



May 14, 2024

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RE: Comments on Draft 2022/23/24 Aurora State Airport Master Plan Chapters 1-4

Dear Director Sugahara, Mr. Thomas and Mr. House:

The City of Wilsonville is a jurisdiction impacted by the operations of the Aurora State Airport and adjacent through-the-fence private properties that are conducted under the auspices of the Oregon Department of Aviation (ODAV) and the Federal Aviation Administration (FAA). The City of Wilsonville has been an active participant for over 20 years in relation to the Aurora State Airport, including serving on the Planning Advisory Committees (PAC) of the Aurora State Airport Master Plan process in 2011/12 and the current 2022/23/24 Master Plan PAC. During this time the City has sought to collaborate with local governments and state and federal agencies to comply with Oregon public-process and land-use laws and to engage in coordinated planning efforts.

The following comments review general, structural problems and specific issues of concern with the current 2022/23/24 Draft Aurora State Airport Master Plan Chapters 1 through 4 and the master planning process. The City's comments are split between a set of basic questions/issues of concern that pertaining to Chapters 1-4 and recent PAC meetings; and a specific issues of concern.

Chapter 1 questions/comments

1. The Oregon Attorney General has indicated in a filing on the LUBA Aurora State Airport case that there is no adopted 2011 or 2012 Aurora State Airport Master Plan. Can an Airport Master Plan reference an un-adopted document? The current draft contains many references to the 2012 Master Plan, clarification on the status of the 2012 master plan is needed in the 2022 master plan.
2. How does 2012 baseline aircraft and operations projections compare to actual 2021 data?

3. A laypersons explanation of the concept of constrained operations and how that relates to runway length is needed. What is the relationship between the two?
4. AAMP Goal 6 states “identify potential environmental and land use requirements that may impact development”. What are some examples of both environmental and land use requirements in this context?
5. Goal 8 – Will there be a new ALP created as part of this process? If not, why? What ALP will be used? When was it created? Was there an opportunity for public input? If it is a goal of the master plan to develop an ALP, is needs to be done with the master plan update. ore detail on the City’s concerns appear on page ___.
6. Goal 9 – What are some examples of recommendations to improve land-use and zoning oversight to “remove barriers to appropriate growth at the airport”? How is “appropriate growth” measured in this context?
7. How specifically will potential environmental and socioeconomic impacts be measured, weighed or evaluated in the context of ‘future development’ at the airport?
8. Is the utilization of federal funds to construct projects (air traffic control tower) identified in an un-adopted master plan legal?

Chapter 2 questions/comments

9. The 2019 constrained operations study is based on the 2012 master plan, which has no legal standing and therefore needs to be redone after completion of the 2022 Master Plan.
10. Should there be a section on accurate airport master plan history, including the most recent court rulings?
11. Page 2-6 states that there are 2,672 direct, indirect and induced jobs. How many jobs are there specifically at the airport — not the total employment count of employers that may be located at the Airport? The City’s information indicates that a majority of employees that ODAV lists “at the Airport” is actually the total employment count reported by businesses at the Airport, of which many businesses such as Columbia Helicopter, HTC and Wilson Construction have a majority of their employees located off-site, working in remote locations not at the Airport.
12. Page 2-6 states that there are 281 aircraft stored at the airport. Figure 2-2 states that there are 396 ‘based aircraft’. What is the difference here?
13. Figure 2-2 shows 94,935 annual operations. Baseline is 76,028 operations. Is Figure 2-2 incorrect?
14. Text on 2-10 states that the based aircraft does not include helicopters. Figure 2-5 (and 3-8) shows 10 helicopters contributing to the 281 based aircraft at the airport. Which is correct?
15. How many gallons of jet fuel is stored on ODAV property?

16. If the constrained operations study (2019) concluded that a runway extension of 7888' was justified, why was the recommendation only for 6002'?
17. Since the 2019 Constrained Operations Study (COS) was based on the 2012 MP, should it not now be redone to reflect more accurate conditions and process?
18. What is the level of accuracy expected from the survey conducted in the 2019 COS?
19. What are 'constrained operations' and why do they matter?
20. Page 2-21 notes the presence of arsenic in the water. Where is the arsenic coming from and what are the ppm compared to EPA tolerances?
21. Page 2-20 states that Columbia Helicopter is identified by EPA as a RCRA Corrective Action Site. What does that mean exactly? What was found there? Were there any fines? Is the site in compliance now?
22. Pages 2-19 – 2-20 address the issue of resilience in terms of a major earthquake. However, there is no analysis or review of the Oregon Department of Geology and Mineral Industries (DOGAMI) data and the potential impacts to Airport and runway. There is merely a note that the Oregon HazVu Statewide Geohazards Viewer "shows that the southern half of the airfield is classified as a Moderate hazard area and the north half is classified as a High hazard area." The lack of serious data review of the earthquake hazard and potential impacts to Airport is a major shortcoming of the plan.
23. Page 2-22, does FAR Part 77 overlay airspace extend over any part of the city of Wilsonville? Why is the FAR 77 overlay not included inside the Wilsonville corporate limits on figure 2-8?
24. Figure 2-8 does not properly identify city of Wilsonville zoning, it would appear to be a generic categorization. That should be noted, or changed.
25. Are there any documented leaks in the underground storage tanks located on ODAV property according to DEQ?
26. Page 2-23, where exactly are the two areas of residential property that are located under the primary, approach, or transitional surfaces?
27. Is pavement condition a consideration in allowing operations that exceeding weight limits? Who approves such requests? Are all requests granted? How many requests are granted versus denied? Please provide numbers.
28. Does a runway expansion cause the RPZ to impact other residential homes not currently impacted?
29. Should the utilities section on page 2-39 address fire and police protection?
30. What are some examples of 'FAA noncompliance' as described on page 2-41.

Chapter 3 questions/comments

31. Draft Chapter 3 lists Annual Aircraft Operations only for the years 2016 thru 2021; however, the same chapter uses 2012 thru 2021, for example Aurora State Airport Instrument Flight Operations. The same set of years should be used for all data tables and analysis, 2012 thru 2021.
32. Page 3-8, if the number of active commercial and private pilots will decline, how will operations increase?
33. Is there a decibel level that should not be exceeded in residential areas near GA airports?
34. What are the considerations taken into account when recommending a runway expansion when there are already conflicts with residential neighborhoods regarding noise? What elements are balanced?
35. Is there ever consideration given to the off airport impacts associated with the recommendations for airport expansion?
36. How many of the total aircraft operations are touch and go landings?
37. How many of the based aircraft are seasonal (located at airport more than half the calendar year)? How is seasonality measured and through what process? Are there multiple surveys in a year?
38. Pages 3-10 *et seq* indicate that ODAV does not plan to use actual flight operations at the Airport and instead to substitute other methodologies to determine an operations forecast. It seems suspicious that real, actual operations data is not being used, and instead other, older data is being used to determine operations forecast. Rather than use the 10 years of actual Airport operations data collected by the ATCT, ODAV uses only data from 2016 -2021; however, Airport operations data is available up until 2023, as the FAA has provided to the City. No adequate justification is provided for not using real, actual Airport operations data.

ODAV indicates that it is using the combined average annual population growth of Clackamas and Marion Counties to determine Airport operations. This appears ridiculous, as there is No correlation or relationship between Airport operations and general population growth of counties, especially for an airport that does not offer commercial aviation services.

ODAV also appears to have miscalculated the combined average annual population growth of Clackamas and Marion Counties: ODAV indicates a growth rate of 0.9%; however the PSU data actually shows a growth rate of 0.7%. At the very minimum the growth rate should be changed to match the actual populations projections.

Questions from the January 2023 PAC meeting

39. From the FAA approval of the Airport Forecast:

“This forecast was prepared at the same time as the evolving impacts of the COVID-19 public health emergency. Forecast approval is based on the methodology, data, and conclusions at the time the document was prepared. **However, consideration of the impacts of the COVID-19 public health emergency on aviation activity is warranted to acknowledge the reduced confidence in growth projections using currently-available data.**”

What is the solution to the above issue?

40. “Accordingly, FAA approval of this forecast does not constitute justification for future projects. Justification for future projects will be made based on activity levels at the time the project is requested for development. **Documentation of actual activity levels meeting planning activity levels will be necessary to justify AIP funding for eligible projects.**”

What kind of documentation is being referenced?

ODAV PAC Meeting #5; April 30, 2024 - Questions on DRAFT Master Plan Chapter 4:

41. The existing Runway Design Code (RDC) defines the standards used for runway construction. Page 4-3 notes that “the approach visibility component may change within AAC/ADG C-II”.

Can you please explain exactly what that comment means?

42. Page 4-9 notes that comments regarding environmental concerns raised by PAC members will be included in Appendix 9 in the master plan, for future consideration by FAA during the completion of any environmental assessment required by NEPA.

When will that documentation will be available on the project web site?

43. Page 4-9 notes that the City of Wilsonville and other jurisdictions will need to update their comprehensive plans to “remain compliant with state land use laws”.

City recently updated the Comprehensive Plan to address airport issues. ODAV was notified of these proceedings. What is exactly involved in the city’s future Comprehensive Plan update? What exactly will be required of the City?

44. Page 4-9 notes that the city should “develop overlay zone ordinance for airspace protection”.

What exactly does that mean for existing land uses? How does this overlay zone work? What is being effected? Please provide specific information regarding this comment.

45. Page 4-10 notes that noise evaluations will be conducted in the Airport MP. When will those be created? Which Chapter addresses noise impacts?

46. Page 4-16 notes a runway length of 5,500 lineal feet. Which direction, N or S will the additional runway be extended, if approved?

Specific issue of concern: Failure to Provide Public Notice of Public Comment Opportunity on Draft Master Plan Chapters 1-4

The City alerted ODAV in 2022 regarding the agency's failure to publish any kind of public notice of the public comment opportunity on Draft Master Plan Chapters 2 through 3 that had a due date of April 12, 2022. The same situation has now occurred again: ODAV failed to publish a public notice for Chapters 3 and 4, in which public comment dates were announced verbally during PAC meetings on March 12 and April 30, 2024, with due dates for public comment respectively "a week after the meeting" and May 14, 2024. City staff alerted ODAV staff on May 3 of the on-going failure to publish public-comment deadlines that help to encourage public participation.

Rather, notice of the opportunity to comment and the deadline for public comments was only provided verbally by ODAV and consultant during the April 5 PAC Work Session meetings. Only after the City contacted ODAV to complain about the lack of public notice did ODAV arrange for public notice of a sort to be buried on the website in text regarding meetings that have been held. Rhetorically speaking, how are members of the public to be aware that there is a public comment opportunity if no public written notice is published or advertised in advance of the comment deadline?

The City of Wilsonville appreciates consideration of our comments and looks forward to ODAV and FAA responses to the issues of concern and questions raised regarding the 2022/23/24 Draft Master Plan Chapters 1-4. Thank you for your time and consideration.

Sincerely,

Chris Neamtzu
Community Development Director
City of Wilsonville

Mark Ottenad
Public/Government Affairs Director

cc: Members of the Oregon Congressional Delegation:
Senator Wyden, Senator Merkley, Congresswoman Salinas
Office of Governor Kate Brown
Members of the Oregon Legislature: Senate President Wagner, House Speaker Fahey,
Senator Woods, Representative Neron
FAA Northwest Mountain Region administrators: Grady Stone and Aleta Best