

August 5, 2020

Dear Mr. Callahan  
FAA Northwest Mountain Region  
Seattle Airport  
2200 S 216<sup>th</sup> St  
Des Moines, WA 98198

I read the detailed report for the Environmental Assessment of the Aurora Airport recently completed for the “turn around” area at the northern end of the runway. It is very detailed as it should be. I would like to suggest that that it be more comprehensive.

There are four points that I didn’t see covered by the report.

1. According to Oregon SB 100 #1 of Oregon State Land Use Rule there has to be effected Citizen Involvement. I didn’t see that Wilsonville or Charbonneau were included in the list in the EA report. We are perhaps the second most affected area outside of Aurora itself.
2. Aurora Airport has no Municipal oversight and relies on well water and septic tanks for handling waste. Included in Rule #6 of SB 100, Air, Water and Land Resources must be addressed. I’ve listed a few items that have serious impact on Wilsonville and Charbonneau’s environment, quality of life and property values.

### **Public health impacts**

Aviation is a major source of local air pollution, leading to significant public health impacts. Jet emissions can cause lung, throat, nasal, larynx and brain cancer, lymphoma, leukemia, asthma, and birth defects. Highly carcinogenic benzo(a)pyrene, a byproduct of jet fuel combustion attached to soot, can cause cancer and tumors in humans through lung and skin adsorption; these are deposited into the atmosphere across the United States at rates that far exceed safety limits on a daily basis.

### **Range of impacts**

Jet emissions affect a 25 mile area around an airport. People, children, animals and plants are toxic crop dusted by jet emissions for 12 miles from a runway end. A typical commercial airport spews hundreds of tons of toxic and criteria pollutants into our atmosphere every day. These drift over heavily populated areas and settle onto water bodies and crops.

### **Lack of oversight**

Although EPA, FAA and airport sponsors have been made aware of the danger, risk for nearby communities and higher cancer rates around many of the nation's airports, they continue to ignore the problem and allow aviation emissions to remain unregulated, uncontrolled and unreported.

There are well over a hundred flights a week that, despite a voluntary overflight agreement, fly directly over Wilsonville.

- Aurora State Airport is the third largest source of aviation lead-gas emissions in the State of Oregon and health impacts have not been studied or documented
- Lack of storm water detention/treatment facilities has negative impact on aquatic species for unnamed tributary of the Pudding River

I've attached a list of just the top 12 violators using unnecessary over flights of Charbonneau just last week.

3. Transportation is Oregon State Land use Rule #12. Not only are idling cars a major source of pollution but the Airport has not addressed their plan for our woefully inadequate surface roads that are already above used substantially above capacity. There have been four fatalities on these roads framing the airport and two accidents without fatalities. Part of our environment quality is considering the impact of increase use of the airport and the "hundreds" of jobs

It will create. We must consider and address surface roads, their emissions, and public danger. There are NO safe levels of lead (from Avgas).

#### By-The-Way

Sulfur in jet fuel is a major killer, but for a small additional cost "on the order of [U.S.] five cents a gallon, you can remove the vast majority of the sulfur," he said. [Junfeng Liu](#), an atmospheric chemist at Princeton University, said the "excellent" study delves into "an important global environmental policy issue."

"Airplane-pollution deaths account for about a tenth of all air-pollution deaths with cross-border causes, Liu said. So airplane pollution could be an important focus for environmental regulations in the future.

Indeed the findings may someday influence U.S. policy, according to Lourdes Maurice, the U.S. [Federal Aviation Administration](#)'s chief scientific and technical adviser for environment"

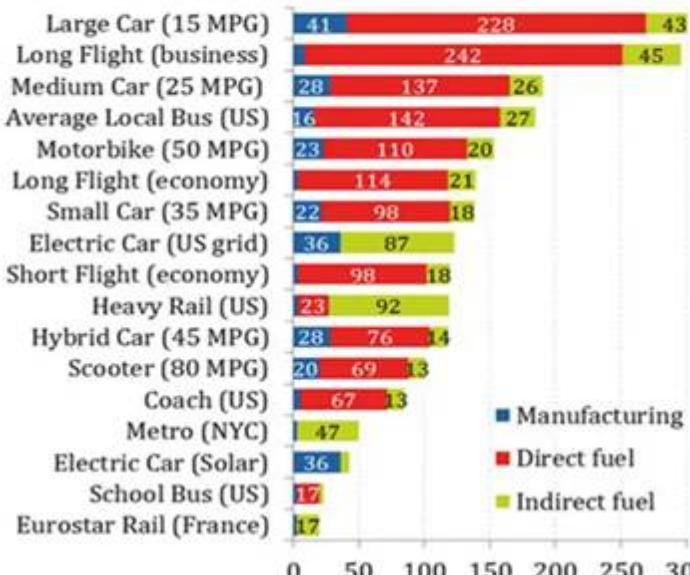
# THE DIRTY DOZEN

## For week ending August 1

Registered Owner	Violations	Name of Owner
WILLAMETTE AVIATION SERVICE LLC	14	DAVID F WAGGONER
H & R AVIATION LLC	9	FREDERICK S FARNBACH
NW WEEKEND WARRIOR LLC	6	RAYMOND T HAMNESS
JAY AERO LLC	6	DONALD JAY
GEOTERRA INC	3	BRET HAZELL
WAGGONER DAVID F	4	DAVID F WAGGONER
WAGGONER DAVID F	4	DAVID F WAGGONER
DAVID R SIDOR	3	DAVID R SIDOR
AIRCRAFT SOLUTIONS GROUP	2	DAVID REYNOLDS, Mgr.
FLIGHTS COOL LLC	2	FLIGHTS COOL LLC
ALAN B HAMMOND	2	ALAN B HAMMOND
JASON M ROBINSON	2	JASON M ROBINSON

The Dirty Dozen listing is the top 12 violators in the previous week of Oregon Dept. of Aviation's Voluntary Noise Abatement program that defines specific flight patterns to minimize low altitude overflights of Charbonneau and Wilsonville neighborhoods.

## Carbon Intensity of Travel: g CO<sub>2</sub>e/pkm



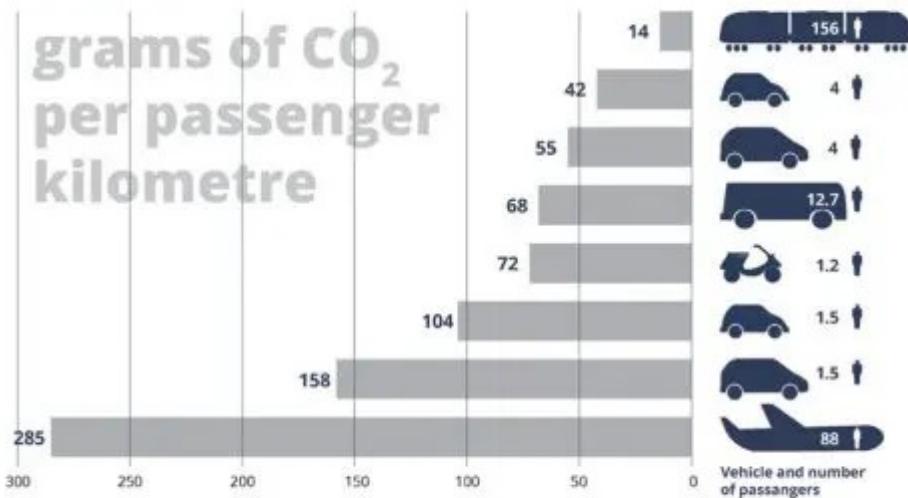
Note: All figures are grams of carbon dioxide equivalents per passenger kilometre (g CO<sub>2</sub>e/pkm). Figures include direct fuel emissions from combustion, indirect fuel emissions from production and vehicle manufacturing emissions. Average loading is assumed for each mode of travel, 1.6 for all cars and 1 for motorbikes. Miles per gallon (MPG) is on road efficiency in US gallons. No radiative forcing multiplier is used for air travel. The electric car is assumed to achieve 200 Wh/km.

Sources: DEFRA, EIA, EPA, GREET 1.8, Chester & Horvath



### CO<sub>2</sub> emissions from passenger transport

European Environment Agency



Note: The figures have been estimated with an average number of passengers per vehicle. The addition of more passengers results in fuel consumption - and hence also CO<sub>2</sub> emissions - penalty as the vehicle becomes heavier, but the final figure in grams of CO<sub>2</sub> per passenger is obviously lower. Inland ship emission factor is estimated to be 245 gCO<sub>2</sub>/pkm but data availability is still not comparable to that of other modes. Estimations based on TRACCS database, 2013 and TERM027 indicator.

Source: EEA report TERM 2014  
eea.europa.eu/transport;

In summary, Aurora Airport really needs an EIS and not an EA.

Most Sincerely,

Wayne Richards  
Civic Affairs Chair  
Charbonneau District  
Wilsonville, OR