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Re: Chapters 1-3 of Draft Aurora Airport Master Plan

Dear Mr. Cummings:

Attached are comments from planner Lorraine Gonzales on Chapters 1 and 2 of the Draft Aurora Airport Master Plan. Ms. Gonzales has been out of the country, so I took a very brief look at Chapter 3 – the Activity Forecast. There were two areas of the forecast that raise questions and concerns.

Forecast Growth Rate for Jets

The forecast at page 3-21 projects potential airport growth. **The forecast projects that jet traffic expected to grow at a 4.5% annual rate, which is significantly higher than any of the comparative growth rates described in the report.** The forecast states that this higher projected rate was derived in part from the linear growth trend for the Aurora airport. However, according to the report, the linear trend for Aurora Airport (5.9%) was impacted by the opening of the South End Airpark, presumably a one-time historical event:

The number of aircraft jumped up when the Southend Airpark opened. Southend Airpark's increased hangar capacity and expansion of aircraft services led to the Airport gaining a greater share of regional aviation activity.

Draft Aurora Airport Master Plan, P. 3-16

The Airport's abrupt change in market share due primarily to the Southend Airpark development is probably the reason based aircraft numbers do not correlate with socioeconomic data.

Draft Aurora Airport Master Plan, P. 3-18

Given this history, it would seem that the linear trend would not be a valid predictor of future growth. **Is there any factual basis for predicting that the rapid growth that resulted from the opening of the Southend Airpark will or can continue? Is there room within the**

existing airport boundaries or sufficient industrial land available outside the airport?
Zoning maps indicate that there is not. Is the ODA aware of any plans to change the surrounding zoning?

Critical Aircraft

The discussion of the selection of critical aircraft in Chapter 3 is puzzling.

From Page 3-28:

According to FAA criteria, an airport's design is based on the characteristics of the critical aircraft, which is the most demanding aircraft that uses the airport "regularly" or "substantially." The FAA defines regular or substantial use as at least 500 annual itinerant operations.

From Page 3-30:

In the FY 2007 data, the Cessna 525 Citation (ARC B-I, 10,400 pounds maximum takeoff weight) is predominant. In the FY 2009 data, the Cessna 560 Citation (ARC B-II, 16,300 pounds maximum takeoff weight) is predominant.

From Page 3-31

*In the future, the Cessna Citation X (36,100 pounds maximum takeoff weight) is projected to overtake the Astra as the predominant C-II aircraft. The Citation X is in the transient fleet using the Airport now, but is not yet part of the Airport's based aircraft fleet. An aircraft operator based at the Airport is buying a Citation X for its increased range capability, to be able to fly nonstop to the East Coast. **The future critical aircraft is the Cessna Citation X. (emphasis in original)***

Is there a reason why the "critical aircraft" is different than the predominant aircraft of last year? How does this meet the "regularly" or "substantially" standards set forth on page 3-28?

Thank you for your attention to this. I look forward to hearing from you.

Sincerely,



D. Daniel Chandler
Senior Assistant County Counsel

cc: BCC
Carol Suomi – FAA
Mark Otenaad
Lorraine Gonzales

Comments & Questions to Draft Airport Master Plan Update

Chapter 1

Page #	Location	Statement	Comment
1-2	Last bullet top of pg	"...By the end of the planning process...."	The PAC requested a vision at the beginning of the process
1-2	Goal 2 – 1 st sentence	"PAC member...constrain the growth of the Airport to meet their needs and the needs of businesses in the Airport's service area.	This is not an accurate statement. Not all the PAC members stated this as a concern. Some PAC members share the community's concern.
1-3	Runway Extension	Entire paragraph	This statement is based on 2009 survey? Survey responses should be available on webpage for review.
1-3	Air Traffic Control Tower – last sentence	"...the FAA and ODA have slowed down a control tower siting...."	What is meant by "slowed down"?
1-4	Other Airport Improvements	Reference to survey as material sited	The survey responses should be available on webpage and to the PAC.
1-5	Aurora State Airport's Regional Role	2 nd to last sentence	Is the reference to "spin-off" addressing off site businesses the airport serves?
1-6	5 th paragraph	"The airport might become a reliever if certain improvements were undertaken—runway lengthening and strengthening, increased hangar availability, auto parking, and improved instrumentation for poor weather operations".	Implies that there is a possibility that Airport will become a reliever. Is that really the intent here, especially when it is concluded on page 1-15 that commercial service is not an appropriate future role for the Aurora Airport. Consultant clarified reliever airport during meeting – does not include commercial aircraft but does include business aircraft that meets the stds in table in chapt 1, page 11.
1-15	Bullet at top of page	"Commercial service is also not an appropriate future role for Aurora State Airport. Portland International Airport has the capacity of handle commercial passenger and cargo airplane active in the region for many years to come. If commercial service grows elsewhere in the region, it will likely be at Salem, which is more suitable for commuter airline service."	(See comment above)
1-15 & 1-16	4 th paragraph Last paragraph 1-16	Aurora State Airport is not an FAA-designated reliever airport for	What would be the "trigger" to designate the Aurora Airport as a reliever airport,

		Portland International...The Airport could be officially designated a reliever in the short-term future, if ODA decides to pursue the designation and the FAA agrees.”	and why Aurora when it was stated above the Salem is the better choice? What is the process?
Chapter 2			
Page #	Location	Statement	Comment
2-2	Area Topography 1 st sentence	“A mostly rural county, Marion encompasses, agricultural and recreation lands (i.e., Ankey Nation Wildlife Refuge, Mount Hood National Forest....).”	Incorrect: Not part of Mt Hood National Forest
2-2	Community and Airport History – 3 rd paragraph	The first Airport Master Plan was prepared in 1976...”	Why not include when tower was 1 st put on ALP? This will provide clarification on all structures planned.
2-3	Airfield Facilities – 2 nd paragraph	“...The runway pavement surface is asphalt....”	How often is runway rated? Why type of aircraft does runway support – commercial, business? Is there a limitation on runway strength & future strength?
2-8	3 rd paragraph	“FAA guidelines state that before FAA grants can be received the Airport Sponsor must provide assurances that appropriate actions have been (or will be) taken, to the extent reasonable, to restrict the use of land adjacent to or in the immediate vicinity of the Airport to those that are compatible with normal airport operations?”	Unclear sentence, please restate for clarity. Are you saying that allowed uses on adjacent lands must be compatible with the airport imaginary surface overlays?
2-8	Surrounding Air Zoning and Land Use – 1 st paragraph, last sentence	“...areas zoned Acreage Residential west of the Airport and a golf course and rural residential (5-acre) north of the Airport.	This statement gives the impression that adjacent lands are RRF5 and the golf course. Restate as “...further north of the airport are RRF-5 zoned lands and a golf course.
2-8	Surrounding Area Zoning & Land Use		Did not address local, regional or state land use laws and regulations. As long as there is not a proposal to expand the airport runway or locate a facility off of the ALP boundaries the MP does not have to address these regulations, however any expansion will require addressing local, regional and state laws to include an exception process. Then again the FAA guidelines in accordance with the FPPA will prohibit the expansion of the airport

			boundary on high value farm lands.
2-9	1 st paragraph	"Clackamas County TSP (2002) identified improvement in the Arndt Road corridor from Airport Road to Ore 99E in its 20-year Capital Need list.	Clackamas County's Capital Improvement Plan (CIP) 2006/2008 Update shelved the Arndt Rd/99E (#267) in 02-23-05).
2-9	2 nd to last sentence	"Noise modeling will be prepared as part of this Master Plan, and the 65 DNL contour will be identified for the future anticipated airport use."	Is this an FAA requirement or in response to PAC and community's concerns relating to noise impacts?
2-10	1 st paragraph	"...Recommendations of that study were to adopt a noise abatement procedure and implementation program, and change the calm wind Runway designation to Runway 35."	In the 2002 noise mitigation study, where was the noise redirected with the implementation of use of Runway 35? Need to see this runway on a map to know where it is.
2-11	4 th paragraph	"FAA guidelines state....The soils are not considered prime farmland".	This implies that extension of the airport lands cannot be achieved. The surrounding farmlands are considered high value farmland according to the 1985 Soil Survey of Clackamas County Area, Oregon, that identifies surrounding soils as type #3 Amity silt loam and #88 Willamette silt loam. Other high value soils surrounding the airport property include #68 & 69 Newberg loam.
2-14	Conclusion	"Additional study regarding noise, threatened and endangered species, cultural resources, and possibly hazardous materials should be conducted once a project is defined."	The Master Plan goals stated in the beginning of this document also commit the MP to include "...evaluation and minimum impacts of airport growth to include transportation".

Planning staff will not comment on Chapter Three: Aeronautical Activity Forecast

*A few typos that may be a result of end of page printing are in draft (pgs. 2-4, 2-8, & 2-10)