



October 28, 2024

Chris Buttice
City of Walla Walla Chief of Police
54 E. Moore Street
Walla Walla, WA 99362

RE: REF-24-0114 - Director's Interpretation on allowance of a Police Station Training Facility in the Public Reserve Zone

Dear Chief Buttice:

On behalf of the City of Walla Walla Police Department you have inquired as to the appropriateness of allowing a Police Station Training Facility in a portion of the Sudbury Landfill 414 Landfill Road, which is zoned Public Reserve. It is my understanding that this training facility would include a gun/shooting practice range and a location for various other police training blocks including, high risk stops, defensive tactics, SWAT training and tactics, building searches, tactical movement, vehicle stops and anything else necessary for development of skills.

Discussion

The City of Walla Walla Municipal Code (WWMC) Table of Permitted Land Uses provides that Police Stations, as well as Fire Stations are outright permitted Level I uses within the Public Reserve Zone. See WWMC 20.100.040.C Community Services. The WWMC does not define Fire Station nor Police Station. The WWMC allows for the Director of Development Services to authorize placement of a use in a zone when such use is not listed in the Table of Permitted Land Uses, if the proposed use is similar to the uses listed in that zone. See WWMC 20.100.020. The Walla Walla Municipal Code also allows for the Director of Development Services to determine if a higher level of review is needed for the proposal. A higher level of review may be necessary if the proposal may impact neighboring properties. See WWMC 20.18.040.

A Fire Station is a similar use to a Police Station as it is the headquarters for fire personnel where first responders are trained, stationed, stand ready, and prepare themselves for responding to fires and other public emergencies. Not all training of firefighters can occur at fire stations because those facilities are limited to administrative offices, stationing of fire vehicles and a base for day-to-day fire response and Emergency Medical Services operations. These stations are also within the community and proximate to those it seeks to serve. It is not possible to provide all the training necessary for fire first responders at the fire stations. Fire departments often have separate fire training facilities with locations away from the fire stations. These fire training facilities are designed to prepare personnel for real-world live fire scenarios, provide for hands on training and provide simulated training opportunities for firefighters to gain essential skills in fire and Emergency Medical Service response.

To provide this necessary hands-on fire training and skill development, the City of Walla Walla Fire department applied for, and the Walla Walla Development Services department permitted the installation of certain fire station training facilities on City of Walla Walla property addressed as 300 S. Cayuse Street, that is zoned Public Reserve. These permits include placing a modular building for a training classroom (See Permit File No. BLD-09-0197) and for foundation and site work to place a fire training structure (See Permit File Nos. BLD-21-0921, ENG-21-0025). This training facility is an ancillary use of the Fire Station and includes a classroom building, and fire training structures that allow for live fire scenario-based training, and skill development with the tools and equipment used by firefighters. This facility is used as a regional training facility for the Walla Walla Fire Department, the City of College Place Fire Department and Walla Walla County Fire District 4. For these reasons, a Fire Station Training Facility is similar and ancillary to a Fire Station and is an appropriate use and rightfully permitted in the Public Reserve Zone.

Similarly, a Police Station serves as the primary base for police officers to respond to incidents, enforce laws and maintain public order. The Walla Walla Police Station is located at 54 E. Moore Street, and like a Fire Station, it is sited within our community and proximate to those the police department serves. Furthermore, a Police Station, like a Fire Station, requires off-site training facilities, ancillary to a Police Station, that provide for the development and essential skills training, such as firearm use and handling, defensive tactics, emergency response, emergency vehicle operations training, and scenario-based training. Many of these essential skills cannot be taught and practiced in a Police Station building that may only allow for training in a classroom setting, likely due to space constraints or limited outdoor areas due to the nature of the training. For these reasons, and under the same rational as a Fire Station Training Facility, a Police Station Training Facility is similar and ancillary to a Police Station and is an appropriate use and rightfully permitted in the Public Reserve Zone.

Another example of a permitted use in the Public Reserve Zone that also includes ancillary uses includes "Schools". A school is an allowed use within the Public Reserve zone. A school does not simply contain classrooms, but includes athletic facilities, playgrounds, instructional facilities or other uses that are similar and ancillary to the School and are appropriate uses and permitted in the Public Reserve Zone.

Decision

Pursuant to WWMC Section 20.02.090, Interpretations, the Director shall have the responsibility of interpreting all terms and provisions of this code. Furthermore, pursuant to WWMC Section 20.100.020, the director of Development Services is authorized to place a use in a zone when such use is not listed, if the proposed use is similar to the uses listed in that zone.

For the above stated reasons, I interpret the Walla Walla Municipal Code Table of Permitted Land Uses to allow Police Station Training Facilities, which include a shooting/gun practice range and tactical driving location as ancillary uses of a Police Station and therefore are permitted within the Public Reserve Zone. As director, I also reserve the right, as provided by the Municipal Code, to elevate a proposal to develop a Police Station Training Facility to a higher level of review to ensure that impacts to neighboring properties are considered and mitigated against. This code interpretation decision does not relieve the proposal from

complying with local, state or federal laws and regulations related to shooting/gun ranges and compliance with laws and regulations related to nuisance and public safety issues.

Appeal

Formal interpretations may be appealed to the appropriate appellate body as prescribed in Chapter 20.38. The appropriate appellate body for interpretations made pursuant to Section 20.02.090 is the Walla Walla Hearings Examiner. An appeal must be filed within fourteen (14) calendar days after service or publication of the notice to the Development Services Department before 5:00 p.m. on the last business day of the appeal period which is **November 12, 2024**.



Preston Frederickson
Development Services Director
Development Services Department

October 28, 2024
Date