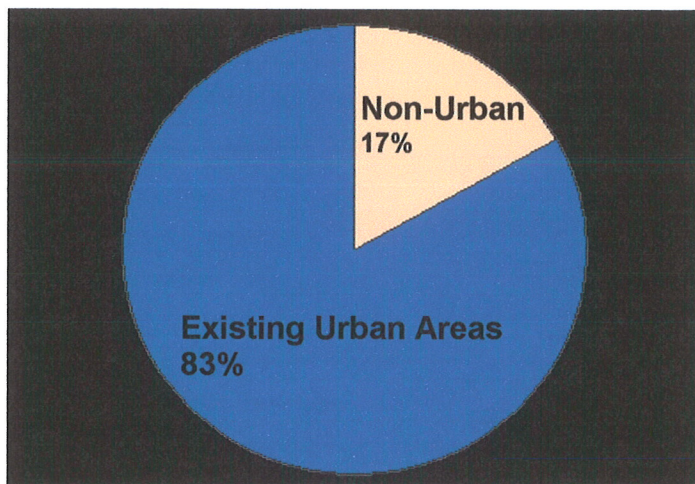
Recent Population Settlement Patterns in Skagit County

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[1] US Census Bureau
[2] Ibid

With population projections radically lower, and with evidence that the cities have accommodated population growth over the last decade, where is the projected need upon which the BVR new town is rationalized?

Airport has Changed – Fifteen years ago when the BVR new town was conceived, Skagit Regional Airport had no particular mission statement from its ownership, the Port of Skagit. The field was used primarily by single-engine prop planes, and no plans existed for runway expansion.

Two years ago the Port of Skagit declared that the mission of the airport was to attract business aviation. The model for this airport is Hillsboro Airport, near Portland, Oregon, a facility that supports and attracts business aircraft for the many industrial sectors in the northern Willamette Valley. This change in mission for the Skagit Regional Airport has been accompanied by several material steps:

- Jet fuel is now available to serve the turbine-powered business aircraft
- A GPS instrument approach is now established here to make the airport more fully capable in inclement weather
- Runway leveling, drainage, and lighting project have been done to improve the capability for jet operations.
- A runway extension is now contemplated to the northwest to make business jet operations more capable at higher fuel loads, and thus with longer ranges.

I would add to this list the recent decision by the Heritage Flight Museum to move their flying vintage aircraft, museum, and maintenance to Skagit Regional Airport. This facility will greatly add to the tourism in Skagit Valley.

The point is that any of these airport improvements would have been difficult to imagine happening here when the BVR project first began. They are all changed conditions and combine to add to the value of the airport to the local community.

And what is that value? WSDOT collected GIS data in 2010 on economic impacts produced by Skagit Regional Airport. The combined direct and indirect regional economic impact is $57,600,000 annually.[3]

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[3] WSDOT Aviation Division

Regional Airport Conflicts have Grown – Several airports in the Puget Sound area have had conflicts with neighboring residential areas. The primary concern has been aircraft-generated noise causing complaints from residents. I will show four cases.

Anacortes Airport was built in the 1960's at the same time as its surrounding housing development, Skyline. This airport has become the poster child for poor airport planning. In the 1990's when the Port of Anacortes contemplated extending the runway 400 feet, the Skyline neighborhood organized and vigorously opposed the lengthening. The fight became so heated that the airport opponents ran a sleight of candidate for Port Commission positions, and for more than a decade these anti-airport Commissioners severely restricted any aviation development. The airport came within one vote of being shut down. Interestingly, most of the opposition came from residents not closest to the runway on the plateau, but rather from the more expensive homes with views on the slopes away from the airport.

OLF Coupeville is an auxiliary field for NAS Whidbey Island, and it's used for Field Carrier Landing Practice (FCLP) by the electronic warfare aircraft based there. Touch and go landings are practiced to simulate operations on an aircraft carrier. Many practice sessions occur at night. The residential community of Admiralty Cove was built in the 1960's very close to the area most affected by the FCLP jet noise. In an effort to reduce conflict, Island County now requires that notices to purchasers of this jet noise be given to those acquiring property nearby. Nevertheless, the Navy is currently being sued by Admiralty Cove residents for jet noise. Flight operations have had to be modified.

Paine Field has had numerous conflicts with residents in Mukilteo, an upscale community to the West with beautiful views towards Puget Sound. The issue has
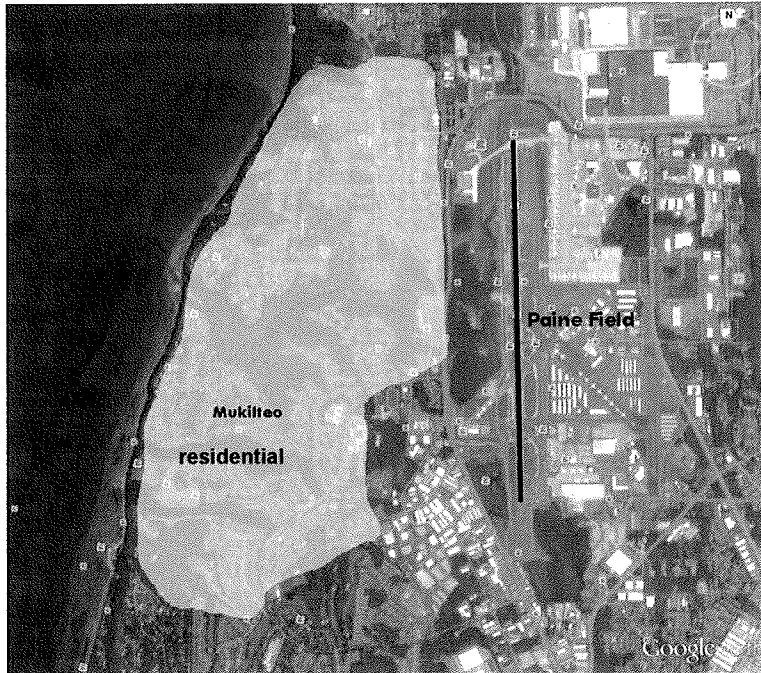
periodically been scheduled air service starting at Paine Field. Whenever an airline proposes beginning service, the Mukilteo neighborhood objects. While the FAA has no restrictions on scheduled service operating there, the airport is owned by Snohomish County and thus the terminal lease is controlled by County government and subject to local political pressure. The economically important Boeing assembly plant garners no such opposition from the nearby residents.

Sea-Tac International Airport is the most important airport in the state. Nevertheless, it has had a considerable amount of conflict with local residential
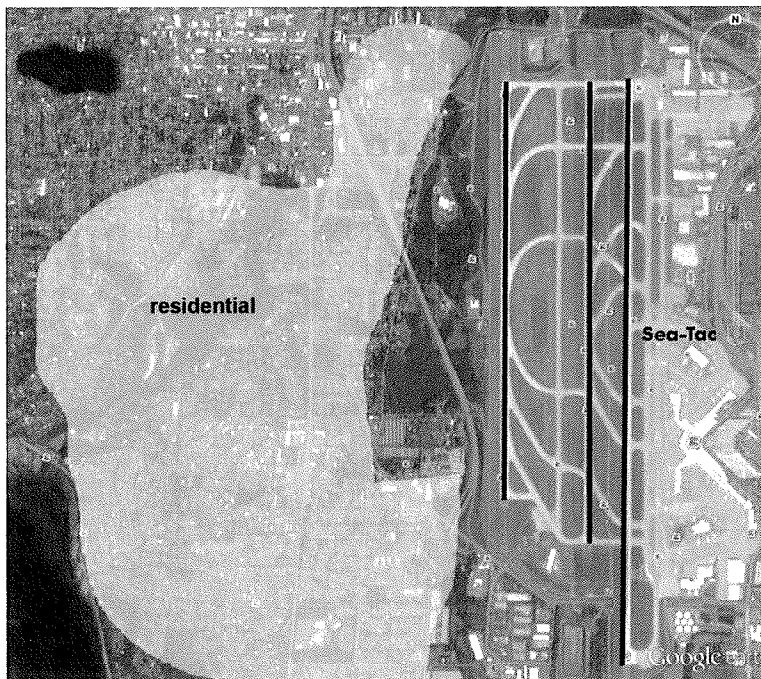

neighborhoods. The third runway at Sea-Tac took two decades to complete, and during that time the estimated cost of the project soared from $200 million to over $1 billion. Much of that increase came from the need to deal with urban residential that had been built to the westof the airport. The Port of Seattle ended up buying over 1,800 homes to clear the way for the third runway. A lawsuit from a coalition of 300 plaintiffs against the airport for noise impacts was decided in favor of the airport in late 2012.

Skagit Regional Airport is now under consideration to have a new town built right under its flight pattern, much like the above examples. Part of the rationalization for

this proximity is that the County now requires that Avigation Easements be signed by property owners in Environs Zones 1-6. This is good measure on the part of the County, but it is not proof against political airport opposition. Again, the above examples show how vulnerable political institutions are to pressure from an incensed minority. Skagit Regional Airport is owned by the Port of Skagit, a three-member Commission. It only takes two individuals to be voted into power to restrict the growth and operations of this airport.
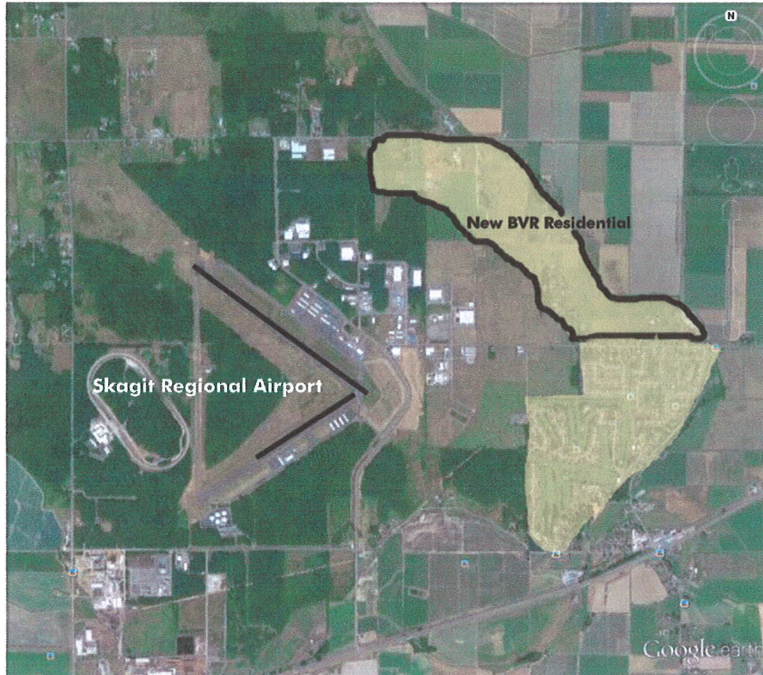
Safety Issues

Since 2006 there have been four fatal aircraft crashes at or near Skagit Regional Airport. Of these, only one was near the paved runway. The other three involved
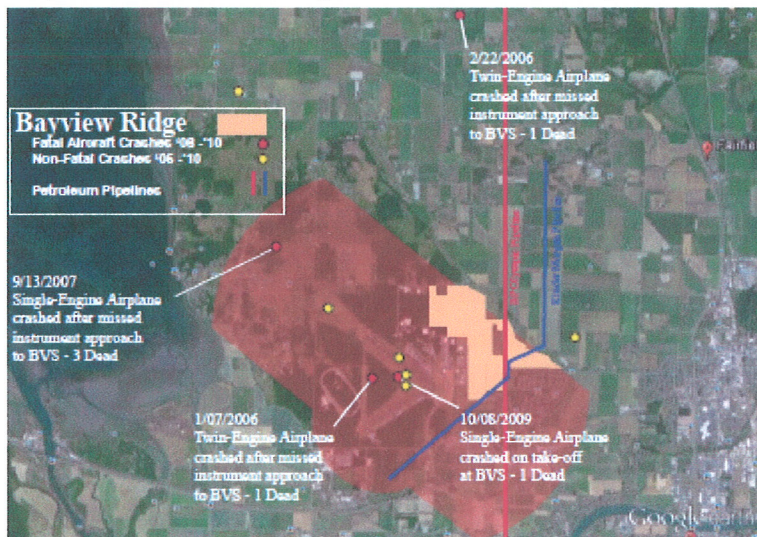
airplanes making an instrument approach to Skagit in poor visibility. These crash impacts bracket the proposed high-density new town. Several other non-fatal crashes are also mapped. While the majority of these crash sites are within the State's Overlay Zones, not all are. The reality is that crashes follow a probability scatter pattern that is not perfectly described by overlay zones. Both the State and the FAA use overlays to provide some

rational order to airport land use, but it should be noted that these areas are not predictive or restrictive of where crashes will occur. It is up to the local land use authorities to exercise common sense and good judgement when considering locating residential uses and schools near an airport.

When siting potentially conflicting or vulnerable land uses near an airport one should not only ask whether it can be legally sited there, but whether it should be so sited.

Changes in Regulation – When the BVR new town was first proposed, State Aviation's policy was to allow school construction under Zone 6. A couple of years ago the Aviation Division updated their guidelines and now they do not recommend siting grade schools within Zone 6. This fact has caused great disruption to the planning for BVR as much of the upland area is covered by Zone 6. Yet regulations change, and it should not be too surprising that standards change over a 15-year period.

In the last two weeks the Port of Skagit has had an aviation consultant evaluating the State Overlay Zones for potential changes at the airport. The consultant has found that should the main runway be extended to the northwest, the zones will also extend in that direction. However, it now looks like the crosswind runway zones will also be modified according to the changed standards. The resulting expansion of the overlay zones is not finally mapped, but it's fair to say they will expand to the north. Whether overlay zone expansion precludes a school site for the BVR development is not yet known.

It is prudent to expect that regulations will evolve over time. This occurs because of changed standards, but also because these regulations are also keyed into levels of operations at the airport, some of which cannot be predicted. The aviation trend line in an urbanizing area like Skagit County is always towards more rigorous standards and more operations.

Accordingly, is it wise to build a new town today right next to an overlay zone that has been changing over the last two years, and even over the last two weeks? What are the odds that this overlay will remain unchanged in size and character over the next few decades?

Conclusion – Take the common sense approach to this new town proposal. If little demonstrated demand exists for the housing, and if the new town residences will likely at some point object to, and interfere with, airport operations, and if safety concerns are present in abutting a high-density community next to a growing airport, then reject the concept. The airport is too valuable an asset with which to experiment, as are the people who would live in this new town.

Respectfully,

Tim Rosenhan