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August 12, 2019

Via Email (betty.stansbury@aviation.state.or.us) and First Class Mail

Betty Stansbury, Director
Oregon Department of Aviation
3040 25th St. SE
Salem, OR 97302-1125

Re: Aurora State Airport Master Planning Process

Dear Ms. Stansbury:

I am writing on behalf of Friends of French Prairie. I would like first to recap the status of the above process. I will then address the relationship between the current draft Master Plan and ODA's flow chart for "Adoption of Final Master Plans." This flow chart is an essential element of the department's State Agency Coordination Program. A copy is attached for your reference.

Status of the Master Planning Process

The draft Master Plan has not been submitted to or adopted by the State Aviation Board. It was substantially altered after the last public process was concluded several years ago, without the opportunity for any public review or comment whatsoever. The required State Agency Coordination (SAC) process has not commenced, or has just now commenced. The applicable Department of Transportation SAC program was not followed during the development of the draft plan.

Conforming the Aurora State Airport Master Planning Process to the Department's Flow Chart for Its Adoption

Referring to the attached flow chart, we note first the component entitled "Planning Advisory Committee and Public Participation." In violation of this provision, the membership of the Planning Advisory Committee (PAC) formed to advise the agency in the master planning process did not include a DLCD representative, or representatives from the Mid-Willamette Valley Council of Governments, the Oregon Department of Agriculture, the Oregon Department of Transportation, the Federal Aviation

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Administration, or the Confederated Tribes of the Grand Ronde. In connection with the validity/good faith of the conduct of the PAC process in the first place, please refer to the attached letter from five members of the PAC to the chair of the Aviation Board, dated September 14, 2010. (The highlighting was in the copy provided to me.) It is obvious that the process was conducted with no intention that the outcome would affect agency decisionmaking. It was an idle exercise.

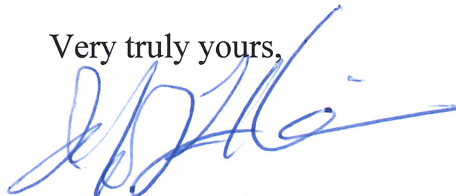
With respect to "Compatibility of Master Plan and Local Comprehensive Plans," we do not believe that there was ever a 45-day public comment period, as required. It appears that the master plan was dripped out in parts over the years, and that no notice was provided that a final draft was ready for adoption. We also believe that no findings were adopted as to the compatibility of any iteration of the master plan with the Statewide Planning Goals. Similarly, it appears that there have been no findings of compliance with the Oregon Aviation Plan or the Oregon Airport Planning Rule.

The flow chart also makes reference to adoption of an Airport Layout Plan for the Aurora Airport. I would appreciate receiving a copy of ODA's full documentation of the Airport Layout Plan, as presented to the FAA. This should be readily available, and should not require a formal public records request.

Conclusion

The only solution to the manifest failings of the master planning process to date under ODA's own procedures is to start that process over, with a properly constituted Planning Advisory Committee and a good faith commitment to public participation in the process. Friends of French Prairie and other interested parties, public and private, look forward to engaging in that process, and look forward to your response, as well.

Very truly yours,



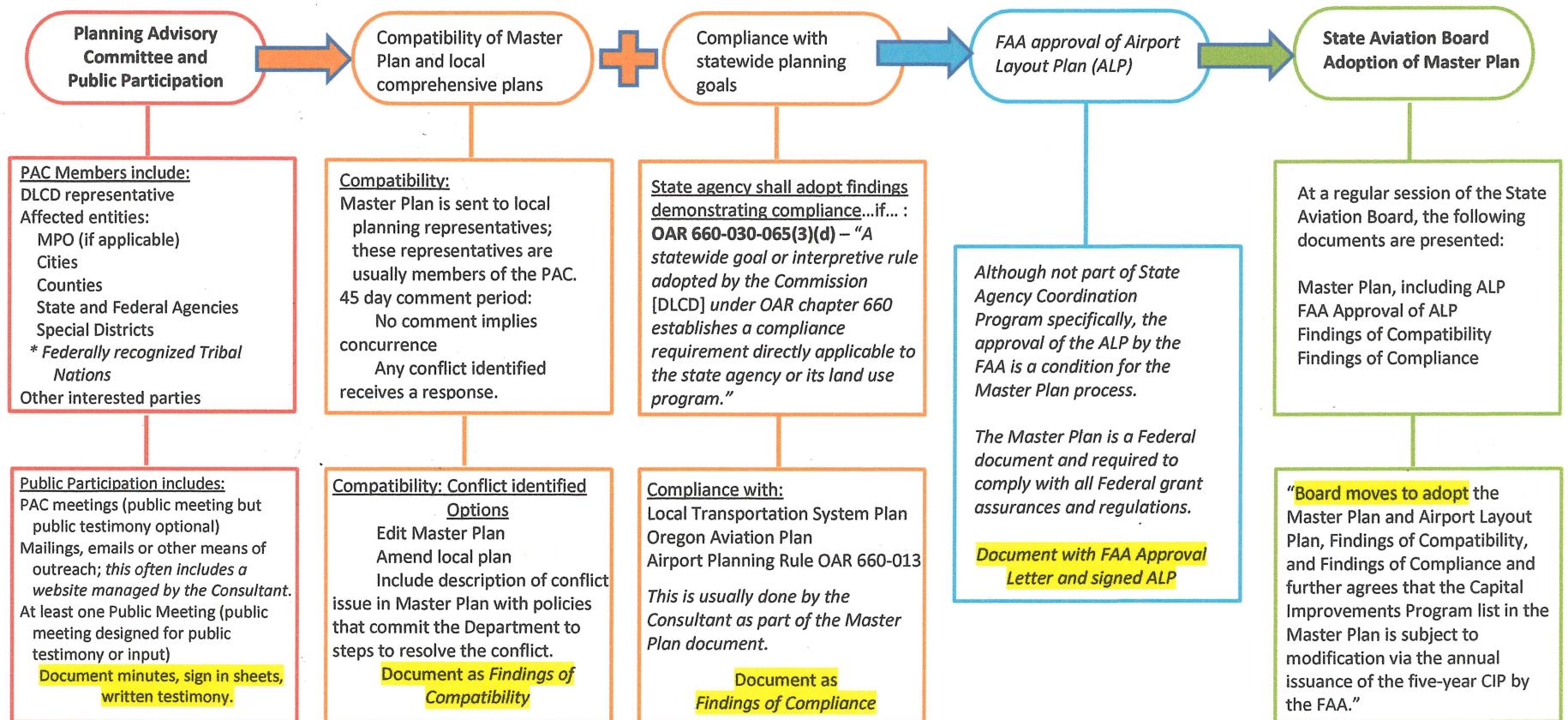
Jeffrey L. Kleinman

JLK:cme

Enclosure

cc: client (via email)
Rachel E. Bertoni, Esq. (via email)

**State Agency Coordination Program:
Adoption of Final Master Plans, Oregon Department of Aviation**



**Members of the Planning Advisory Committee
to the Aurora State Airport Master Plan**

Charbonneau Country Club • City of Wilsonville • Clackamas County
Deer Creek Estates • Friends of Marion County

Mark Gardiner, Chair
State Aviation Board
Oregon Department of Aviation
3040 25th St. SE
Salem, OR 97302-1125

September 14, 2010

**RE: Request for meeting to discuss Aurora State Airport master planning
process and role of the Planning Advisory Committee**

Dear Mr. Gardiner:

As local-government and community-organization members of the Planning Advisory Committee (PAC) to the Aurora State Airport Master Plan, we have grave concerns that our participation in the process is not intended to be meaningful. We see serious deficiencies in how the process is being conducted by the consultant, W.H. Pacific, and we seek to resolve these issues of concern.

In a nutshell, we are very concerned that the Aurora Airport master planning process is being rushed on a condensed schedule—reduced by one-third from the original timeline—without adequate discussion of issues at the PAC level in order to satisfy preconceived outcomes of a few special interests that may be detrimental to the greater public good. It seems fairly clear that the consultant intends to march steadily through construction of ‘chapters’ of the master plan, according to a predetermined timetable, regardless of whether or not there has been adequate discussion at the PAC of the issues. This is not the meaningful public-input practice that the Federal Aviation Administration (FAA) recommends for stakeholders in the master-planning process.

The FAA is quite clear, as outlined in the document ‘Airport Master Plans,’ AC 150/5070-6A, that **stakeholders must have an early opportunity to meaningfully comment before major decisions are made.** Stakeholders in the master-planning process have been asked to enunciate their individual goals, but there has been no discussion on how to integrate these into establishing the ‘strategic role’ and the ‘study goals’ as outlined by the FAA. ODA and consultant W.H. Pacific have specifically rejected the establishment of a ‘vision’ for the Airport as a starting point, something several members of the PAC requested at the outset of the process.

We observe from the conduct of ODA that installation of an air traffic control tower is being actively pursued prior to development of the new master plan and without consultation with the PAC. The fact that ODA is acquiring funds to build a control tower in the absence of any cost estimate and without first conducting planning demonstrates a serious lapse in judgment. ODA has indicated that concurrent to the master plan update, the agency has contracted for an air traffic control tower siting study; again an issue that the PAC should discuss has been arbitrarily removed the planning process.

Further, it seems clear that the role of the PAC has been deliberately marginalized. The forecast of future activity at the airport has apparently been compiled and is about to be sent to the FAA for

approval without any advance discussion with the PAC. It is notable that there is no accurate information available on current activity levels, since there are no records of landings and take-offs. Any methodology used to generate undocumented current activity numbers to use as a starting point for future usage projections surely should require very close scrutiny. But the PAC has not been given that opportunity for review and discussion.

Despite the absence of any discussion of the 'strategic role' and 'study goals' and any review of the activity forecast with the PAC, the process developed by the consultant, under the direction of ODA, appears to be one of justifying the preconceived idea that runway expansion and strengthening is required at Aurora Airport. The Scope of Work, dated June 19, 2009, states on page 3 that consultant "W.H. Pacific will prepare a letter on behalf of ODA to request statements [presumably from large jet operators] to *help justify* an extension" of the runway (emphasis added). This would seem to clearly demonstrate an intent that undermines any pretense of a meaningful process.

We are not aware of any impact analysis based on a forecast of future activity that was developed. In short, this appears to leave the simplistic assumption that if the demand can be somehow justified, then it must be supplied, no matter the impacts. Common sense tells us that increasing the size and types of airplanes, and the increase in the frequency of their use, will have impacts. Going from a general aviation airport with mostly small, propeller-and-piston-engine light-airplane and smaller jets under 45,000 pounds to an airport catering to larger, heavier turbine-engine jet aircraft calls for a serious, reasoned analysis of impacts.

The Aurora State Airport is located in the French Prairie area of "foundation farmland," which the Oregon Department of Agriculture indicates contains Oregon's highest-quality agricultural soils, and has been able to co-exist with its neighbors as a small-aircraft airport. However, the airport is within a mile of the Portland Metro Urban Growth Boundary and dense residential development to the north. There are serious traffic-congestion problems on roads around the airport and on nearby Interstate 5 at the Boone Bridge "bottleneck" over the Willamette River. As the FAA document 'Airport Master Plans' makes clear, the regional setting of the airport must be examined "because the impact of airport planning decisions can extend well beyond the airport property line." What will be the impacts of this greater development at the airport be on noise, pollution, the surrounding farm lands, off-site surface transportation facilities including the interstate highway, and nearby residential areas? What, if any, mitigation should occur?

While the PAC's role has been marginalized, ODA plans to select interviewees outside of the PAC and master-planning process who will be asked to give their views on at least one of the major master-planning issues. The Scope of Work, page 8, states that "up to 20 people [will be interviewed] regarding future activity at the airport." That is a critical task. Who are these people and how has ODA directed the consultant to choose them? What meaningful process is there for the PAC in this regard? Again, there has been no discussion by the consultant with the PAC on this matter.

The Scope of Work, page 5, lists the main areas under which data will be collected. Under Item E, Environmental Inventory, there is no mention of collecting data on noise and traffic impacts on nearby communities and on their transportation infrastructure, key aspects listed by the FAA on page 123 with the title 'Environmental Overview for Master Plan Purposes,' FAA AC 150/5070-6B. Nor

is there any discussion in the Scope of Work of National Environmental Policy Act (NEPA) requirements and whether or not an Environmental Impact Statement (EIS) is required. The Scope of Work states that noise contours will be developed, but only to show existing conditions and those five years into the future. As the activity forecasts will be generated for five years, 10 years and 20 years into the future, the noise contours should be developed for the same time periods.

We are very concerned that the Aurora Airport master planning process is being rushed through on a condensed schedule without adequate discussion of the issues at the Planning Advisory Committee level in order to satisfy the preconceived outcomes of a few special interests. This is not the meaningful, due process input the FAA intended in their Master Plan process.

We respectfully request that a meeting be arranged at the earliest opportunity for the undersigned with you, the Acting Director of ODA, the consultant, and appropriate representatives of the FAA to discuss these concerns. Furthermore, we request that this letter be memorialized as a part of the record of the Aurora Airport Master Plan update. Too many issues of previous inside dealings connected with ODA's handling of matters at the Aurora Airport have recently come to light, and it is important that now, under new management direction, ODA not be a part of a process that lacks meaningful input, good planning, and transparency.

We thank you for your time and consideration.

Respectfully submitted by the undersigned members of the Planning Advisory Committee to the Aurora State Airport Master Plan.




Tony Holt, Chair, Civic Affairs Committee
Charbonneau Country Club



Jim Bernard, Commissioner
Clackamas County Board of Commissioners



Steve Hurst, Councilor
City of Wilsonville City Council



Rick Kosta, President
Deer Creek Estates Homeowners' Association



Roger Kaye, President
Friends of Marion County