

April 14, 2023

KITTITAS COUNTY
Kittitas County Community Development Services
411 N. Ruby Street, Ste 2
Ellensburg, WA 98926

RE: SE-23-00007 Bowers Field - Notice of Application

Dear M. Pedersen:

Washington State Department of Transportation Aviation Division (WSDOT-AD) appreciates your engagement with our office concerning construction plans near airports. Due to the proximity of the proposed SE-23-00007 to the Bowers Airport, we reviewed the application materials in reference to WSDOT-AD's Airport Land Use Compatibility Program. This program addresses elements of safety, airspace hazards, noise, and land use in relation to public use airports. WSDOT-AD is concerned with the safety and compatibility of the placement of this project. Specifically, we are concerned that the mitigation enhancements may increase the attraction of wildlife in close proximity to aviation operations.

The *WSDOT Airports and Compatible Land Use Guidebook* (attached) states that "particular attention should be paid to any proposed use that could create an increased attraction for birds and other wildlife." The Federal Aviation Administration (FAA) has also published guidance on potential wildlife impingement on airport operations. In [Advisory Circular \(AC\) – 150/5200-33C Hazardous Wildlife Attractants On or Near Airports](#),

The FAA urges regulatory agencies and planning and zoning agencies to evaluate proposed new land uses within the separation criteria and prevent the creation of land uses that attract or sustain hazardous wildlife within the separation distances.

The FAA recommends the use of minimum separation criteria outlined below for land-use practices that attract hazardous wildlife to the vicinity of airports. Please note that FAA criteria include land uses that cause movement of hazardous wildlife onto, into, or across the airport's approach or departure airspace or aircraft operations area.

Because this airport has special approach procedures specifically designed to accommodate aircraft in poor weather conditions, "the FAA recommends a distance of 5 miles between the closest point of the airport's aircraft operations area and the hazardous wildlife attractant." While we recognize that this standard is quite conservative, the lower standard "for airports serving turbine-powered aircraft [such as Bowers], the FAA recommends a separation distance of 10,000 feet from these airports for any of the hazardous wildlife attractants"¹ would still be applicable. The eastern most boundary of the project appears to be approximately 1,600 feet west of the aircraft operations area and adjacent to the approach and departure paths of runways 11/29.

¹ AC – 150/5200-33C

In Chapter 2 – Land-use Practices On or Near Airports that Potentially Attract Hazardous Wildlife, section 2.4, the AC specifically discusses existing wetlands on or near airport property as well as mitigation of wetland functions both onsite and offsite of the airport. Because this project appears to broaden the coverage of wetlands, it is critical to consider that “enhancing such mitigation areas to attract hazardous wildlife must be avoided” and all parties should implement “enhancement plans that would not worsen existing wildlife hazards or create such hazards.”

Additionally, the FAA requests early coordination as they will need to review any mitigation proposals for compatibility with aviation safety and airport operations. This coordination is mandatory due to existing airport Federal grant obligations. The AC also states that “a Qualified Airport Wildlife Biologist should evaluate any wetland mitigation projects... [and] a wildlife management plan should be developed to reduce the wildlife hazards.”² For your reference, applicable FAA Northwest Mountain Region Airport Division contact information can be found [here](#).

For assistance with minimizing the potential for wildlife attraction in this project, WSDOT-AD provides resources in its [Airport Stormwater Manual](#). Suggestions concerning wildlife planning are outlined in Chapter 3. Ideas include planting design and plant species selection within the improvement area. Appendix A of the manual lists recommended plants for airports east of the Cascades as well as species identified as inappropriate for use in airport settings.

Lastly, the project developer should notify the FAA as soon as practicable so they may evaluate the proposed structures for potential conflict with airspace standards on or surrounding the airport. The developer should file forms 7460-1 and 7460-2 at their earliest convenience in order to avoid delays as a result of waiting for a response. Information on how to file notice with the FAA can be found [here](#).

We want to reiterate the importance of wildlife management in the vicinity of airports. Any changes to or increases of wildlife activity create additional risk to safety for both aviation operations and persons/property on the ground. The encroachment of incompatible land uses upon Washington State airports also diminishes their ability to function as essential public facilities and often leads to operational impacts and closures.

WSDOT Aviation Division fully supports wetland mitigation and proactive environmental management such as proposed in this project. Our interest in this project is solely to preserve the safety and functionality of our state airports. We hope that there can be a balance between safety and ecological necessities. Our office is available for any questions or further discussions. Please do not hesitate to contact me at (360) 890-5258 or isond@wsdot.wa.gov.

Sincerely,



David Ison, PhD

Aviation Planner – Airport Land Use Compatibility
WSDOT Aviation Division

ATTACHMENT: *WSDOT Airports and Compatible Land Use Guidebook*

² AC – 150/5200-33C