



August 4, 2020

**VIA EMAIL:** sean.callahan@faa.gov  
**AND FIRST CLASS MAIL**

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Seattle Airports District Office  
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Des Moines, WA 98198

**RE: Comment on Draft Environmental Assessment – Aurora State Airport Obstruction Removal and North Run-Up Apron Improvements Project**

Dear Mr. Callahan:

In accordance with the notice for public comment, the City of Wilsonville submits the following comments with respect to the above-referenced draft Environmental Assessment (“EA”):

While the City supports measures to ensure airport safety, including necessary obstruction removal, and also supports improvements that facilitate current operations (not the disguised expansion thereof), the City has serious concerns about how the Oregon Department of Aviation (ODA) views public process. The City would like more detail regarding the AGIS study conducted in 2016 (*referenced at Chapter 1, 1.4*) and whether that study was done to address current operations or the addition of larger jets at the airport, or the hope to accommodate more and larger jets. The latter seems more likely, also making noise a major concern, as outlined more particularly below.

The EA refers throughout its text to the **2013** Master Plan for the Aurora Airport. As you are aware, litigation is pending before the Oregon Land Use Board of Appeals (LUBA) challenging ODA’s assertion that the 2000 Airport Master Plan for Aurora Airport was ever legally updated. It is the position of the City of Wilsonville, the City of Aurora, Clackamas County, and 1000 Friends of Oregon that public process and public meeting laws were not followed in the adoption of what is now referred to by the ODA as either the 2011 or the 2012 Master Plan, which was not a legally valid update to the Aurora State Airport Master Plan. Until the draft EA, however, the City had never seen a reference to a 2013 Master Plan, which is the Master Plan referenced throughout the EA. We now understand, however, that the reference to a 2013 Master Plan was a typo, and the Master Plan should have been referenced as a 2012 Master Plan, according to the ODA webpage you recently forwarded to the City.

As noted above, the City does not object to the proposed removal of obstructions that penetrate critical airspace and could create line-of-sight and safety issues for the type of aircraft currently allowed to operate out of the Aurora Airport (excluding larger jets operating via waivers that should not have been granted). However, the EA fails to identify in detail the proposed tree-removal obstruction treatment plans for approximately 46 sites (also referred to in the EA as “Polygon Number,” “Impact Area,” or “Obstruction Removal Areas”) of varying size, some of which appear to be many acres in size (EA Appendices p. 67). An EA should provide sufficient specificity such that impacted residents and businesses are able to ascertain how the proposed action will affect their property. If the plan is to remove trees in anticipation of a runway expansion, then more than this simple EA will be required.

The lack of a noise study in conjunction with this EA violates the FAA’s own requirements. A noise study is required and must be done. Chapter 3, 3.11 *Noise and Noise-Compatible Land Use*, states that no noise analysis is needed for projects involving Designated Group I and II airplanes (wingspan less than 79 feet) in Approach Categories A through D (landing speeds less than 166 knots) operating at airports whose **forecast** operations by the NEPA document do not exceed 90,000 annual propeller operations (247 average daily operations) or 700 annual jet operations (2 average daily operations). (Emphasis added.)

The EA report goes on to state that no noise study was required at Aurora Airport because “the current airport operations do not exceed 90,000 operations and the forecast operations, according to the APO Terminal Area Forecast Detail Report – Forecast issued January 2020, Aurora State Airport had an estimated 63,113 operations for 2018.” To the contrary, however, on the first page of the report, under 1.2 *Background*, the EA states “Aurora State Airport has 327 based aircraft and has an estimated **94,935** total annual operations, as reported on the FAA 5010-1, Airport Master Record.” (Emphasis added.) Thus, based on the report’s own statement of fact, a noise study should, in fact, have been conducted since operations are, in fact, forecast to exceed 90,000. The determining trigger is the “forecast operations” not past 2018 “estimated” operations.

The nearest, most impacted, population to the Aurora Airport is the Charbonneau neighborhood, located in Wilsonville. Charbonneau houses a large senior population, including a senior care facility, with a population more vulnerable to noise and air pollution. Yet, this neighborhood/population received no mention in the EA. A noise study is required by the FAA’s own standards and is especially critical given the proximity to a large neighborhood of Wilsonville residents, many of whom are retired and home all day and night, with forced exposure to airport noise at an undetermined level due to the lack of a study.

While the City would not object to a proposed apron expansion to accommodate the existing fleet of aircraft properly sized to operate out of the Aurora Airport, the City will vigorously contest efforts to set the area up for a runway expansion or for run-up by larger jets. The airport has already been allowing jets that are too large to safely land and too heavy for the existing pavement, via a waiver process. We anticipate the ODA’s next argument will be that a runway expansion is needed because the runway is too short for the jets now being allowed to land and the pavement has been too damaged by their weight.

With respect to Options 1-6, the EA lacks any comparative analysis of the impact of the various alternatives on adjoining or nearby properties. The maps are not clear. The City, therefore, finds Option 3 to be the only viable reasonable option, wherein all construction would occur on land already owned by the ODA. In other words, the City would advocate that the proposed apron construction not require the unnecessary conversion of any additional private land outside the airport boundary and the resulting environmental impacts.

In the event the FAA allows any apron expansion, wherever it is located, a National Pollution Discharge Elimination System Permit #1200-C from the Oregon Department of Environmental Quality should be required.

The City agrees with the EA assessment that the expansion of the proposed run-up area should require construction of new and improved stormwater facilities beyond the very limited existing stormwater facilities that already fail to manage stormwater run-off. Careful consideration should be given to stormwater run-off, dewatering protocol, and permanent stormwater facilities during and following the proposed construction, in order to protect the environment, nearby navigable waterways, and adjoining properties. The EA fails to note the well-known lack of potable water and a viable sewer system for the airport.

On page 22, the EA notes the importance of protecting groundwater and notes the proximity of the airport and the proposed construction to two municipal groundwater wells operated by the City of Aurora. The EA, however, does not discuss what, if any, impacts this project might have on those wells. The City will leave this issue to Aurora to comment on.

Pictures and text contained in the EA Appendices, Environmental Inventory (EA Appendices p. 59) and the Wetland Reconnaissance (EA Appendices p. 178) indicate that potential suitable habitat for state or federally listed plant species may be impacted; however, no mitigation strategy or special treatments for these areas are considered. "Nearby fish-bearing streams include the Pudding River, approximately 1 mile east of the proposed project, and Deer Creek, just under a mile west of the project area (Figure 3, Appendix A). Deer Creek joins Senecal Creek which flows into Mill Creek, and in turn enters the Pudding River about 2 miles south of the Airport. The Pudding River is a tributary of the Molalla River which joins the Willamette River at river mile 36 within the Molalla River State Park. \* \* \* Stormwater from the project area as well as from the north and east is collected in the vegetated swales located west of Taxiway A and then piped to a vegetated swale just east of Boones Ferry Road (Figure 6, Appendix A). Ultimately, stormwater from the project area enters the Pudding River basin via an unnamed tributary to Deer Creek (Figure 6, Appendix A)." Biological Assessment, p. 19.

The EA indicates that neither Deer Creek nor Senecal Creek is mapped as Essential Salmonid Habitat (ESH) (DSL, 2019). However, these are tributaries that feed into and supply water habitat for Mill Creek, the Pudding River, and the Molalla River that are mapped as ESH. Biological Assessment, p. 20. The EA fails to document or describe why loading additional sediment or other airport-induced pollution to tributaries of ESH to Mill Creek, the Pudding River, and the Molalla River will not impact ESH.

Additionally, the EA fails to address the proposed action impacts on Oregon white oak trees and their habitats that the Oregon Fish and Wildlife Office of the U.S. Fish and Wildlife Service identifies as crucial and at-risk. The agency reports that only 3% of the original 1.8 million acres of Oak savannas and prairies still exist today. See <https://www.fws.gov/oregonfwo/articles.cfm?id=149489529>.

The EA indicates that federal and state listed species and/or their critical habitat is present in the vicinity (Environmental Inventory, p. 58). Four of the 20 obstruction removal polygons have the potential to provide habitat for listed plant species due to the presence of associated species and/or presence of native groundcover vicinity (Environmental Inventory, p. 62).

Finally, the EA notes on page 24 that a future project may include a runway extension. As noted above, although that extension is technically not the subject of this EA, suffice it to say, this is the camel's nose under the tent. The City will expect and demand a full EIS be required for a runway expansion. For the future record, the City is likely to strongly oppose any such runway expansion.

The City of Wilsonville appreciates the FAA's consideration of its comments.

Sincerely,



Tim Knapp, Mayor  
City of Wilsonville

cc: Wilsonville City Council  
Barbara Jacobson, City Attorney  
Bryan Cosgrove, City Manager