AURORA STATE AIRPORT
MASTER PLAN
1976 - 1995

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CH2M HILL

AERONAUTICS DIVISION
OREGON DEPARTMENT OF TRANSPORTATION

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Many others, too numerous to name, aided in developing this Plan. They included representatives of various public agencies and several individual interested citizens.

The preparation of this airport master planning project was financed in part through a planning grant from the Federal Aviation Administration, Department of Transportation, under the provisions of the Airport and Airway Development Act of 1970, (Public Law 91-258), as amended. The balance was funded by the Aeronautics Division of the Oregon Department of Transportation

The Oregon Division of Aeronautics' primary role in this project is that of airport owner and sponsor.

JUNE 1976

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GLOSSARY

BT	Basic Transport, a category of airport serving BT aircraft, which are all airplanes of 12,500 to 60,000 pounds maximum gross take off weight; also includes turbojets under 12,500 pounds.
DEQ	Oregon Department of Environmental Quality
DG	Dual Gear Aircraft
EPA	Environmental Protection Agency
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulation
FBO	Fixed Base Operator; FBO's provide aviation services at airports.
GA	General Aviation, includes all types of aviation except Air Carriers and Military.
GU	General Utility, a category of airport serving GU Aircraft, which are all airplanes under 12,500 pounds maximum gross take off weight.
IFR	Instrument Flight Rules; Required in controlled airspace with a visibility of less than 3 miles and/or ceilings lower than 1000 feet.
LCDC	Oregon Land Conservation and Development Commission
MALSF	Medium Intensity Approach Lighting System with sequence flashers; for use during instrument weather (IFR).
MLS	Microwave Landing System, used to provide horizontal and vertical guidance to landing aircraft during low visibility weather.
NDB	Non-directional Beacon, an electronic beacon providing directional guidance to aircraft.
NEF	Noise Exposure Forecast, used as guidance for predicting human response to aircraft noise.
OAD	Oregon Aeronautics Division, Oregon Department of Transportation.
SCS	U.S. Department of Agriculture, Soil Conservation Service
SG	Single Gear Aircraft
SMSA	Standard Metropolitan Statistical Area, a standard area used to measure, compare, and predict socio-economic trends in metropolitan areas.
TRACON	Terminal Radar Control Facility
VASI	Visual Approach Slope Indicator
VFR	Visual Flight Rules, can be used when the visibility is greater than 3 miles and the ceiling is higher than 1,000 feet.
VOR/DME	Very high frequency Omni-directional Radio range/Distance Measuring Equipment. It provides an instrument approach procedure using VORTAC.
VORTAC	Very high frequency Omni-directional Radio range with TACAN (Tactical Air Navigation Equipment).

INTRODUCTION

INTRODUCTION

Throughout recent years changing patterns of aviation activities at the Aurora State Airport have made it difficult for the Oregon Aeronautics Division to maintain a responsive program for improvement. Short term needs have been met, but there has been no long range development plan for the airport.

There have been a long series of changes in the fixed base operations at the airport. These changes and replacements have affected the services to the airport user and sometimes even the nature of the airport's traffic growth.

Even while airport traffic was on a steady increase there have been periodic occurrences of crisis situations for which there was little time for advance planning. Revenues to the owner, the Oregon Aeronautics Division, have fluctuated, and financial planning has been difficult for the State, which is responsible for the airport.

The airport is one of the busiest general aviation airports in Oregon. Traffic includes a full range of general aviation equipment. Aurora State Airport serves portions of several counties, both rural and urban, and a wide variety of business and private users. Figure 1 is a recent photograph of the airport.

Many of the airport's facilities require improvements appropriate to present and predicted air traffic. Also today's unprecedented emphasis on environmental compatibility and land use planning demands that the airport community and the airport owner identify airport needs and seek balanced solutions.

In May 1975 the Oregon Aeronautics Division, Department of Transportation, retained CH2M HILL as airport consultants to prepare a master plan for the Aurora State Airport.

The Aurora State Airport Master Plan was developed through the combined efforts of many participants. They included representatives from local and state governments, the Federal Aviation Administration and many private citizens representing surrounding communities and users of the airport.

AURORA STATE AIRPORT
AURORA, OREGON

FIGURE 1

It is important to note that the Master Plan is a program to anticipate public needs and to maintain compatibility with other public interests. It is not a program to stimulate growth or development.

This Master Plan provides the community at large and appropriate public agencies with a means to understand the airport's significance and to implement plans and programs related to the airport.

The Master Plan describes the kind and magnitude of development needed for aviation services and facilities and provides an orderly schedule for development through 1995. The plan also endeavors to preserve and improve the airport through economical solutions that remain compatible with regional development and responsive to community wishes.

Objectives accomplished and included in the Master Plan are:

- Preparation of an inventory of facilities and conditions and a collection of data essential to understanding the airport and its operation.
- Development of aviation forecasts and a determination of the airport's role in the airport system through 1995.
- An analysis of airport space and facilities requirements.
- Presentation of graphic depictions of recommended future development of all areas within and adjacent to the airport.
- Evaluation of the impact of future development upon the environment and the surrounding community.
- Establishment of a schedule for development by priorities and a staged improvement program with cost estimates.
- Specific recommendations for implementing the development program including a financial plan.

The Master Plan deals with a program for the future of the airport and with guidelines for compatible use of the surrounding land. Because future trends and goals may not exactly match present forecasts and current community policies, the Master Plan has built-in flexibility to adjust to changes without detracting from its overall integrity.

Following adoption of the Master Plan the goal will be to follow through with a continuous implementation program, updating the Master Plan as required. This will be the best way to maximize the airport's benefits while minimizing costs and adverse impacts. It is also the best way to insure that the airport remains a compatible neighbor.

SUMMARY

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RECOMMENDATIONS

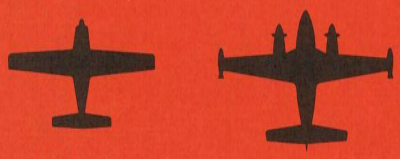
- This airport Master Plan should be adopted and implementation commenced immediately.
- Application should be made to the FAA for funds to support the Implementation Plan.
- The Aurora State Airport should be retained at its existing site.
- In order for the State to implement the Master Plan the State needs to control all airport land. Therefore acquisition of the land for the terminal area should be accomplished without delay.
- The existing airport dimensional criteria should be preserved even though they partially surpass usual FAA airport standards.
- The parallel taxiway and exit taxiway system must be constructed immediately. This is necessary to protect public safety and to provide adequate runway capacity.
- Obstruction removal should be accomplished as described in the Master Plan.
- Paved aircraft parking aprons should be provided in the near future.
- Improved airfield lighting should be installed in the near future.
- The airport maintenance program should be accelerated, particularly as regards runway pavement rehabilitation and airfield surface drainage improvements.
- The State should continue to work closely with Marion and Clackamas Counties to develop compatible land use planning for the airport environs.
- The State should work closely with Marion and Clackamas Counties to develop zoning changes on and near the airport as recommended by the Master Plan.
- The State Aeronautics Divison should make recommendations to the State Highway Division for improving access routes and facilities.
- The establishment of bus and/or limousine service to the airport should be encouraged.
- At this time no appropriate alternatives for airport ownership seem to exist. The State should retain ownership of the airport because its closure would have a critical adverse impact on the Oregon Aviation System.
- The State should take a more active part in the management of the entire airport and particularly give more attention to user service and problems.
- The State should develop an expanded airport management program and increase its airport staff as necessary to administer the airport operation and development program.
- The State's financial policy should be to make the airport more self-supporting. This should be accomplished by obtaining more direct control of the sources of airport revenues. Revenues should be increased in accordance with area competition and inflation rates. Lease rates should be reviewed frequently and revised to maintain consonance with general economic conditions.
- Airport traffic surveys should be made periodically and incorporated into the Master Plan and the Oregon Aviation System Plan.
- A program to collect weather data should be initiated and used for facility planning.
- The State should schedule periodic reviews of the Master Plan. It should be revised whenever necessary to keep it current.
- In updating the Master Plan the State should work closely with the airport users, local governments, and citizens. A flexible attitude and approach to the planning process should be maintained.
- Also it is important to keep the public and public agencies informed as to what impacts off-airport plans may impose on this public facility.

SUMMARY

FINDINGS

- No formal long-range Plan has ever been accomplished for the Aurora State Airport.
- The lack of a Master Plan makes long-range financial planning difficult or nearly impossible because there can be no budget targets for improvements.
- The Aurora State Airport serves a large service area, including several counties. The airport's sphere of influence is regional in magnitude, and the airport can be considered to be part of a regional system of airports for the greater Portland area.
- Surface access to the airport is poor from Marion County, but it is mostly adequate from other counties north of the airport.
- The airport needs maintenance of existing private and public facilities. Pavement and drainage are key items.
- The airport is built to standards exceeding minimum FAA requirements and often surpassing maximum FAA criteria.
- The lack of a parallel taxiway is a serious problem both for safety and for airfield capacity.
- Improvements to airport facilities are not keeping pace with increases in air traffic levels.
- There is no on-site airport management to enforce airport operational safety regulations on a uniform basis.
- Aircraft parking areas are in very poor condition and their use is limited by weather and soil conditions.
- The airport has no central focal point, and no main entrance. This is confusing to transient pilots and visitors who are seeking a main terminal area.
- The airport is owned in two parts. The runway area is owned by the Oregon Aeronautics Division and is basically a paved flight strip. All revenue producing areas of the airport are owned by private interests, who are under no specific obligation to guarantee minimum levels of service to the public.
- Multiple ownership of separate parts of the airport make master planning and policy development impossible to implement through any comprehensive program or Master Plan.
- The Aurora State Airport has inadequate recognition by public comprehensive plans and by zoning ordinances. Land use planners must be provided with information regarding aviation trends.
- Although the airport use is now compatible with adjacent land use, the surrounding area has potential for growth. Therefore the airport needs to be guaranteed protection from encroachment throughout the long-range future.
- The current zoning of the airport, Public Amusement (PA), is inappropriate. Zoning adjacent to the airport, Residential-Agricultural (RA), is at least partially potentially incompatible with the airport. Proposed rezoning to Exclusive Farm Use (EFU) would be very compatible.
- The Master Plan forecasts significant increases in general aviation traffic. Master Plan forecasts for 1995 show 248 based aircraft, 209,000 annual operations, 115 operations during the busy hour.
- By 1995 eight percent of the aircraft are predicted to be multi-engine propeller aircraft and three percent will be turbojet aircraft. The airport will be serving a population of over one million people. Forecasts show a need for an air traffic control tower, a crash/ fire/rescue station, a terminal building, and full time supervision by an airport manager. No airline traffic is predicted for the future.
- The airport's current role is General Utility, but this is forecast to change to Basic Transport as more corporate types and turbojet aircraft use the airport by the mid-1980's. The specific year when actual activity will indicate the role to be Basic Transport will partially depend upon the airport development program of the Port of Portland and upon urban growth from Portland southward toward Aurora.
- The existing airport site properly protected by land use planning, is adequate to accommodate the 20-year forecast needs of the Aurora State Airport.
- A proposed new airport in the southeast Portland area would affect Aurora State Airport slightly by absorbing a small portion of the aviation demand and slowing the growth of the airport, but the effects would not be significant.
- Two serious capacity problems limit the airport at this time. There is a runway capacity problem because of the lack of a parallel taxiway and there is a parking problem, particularly during wet weather, because of the lack of paved public apron space.

- The airport does not presently provide sufficient public service facilities.
- Employment on the airport is increasing. Between 100 and 125 persons are directly employed on the airport. Their direct plus indirect salary impact is estimated to approach $1,000,000 annually, and the economic impact of the airport is on the increase.
- Eventually the airport will require a longer runway to accommodate more complex aircraft forecast in the future, but the need for a second runway is not apparent throughout the 20-year study period.
- IFR approach procedures for the airport are unsatisfactory. Minima are poor and the requirement for DME equipment in the aircraft is limiting.
- The airport has no on-site navaids. Additional electronic and visual navaids are required.
- The Master Plan has developed a schedule of projects by priority necessary to develop the airport. They are contained in the Plan.
- For extensive terminal area development soil and drainage conditions may dictate the use or installation of central waste treatment facilities.
- The impacts caused by the operation of the airport upon the surrounding environment are light and can remain light if compatible land use planning is accomplished. This is described in the Master Plan.
- The Master Plan presents a three-stage 20-year capital development program. Total estimated costs including private and Federal investments are about $3.3 million in 1976 dollars.
- The capital development program can be carried out with a State of Oregon share of $767,000 for the 20-year period based on the current Federal participation basis.
- Currently the revenue produced by the airport is inadequate to support development to meet forecast aviation demand levels. Under this Airport Master Plan the State's revenue could be developed to support the program recommended by the Master Plan.
- Complexities of airport operational management under a two part ownership, (i.e., State and private), will increase as air traffic levels and levels of competition of private interests increase.
- As traffic levels increase and activities become more complex the present staffing level of the Airport Branch of the State Aeronautics Division is not adequate to properly manage the operation and development of the airport.
- Although the Oregon Aviation System Plan has recommended transfer of the airport to a unit of local government, no such agency appears to be available. State ownership of all airport property and management by the State appears to be the only viable alternative for successful operation and development of the Aurora State Airport.



AIRPORT REQUIREMENTS

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AIRPORT REQUIREMENTS

INVENTORY

History

The Aurora State Airport is a public airport owned and operated by the Oregon Aeronautics Division. The airport was constructed in 1943 by the State Highway Department to provide an emergency alternate field for air carrier aircraft. Thus, the airport has been in operation as an airport for approximately 33 years, although it has not and does not serve air carrier aircraft.

The airport has had a varied history. It has served military aircraft, crop dusters, gliders, as well as the full range of general aviation aircraft. Aurora State Airport began as a Federal Flight Strip Project. In the early years until 1953 the Bureau of Public Roads (BPR) administered the airport. In 1946 the Civil Aeronautics Administration included the Aurora Flight Strip in the National Airport Plan (now National Airport System Plan) where it has remained.

Legislation was passed in 1947 to permit the Board of Aeronautics (now Division of Aeronautics) to own and operate state airports, and in 1953 the Board signed a lease agreement with BPR to maintain and operate the airport. In 1973 the State Highway Commission transferred title to the Board of Aeronautics.

Location

The Aurora State Airport is located in the North Willamette Valley between Portland and Salem as shown on Figure 2, Location Map. The airport lies in Marion County, with the north property line bordering on the Marion-Clackamas County line. The Portland city center is about 20 miles north along Interstate Highway 5, and Salem lies 26 miles to the south.

Access

Airport access convenience plays a key role in determining the size of the area which the airport serves. Figure 3 shows travel times by car. The Aurora State Airport is reached by the local highway system. This system provides relatively good access to most of the airport service areas. However several major drawbacks exist as follows:

1) Several roads serving the airport are constructed to low standards and/or are in poor condition.

2) Only indirect routes are available for access, particularly in the immediate vicinity of the airport.

3) The indirect routes are further complicated by a deficiency in airport related signing.

4) The surface facilities currently serving the airport are exclusively automobile oriented.

The Freeway (I-5) is about a mile west of the airport. It has been and is undergoing improvement for most of its length between Portland and Salem. For this distance the Freeway is an excellent six lane divided highway. It provides convenient access to downtown Portland and southern and western suburbs. The interchange with State Highway 51 just south of Wilsonville affords superior access to the airport.

Travel from the Salem area, although utilizing I-5 for much of its distance, is hampered by the required use of the Fargo Road interchange. This interchange is the only one in the area allowing southern traffic to enter or leave the Freeway between Woodburn and Wilsonville. The result is that traffic must use a narrow, winding road to get from I-5 to Highway 51 in the vicinity of the airport.

Airport users from the southeastern portion of the service area have somewhat more convenient access. Both of the major facilities used, Highways 51 and 99E, have good quality two lane roadways. The access they provide to the impacted airport users is efficient and generally satisfactory.

Highway 99E between Aurora and the Southeastern Portland Communities is a recently improved, undivided four lane facility. It allows adequate mobility but is contrained at times by longer travel times because it passes through several communities on the surface street level as opposed to being grade separated. The adequacy of 99E will be improved in the future with the completion of I-205. The combination of 99E and I-205 will provide a higher level of service to the central and eastern Portland areas. Portland International Airport and southern Washington will also be more accessible by this route.

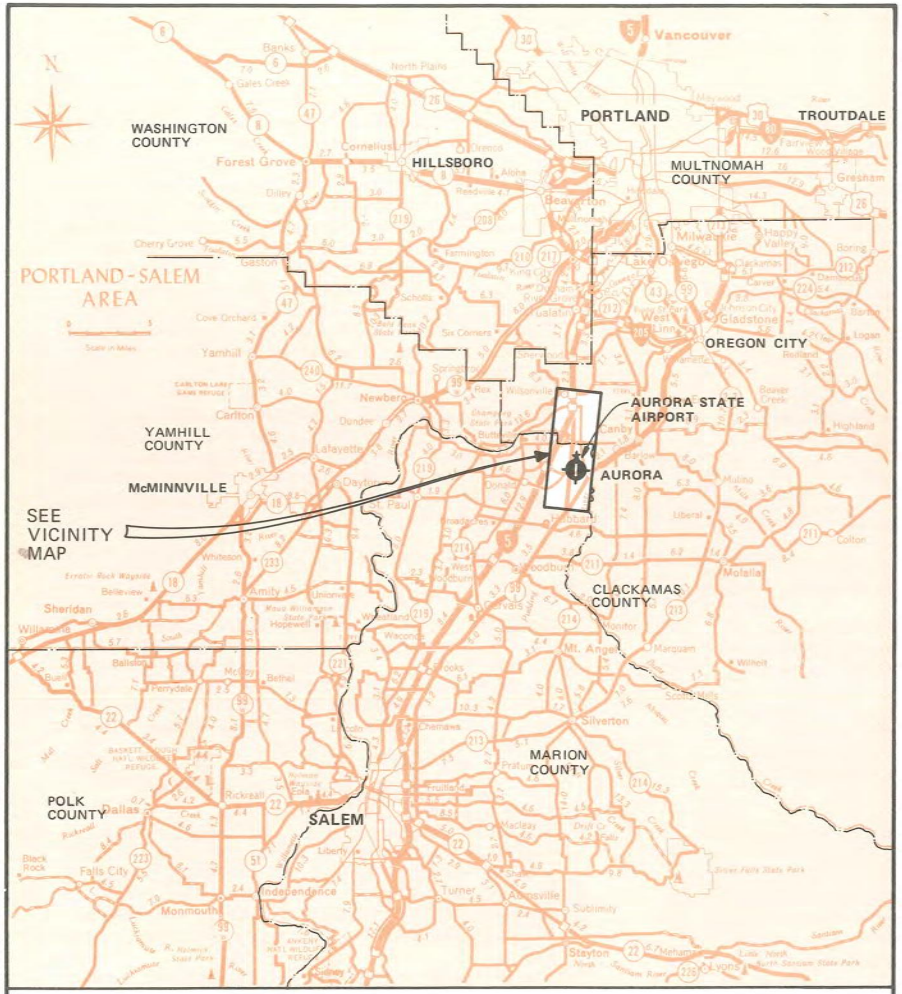
The major drawback of the northern 99E route is that the highway becomes a two lane facility outside of Aurora and enters town essentially as a surface street. The route then travels a circuitous path over city streets and county roads to reach the airport.

Geography

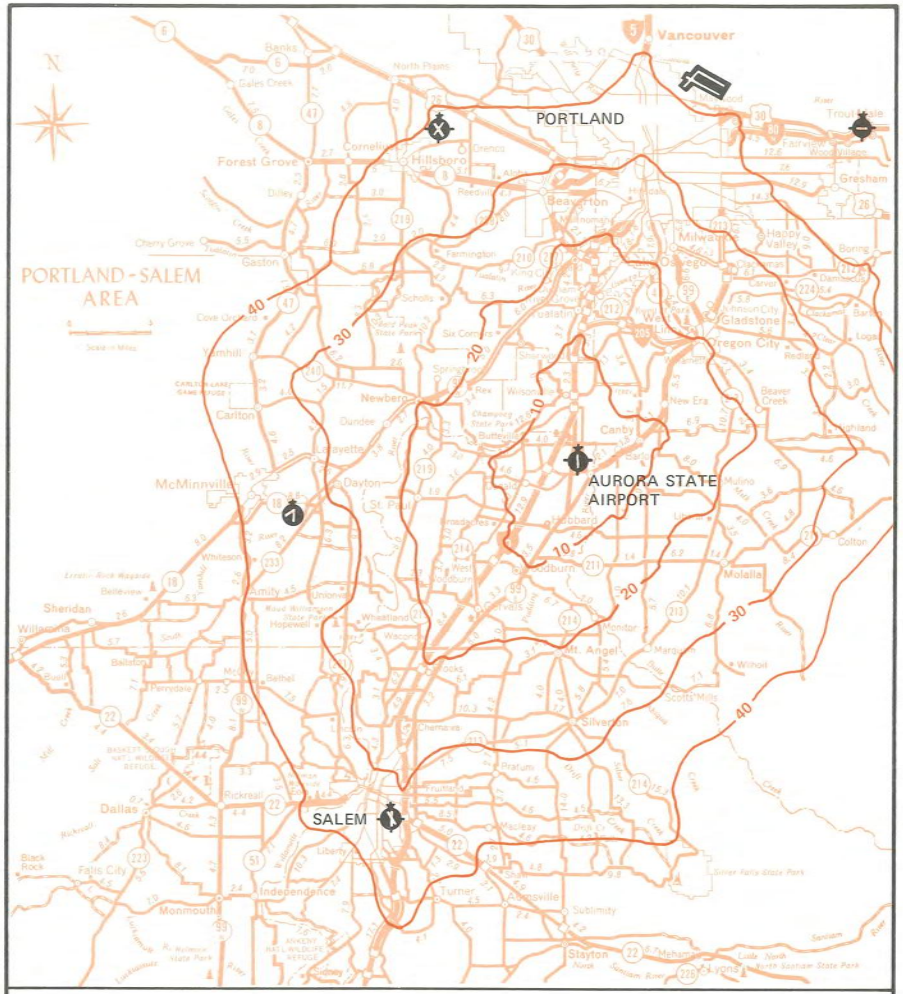
The airport site lies 3 miles south of the Willamette River about 195 feet above sea level. See Figure 4, Vicinity Map. Topography around the airport is generally level. This precludes a need for extensive grading for airport construction work. However, the flat gradients of the site do not permit good surface drainage, particularly during long rainy periods.

Less than a mile to the east is a large flood plain created by the Pudding River, but the airport site does not flood. The 100-year flood boundary approaches no closer than one-half mile from the airport. During this condition ground travel from the east is restricted but Interstate Five remains accessible to the west and provides adequate, short-term surface access to the airport.

The soil at the site is classified by the Soil Conservation Service (SCS) as Amity silt loam. The soil and its components tend to fall into the clayey-silt or silty-clay category. While such soil is not an ideal construction material, it can be utilized under proper construction procedures as a foundation for pavements and structures required at the airport. The soil has poor internal drainage characteristics and is often limited by a perched water table. Its suitability for septic disposal drain fields is marginal.

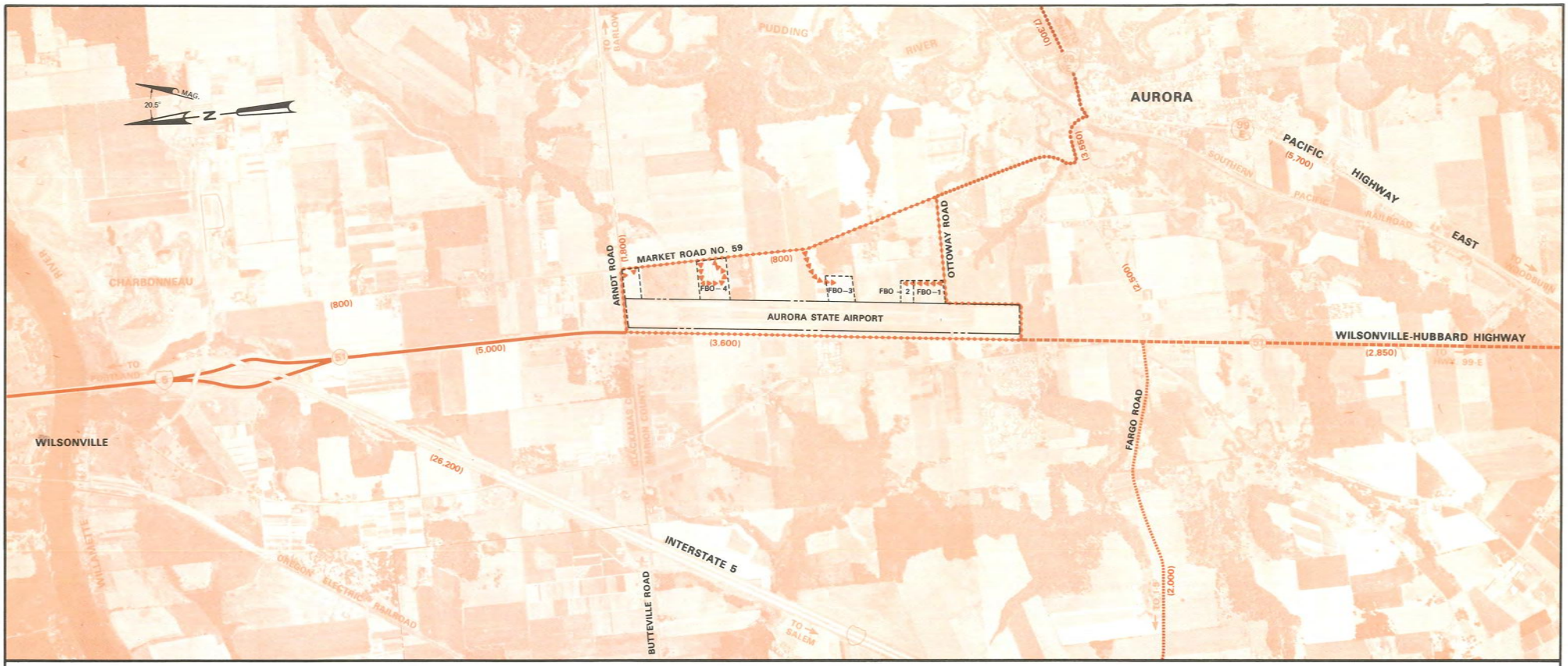


AURORA STATE AIRPORT
LOCATION MAP
FIGURE 2



40 TRAVEL TIME IN MINUTES VIA NORMAL SURFACE ROUTES AT AVERAGE SPEEDS

AURORA STATE AIRPORT
GROUND TRAVEL TIMES
FIGURE 3



EXISTING GROUND ACCESS FACILITIES

PRINCIPAL CITIES	FACILITIES	DISTANCE (MILES)
PORTLAND (DOWNTOWN)	I–5	23
BEAVERTON	I–5, HWY 217	20
LAKE OSWEGO	I–5	13
WILSONVILLE	I–5	3
PORTLAND–HILLSBORO AIRPORT	I–5, HWY 217, HWY 26	34
AURORA	FAS 678	1
CANBY	FAS 678, HWY 99E	5
OREGON CITY	FAS 678, HWY 99E	14
MILWAUKIE	FAS 678, HWY 99E	20
PORTLAND–INTERNATIONAL AIRPORT	FAS 678, HWY 99E, I–205, HWY 213	31
PORTLAND–TROUTDALE AIRPORT	FAS 678, HWY 99E, I–205, HWY 213, I–80	37
SALEM	HWY 51, FAS 128, I–5	27
EUGENE	HWY 51, FAS 128, I–5	91
WOODBURN	HWY 51, HWY 99E, HWY 214	8
SILVERTON	HWY 51, HWY 99E, HWY 214	17
AURORA STATE AIRPORT PERIMETER ROADS	HWY 51, FAS 117, FAS 678, COUNTY ROAD	4
AIRPORT ACCESS ROADS	A.C. PAVEMENT, GRAVEL	VARIES

NOTE:
NUMBER SHOWN AS (000) REPRESENT ANNUAL DAILY TRAFFIC.

1000 0 1000 2000
SCALE IN FEET

AURORA STATE AIRPORT
VICINITY MAP
FIGURE 4

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The climate is a modified marine climate influenced by the Coast Range to the west. Total annual precipitation, usually in the form of rain, has averaged 42 inches (107 cm) at the Agricultural Experiment Station just north of the airport. Most of the rainfall occurs from November to March and summers are dry. Winds are rarely of more than moderate force.

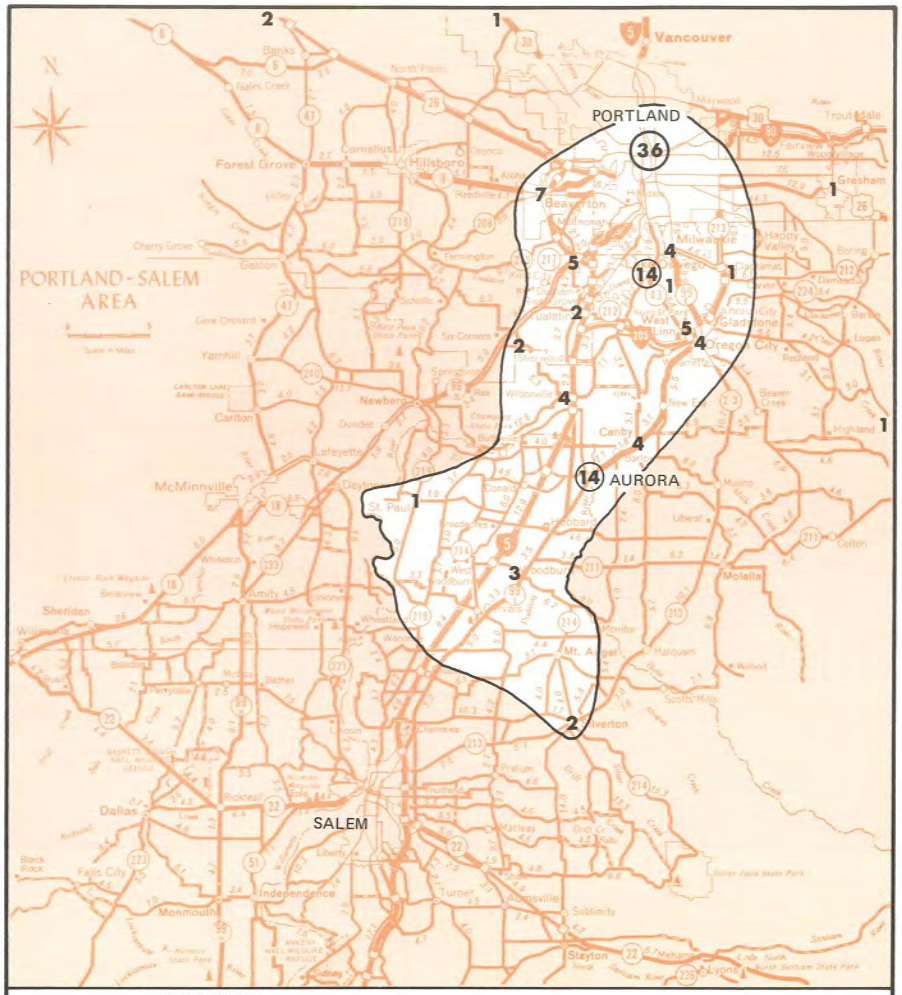
Weather data has been gathered both at the airport and at stations nearby. The normal maximum temperature, 28.7° Celsius (83.6° F) occurs in July. Minimum temperatures below 0° Celsius occur an average of 15 days out of the month during the month of January. Wind analysis is discussed later. Wind data is found in the Appendix.

Ceiling and visibility data are not available for any location in the immediate vicinity of the Aurora State Airport. However, local pilots indicate that Aurora weather is better than average regarding visibility conditions when compared with those airports nearer the Columbia River.

The area from which the airport draws most users is shown on Figure 5. This service area shows the location of owners of aircraft which are based at the Aurora State Airport. The principal population concentration within the service area is generally north of the airport. In 1970, the approximate population within that area was 710,100 people.

Outside of the Portland metropolitan area including suburbs, the remainder of the service area, which contains several outlying communities in Marion and Clackamas Counties, is largely rural in character. Non-agricultural industries are located mostly to the north around Portland and its suburbs.

The greater Portland metropolitan area tends to generate considerable demand for air transportation airport activity there is well above state and national averages. Figure 6, Existing Airport System shows other airports serving the region and making up a regional system of airports. This figure illustrates paved airports, airports with improved facilities, and airports open to the public. A few private airports are also indicated. There are also many small unimproved private fields in the region which are not shown on the figure.



LEGEND

BOUNDARY OF AREA IN WHICH ARE LOCATED 90% OF THE OWNERS OF AURORA STATE AIRPORT BASED AIRCRAFT

(14) NUMBER AND LOCATION OF AIRCRAFT OWNERS (1 PER AIRCRAFT) BASED AT AURORA STATE AIRPORT. THE NUMBERS REPRESENT 114 AIRCRAFT. THE ADDRESSES OF 13 OWNERS WERE UNAVAILABLE

AURORA STATE AIRPORT

SERVICE AREA

FIGURE 5

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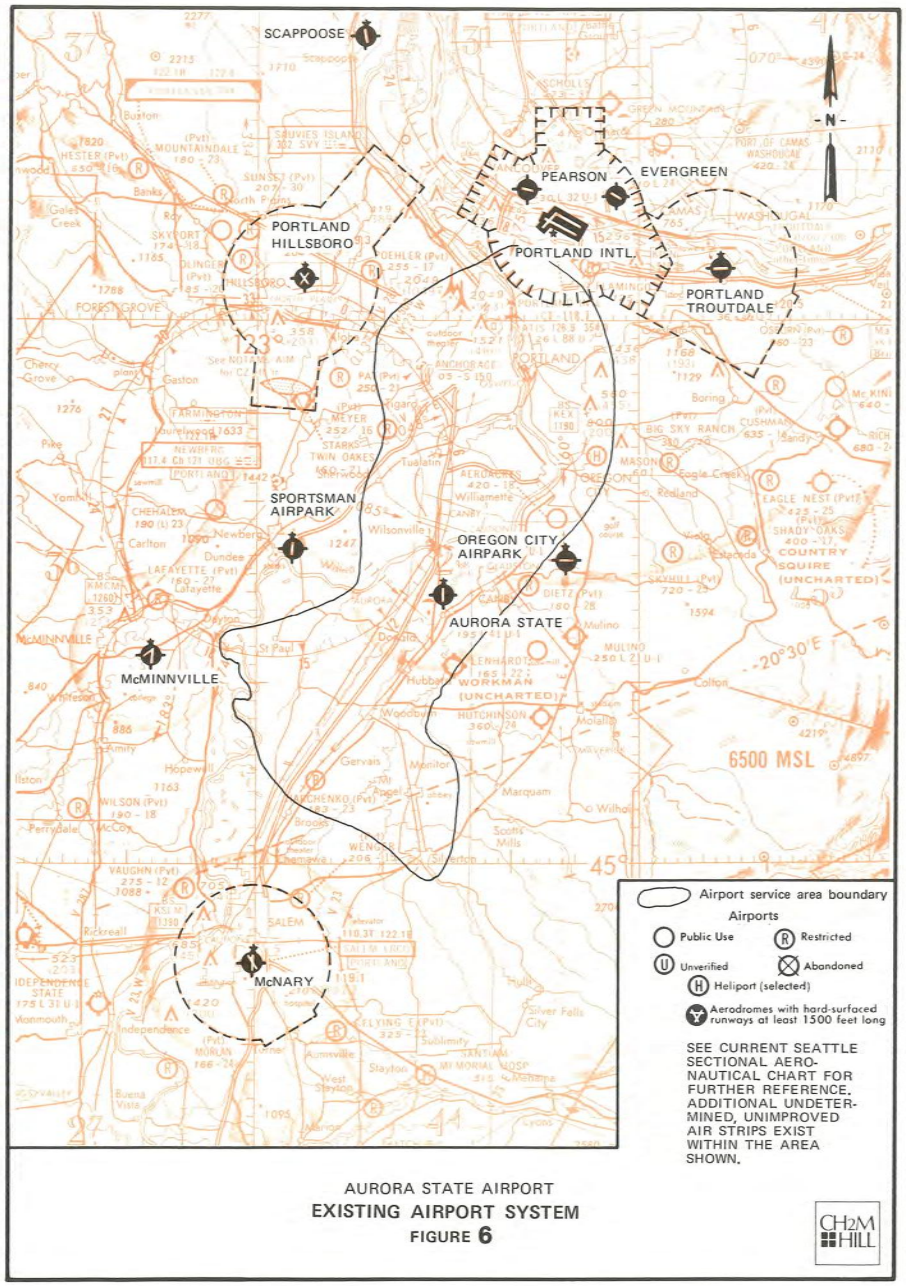


AURORA STATE AIRPORT
EXISTING AIRPORT SYSTEM
FIGURE 6

Area Planning - Land Use

The pattern of existing land use and the prospects for future development in the vicinity of the airport are prime considerations in assuring compatible land use as use as the airport grows.

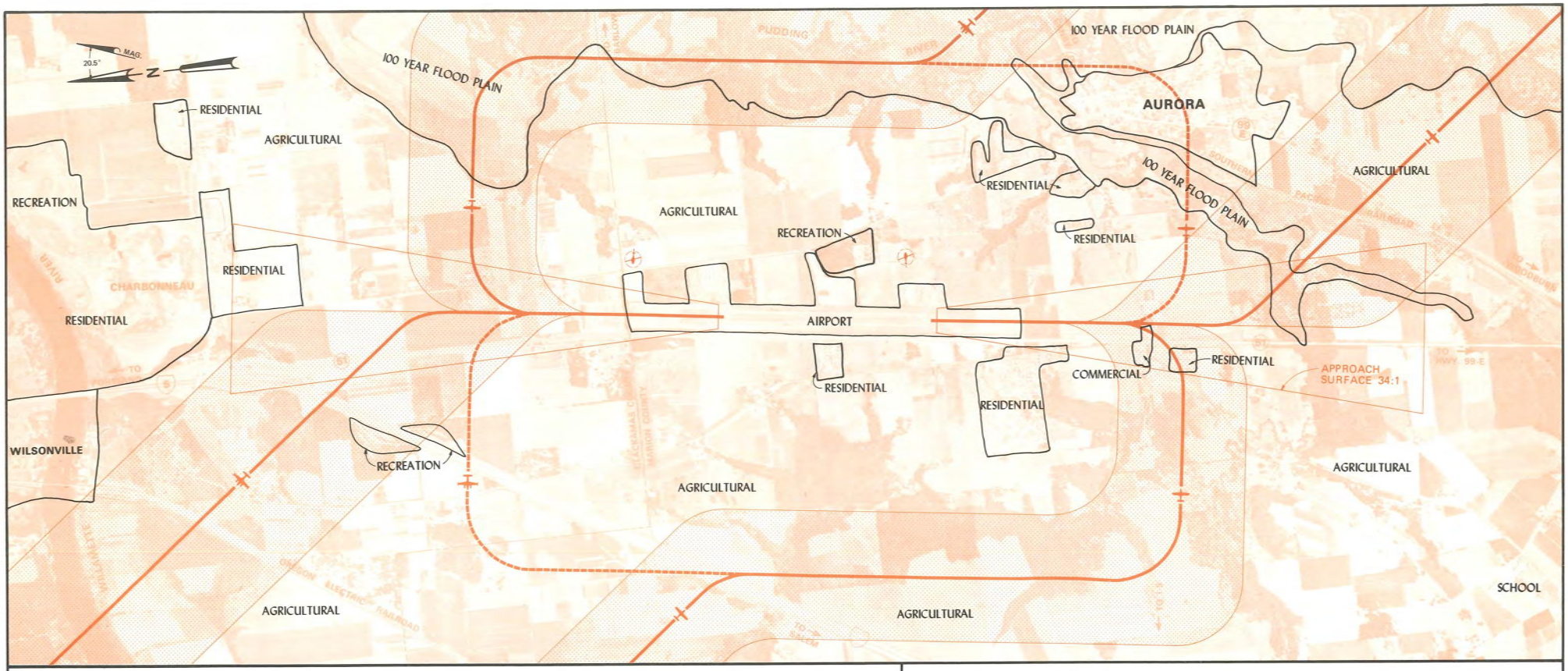
The existing land use pattern, as shown in Figure 7, is predominantly agriculture. The land capability class of the soils is mostly Class II, which is very good farm land. The average 1970 product value for land of this class in Marion County was in the range of $200 to $300 per acre. Typical local products include nursery stock, grass for grazing and for hay, grass seed, orchards, and turkeys.

Three small concentrations of more intensive use exist along the airport perimeter. The largest is a 60-acre residential area west of the Wilsonville-Hubbard Highway, Highway 51. Another is a 35-unit and a mobile home park to the west along the Highway 51. The third is a church retreat group camp located to the east between the runway and the road to Aurora. Figure 8, Existing Noise Exposure, shows the extent of aircraft noise on these areas.

The closest urban development, Aurora, population about 550, is about a mile to the southeast. The City is known locally for its historic founding in 1856 by Dr. William Keil as a religious colony based on communal living. A number of historic buildings are being preserved and antique shops are prevelant.

Wilsonville is located about 3 miles to the north of the airport in Clackamas County. The City originally developed as a farm community and later as a freeway service center. More recently, the City has started to grow as a suburb of Portland. One major addition stimulating growth is a new plant built by Tektronix employing 900 to 1100 employees.

The Clackamas County Comprehensive Plan designates the land adjoining the airport on the north as agricultural and to the east as a flood plain. The Plan provides for growth in Wilsonville including a growth area south of the Willamette River, but that will be deleted from the Plan. Charbonneau is a 770-acre planned community for 5,000 people located just south of the Willamette River, and is shown on Figure 7.



EXISTING LAND USES

AGRICULTURAL:

CHARACTERIZED BY DIVERSIFIED AGRICULTURAL USES AND CROPS INCLUDING VEGETABLES, TREE FRUITS AND NUTS, BERRIES, GRASS AND LEGUME SEED, HAY, GRAIN, NURSERY STOCK, LIVESTOCK AND DAIRYING.

RESIDENTIAL:

RANGES FROM THE CITIES OF AURORA AND WILSONVILLE, THROUGH CONCENTRATED DEVELOPMENTS SUCH AS CHARBONNEAU AND DEER CREEK ESTATES TO SCATTERED SUBDIVISIONS AND MOBILE HOME COURTS.

RECREATION:

IMPROVED FACILITIES INCLUDE THOSE AT CHARBONNEAU, THE CHURCH GROUP CAMP NEAR THE AIRPORT AND THE REST AREA ALONG INTERSTATE 5. OTHER ACTIVITIES RELATED TO THE WILLAMETTE AND PUDDING RIVERS ALSO PREVALENT.

COMMERCIAL:

MOSTLY RESTRICTED TO CITIES WITH ONLY A FEW, SCATTERED POCKETS OF DEVELOPMENT, THE LARGEST OF WHICH IS JUST OFF THE SOUTH END OF THE AIRPORT.

SCHOOL:

GENERALLY LIMITED TO CITIES, WITH NORTH MARION UNION HIGH SCHOOL AS AN EXCEPTION.

FLOOD PLAIN:

DEFINED BY LIMITS OF 100 YEAR FLOOD. AGRICULTURAL, CONSERVATION AND RECREATIONAL USES.

AIRPORT:

INCLUDES RUNWAY, TAXIWAY, CLEAR ZONES AND AIRPORT RELATED, FIXED BASE OPERATIONS. ACTIVITIES INCLUDED ARE FUELING, AIRCRAFT SALES, STORAGE AND REPAIR, AIRCRAFT CHARTER AND RENTAL, AND FLIGHT INSTRUCTION.

AURORA STATE AIRPORT

EXISTING LAND USE

FIGURE 7

CH2M HILL

Although Marion and Clackamas Counties have adopted Comprehensive Land Use Plans, both are general in nature, and are currently undergoing a revision and updating process. The City of Aurora has recently prepared a comprehensive plan indicating urban expansion outside of current city boundaries but not up to the airport.

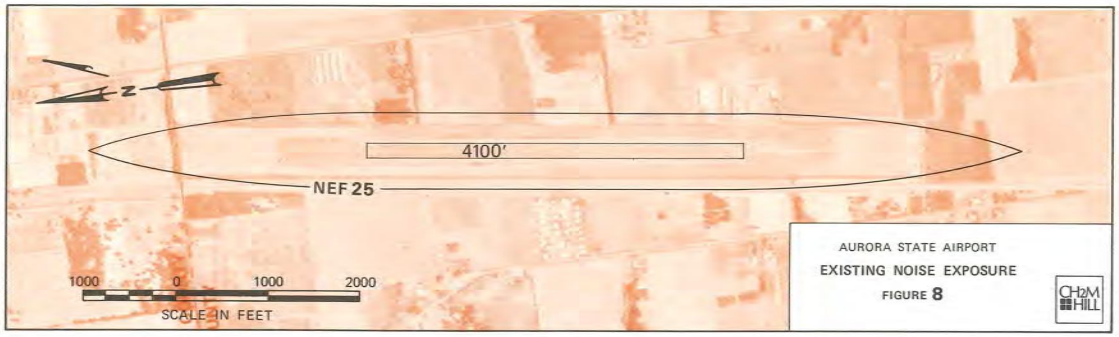
With the exception of the three small residential developments west of the airport the existing land use conforms closely to the adopted Comprehensive Plans. All plans adopt the intent to preserve productive farm land, which includes most of the land around the Aurora State Airport.

Zoning

The Marion County Zoning Ordinance designates a specific zoning district for the Aurora State Airport called "Public Amusement and Recreation" (PA). The provisions of this district are primarily confined to other permitted uses which are incompatible with an airport. This is because nearly all of the other uses permitted outright in the district (amusement park, auditorium, exposition, stadium, and zoo) are incompatible with airport operations due to their typical concentrations of people and noise sensitive activities. In addition, the current district, PA, lacks specific provisions for airport related commercial uses and height obstructions in the surrounding airspace.

Nearly all the land in Marion County surrounding the airport is currently zoned "Residential Agricultural," (RA). The provisions of this district enable the development of country estate, or acreage residential, development in addition to farming. The primary permitted uses include single-family dwellings and farming. Minimum lot area requirements for residential development depend on the nature of sewerage service. In areas served by subsurface sewage disposal, minimum lot area is set by the County Health Department, with no minimum area specified.

Marion County is initiating a program to rezone the Woodburn-Hubbard Area with the purpose of assuring preservation of prime farm land in conformity with the Marion County Comprehensive Plan and Oregon State Land Conservation and Development Commission



(LCDC) Guidelines. The County is rezoning as much land as practical to the "Exclusive Farm Use" (EFU) or "Farm-20" (F-20) classifications. These districts will assure lower density development than currently permitted in the RA zone.

The Marion County Zoning Ordinance does not currently contain provisions to limit building heights as they relate to airspace obstruction surfaces. Buildings in the RA zone are limited in height to 35 feet, except for public and semi-public buildings which may be as high as 70 feet. The EFU and F-20 zones have no height limitations.

The Clackamas County Zoning Ordinance applies to the area north of the airport. This area is currently zoned "Residential Agricultural" (RA-1). Under this classification, residential densities up to two dwelling units per acre are permitted where either public water or sewerage service are provided. For the area in the vicinity of the airport densities lower than two dwellings per acre will be required in the future in order to conform with comprehensive plan policies. Consequently, small acreage residential areas like the one currently under development just south of Charbonneau should not be permitted in the future. Zoning in Clackamas County does not include height limitations.

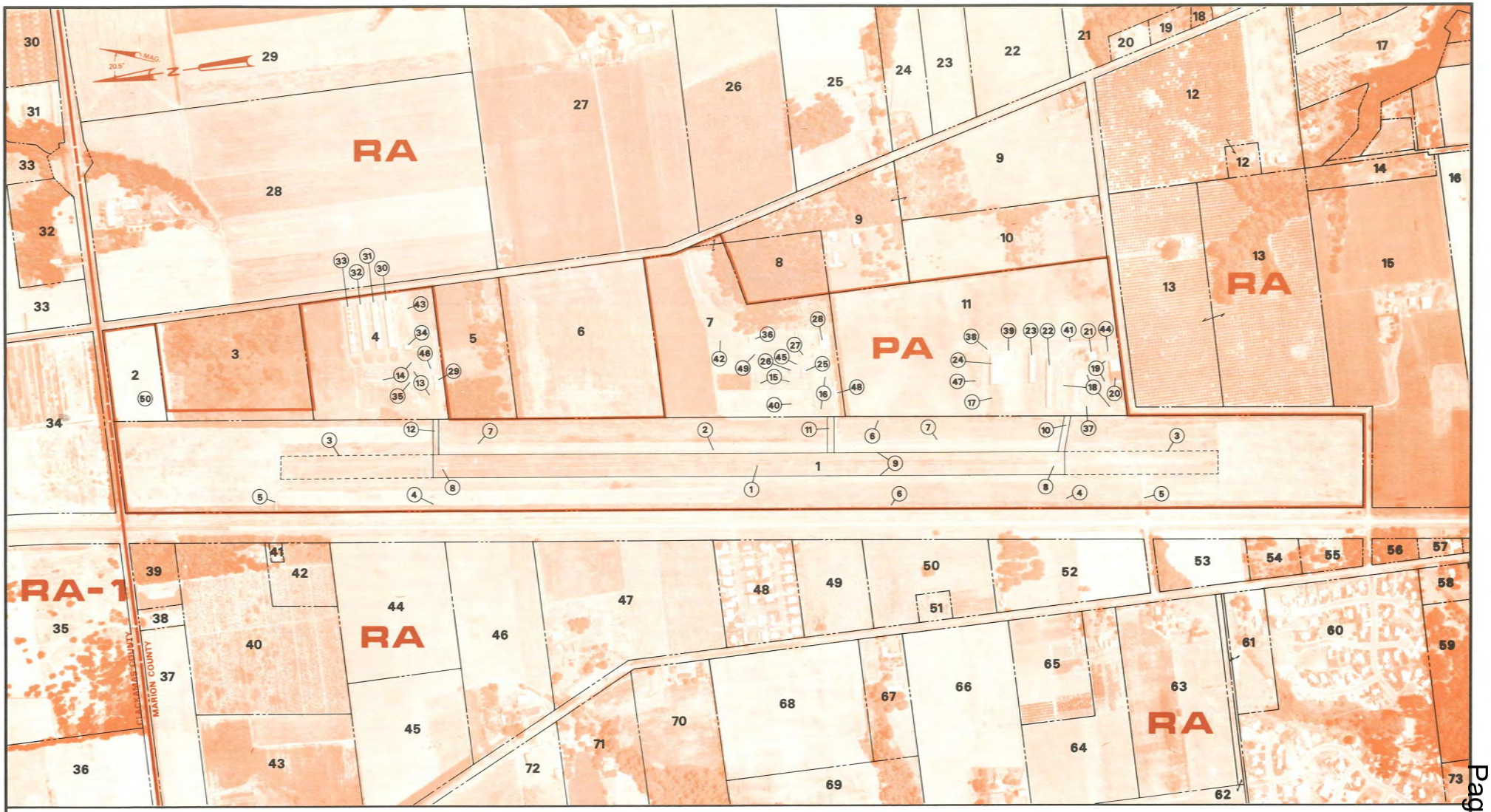
In the future, Clackamas County will be rezoning the RA-1 area to either "Exclusive Farm Use" (EFU) or "Residential Farm-Forest" (RF-F) in keeping with comprehensive plan and LCDC Guidelines. The EFU and RF-F designations would more adequately assure compatible land use in the airport vicinity; requiring 20 and 10 acre minimum lot areas respectively.

Figure 9 shows existing zoning districts on and around the Aurora State Airport.

Existing Airport - 1975

The present Aurora State Airport is the original Aurora Flight Strip. This consists of a single runway oriented north and south on a 113 acre parcel. Except for three privately constructed taxiway exits there are no other facilities provided on the airport property.

The runway is 4100 feet by 150 feet, designated 17/35, and is paved and lighted. It occupies State owned property 600 feet wide and about 8100 feet long paralleling Highway 51. An instrument approach procedure utilizing the Newberg VOR allows limited IFR operations during instrument weather. The airport is shown on Figure 9.



AURORA STATE AIRPORT

EXISTING AIRPORT FACILITIES

FIGURE 9

CH2M HILL

Various private facilities open to the public and located on private lands east of the airport complement the Aurora State Airport facilities. As a public-use airport facility several deficiencies exist. The airport has no main entrance or terminal area. There is no public aircraft parking apron, and there are no FAA facilities on the airport. Table 1 describes the existing facilities, Table 2 provides property information, and Figure 10 shows some of the facilities and conditions existing. General data is provided by Table 3.

The absence of a parallel taxiway system combined with the lack of an FAA traffic control tower poses a rather serious problem as to safety and runway capacity. Taxiing must be conducted on or beside the runway. Since only the runway is State owned and there are three different FBO areas, traffic procedures that would insure safe aircraft are difficult to establish.

Many transient pilots are confused as to which FBO area is their destination and taxi unnecessarily. Often taxiing aircraft are forced to give way to landing aircraft and must leave the runway pavement. This spreads loose aggregate on the runway increasing the potential for propeller damage.

Key points concerning airport layout are:

- The runway length accommodates all aircraft using the airport, which are light twin aircraft and smaller. Occasionally turbo-jets use this runway. There are all weather 1000- x 150-feet gravel overruns on both ends.
- The airport has no parallel taxiway system or turnarounds. However, the runway width, 150 feet, allows adequate space for turning most aircraft.
- The taxiway system is limited to three stub-entrance taxiways not connected to each other. They serve three apron areas, which are mostly turf.

TABLE 1

EXISTING FACILITIES 1975

ITEM	DESCRIPTION	CONDITION	COMMENTS
(1) RUNWAY 17-35	150' x 4100' ASPHALT CONCRETE PAVEMENT	FAIR	NUMEROUS CRACKS
(2) PARALLEL TAXIWAY	50' x 4100' GRAVEL SURFACE	POOR	TOO CLOSE TO RUNWAY
(3) OVERRUN AREAS	150' x 1000' GRAVEL STABILIZED	GOOD	OVERGROWN WITH GRASS
(4) WIND CONES	YELLOW FABRIC CONES ON METAL POLE	GOOD	SOUTH WIND CONE IS LIGHTED
(5) CLEAR ZONE ACCESS ROADS	UNIMPROVED ROADS	FAIR	MAINTENANCE AND FARM ACCESS ONLY
(6) DRAINAGE DITCHES	40' WIDE x 4' DEEP, 275'± FROM RUNWAY CENTERLINE	FAIR	EVIDENCE OF STANDING WATER
(7) SERVICE ROAD	UNIMPROVED ROAD	POOR	USED FOR FUEL AND SERVICE TRUCKS
(8) RUNWAY MARKINGS	BASIC STANDARD-WHITE	POOR	MARKINGS ARE STANDARD FOR BASIC RUNWAY
(9) RUNWAY LIGHTING	STAKE MOUNTED, LOW INTENSITY LIGHTS	GOOD	TAXIWAYS ARE NOT ADEQUATELY LIGHTED. THRESHOLD LIGHTS ARE OFFSET TO THE WEST
(10) STUB TAXIWAY	30' WIDE ASPHALT CONCRETE PAVEMENT	GOOD	NON STANDARD MARKINGS
(11) STUB TAXIWAY	30' WIDE ASPHALT CONCRETE PAVEMENT	GOOD	DOES NOT EXTEND ACROSS GRAVEL PARALLEL TAXIWAY. NO MARKINGS
(12) STUB TAXIWAY	30' WIDE ASPHALT CONCRETE PAVEMENT	GOOD	NO MARKINGS
(13) AIRCRAFT PARKING APRON	100' x 200' ASPHALT CONCRETE PAVEMENT	GOOD	PARKING AND MANEUVERING AREA. PRIVATELY OWNED.
(14) AIRCRAFT PARKING AND TIE DOWN AREA	150' x 300' ROCK STABILIZED TURF. 20 TIE DOWN SPACES. 10 TO 12 ADDITIONAL PARKING SPACES.	FAIR	USED FOR TRANSIENT AND PRIVATE AIRCRAFT. PRIVATELY OWNED.
(15) AIRCRAFT PARKING AND TIE DOWN AREA	100' x 400' ROCK STABILIZED TURF. 14 TIE DOWNS	FAIR	USED FOR TRANSIENT AND NON-FBO AIRCRAFT. PRIVATELY OWNED
(16) AIRCRAFT PARKING APRON AND TIE DOWN AREA	100' x 130' AND 20' x 300' ASPHALT CONCRETE PAVEMENT AND 80' x 300' GRAVEL SURFACE. 15 TIE DOWNS 4 TO 6 PARKING POSITIONS.	FAIR	SERVICING AND PARKING AREA FOR FBO OWNED AIRCRAFT. PRIVATELY OWNED.
(17) AIRCRAFT PARKING APRON	100' x 150' ASPHALT CONCRETE PAVEMENT	GOOD	NO MARKED PARKING SPACES. PRIVATELY OWNED.
(18) AIRCRAFT PARKING AND TIE DOWN AREA	SEVERAL TURF AREAS. 18 TIE DOWNS. 6 TO 8 ADDITIONAL PARKING POSITIONS	FAIR	USED FOR FBO, PRIVATE AND TRANSIENT AIRCRAFT. PRIVATELY OWNED.
(19) AIRCRAFT PARKING APRON	75' x 300' ASPHALT CONCRETE PAVEMENT. NO TIE DOWNS. SEVEN PARKING POSITIONS	GOOD	PARKING AND MANEUVERING AREA FOR TIE DOWN AREA AND SHOPS. PRIVATELY OWNED.
(20) MAINTENANCE HANGER AND GROUND SCHOOL OFFICES	70' x 135' x 25' HIGH METAL COVERED WOOD STRUCTURE	GOOD	TRAILER ATTACHED TO WEST SIDE. OSAO BEACON MOUNTED ON ROOF. PRIVATELY OWNED.
(21) FBO ADMINISTRATION BUILDING	40 x 40' x 20' HIGH WOOD FRAME STRUCTURE	GOOD	APARTMENT ABOVE OFFICES. PRIVATELY OWNED.
(22) T HANGAR	30' x 290' x 16' HIGH METAL COVERED WOOD STRUCTURE. 10 PLANE CAPACITY	FAIR	NONCOMPARTMENTALIZED, NO ELECTRICITY. PRIVATELY OWNED.
(23) T HANGAR	34' x 190' x 16' HIGH METAL COVERED WOOD STRUCTURE. 6 PLANE CAPACITY	GOOD	NONCOMPARTMENTALIZED, NO ELECTRICITY. PRIVATELY OWNED.
(24) MAINTENANCE HANGAR	80' x 180' x 30' HIGH METAL STRUCTURE	EXCELLENT	PRIVATELY OWNED, TEMPORARILY LEASED FOR HELICOPTER MAINTENANCE
(25) FBO ADMINISTRATION BUILDING	30' x 40' x 14' HIGH WOOD STRUCTURE	GOOD	PRIVATELY OWNED
(26) FBO OFFICE ANNEX	12' x 65' OFFICE TRAILER	GOOD	PILOT AND FLIGHT INSTRUCTOR OFFICES. PRIVATELY OWNED.
(27) FBO OFFICE ANNEX	10' x 50' OFFICE TRAILER	FAIR	GROUND SCHOOL OFFICES PRIVATELY OWNED.
(28) MAINTENANCE HANGAR	50' x 60' x 20' HIGH METAL COVERED WOOD STRUCTURE, 20' x 20' LEAN-TO ATTACHED	EXCELLENT	MAINTENANCE SHOP AND PARTS STORAGE. PRIVATELY OWNED.
(29) AVIONICS SHOP	40' x 100' x 16' HIGH METAL COVERED WOOD STRUCTURE	EXCELLENT	PRIVATELY OWNED
(30) T-HANGAR	40' x 310' x 13' HIGH METAL COVERED, METAL FRAME STRUCTURE,10 PLANE CAPACITY	EXCELLENT	COMPARTMENTALIZED, ELECTRICITY, PRIVATELY OWNED.
(31) T-HANGAR	40' x 310' x 13' HIGH METAL COVERED, METAL FRAME STRUCTURE,10 PLANE CAPACITY	EXCELLENT	COMPARTMENTALIZED, ELECTRICITY, PRIVATELY OWNED.
(32) T-HANGAR	40' x 310' x 13' HIGH METAL COVERED, METAL FRAME STRUCTURE,10 PLANE CAPACITY	EXCELLENT	COMPARTMENTALIZED, ELECTRICITY, PRIVATELY OWNED.
(33) T-HANGAR	40' x 310' x 13' HIGH METAL COVERED, METAL FRAME STRUCTURE,10 PLANE CAPACITY	EXCELLENT	COMPARTMENTALIZED, ELECTRICITY, PRIVATELY OWNED.
(34) OFFICE BUILDING	35' x 50' x 12' HIGH WOOD FRAME STRUCTURE	GOOD	PRIVATELY OWNED. UNOCCUPIED.
(35) FUEL TANKS	UNDERGROUND TANKS FOR 80/87 AND 100/130 FUEL. 10,000 GALLON CAPACITY EACH TANK	GOOD	STORAGE FOR FBO AT SOUTH END OF FIELD. PRIVATELY OWNED.
(36) FUEL TANKS	ABOVE GROUND TANKS FOR 80/87 AND 100/130 FUEL	GOOD	PORTABLE TANKS. PRIVATELY OWNED.
(37) FUEL TANKS	TWO 10,000 GALLON UNDERGROUND TANKS	GOOD	CURRENTLY NOT USED PRIVATELY OWNED.
(38) FBO OFFICE	12' x 55' OFFICE TRAILER	GOOD	TEMPORARY OFFICE PRIVATELY OWNED.
(39) TRAILERS	THREE SMALL TRAILERS	UNKNOWN	PRIVATELY OWNED. UNOCCUPIED
(40) WIND TEE	20' LONG WIND TEE. PAINTED YELLOW AND LIGHTED	GOOD	NO SEGMENTED CIRCLE. PRIVATELY OWNED.
(41) ACCESS ROAD	12' WIDE ASPHALT CONCRETE	POOR	PRIVATELY OWNED
(42) ACCESS ROAD	18' WIDE ASPHALT CONCRETE	FAIR	PRIVATELY OWNED.
(43) ACCESS ROAD	20' WIDE GRAVEL SURFACED	POOR	PRIVATELY OWNED.
(44) AUTOMOBILE PARKING	60' x 100' ASPHALT CONCRETE, 20 CAR CAPACITY	FAIR	PRIVATELY OWNED.
(45) AUTOMOBILE PARKING	75' x 250' ASPHALT CONCRETE, 50 CAR CAPACITY	FAIR	PRIVATELY OWNED.
(46) AUTOMOBILE PARKING	75' x 100' GRAVEL SURFACED, 25 CAR CAPACITY	POOR	PRIVATELY OWNED.
(47) STRUCTURAL STEEL	MISCELLANEOUS STRUCTURAL STEEL MEMBERS PILED FOR STORAGE	NA	OWNERSHIP AND USE UNKNOWN
(48) MAINTENANCE SHED	40' x 50' x 12' HIGH WOOD FRAME STRUCTURE	POOR	PRIVATELY OWNED.
(49) STORAGE SHED	12' x 30' x 10' HIGH WOOD FRAME STRUCTURE	POOR	PRIVATELY OWNED.
(50) FBO AREA	HELICOPTER MAINTENANCE FACILITY UNDER CONSTRUCTION	NA	PRIVATELY OWNED.

- The full width of runway pavement is asphalt-concrete of 3-inch thickness over a gravel base, total thickness 18 inches. Pavement strength has been designed for 30,000 lbs. single wheel loading. The surface condition is poor to fair because of oxidation, extensive cracking, and ravelling. There is considerable loose aggregate on the runway surface most of the time.
- Airport lighting consists of low-intensity runway edge lighting, a rotating beacon of marginal visibility and a lighted wind cone. There are no other visual aids to assist pilots during darkness or low visibility conditions.

TABLE 2

PROPERTY INFORMATION - 1975*

STUDY NO.	OWNER	ACRES	STUDY NO.	OWNER	ACRES
1	OREGON AERONAUTICS DIVISION	112.79	37	D.C. HEWITT	13.59
2	COLUMBIA HELICOPTERS INC.	5.70	38	D.C. HEWITT	0.89
3	W.G. & N.C. LEMATTA	14.35	39	D.C. HEWITT	3.06
4	W.O. REEL	16.77	40	CASCADE XMAS TREE FARM CO.	22.20
5	W. & C. JESKEY	9.28	41	CASCADE XMAS TREE FARM CO.	0.23
6	C.W. SNYDER	21.07	42	CASCADE XMAS TREE FARM CO.	3.77
7	W.M. & V.L. BENNETT	25.10	43	HOEHNKE NURSERY CO.	19.52
8	SAN GABRIEL GOSPEL TEMPLE	5.12	44	FREEMAN, JR. ETAL	15.00
9	SAN GABRIEL GOSPEL TEMPLE	28.18	45	ELMER O. & MARGARET JESKEY	13.92
10	G.W. & K.L. JESKEY	12.62	46	ELMER JESKEY	16.55
11	NORTHWEST AIRMOTIVE	38.56	47	F.R. & E. KAHLE	16.73
12	M.W. & R.L. NAGL	27.74	48	SUNSET HAVEN SUBDIVISION	7.0
13	D.L. DONNELLY	44.32	49	F.R. & E. KAHLE	6.20
14	W. & L. TRAGLIO	2.97	50	R.H. KEIL	9.50
15	R.P. & J.B. JENKS	40.13	51	S.D. & C.J. KENNEY	1.00
16	G. & H. PARDY	57.98	52	W. & H. KEIL	10.02
17	MISCELLANEOUS RESIDENTIAL PARCELS	–	53	W.R. & D. SEELY	4.59
18	D.& M. CATTON	32.14	54	W.R. & D. SEELY	2.00
19	J.P. & M.V. MYERS	1.21	55	H.W. & G.J. McCUNE	2.33
20	R.L. KOCH	1.20	56	W. & H. KEIL	1.05
21	R. & E. REUBEN DALL	70.63	57	A. WATTS	1.00
22	L.H. & M.B. THOMPSON	28.60	58	R.L. & D. BRAND	2.00
23	F.B. SNYDER	13.86	59	R.L. & D. BRAND	13.87
24	C.W. SNYDER	12.77	60	DEER CREEK ESTATES	52.46
25	F.B. SNYDER	34.88	61	J.D. & L.M. PHILLIPS	5.00
26	C.W. SNYDER	37.94	62	L.W. & B.H. PETERS & C.L. PETERS	21.91
27	A.M. & E.M. HESS	80.99	63	W. & N. RUSSELL	20.19
28	M. & E. STAEHLY	76.16	64	W.S. & E.L. MOELLER	13.56
29	H. STAEHELY	79.40	65	L. & V. KLEVE	8.00
30	NOT OBTAINED	68.19	66	R.H. & B. KEIL	42.57
31	ROBERT I. COLVIN	4.50	67	E.B. & D. KNORR	5.14
32	HENRY W.B. & DORTHY L. COLVIN	6.15	68	E.B. & D. KNORR	17.75
33	HENRY W.B. & DORTHY L. COLVIN	70.48	69	F. ANDERSON & D. KNORR	52.02
34	CROWN ZELLERBACH CORP	23.96	70	E.L. DERR	51.76
35	EARL H. & MARILYN R. STOLLER	43.40	71	G.H. & S.L. EROFF	10.00
36	EARL H. & MARILYN R. STOLLER	79.52	72	N.J. McDONALD	60.98
			73	CEDAR FIELD ESTATES	7.00

* COUNTY RECORDS AUGUST 1975

- The private facilities which connect to and serve Division of Aeronautics property are not constructed to uniform specifications. Pavement strength and quality varies and geometrical standards are non-uniform.

- Entrance roads have been constructed to suit individual requirements, and are not interconnected. Utilities consist of electric power, telephone, water from wells and individual septic disposal systems.

TABLE 3

EXISTING AIRPORT DATA

ELEVATION	195 FEET MSL
LATITUDE	45°14′ 43″
LONGITUDE	122°46′ 07″
ACREAGE	113 ACRES
MEAN MAXIMUM TEMPERATURE (HOTTEST MONTH)	84° F (29° C)
NAVAIDS	NONE
INSTRUMENT APPROACH PROCEDURE	VOR/DME
RUNWAY 17-35	N 07° 08′E TRUE BEARING
LENGTH	4,100 FEET (1250 M)
WIDTH	150 FEET (46 M)
GRADIENT	0.07%
APPROACH SLOPE	34:1
OBSTRUCTION	TREES AT 2,100′ FROM RW 17 THRESHOLD
PAVEMENT	ASPHALT CONCRETE
STRENGTH	30,000 LBS, SINGLE GEAR (13,600 KILOGRAMS)
LIGHTING	LOW INTENSITY
MARKING	BASIC

- There are three conventional hangars, 56 tee-hangar bays, and various other buildings, some mobile. The fixed base operators provide both 80 and 100 octane gasoline, but no jet fuel is available.

- Space for expansion at this time is mainly dependent upon private lease arrangements by the fixed base operators. Between the highway which lies east of the airport and the east property line of the Division of Aeronautics, there are about 177 acres of land held in private ownership. The 113 acres owned by the Division of Aeronautics provides room for runway lengthening, but not for other types of expansion.

FIXED BASE FACILITIES AT NORTH END OF FIELD

SHOWING TEE HANGARS, AVIONICS SHOP AND TURF AIRCRAFT PARKING. TREES IN LOWER RIGHT ARE FAR PART 77 OBSTRUCTIONS.

FIXED BASE OPERATION AT MID-FIELD

SHOWING FBO OFFICES AND HANGAR, AIRCRAFT PARKING, AND A CHURCH GROUP CAMP IN THE TREES BEHIND.

FIXED BASE OPERATIONS AT SOUTH END OF FIELD

SHOWING CONVENTIONAL HANGAR TEMPORARILY HOUSING HELICOPTER MAINTENANCE FACILITY (LEFT), TEE HANGARS (CENTER) AND FBO OFFICE AND HANGAR (RIGHT). THE CITY OF AURORA IS IN THE UPPER RIGHT BACKGROUND.

HELICOPTER MAINTENANCE FACILITY

SHOWING THE MAINTENANCE HANGAR AND HELIPORT CURRENTLY UNDER CONSTRUCTION AT THE EXTREME NORTH END OF THE FIELD.

ASPHALT CONCRETE RUNWAY PAVEMENT

SHOWING TYPICAL LONGITUDINAL AND TRANSVERSE CRACKING (NOTE 6-INCH PEN NEAR CRACK INTERSECTION)

AURORA STATE AIRPORT

PHOTOGRAPHS OF FACILITIES/CONDITIONS

FIGURE 10

Economic Impact

Employees on the airport average between 100 and 125, with the majority working on maintenance for a helicopter operator. Total salaries directly generated on the airport are estimated to be about $750,000 annually.

Facilities provided the general public include: waiting rooms, restrooms, telephone, car rental and automobile parking. Commercial aviation services to the public include aircraft rental, flight instruction, charter flying, aircraft maintenance, aviation fuel service, aircraft sales, and aircraft avionics sales and maintenance. However there has been considerable fluctuation in the level of these services.

All revenue-producing activities are located on private land, and generate no income to the airport owner other than a fuel flowage fee of $0.03 per gallon. This is paid to the Oregon Division of Aeronautics which is currently revisings its rates for flowage and ingress-egress. The ingress-egress permits are issued to the three operators by the Division of Aeronautics.

One fixed base operation is located at the south end of the airport, and another operator is located in the center of the field. The third operator, a helicopter maintenance facility, is currently moving from temporary quarters at the south end of the field to permanent facilities at the extreme northeast corner of the airport.

Off the north end of the airport is a parcel of land containing 40 tee-hangars for rent, turf aircraft parking and an aircraft avionics shop. For identification this area is labeled FBO-4 on Figure 4, page 9, although no Fixed Base Operation currently exists there.

Wind Analysis

Two years of wind data was collected between May 1968 and April 1970 at the south end of the airport. This was accomplished under the supervision of the Port of Portland. The data summary appears in the appendix and the wind rose appears on the Airport Layout Plan.

Calms (less than 4 mph) occur 66.5 percent of the time. When the wind exceeds 4 mph, it seldom surpasses 13 mph and generally is either northerly or southerly. Winds in excess of 13 mph normally come from the south. This occurs only about 1.5 percent of the time, and it is rare for the wind velocity to exceed 25 mph. It is not possible with available data to correlate wind conditions with ceiling and visibility to develop a reliable IFR wind rose.

Freak storms, such as the Columbus Day Storm in 1962 are a rare phenomenon with only eight other such occurrances recorded in the last 100 years. During these storms sustained winds have exceeded 50 mph with 110+ mph gusts.

The wind data and analysis used for this study was compared with wind measurements made at the OSU Agricultural Experiment Station 2 miles northeast of the airport. Both were found to be in agreement. The Aurora State Airport wind analysis indicates that the present runway orientation, north 7°8' east, (true) is excellent and provides 99.5 percent crosswind coverage for crosswind components 15 mph and under.

With this coverage Runway 17 can be used 49.4 percent of the time and Runway 35, 50.1 percent of the time. For 12 mph crosswind compnents, the coverage is 99.3 percent. In this case Runway 17 may be used 49.3 percent and Runway 35, 50,0 percent of the time.

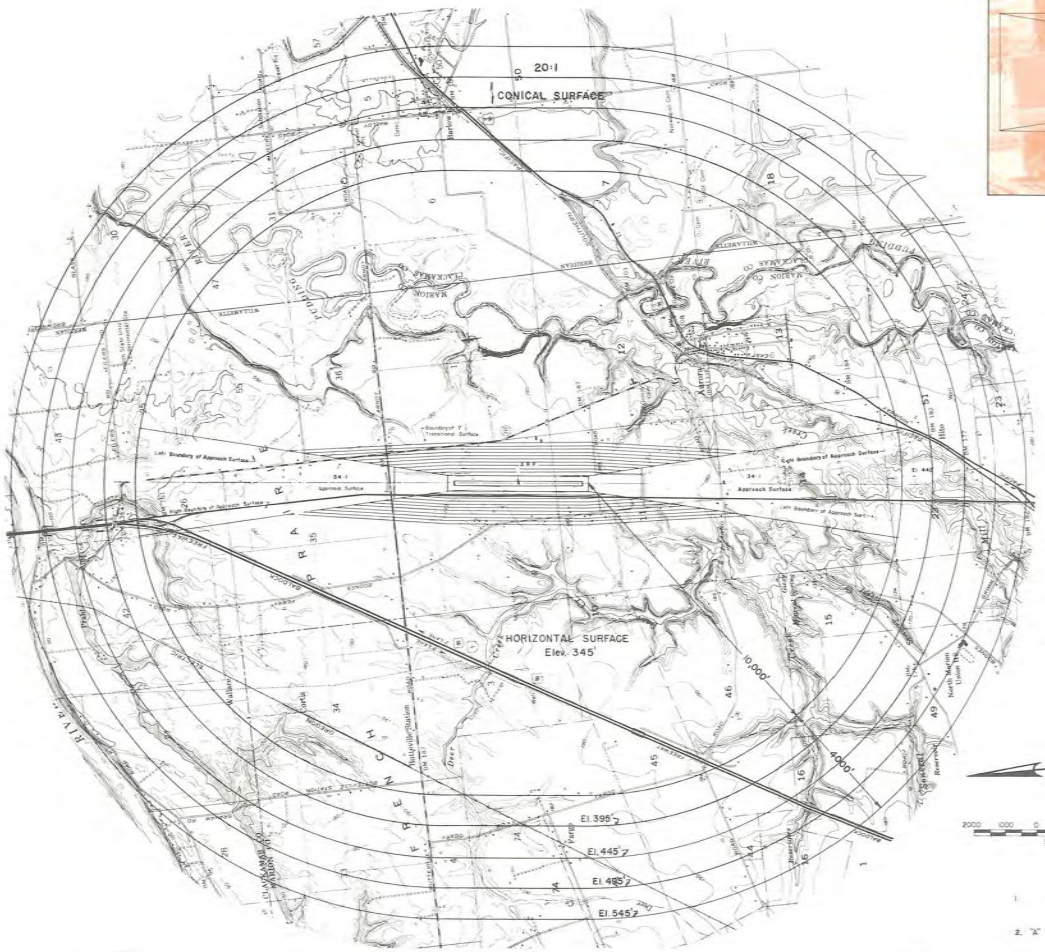
Airspace

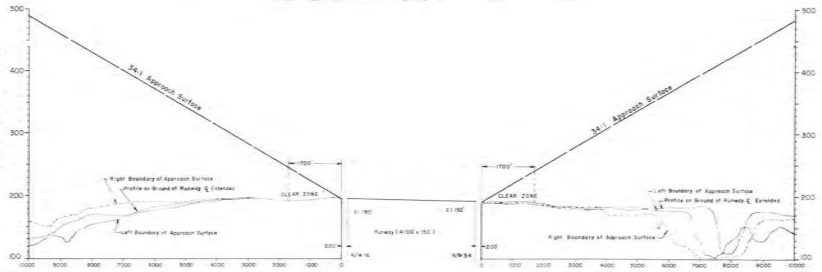
Figure 11 shows existing airport imaginary surfaces as developed by the Division of Aeronautics in 1972. Any object which penetrates through these geometrical planes needs evaluation as to its effect on air navigation in the vicinity of the airport. The figure also indicates obstructions that should be removed. The State owns air easements, as indicated, which permit the State to remove most of the obstructions shown.

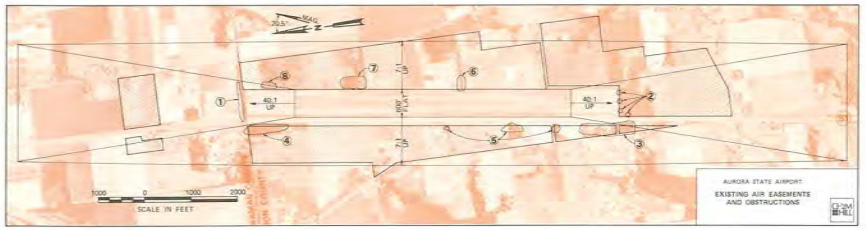
Figure 12 shows the existing airways in the vicinity of the airport. There are no electronic navigational aids located on the airport and there is no certified weather observer on site.

Use of the Aurora State Airport during instrument weather conditions (IFR) is possible with certain restrictions. The airport is served by a non-precision VOR/DME approach using the Newberg VORTAC. The approach is somewhat restricted because this VORTAC is also used for approaches to McMinnville Airport and is a key facility used by the Portland TRACON (Terminal Radar Control Facility). Minimums are 1000 feet ceiling and 1-1/4 miles visibility, which is not very adequate to insure a high rate of useage during IFR weather.

Because Aurora State Airport lies in the Portland Terminal Airspace, some assistance in reaching the airport during conditions of low ceiling with good visibility below the ceiling is possible through the radar coverage of the Portland radar (ASR). However, just over the airport, Portland Approach Control is not able to vector aircraft lower than 3400 feet MSL. North of the airport, minimum vectoring altitude is 2500 feet. In this area, neither terrain nor tall structures pose obstruction problems. Limitations occur only due to incomplete radar coverage.

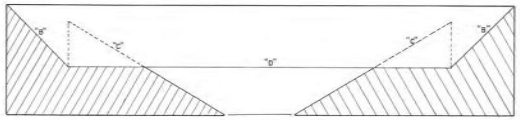


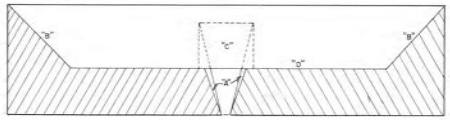




OBSTRUCTION REMOVAL REQUIREMENTS
TO MEET FAR PART 77 CRITERIA

1. TREES – EXISTING AND ULTIMATE APPROACH SURFACE OBSTRUCTIONS TO BE REMOVED
2. TREES – ULTIMATE APPROACH SURFACE OBSTRUCTIONS TO BE REMOVED
3. TREES – EXISTING APPROACH SURFACE AND EXISTING AND ULTIMATE TRANSITION SURFACE OBSTRUCTIONS TO BE TRIMMED
4. TREES – EXISTING AND ULTIMATE TRANSITION SURFACE OBSTRUCTIONS TO BE REMOVED OR TRIMMED
5. TREES – EXISTING AND ULTIMATE TRANSITION SURFACE OBSTRUCTIONS TO BE TRIMMED OR REMOVED
6. TREES – EXISTING AND ULTIMATE TRANSITION SURFACE OBSTRUCTIONS TO BE REMOVED
7. TREES – EXISTING AND ULTIMATE TRANSITION SURFACE OBSTRUCTIONS TO BE REMOVED
8. TREES – ULTIMATE TRANSITION SURFACE OBSTRUCTIONS TO BE REMOVED





DEFINITIONS

1. PRIMARY SURFACE – The surface longitudinally centered on the runway centerline and extending 200 feet beyond each end of a specially prepared hard surfaced runway. The width of the primary surface is equal to the width of the beginning of the runway's most precise approach surface
2. "A" TRANSITIONAL SURFACE – The surface that extends upward and outward at right angles to the runway centerline and the runway centerline extended at a slope of 7:1 from the sides of the primary surface and from the sides of the approach surfaces to the horizontal and conical surfaces.
3. "D" HORIZONTAL SURFACE – The horizontal plane 150 feet above the established airport elevation beginning at its intersection with the transitional surface and extending to the beginning of the conical surface.
4. "B" CONICAL SURFACE – The surface extending upward and outward from the periphery of the horizontal surface at a slope of 20:1 for a horizontal distance of 4000 Lf.
5. "C" APPROACH SURFACES – The surface longitudinally centered on the extended runway centerline and extending upward and outward from each end of the primary surface.
6. AIRPORT REFERENCE POINT – The point established as approximate geographical center of the airport landing area.
7. AIRPORT ELEVATION – The highest point on the useable landing area, which elevation is datum to establish the elevation of the horizontal surface.

AURORA STATE AIRPORT

EXISTING AIRPORT IMAGINARY SURFACES AND OBSTRUCTIONS

FIGURE 11

No.	Revision	By	Appr.	Date

AURORA STATE AIRPORT
AURORA, OREGON

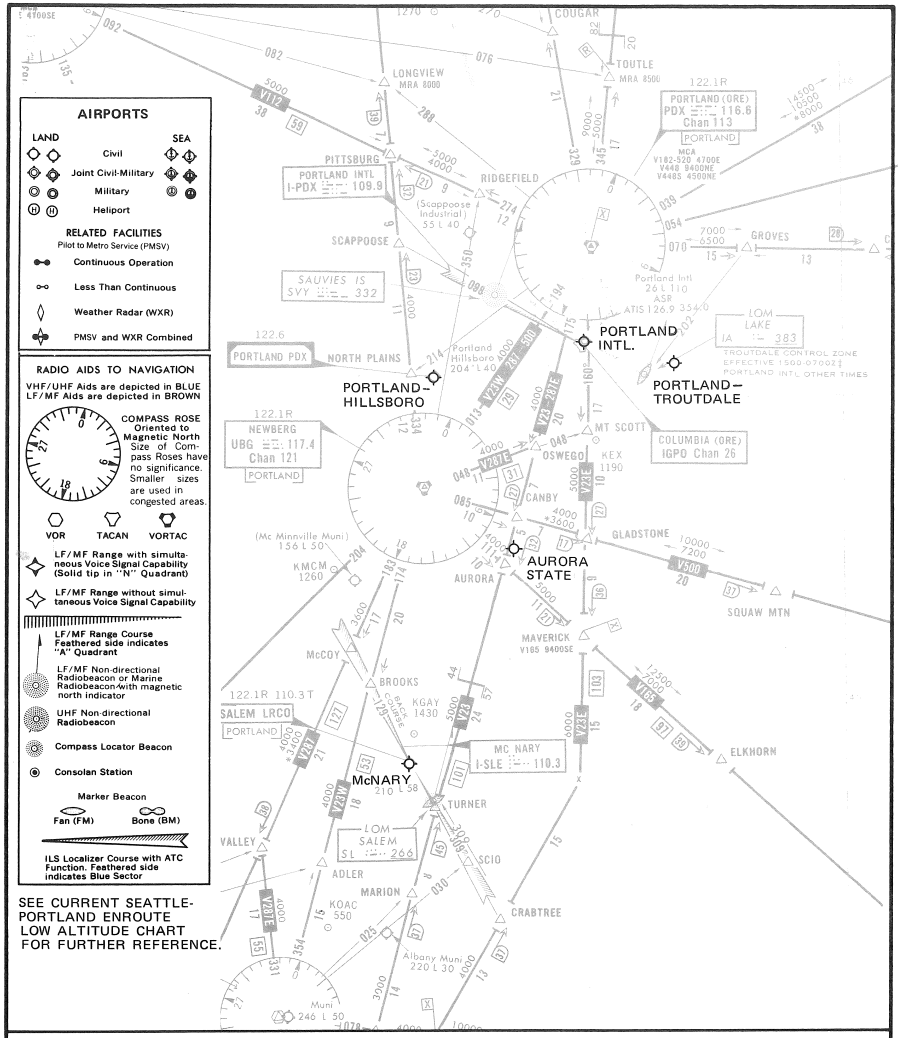
APPROACH & CLEAR ZONE PLAN and ZONING PLAN

Prepared by
OREGON STATE BOARD OF AERONAUTICS
SALEM, OREGON

Submitted by
OREGON STATE BOARD OF AERONAUTICS
Salem, Oregon

Approval Block
Airport Engineer

Designed by R.M.R. Date 1972 | Traced by | Date
Drawn by G.R.D. Date | Checked by | Date
Scale as Shown | Township 3S & 4S | Range 1 W. W.M. | Dwg. No. B-71
Sheet of | Section 35 & 2 & 11 | County Clackamas & Marion



AURORA STATE AIRPORT
EXISTING AIRWAYS
FIGURE **12**

CH2M HILL

Air Traffic Activity

For this study, air traffic activity has been compiled from FAA, State, and Port of Portland sources. Insofar as possible, data for this section was obtained from the original source. Also, data collected was correlated with this study's field surveys and was compared with information presented in other recent publications.

Air traffic activity for the Aurora State Airport has been measured in terms of numbers of aircraft based at the airport, and in terms of operations performed by these based aircraft and by itinerant aircraft at the airport. (An operation is either a landing or a takeoff.) Table 4 shows the number and types of aircraft based at the airport.

TABLE 4

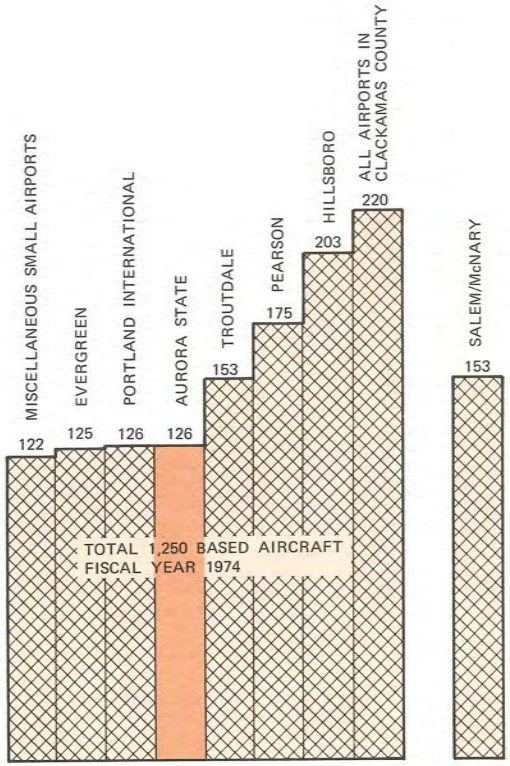
DISTRIBUTION OF AIRCRAFT TYPES BASED AT AURORA STATE AIRPORT (1975)

TOTAL	127
MULTI-ENGINE	8
SINGLE ENGINE, RETRACTABLE	35
SINGLE ENGINE, FIXED GEAR 4 PLACE AND LARGER	45
SINGLE ENGINE, FIXED GEAR UNDER 4 PLACE	35
HELICOPTER	4
TURBOJET	0

The number of aircraft based at the Aurora Airport fluctuates greatly throughout the year, as it does at other Portland area airports. This is because of fluctuations in the inventory of aircraft for sale and due to the seasonal nature of the flying weather. Although the number of based aircraft may fluctuate to as high as 150, the 1974 count from the Port of Portland field survey indicated 126 based aircraft.

At this time, no turbine powered aircraft or gliders are based at Aurora. In recent months, it is estimated that there have been about ten to twelve transient aircraft parked on the airport at any given time. Turbojet aircraft now use the airport intermittently.

Little information is available concerning the purpose for which the aircraft are flown. Approximately 35 to 40 percent of the aircraft surveyed are owned by businesses. These range from the fixed base operator's charter service to a Portland radio station's traffic watch. It has not been possible to determine the actual hours or percentage of business flying.



DISTRIBUTION OF GENERAL AVIATION BASED AIRCRAFT IN PORTLAND SMSA AND AT SALEM/McNARY

FIGURE **13**

SOURCE: PORTLAND – CLACKAMAS AIRPORT STUDY

In the airport's service area, shown earlier, lives a population of about 710,000. Incomes there are above average, which factor influences air traffic levels to exceed normal national averages. Figure 13 shows the distribution of general aviation aircraft in the greater Portland area and the Aurora State Airport's share.

The number of operations flown at the airport determines the level of traffic activity at the airport. Since there is no air traffic control tower on the Aurora State Airport, it was necessary to gather operations information from other sources. Four sources are: The Oregon Aviation System Plan, the FAA Master Record (Form 5010), the Portland-Clackamas Airport Study, and air traffic surveys made by the FAA. Apparently, the first three mentioned sources have utilized some of the same basic data, which conflict with actual counts.

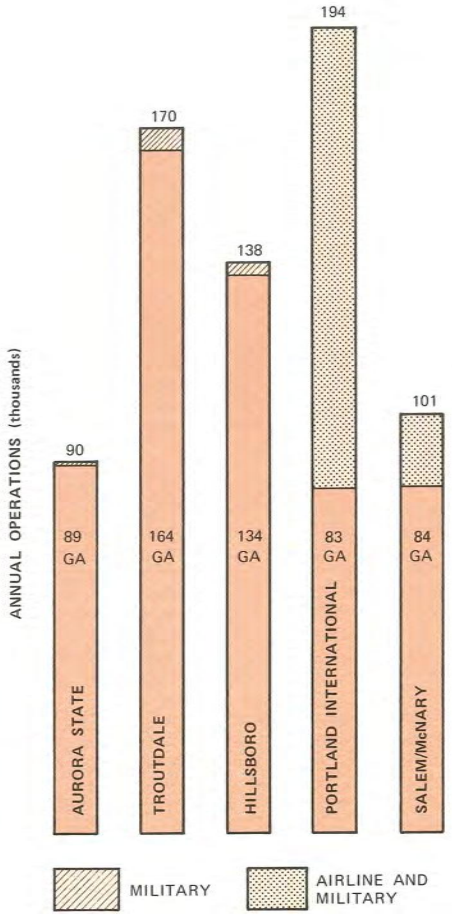
This study's evaluations determined the actual activity levels to be somewhat lower than some of the above source data indicated. This study's base data was determined by adjusting actual traffic counts to correlate with known counts at other local airports with air traffic control towers. Statistics were developed as shown in Table 5. Figure 14 compares activity at Aurora State Airport with other principal regional Oregon airports.

TABLE 5

1975 AIR TRAFFIC DATA FOR AURORA STATE AIRPORT

OPERATIONS	
TOTAL ANNUAL	90,000
LOCAL ANNUAL	52,000
ITINERANT ANNUAL	38,000
IFR ANNUAL	500*
PEAK MONTH	11,000
BUSY DAY	400
BASED AIRCRAFT	127
OPERATIONS PER BASED AIRCRAFT	709
MILES FLOWN	2.8 million *
PASSENGER MILES INCLUDING PILOT	6.5 million *

*Approximate



AIR TRAFFIC ACTIVITY AT AREA MAIN AIRPORTS 1975

FIGURE **14**

SOURCE: FAA

AVIATION FORECASTS

Aviation demand forecasts for the years 1980, 1985, and 1995 have been developed to identify the role of the airport in those years. Factors analyzed were population and economic growth, aviation technology and trends, air traffic activity, and the effect upon the airport of adjacent airport development. The effects of new technology have the least impact because of the type and numbers of aircraft now in the system and the relatively long life of present types.

The boundary of the service area, Figure 5, page 10, indicates that there is little correlation between the location of aircraft owners and the airports they use. No study, or survey, has yet determined the reasons why aircraft owners in the Portland area often choose to use airports that are not the nearest airport to their home or business.

The Portland-Clackamas Airport Study (PCAS), recently completed by the Port of Portland, identifies the Aurora State Airport to be part of a regional airport system in the Greater Portland metropolitan area. The Aurora State Airport, along with other airports draws from the entire region to generate traffic activity. Therefore requirements and the timing of requirements for Aurora State Airport will be influenced by developments at the other airports or at new airports in the Portland region.

The forecasting methodology has been limited by the base data which was available as regards historical aviation statistics and socio-economic data and forecasts. The method used was first, to identify the airport service area and its history, and second, to correlate the airport service area with the area's socio-economic characteristics. Mixed socio-economic projections, mostly population and growth trends, were assembled together with historical air traffic data.

Then, because this airport is inseparable from the "Portland Regional Airport System," it was necessary to examine forecasts on the national, state, and local level. The most up-to-date and comprehensive of the other forecasts is that of the Portland-Clackamas Airport Study. Other source material included miscellaneous FAA material, but primarily FAA's The Northwest Region Aviation System, Ten-Year Plan 1975-1985, and The Oregon Aviation System Plan (OASP) from the Oregon Department of Transportation.

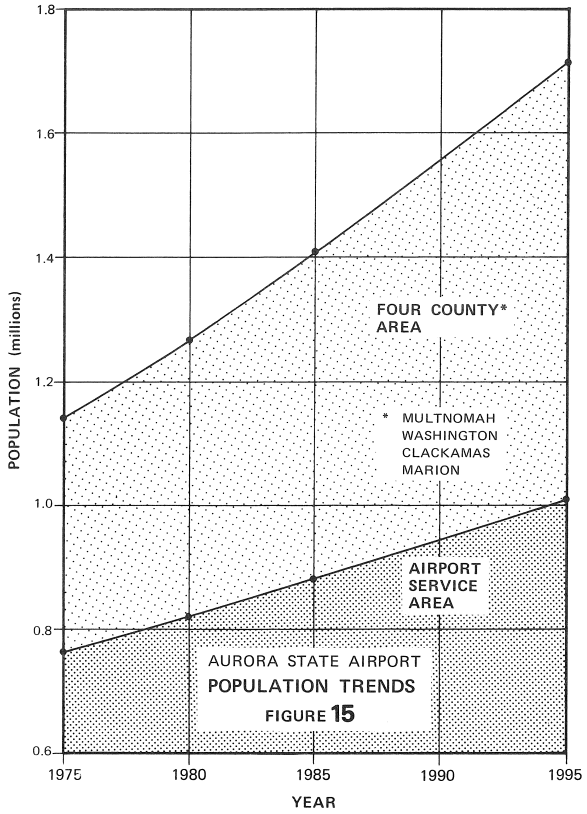
The possible range of forecasting methods was limited for the Aurora State Airport because the service area lies only partially in the Portland SMSA. Much of the base data available for SMSA's is not available for other parts of the Aurora State Airport's service area. Insofar as possible, the Aurora forecasts have correlated based aircraft to population and socio-economic trends.

The aircraft operations forecasts have been correlated to known general aviation activity trends at Control Tower airports with specific on-airport traffic counts. The results were then adjusted to reflect the trends of other recent forecasts just mentioned. Because historical information did not check closely with actual surveys, the comparison of the Aurora State Airport forecast to other studies necessitated considerable adjustments. Comparisons are shown in the appendix.

Figure 15, Population Trends, indicates the predicted 4-county region growth rate from Marion County Comprehensive Plan and data from the Comprehensive Health Planning Association's projections. The service area, as defined earlier predicts a slower growth rate than the SMSA. On this basis, the growth rate at the Aurora State Airport may be expected to be somewhat slower than the growth rate at some of the other airports in the Portland metropolitan area.

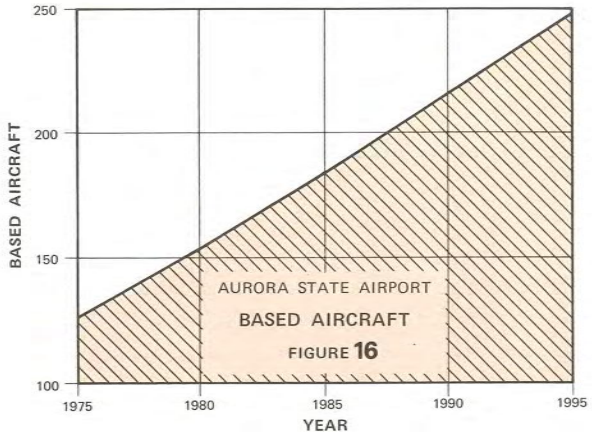
Population forecasts from the above projections for the year 1995, indicate an anticipated population of 1,011,000 in the service area, up from 710,000 in 1970. This represents a 42 percent increase, whereas the four-county increase is projected at 82 percent.

Figure 16 shows the forecast based aircraft at the Aurora State Airport. Other studies' projections are compared in the appendix. The projections used for this study have assumed no new airport in



the southeast Portland area. The appendix contains graphs that indicate either possibility, but the effects were determined not to be critical to this master plan.

The forecast for Aurora State Airport developed in this study uses fewer based aircraft than projections made by other studies. This is because recent surveys seem to indicate inaccuracies in earlier counts of based aircraft. Perhaps the previous counts were taken at periods of peak fluctuations.



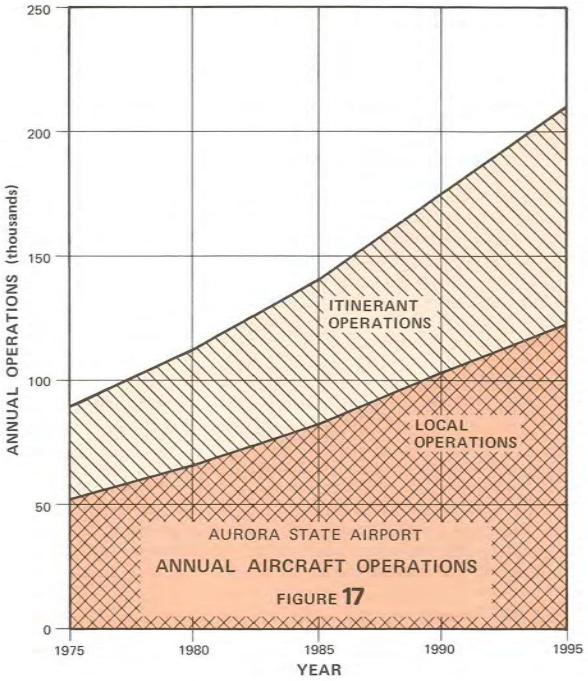
The forecast annual aircraft operations for the Aurora State Airport are shown on Figure 17. These have been projected using the best historical data available, that taken from actual surveys and projected in correlation with FAA counts and projections at Portland-Hillsboro and Portland-Troutdale airports. A verification check was made by using the methods of Report No. FAA-RD-74-178, Estimating Operations at Non-Towered Airports Using the Non-Survey Method.

The operations per based aircraft are predicted to increase from 709 in FY 1975 to 843 in 1995. This is a projected increase of 18.9 percent, which is consistent with other state and national trends.

Consistent with the other mentioned studies and national trends, projections were made for the mix of aircraft types. Figure 18 shows forecast aircraft population for the 5, 10, and 20 year periods.

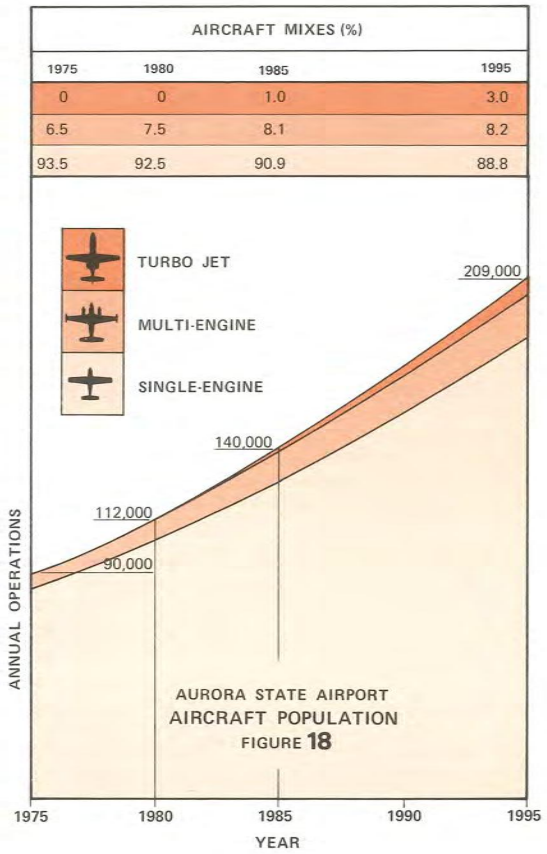
The present and forecast roles of the Aurora State Airport were carefully examined. At the present time, the airport is a General Utility airport (GU), which by definition is an airport whose operational role is to serve all types of piston-powered aircraft of maximum gross weights of 12,500 lbs. or less.

According to the forecasts developed the airport will sustain sufficient numbers of basic transport type general aviation aircraft to change the operational role to Basic Transport (BT). This would occur between 1985 and 1990. A basic transport type is: either any turbojet aircraft, or a propeller aircraft with a maximum gross weight of from 12,500 pounds to 60,000 pounds.



The functional role of the airport, defined by service level, is a high density feeder system airport, designated F-1. This is based upon a level of annual operations exceeding 100,000.

The forecast demands for the Aurora State Airport as used in this Master Plan are shown in Table 6. New developments or management policies may change these forecasts. Also since Aurora is part of the Portland regional system, its competitive position in the system strongly influences the distribution of regional aviation demands.



If the facilities at the Aurora State Airport should in the future be considerably upgraded without significant changes at other regional airports, then the competitive position of this airport may significantly increase the aviation demand at Aurora State. For this reason, projections should be periodically checked and revised.

TABLE 6 MASTER PLAN FORECASTS FOR AURORA STATE AIRPORT				
	ACTUAL (1975-76)	1980	1985	1995
BASED AIRCRAFT	127	154	184	248
ANNUAL OPERATIONS	90,000	112,000	140,000	209,000
BUSY HOUR OPERATIONS	50	60	78	115
OPERATIONS PER BASED AIRCARFT	709	727	761	843

DEMAND VERSUS CAPACITY ANALYSIS

This analysis determines during which years forecast aviation demands upon the airport will exceed facility capacities. Determinations are included for the short, intermediate, and long range periods (1980, 1985, 1995).

Both the airside and the groundside have been analyzed. The airside includes the runway and taxiway system, as well as the airspace. The groundside includes the terminal area, with aprons, hangars, buildings, utilities, development area, and entrance and access roads.

The forecast aviation demands shown in Table 6 are the basis for this section. Capacity determinations were made using FAA Advisory Circular 150/5060-1A, Airport Capacity Criteria Used In Preparing the National Airport Plan. Capacities for the groundside activities were determined from FAA and other airport engineering standards. It was assumed that instrument operations will be conducted utilizing traffic procedures that will not restrict airspace. Also, it was assumed in studying runway capacity, that an adequate taxiway system would be developed to minimize runway congestion.

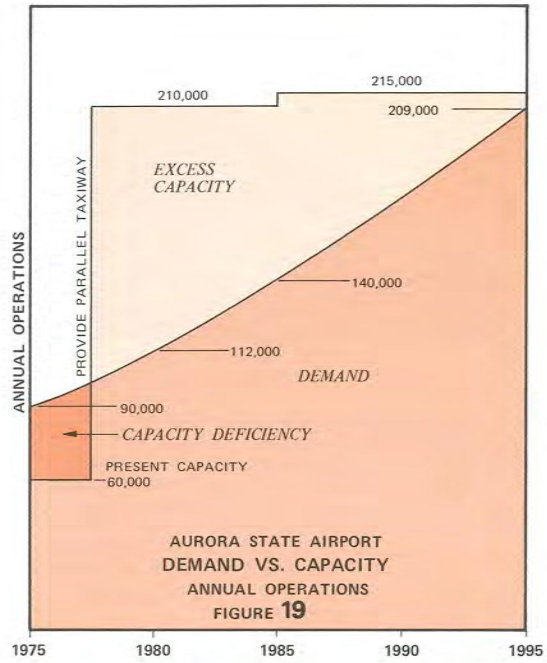
Another factor affecting capacity is the aircraft mix. For this study, it was assumed that the percentage of small general utility type aircraft will exceed 90 percent through the 20-year long range period as indicated on Figure 18, page 22. This assumption conforms to national trends for similar situations.

Direction of runway operation does not restrict capacity at Aurora, where the direction of operation is slightly over 50 percent for the north operation and slightly under 50 percent for the south operation, and where there are no close-in airspace constraints. In the absence of data on IFR conditions at the Aurora State Airport, conditions for the Portland-Hillsboro Airport were used, where records show 92.8 percent VFR and 7.2 percent IFR. The FAA long range capacity method, used as a check, assumes an annual condition of 90 percent VFR and 10 percent IFR.

In the airside analysis, no restriction on capacity was determined to exist in the airspace around the Aurora State Airport. However, as traffic increases, it must be assumed that increased demands for IFR operations can and will be met by improvements to FAA's traffic control system and airway facilities. No procedural problems are anticipated in the vicinity of the airport, such as for noise abatement.

A parallel taxiway is required before runway capacity will be adequate. See Figure 19 regarding present deficiencies. With a parallel taxiway capacity would be acceptable throughout the long range period, provided the taxiway system is adequately upgraded. Runway demands in 1995 are for 209,000 annual operations (without a new southeast Portland airport); whereas a single runway with adequate taxiways has a practical annual capacity of 215,000 operations.

Practical hourly runway capacity based on the FAA method is 53 for IFR and 120 for VFR. No peak hour activity data is available for the Aurora State Airport, but it is estimated that 115 operations may occur during the peak hour during VFR by the end of the 20-year long range period. Figure 20 shows demand versus capacity through the 20-year period. Peak hour activity could vary somewhat, depending upon the daily peaking factor (the amount of daily activity occurring during the consecutive two busy hours). Capacity would not be exceeded if departure delays during the peak hour of the week do not exceed 2 minutes, which is the delay normally accepted by FAA and industry criteria.

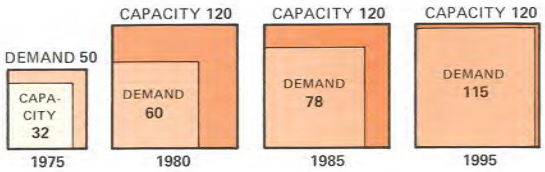


AURORA STATE AIRPORT
DEMAND VS. CAPACITY
ANNUAL OPERATIONS
FIGURE 19

The most critical capacity deficiency facing the airport is the complete lack of controlled ground space outside of the runway area. There are and will continue to be constraints in the terminal area including aprons and buildings and automobile routes until sufficient land is controlled by the airport owner. All of the groundside analyses in this study assume that the airport owner will be able to develop capacities to meet demands through adequate control of airport development land.

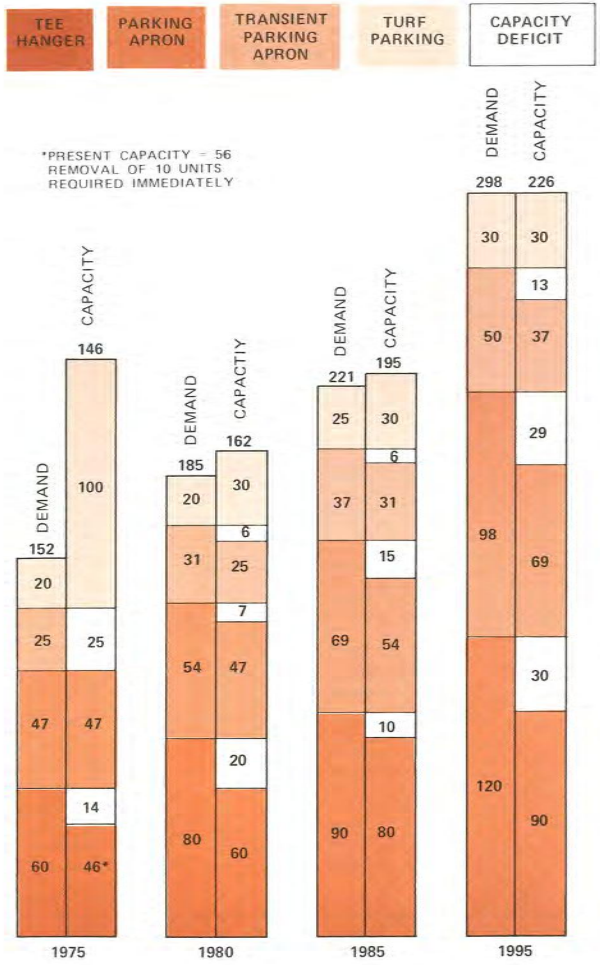
If a single runway at Aurora State Airport is to be satisfactory for the 20-year forecast period, plans must be made to insure that the runway system functions properly. This requires developing a parallel taxiway system including adequate exit taxiways so that runway occupancy time can be reduced to a minimum. This is required for safety as well as for improved capacity.

Parking apron space is the major groundside deficiency and demands will continue to be significant. The requirements for aircraft parking capacities to meet demands are shown on Figure 21. Although many airports provide all parking on pavement, it has been assumed in this case that it will be adequate to park 90 percent of the based aircraft on paved aprons or in hangars. Hangar capacity is presently 56 aircraft. Forecasts show that by the end of the long range period, there will be requirements for 120 tee-hangar bays.



AURORA STATE AIRPORT
DEMAND VS. CAPACITY
PEAK HOUR OPERATIONS
FIGURE 20

Also, there is a requirement for one central entrance road connecting the other roads used by the individual operators on the airport. Additional automobile parking will be required, along with more public terminal building space as traffic demands increase. Specific requirements are discussed in the next section.



DEMAND VS. CAPACITY
AIRCRAFT PARKING
IN NUMBERS OF AIRCRAFT
FIGURE 21

FACILITIES REQUIREMENTS

The requirements in this section for airport facilities are based upon FAA criteria for Utility and Transport airports. Existing deficiencies and undesirable conditions are identified in the INVENTORY The DEMAND/CAPACITY ANALYSIS shows capacity deficiencies and when expansion is required.

In the long range period, around 1985, the airport category will change from General Utility to Basic Transport. This will require a runway lengthening of about 1900 feet in two stages by 1995. Other than additional costs, this requirement poses no serious space problem because airfield size is presently adequate to accommodate a Basic Transport runway.

However, the absolute lack of airport property to either side of the runway area makes land acquisition a prerequisite to any other airport development. Table 7 shows ultimate facilities requirements and indicates many needed improvements that cannot be placed on present airport property. The table also recommends 1140 acres to be zoned as a buffer zone overlay for land use protection against airport encroachment.

A single runway system is adequate for future needs through the 1995 period studied. Neither capacity constraints, nor constraints posed by crosswind coverage require a second runway, and the effect of constructing or not constructing a new southeast Portland airport will not change this adequacy during the Master Plan study period.

Current runway length, 4100 feet, is slightly more than the General Utility requirement, which is 3600 feet. A Basic Transport length accommodating about 60 percent of the fleet with a 60 percent load would be 4700 feet. One hundred percent of the BT fleet at 60 percent load requires 5300 feet. This Master Plan recommends lengthening to 5000 feet shortly before 1985 and retaining the present 30,000 pounds single gear pavement strength. In the 1985 to 1995 period the runway should be increased to about 6,000 feet and single gear pavement strength increased to 60,000 pounds. Sixty percent of the BT fleet at 90 percent load requires 6300 feet.

The present width, 150 feet, should be retained to provide a somewhat better level of safety, particularly during periods of strong winds. When a MLS or equivalent system is installed, a wide runway will be desirable particularly for turbojet aircraft operating at relatively high approach speeds. Depending upon the development of MLS runway standards this recommendation is subject to change. Retaining the present width of pavement will also minimize construction problems associated with future runway edge lighting.

The taxiway system is very critical to airport safety and capacity. A parallel taxiway, the entire length of the runway, is required immediately with adequate exits from the runway. New stub taxiways from the parallel taxiway to all apron areas are also required. The stub and exit taxiways should be lighted with medium intensity lights and should be marked. Taxiway reflectors are suitable for the parallel taxiway.

Paved aircraft parking aprons are required immediately. Virtually all aircraft are currently parked on turf, which causes stability problems during wet weather. No apron facilities are provided for transient parking. A centrally located public parking apron will solve this major deficiency.

The frequency of instrument weather conditions and long winter hours of darkness dictate an upgrading of the lighting and navigational systems. Medium intensity runway edge lighting should be installed, including visual approach slope indicators (VASI) on both ends. An on-airport or near-airport nonprecision approach aid should be added to provide better minimums and higher IFR capacity. Eventually an MLS is recommended. This should be supplemented by an approach light system such as MALSF.

As the trend for ownership of more expensive airplanes and more multi-engine airplanes increases, the shortage of tee-hangars will become even more critical. As airport services increase additional conventional hangars will be required. Aircraft security needs will increase as more aircraft are based at the airport and as ground traffic increases. Better fencing and more lighting around aircraft parking areas will be required.

TABLE 7

ULTIMATE FACILITIES REQUIREMENTS

DESCRIPTION	EXISTING (1975) FACILITIES	1995 REQUIREMENT	RECOMMENDED DEVELOPMENT
LAND FOR AIRPORT DEVELOPMENT	113 acres	229 acres	116 acres
LAND FOR AIR EASEMENTS	223 acres	241 acres	18 acres
LAND TO BE ZONED AIRPORT BUFFER	None	1,140 acres	1,140 acres
OBSTRUCTION REMOVAL	Trees	1.5 acres	1.5 acres
RUNWAY, NON-PRECISION INSTRUMENT	4,100' x 150'	6,000' x 150'	1,900' x 150'
STRENGTH	30,000#	60,000#	30,000#
TAXIWAYS: PARALLEL	None	6,000' x 40'	6,000' x 40'
EXITS	3(1)	6	6 (40' wide)
STUBS	3(1)	4	4 (40' wide)
HOLDING APRONS	1(1)	4	4 (50' x 100')
PAVED PARKING APRON:			(50,000 SY)
BASED AIRCRAFT	None	98 Aircraft	98 Aircraft
TRANSIENT AIRCRAFT	Negligible	50 Aircraft	50 Aircraft
TURF PARKING AREA	100(2)	30 Aircraft	20 Aircraft
LIGHTING			
MEDIUM INTENSITY, RUNWAY	4,100 LF (Low Intensity)	6,000 LF	6,000 LF
MEDIUM INTENSITY, TAXIWAY	None	7,200 LF	7,200 LF
TAXIWAY REFLECTORS	None	6,000 LF	6,000 LF
AIRPORT BEACON	Substandard	1	1
LIGHTED WIND INDICATORS	1(1)	3	3
VASI	None	2 ends	2
MALSF	None	1	1
APRON LIGHTING	None	1,800 LF	1,800 LF
SEGMENTED CIRCLE	None	1	1
NAVIGATIONAL APPROACH AIDS	Newberg VOR TAC	MLS or Equivalent	NDB and MLS
FENCING: SECURITY	None	7,000 LF	7,000 LF
PERIMETER	11,000 LF(1)	13,500 LF	13,500 LF
AUTOMOBILE PARKING	80 cars	280 cars	200 cars
AIRPORT ROADS	Substandard(1)	7,300 LF	7,300 LF
TERMINAL/ADMINISTRATION BUILDING	None	5,000 SF	5,000 SF
AIR TRAFFIC CONTROL TOWER	None	1	1(3)
CRASH, FIRE, RESCUE STATION	None	1	1
TEE-HANGARS	56(4)	120	74(5)
CONVENTIONAL HANGARS	3	6 to 8	3(5)
HELIPORT	None	1	1 (120' x 160')

(1) Replace Existing (4) Remove 10 Existing
(2) Abandon 80 Existing (5) By Private Development
(3) By FAA

Eventually, greater activity on the groundside of the airport will necessitate more terminal and operations building space together with a centrally located administration building. There should be only one prominent entrance road to the airport and an internal road system that connects the entrance road to the various services and operators and apron areas. As more people use the airport, it will be necessary to upgrade the sanitary waste systems, and possibly centralize waste treatment facilities on the airport or in a municipal system.

The needs for development will create a need for capital for investment. Therefore it will be necessary to stimulate revenue producing activities by generally encouraging airport related commercial activities that will provide financial support to the airport.

ENVIRONMENTAL REQUIREMENTS

The principal environmental effects of airport development include: noise, air and water pollution, ecological impacts, social impacts, and effects of construction and operation. The development of many of the improvement projects needed for the airport will affect the environment, sometimes noticeably and sometimes imperceptibly.

The primary environmental consideration at the Aurora State Airpot is to have compatible land use in the airport vicinity. Exposure to aircraft noise mostly determines compatibility. Other considerations are aircraft accident potential, air pollution, and effects of vehicular traffic patterns.

Aircraft noise exposure often has adverse behavioral and subjective effects on people. Behavior effects involve interference with on-going activities such as speech, learning, and sleeping. Subjective effects are described by terms like "annoyance" and "nuisance." The magnitude of the problem depends on the volume, frequency, and time of day of aircraft operations; the number of turbojet aircraft operations; and the character of land use exposed. Table 8 describes typical noise impacts on land use.

The aircraft noise generated at a general aviation airport like Aurora State is ordinarily minimal because there is no appreciable number of turbojet or night operations and because the surrounding development has a relatively low population density. Critical noise contours for existing conditions do not fall outside the airport. See Figure 8, Existing Noise Exposure, page 13.

The FAA, with assistance from EPA, is responsible for regulating aircraft noise. To date no specific regulations or standards for acceptable aircraft noise exposure limits on land use have been established. Instead, general guidelines regarding land use compatibility and noise exposure are used. A technical forecast of noise exposure levels is included in the AIRPORT PLANS section.

Land use compatibility guidelines are based on the relative noise sensitivity of different activities. The most sensitive uses are those involving conversation and sleeping. Typically, auditoriums, arenas, schools, hospitals, and housing are the least compatible and open space uses like farming are the most compatible. Consequently, preservation of the existing agricultural land use pattern around the Aurora State Airport is the key to compatible land use regardless of the noise exposure levels.

TABLE 8

NOISE IMPACTS ON LAND USE

LAND USE	NOISE EXPOSURE FORECAST (NEF)		
	< 30 LOW NOISE IMPACT	30-40 MODERATE NOISE IMPACT	> 40 HIGH NOISE IMPACT
RESIDENTIAL, LOW DENSITY			
RESIDENTIAL MEDIUM DENSITY			
RESIDENTIAL, HIGH DENSITY			
SCHOOLS, HOSPITALS			
OFFICE			
COMMERCIAL			
INDUSTRIAL			
AGRICULTURAL			
RECREATION			

LEGEND

NO CONFLICT | LOW CONFLICT | MODERATE CONFLICT | SERIOUS CONFLICT

Reducing aircraft accident potential may require regulating the height of objects under established flight paths and prohibiting light and smoke emissions that adversely effect the pilot's vision. Because the greatest probability of aircraft accidents is either on or immediately adjacent to the runway. It is important that the airport itself meets adequate design standards. It is also adviseable to discourage large concentrations of people or hazardous materials within the approach and departure paths. This is a matter for local agencies to regulate in cooperation with the airport owner.

The air quality aspects of airport development are regulated by the Oregon Department of Environmental Quality (DEQ). DEQ is responsible for assuring compliance with State and Federal air quality standards. The Aurora State Airport is subject to the indirect source rules as set out in OAR 340. Under these rules, the potential impacts of airport operations on air quality need to be evaluated only when a modification to the airport is proposed that will increase annual operations by 25,000 or more within 10 years after completion of the improvement. This impact evaluation is called for just prior to the time of making the improvement.

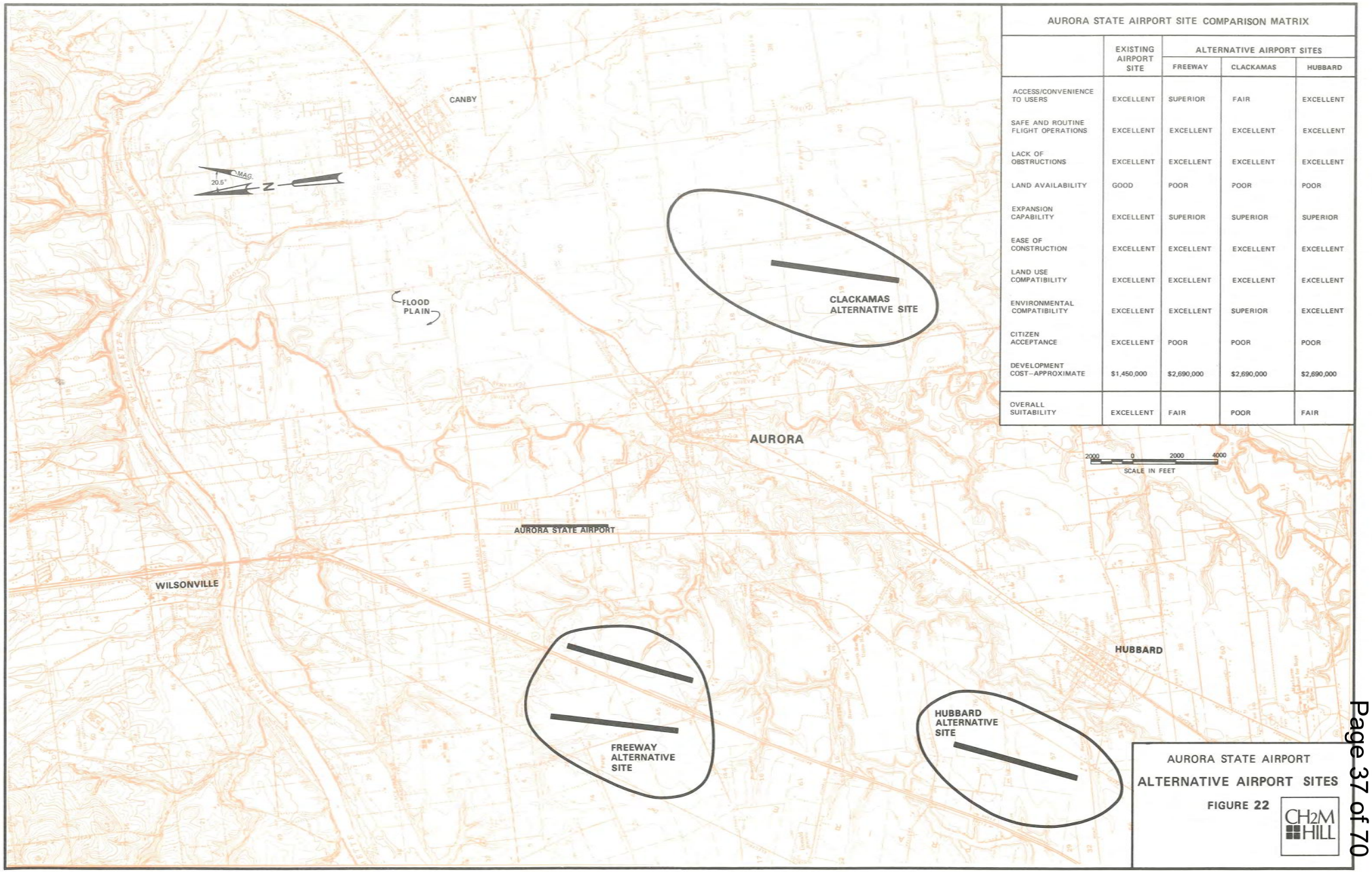
The vehicular circulation aspects of airport development need to be considered in the context of congestion on existing highways. Based operations at the airport currently have individual access points. Consideration must be given to linking all ground operations with a continuous system on the site in order to minimize confusion, congestion and accident hazards on the bordering highways.

At this time, it appears that there are no significant ecological or social impacts upon the airport environs. It is important that future development programs minimize the possibility for dislocating persons or businesses.

This Master Plan does not require that an Environmental Impact Assessment Report be performed. Later at the time of construction major capital improvements at the airport will require a full disclosure of environmental effects expected to result. This will be disclosed in an Environmental Impact Statement as required under the National Environmental Policy Act of 1969.

SITE SUFFICIENCY

The existing site of the Aurora State Airport was evaluated as to its adequacy to meet forecast requirements and according to possible environmental conflicts. Alternative airport sites shown on Figure 22 were identified, examined and compared to the existing airport. The full report is included in the appendix. It concluded that the existing site is adequate and should be retained. This choice gives the most public benefit for the least financial cost and adverse impacts.



AURORA STATE AIRPORT SITE COMPARISON MATRIX

	EXISTING AIRPORT SITE	ALTERNATIVE AIRPORT SITES		
		FREEWAY	CLACKAMAS	HUBBARD
ACCESS/CONVENIENCE TO USERS	EXCELLENT	SUPERIOR	FAIR	EXCELLENT
SAFE AND ROUTINE FLIGHT OPERATIONS	EXCELLENT	EXCELLENT	EXCELLENT	EXCELLENT
LACK OF OBSTRUCTIONS	EXCELLENT	EXCELLENT	EXCELLENT	EXCELLENT
LAND AVAILABILITY	GOOD	POOR	POOR	POOR
EXPANSION CAPABILITY	EXCELLENT	SUPERIOR	SUPERIOR	SUPERIOR
EASE OF CONSTRUCTION	EXCELLENT	EXCELLENT	EXCELLENT	EXCELLENT
LAND USE COMPATIBILITY	EXCELLENT	EXCELLENT	EXCELLENT	EXCELLENT
ENVIRONMENTAL COMPATIBILITY	EXCELLENT	EXCELLENT	SUPERIOR	EXCELLENT
CITIZEN ACCEPTANCE	EXCELLENT	POOR	POOR	POOR
DEVELOPMENT COST--APPROXIMATE	$1,450,000	$2,690,000	$2,690,000	$2,690,000
OVERALL SUITABILITY	EXCELLENT	FAIR	POOR	FAIR

AURORA STATE AIRPORT

ALTERNATIVE AIRPORT SITES

FIGURE 22

CH2M HILL

AIRPORT PLANS

AIRPORT PLANS

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AIRPORT LAYOUT PLAN	30
APPROACHES, OBSTRUCTIONS, EASEMENTS	31
TERMINAL AREA PLAN	34
SURFACE ACCESS	36
ENVIRONMENTAL CONSIDERATIONS	38
LAND USE PLAN AND RECOMMENDED ZONING	40

AIRPORT PLANS

CONCEPT

Conceptual considerations were based on Master Plan Forecasts, Table 6, page 24, and Ultimate Facilities Requirements, Table 7 page 26. In the 20-year study period requirements are for a single runway general aviation airport of high quality and having a large terminal area and ample off-airport protection from encroachment.

The effective use of space is the critical ingredient to developing or improving the airport system. Space for airport expansion is impacted on three sides by highways which would be relatively difficult to relocate, and on the fourth side by privately owned and controlled property.

Previous study determined that the best course of action is to develop the present airport. The full report regarding site sufficiency is found in the APPENDIX. Because the airport is a use of land predominately compatible with existing uses in the area, the present runway position has been retained. Expansion will occur into the space east of present airport property. This is shown on Figure 23, Airport Layout Plan.

Other alternatives were considered and discarded for reasons of costs, adverse impacts, public acceptability and other practical considerations. One alternative considered was to aquire land to the south of the runway. All expansion would then be toward the south. Although for the reasons above this concept was rejected, it will be reconsidered in the future and used if warranted.

AIRPORT LAYOUT PLAN

The Airport Layout Plan graphically illustrates the proposed development for the existing airport through the 20-year forecast. The plan provides dimensions of proposed facilities and several tables of data explaining the plan. Details of the development staging are covered later in the Master Plan.

Key points for the 20-year period include:

- In order that there can be an implementable Master Plan the Airport Layout Plan prescribes acquiring 116 acres of land in fee on the east side of the airport. Without this space for airport development it will be impossible to implement a complete and productive airport development program.

  Also 18 acres of land is to be acquired in easement for obstruction removal and for airspace protection north of the airport.

- The existing airport is to be retained with a few criteria surpassing usual maximums. The existing runway remains at its current length, slightly longer than GU requirements, (4100 versus 3600 feet), and will remain 150 feet wide instead of the usual 100 feet.

  The parallel taxiway will be placed at 225 feet instead of 200 feet because of existing drainage conditions, and the building restriction line will remain at 500 feet as established several years ago.

  Pavement strength will remain at 30,000 pounds S.G. except where lighter strength aprons are to be permanently used for lighter aircraft only.

- The runway will be improved from the existing 4100 feet and 30,000 pounds S.G. strength ultimately to 6,000 feet and to 60,000 pounds D.G. strength.

- A parallel taxiway will be constructed with several 90 degree exits and stub taxiways to provide direct access to the parking aprons.

- Paved aircraft parking aprons for 98 based aircraft and 50 transient aircraft will be developed, and turf parking for 30 aircraft will be improved.

- Lighting improvements will be extensive. Medium intensity runway and taxiway lights will be added together with taxiway reflectors on the parallel taxiway, a new beacon, VASI's for both runway ends, MALSF and apron lighting.

- New navigational aids (NDB and MLS or equivalent) are specified in addition to an air traffic control tower.

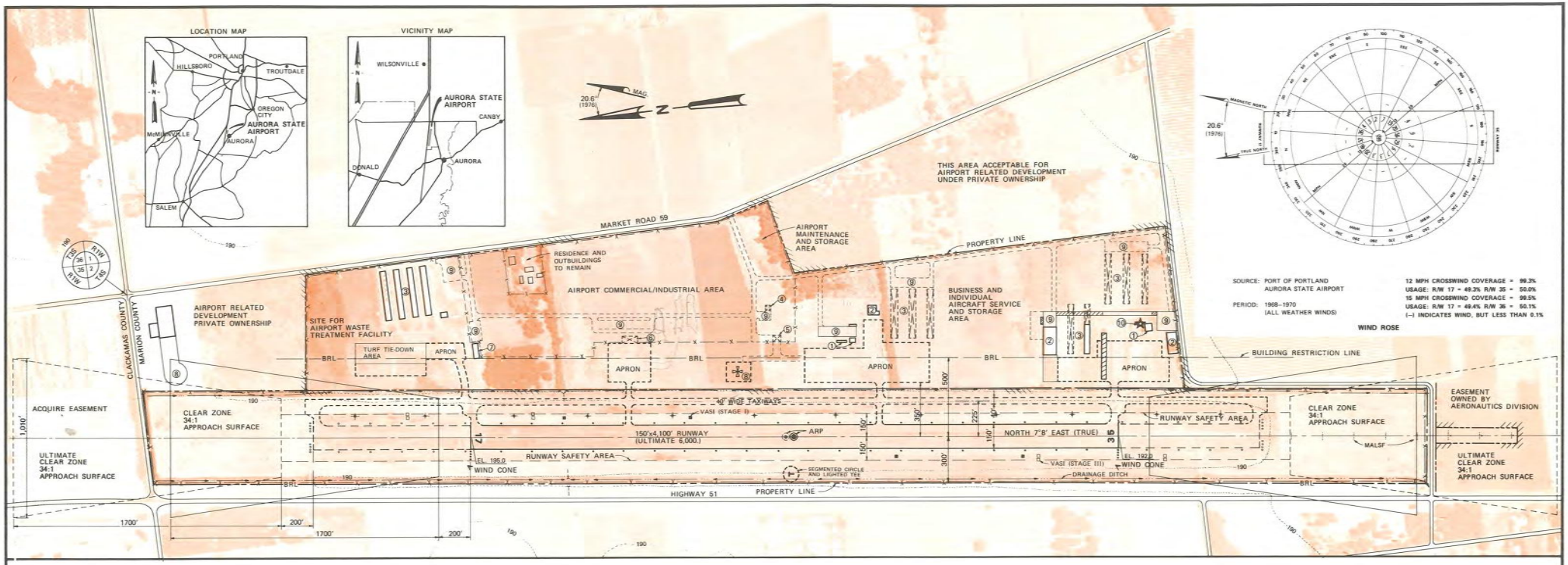
- Airport entrance and internal road systems will be considerably modified on the land which is to be acquired and new automobile parking areas will be provided.

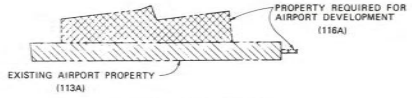
- The airport will be divided into areas of different uses which will be kept segregated. The aircraft areas will be separated from public and commercial areas by security fences. Perimeter fences will enclose the entire airport.

- Ultimately a terminal/administration building and a crash/fire/rescue station will be constructed. More hangars are prescribed.

- A heliport is specified for the ultimate airport.

The Airport Layout Plan has been approved and will remain the official guide for airport development until revised.





ULTIMATE AIRPORT PROPERTY

300 0 300 600
SCALE IN FEET

FACILITIES	
NO.	
1	F.B.O. OFFICE
2	F.B.O. HANGAR
3	TEE-HANGAR
4	CONTROL TOWER
5	CRASH, FIRE, RESCUE BLDG.
6	ADMIN./TERMINAL BUILDING
7	AVIONICS SHOP
8	HELIPORT
9	AUTOMOBILE PARKING
10	AIRPORT BEACON

NOTES:

1. FOR ADDITIONAL INFORMATION CONCERNING THE TERMINAL AREA SEE TERMINAL AREA PLAN.
2. FOR ADDITIONAL INFORMATION CONCERNING APPROACH SLOPES, CLEAR ZONES AND OBSTRUCTION SURFACES SEE ULTIMATE AIRPORT IMAGINARY SURFACES PLAN.
3. AFTER MLS STANDARDS HAVE BEEN ESTABLISHED, THE DIMENSIONS FOR RUNWAY WIDTH AND FOR APPROACH SURFACES MAY BE REVISED.
4. THE LOCATION OF THE MALSF IS SUBJECT TO CHANGE DEPENDING ON AN IFR WIND ANALYSIS.

BASIC DATA TABLE				
RUNWAY DATA				
	EXISTING (1975)	STAGE I (1975-1980)	STAGE II (1980-1985)	STAGE III (1985-1995)
RUNWAY LENGTH	4,100' 1,250m	4,100' 1,250m	5,000' 1,524m	6,000' 1,829m
RUNWAY WIDTH	150' 46m	150' 46m	150' 46m	150' 46m
EFFECTIVE GRADIENT (%)	0.07	0.07	0.07	0.06
PERCENT WIND COVERAGE	99.5	99.5	99.5	99.5
INSTRUMENT RUNWAY	None	None	None	None
PAVEMENT STRENGTH*	30S	30S	30S	60D
FAR PART 77 CATEGORY	B/C	B/C	B/C	B/C
FAR PART 77 APPROACH SLOPES	34:1	34:1	34:1	34:1
ACTUAL CLEAR APPROACH SLOPES	N26:1 S36:1	34:1	34:1	34:1
LIGHTING	L. Intensity	M. Intensity	M. Intensity	M. Intensity
MARKING	Basic	Non-Precision	Non-Precision	Non-Precision
NAVIGATIONAL AIDS	None	VASI	MALSF	MLS
OPERATIONAL ROLE	GU	GU	BT	BT

*Values given are the gross weight in 1,000 lbs. for single (S) and dual (D) gear aircraft.

BASIC DATA TABLE		
AIRPORT DATA		
	EXISTING	ULTIMATE
AIRPORT ELEVATION (MSL)	195'	195'
AIRPORT REFERENCE POINT (ARP) LAT.	45° 14' 43"	45° 14' 44"
LNG.	122° 46' 07"	122° 46' 07"
NAVIGATIONAL AIDS	NONE	MLS
NORMAL MAX. TEMP. HOTTEST MONTH	84°F (29°C)	84°F (29°C)
FUNCTIONAL ROLE	S3	S2
MISCELLANEOUS FACILITIES: TAXIWAY MARKING AND LIGHTING	NONE	BASIC

KEY TO ABBREVIATIONS

B/C Non-precision Instrument Runway Larger Than Utility
GU General Utility
BT Basic Transport
S3 Low Density Secondary System
S2 Medium Density Secondary System

LEGEND		
EXISTING	ULTIMATE	
190		GROUND CONTOURS
		PROPERTY LINE
		STORM DRAIN INLET
		RUNWAY LIGHTS
		THRESHOLD LIGHTS
		FACILITIES
		AIRPORT REFERENCE POINT
		BUILDING RESTRICTION LINE (BRL)
		BUILDINGS
		FACILITIES TO BE REMOVED
		DRAINAGE COURSE
		DRAINAGE CULVERT
		FENCE

FEDERAL AVIATION ADMINISTRATION APPROVAL
Approval Date 11 JUNE 1976
See Approval Letter 11 JUNE 1976 Date
GEORGE L. BULEY
Chief, Airports Planning Branch

AERONAUTICS DIVISION APPROVAL
ROY M. RAASINA 13 MAY 1976
Manager Airport Branch
PAUL E. BURKET 13 MAY 1976
Administrator

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FIGURE 23

No.	Revision	By	Appr	Date

AURORA STATE AIRPORT
AURORA, OREGON

AIRPORT LAYOUT PLAN

OREGON STATE AERONAUTICS DIVISION
SALEM, OREGON

Township 4S Range 1W Scale as Shown Dwg. No. B-71 MP
Section 2,11 County MARION Date 13 MAY 76 Sheet 1 of 3

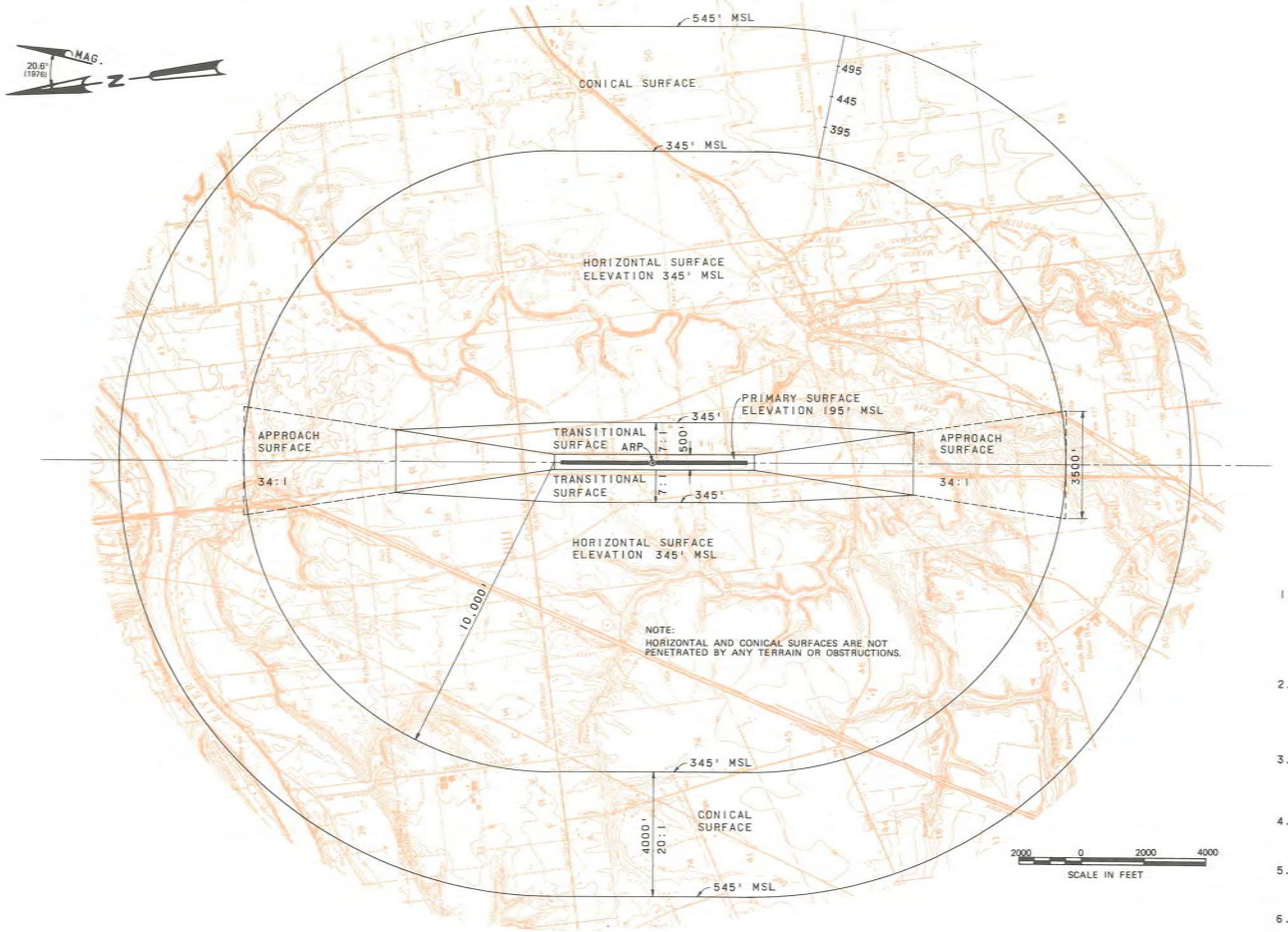
APPROACHES, OBSTRUCTIONS, EASEMENTS

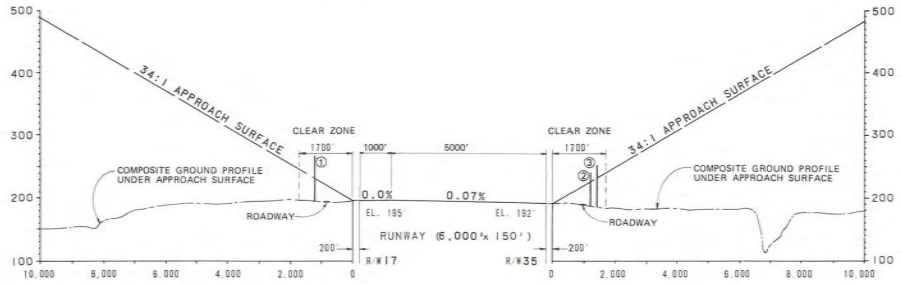
Figure 24 shows the ultimate airport imaginary surfaces and is a part of the Airport Layout Plan. These surfaces are according to Federal Aviation Regulations Part 77 and are much like the existing surfaces.

The existing surfaces as of June 1976 remain as illustrated on Figure 11, page 19. This plan was prepared in 1972 by the Aeronautics Division.

After existing obstructions are removed few future problems are anticipated. Existing air easements are to be retained and one new area north of the airport is to be acquired. The figure depicts Part 77 standards for a nonprecision instrument runway.

Exhibit 5
Page 43 of 70





OBSTRUCTION REMOVAL SCHEDULE TO MEET FAR PART 77 CRITERIA

NUMBER	OBSTRUCTION	ACTION	PHASE
①	TREES	TO BE REMOVED	PHASE I
②	TREES	TO BE REMOVED	PHASE II
③	TREES	TO BE REMOVED	PHASE II
④	MISC. TREES TRANSITION SURFACES (Not shown. see Fig. 11)	TO BE REMOVED	PHASE I & II

DEFINITIONS

1. PRIMARY SURFACE - THE SURFACE LONGITUDINALLY CENTERED ON THE RUNWAY CENTERLINE AND EXTENDING 200 FEET BEYOND EACH END OF A SPECIALLY PREPARED HARD SURFACED RUNWAY. THE WIDTH OF THE PRIMARY SURFACE IS EQUAL TO THE WIDTH OF THE BEGINNING OF THE RUNWAY'S MOST PRECISE APPROACH SURFACE.
2. TRANSITIONAL SURFACE - THE SURFACE THAT EXTENDS UPWARD AND OUTWARD AT RIGHT ANGLES TO THE RUNWAY CENTERLINE EXTENDED AT A SLOPE OF 7:1 FROM THE SIDES OF THE PRIMARY SURFACE AND FROM THE SIDES OF THE APPROACH SURFACES TO THE HORIZONTAL AND CONICAL SURFACES.
3. HORIZONTAL SURFACE - THE HORIZONTAL PLANE 150 FEET ABOVE THE ESTABLISHED AIRPORT ELEVATION BEGINNING AT ITS INTERSECTION WITH THE TRANSITIONAL SURFACE AND EXTENDING TO THE BEGINNING OF THE CONICAL SURFACE.
4. CONICAL SURFACE - THE SURFACE EXTENDING UPWARD AND OUTWARD FROM THE PERIPHERY OF THE HORIZONTAL SURFACE AT A SLOPE OF 20:1 FOR A HORIZONTAL DISTANCE OF 4000 FEET.
5. APPROACH SURFACES - THE SURFACE LONGITUDINALLY CENTERED ON THE EXTENDED RUNWAY CENTERLINE AND EXTENDING UPWARD AND OUTWARD FROM EACH END OF THE PRIMARY SURFACE.
6. AIRPORT REFERENCE POINT (ARP) - THE POINT ESTABLISHED AS APPROXIMATE GEOGRAPHICAL CENTER OF THE AIRPORT LANDING AREA.
7. AIRPORT ELEVATION - THE HIGHEST POINT ON THE USEABLE LANDING AREA, WHICH ELEVATION IS DATUM TO ESTABLISH THE ELEVATION OF THE HORIZONTAL SURFACE.

FEDERAL AVIATION ADMINISTRATION APPROVAL

Approval Date 11 JUNE 1976

See Approval Letter 11 JUNE 1976 Date

GEORGE L. BULEY
Chief, Airports Planning Branch

AERONAUTICS DIVISION APPROVAL

ROY M. RAASINA
Manager Airport Branch 13 MAY 1976

PAUL E. BURKET
Administrator 13 MAY 1976

No.	Revision	By	Appr	Date

AURORA STATE AIRPORT
AURORA, OREGON

ULTIMATE AIRPORT IMAGINARY SURFACES PLAN

OREGON STATE AERONAUTICS DIVISION
SALEM, OREGON

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FIGURE 24

Township 4S Range 1W Scale as Shown Dwg. No. 3
Section 2,11 County MARION Date 13 MAY 76 Sheet 3 of 3

TERMINAL AREA PLAN

This plan is a part of the Airport Layout Plan, and shows an area which needs significant development. In order to provide assurance that runway and terminal areas can be developed in harmony, it will be necessary first to acquire the land for the terminal area. This will enable the existing flight strip type of airport to become a complete airport, particularly as regards adequate public service areas.

By providing a parallel taxiway with stubs to various apron areas the airport users will have all weather parking and have easy access to tee-hangar parking. Figure 25 shows the Terminal Area Plan.

The terminal area is separated into three general areas. The first is the south portion of the terminal area where 2 fixed base operations with several tee-hangars will be located. There will be ample room for individuals and businesses to lease space and provide their own hangars and individual service facilities.

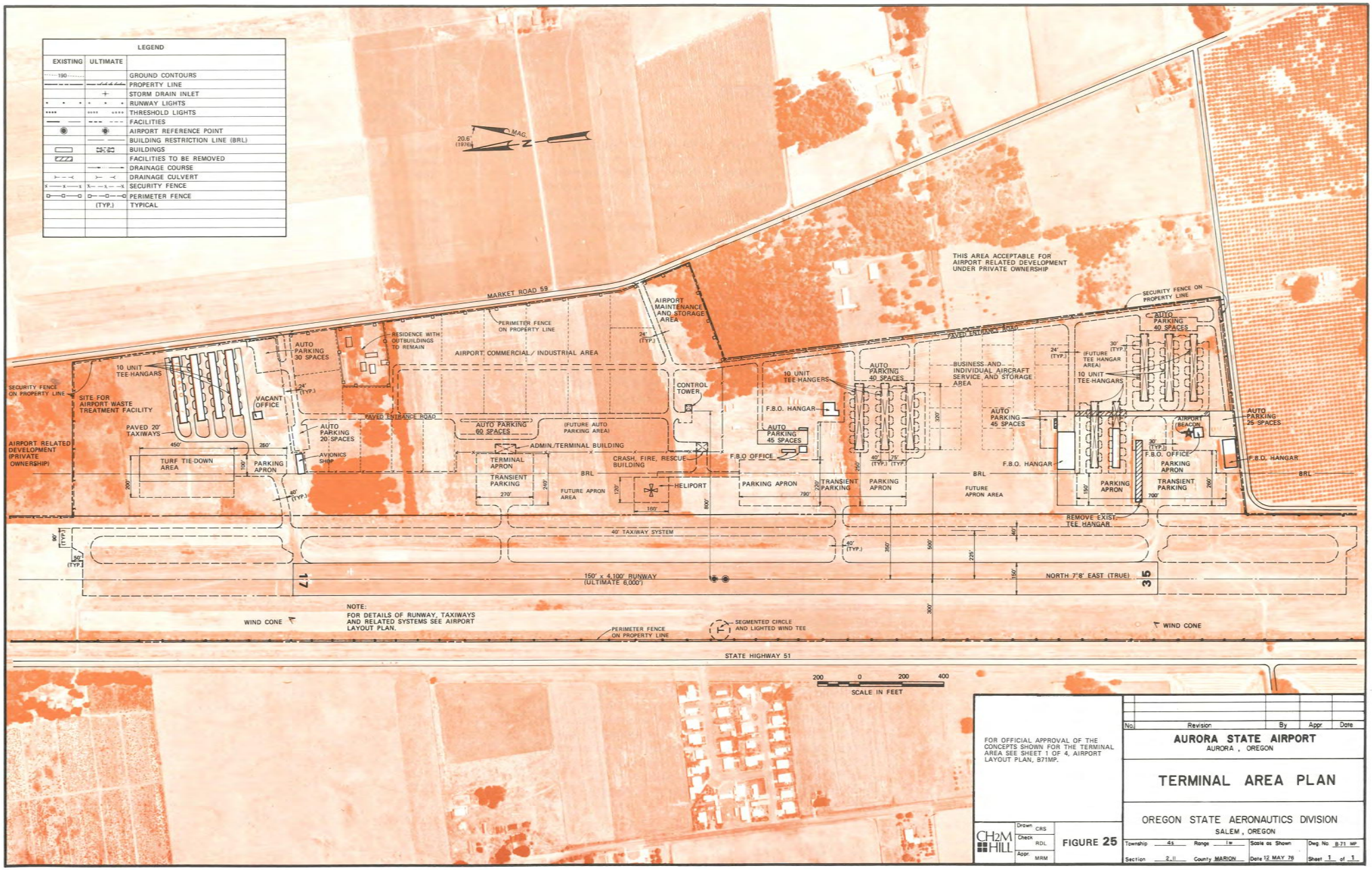
In the center of the airport will be space for general public oriented activity. Next to the runway will be a central public apron with terminal building and space for airport maintenance and management personnel. This area will contain in the center of the airport the FAA air traffic control tower, the crash/fire/rescue station and a heliport.

Just east of the central terminal area is a large area designated as a commercial/industrial park to accommodate aviation directly related or other carefully selected compatible light industrial facilities. By being located on airport property such commercial facilities can provide better services to the flying public and also provide income to broaden the financial base of the airport.

An area on the north part of the future airport property has been designated for a central airport waste treatment facility. Depending upon actual needs and State regulations a forced main to a municipal facility might be considered. This is a subject for study as the Master Plan is implemented.

Another smaller developable area suitable for further expansion as a third FBO operation lies at the north end of the terminal area property.

The internal road system is designed to provide convenient access to all parts of the airport. It will separate different kinds of airport users. Aircraft areas are to be separated from the general public and from commercial/industrial areas. Apron lighting and security fencing are prescribed for the aircraft parking area.


LEGEND
EXISTING
ULTIMATE
GROUND CONTOURS
PROPERTY LINE
STORM DRAIN INLET
RUNWAY LIGHTS
THRESHOLD LIGHTS
FACILITIES
AIRPORT REFERENCE POINT
BUILDING RESTRICTION LINE (BRL)
BUILDINGS
FACILITIES TO BE REMOVED
DRAINAGE COURSE
DRAINAGE CULVERT
SECURITY FENCE
PERIMETER FENCE
(TYP.)
TYPICAL
MAG.
20.6°
MARKET ROAD 59
THIS AREA ACCEPTABLE FOR AIRPORT RELATED DEVELOPMENT UNDER PRIVATE OWNERSHIP
SECURITY FENCE ON PROPERTY LINE
AIRPORT MAINTENANCE AND STORAGE AREA
PAVED ENTRANCE ROAD
AUTO PARKING 40 SPACES
RESIDENCE WITH OUTBUILDINGS TO REMAIN
PERIMETER FENCE ON PROPERTY LINE
AIRPORT COMMERCIAL / INDUSTRIAL AREA
AUTO PARKING 30 SPACES
10 UNIT TEE-HANGARS
SECURITY FENCE ON PROPERTY LINE
SITE FOR AIRPORT WASTE TREATMENT FACILITY
VACANT OFFICE
PAVED 20' TAXIWAYS
AUTO PARKING 20 SPACES
AVIONICS SHOP
AIRPORT RELATED DEVELOPMENT (PRIVATE OWNERSHIP)
TURF TIE-DOWN AREA
PARKING APRON
AUTO PARKING 60 SPACES
(FUTURE AUTO PARKING AREA)
ADMIN./TERMINAL BUILDING
TERMINAL APRON
TRANSIENT PARKING
FUTURE APRON AREA
CRASH, FIRE, RESCUE BUILDING
HELIPORT
CONTROL TOWER
10 UNIT TEE-HANGARS
F.B.O. HANGAR
AUTO PARKING 45 SPACES
F.B.O OFFICE
PARKING APRON
TRANSIENT PARKING
BUSINESS AND INDIVIDUAL AIRCRAFT SERVICE AND STORAGE AREA
AUTO PARKING 40 SPACES
AUTO PARKING 45 SPACES
F.B.O. HANGAR
F.B.O. OFFICE
PARKING APRON
TRANSIENT PARKING
FUTURE APRON AREA
(FUTURE TEE HANGAR AREA)
10 UNIT TEE-HANGARS
AIRPORT BEACON
AUTO PARKING 25 SPACES
F.B.O. HANGAR
BRL
REMOVE EXIST. TEE HANGAR
40' TAXIWAY SYSTEM
150' x 4,100' RUNWAY (ULTIMATE 6,000')
17
35
NORTH 7°8' EAST (TRUE)
WIND CONE
NOTE:
FOR DETAILS OF RUNWAY, TAXIWAYS AND RELATED SYSTEMS SEE AIRPORT LAYOUT PLAN.
PERIMETER FENCE ON PROPERTY LINE
SEGMENTED CIRCLE AND LIGHTED WIND TEE
WIND CONE
STATE HIGHWAY 51
200 0 200 400
SCALE IN FEET
FOR OFFICIAL APPROVAL OF THE CONCEPTS SHOWN FOR THE TERMINAL AREA SEE SHEET 1 OF 4, AIRPORT LAYOUT PLAN, 871MP.
CH2M HILL
Drawn CRS
Check RDL
Appr MRM
FIGURE 25
No. Revision By Appr Date
AURORA STATE AIRPORT
AURORA, OREGON
TERMINAL AREA PLAN
OREGON STATE AERONAUTICS DIVISION
SALEM, OREGON
Township 4S Range 1W Scale as Shown Dwg No. 8-71 MP
Section 21 County MARION Date 12 MAY 76 Sheet 1 of 1

SURFACE ACCESS

Although surface access to the airport has been carefully studied, it is beyond the scope of an implementation program to develop improvements to the access system. Therefore only recommended solutions have been prepared and are shown on Figure 26, Recommended Airport Access Plan. These recommendations are advisory for other agencies having jurisdiction.

The Recommended Airport Access Plan relies on the strong points of the existing surface transportation systems and reinforces its deficiencies. The basic concept is to provide convenient access from the service area to the main airport entrance.

The Recommended Airport Access Plan makes maximum use of existing facilities with minimum capital expenditures to obtain an efficient airport access system, one that is well suited to the future expansion of the airport. The system may not significantly reduce the travel time of the airport users, but it will substantially improve convenience and safety.

It should retain the present access that Aurora residents have to the airport. However, the major flow of traffic to the airport should be diverted around Aurora allowing the city to remain unaffected by future airport generated traffic, which would aid in attempts to maintain the historical significance of Aurora.

If other highway criteria permit, it is important to provide access south via the freeway which is not presently available. This would be accomplished by a partial interchange as shown. This also could aid in preserving the quiet nature of Aurora.

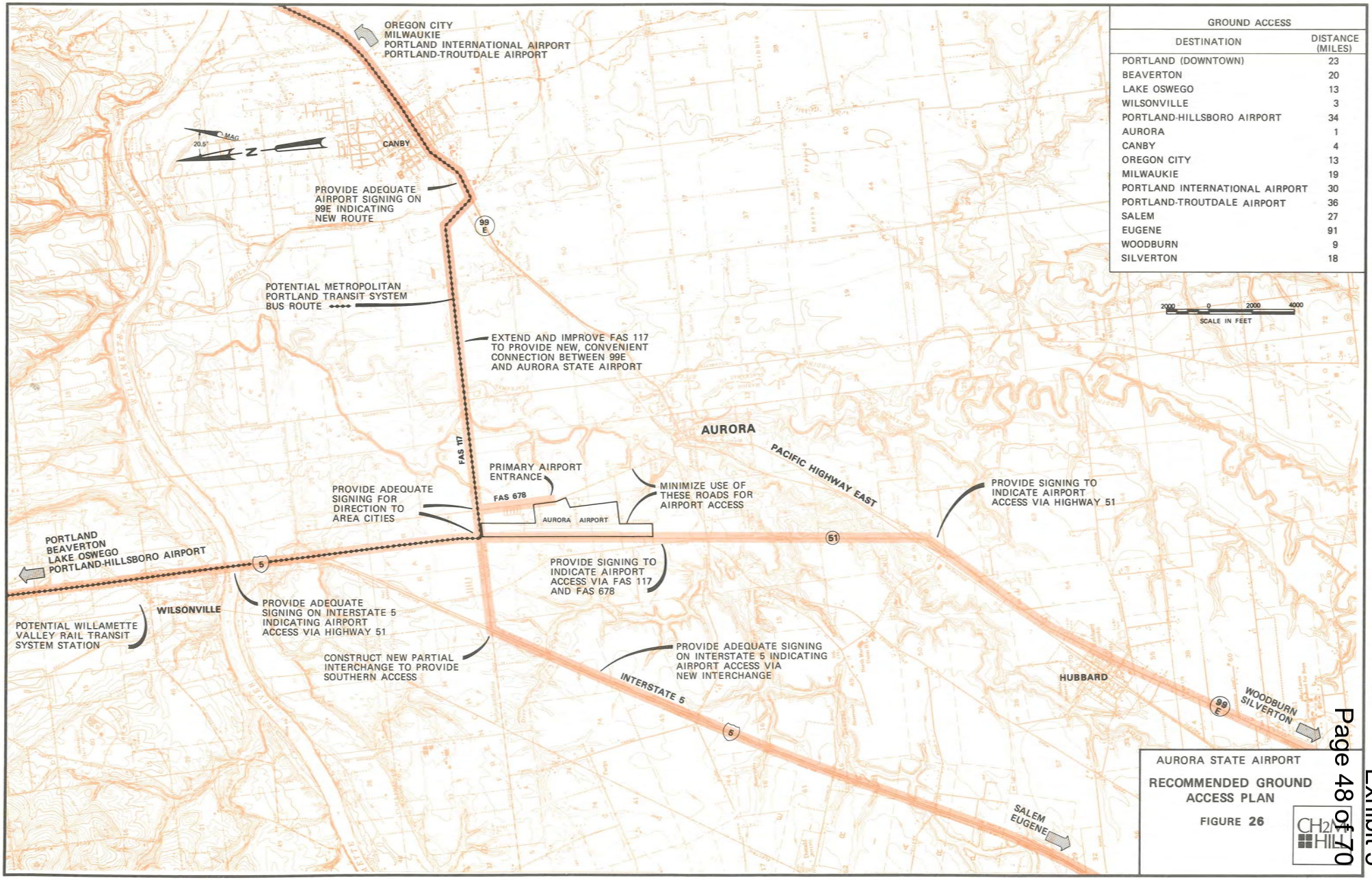
Travel on lower type facilities should be discouraged. By utilizing predominantly higher type roadways actual modification and maintenance in the field can be minimized. It is estimated that airport related activities will generate approximately 200 automobile trips at the peak hour in 1995. This amount is not significant in its impact on the area transportation system or on the major facilities.

The use of major facilities will eliminate most of the problems associated with the circuitous routes now serving the airport. The costs of operating and maintaining major facilities will be spread over a larger population, which is appropriate because of the regional nature of the Aurora State Airport.

An extensive signing program must complement any ultimate routing to the airport. This will alert the public, particularly the airport users, to the most expeditious route to the airport. Without this, much of the benefit of the other steps may be lost.

Finally, the potential exists for the extension of the Portland Metropolitan area transit system (Tri-Met) to include a route that would pass immediately north of the airport on Arndt Road. Routes are now established in Canby and Wilsonville. A tie-in with these would provide a transit link that would allow travel by transit from the airport to virtually anywhere in the metropolitan area.

Exhibit 5
Page 47 of 70



GROUND ACCESS	
DESTINATION	DISTANCE (MILES)
PORTLAND (DOWNTOWN)	23
BEAVERTON	20
LAKE OSWEGO	13
WILSONVILLE	3
PORTLAND-HILLSBORO AIRPORT	34
AURORA	1
CANBY	4
OREGON CITY	13
MILWAUKIE	19
PORTLAND INTERNATIONAL AIRPORT	30
PORTLAND-TROUTDALE AIRPORT	36
SALEM	27
EUGENE	91
WOODBURN	9
SILVERTON	18

AURORA STATE AIRPORT

RECOMMENDED GROUND ACCESS PLAN

FIGURE **26**

CH2M HILL

ENVIRONMENTAL CONSIDERATIONS

Environmental assessments have been made based upon the Airport Layout Plan drawings and upon the forecast traffic. None of the physical developments proposed require an Environmental Impact Assessment Report at this time. However the runway lengthening proposed after the next five year period will require a formal environmental process prior to construction.

Adverse environmental impacts include noise effects, air and water pollution and some traffic congestion due to build-up in the area. Figure 27 shows noise exposures for 1980, 1985 and 1995. The noise contours were developed using the forecasts given earlier in Table 6, page 24, and information on aircraft population, Figure 18, page 23. Table 8, page 27, shows noise impacts on land use.

Generally when NEF contours are below 30 the noise impact is slight and requires no special noise insulation for new construction. When the NEF is between 30 to 35 new construction should be undertaken after analysis of noise reduction requirements has been made and needed noise insulation features included in the design of buildings in that area. Because of the agricultural nature of the land around the Aurora State Airport the noise exposure, even in 1995, should not effect a large number of people.

Although aircraft emit air pollutants, they are small in numbers compared with the automobile. Table 9 shows air quality impacts produced by the forecast aircraft traffic at the airport. Automobile traffic on the airport was not analyzed.

In considering how to diminish the environmental impacts produced by the Aurora State Airport alternatives were examined. The main alternatives are:

- to make no improvements
- to make the improvements according to a Master Plan
- to close the airport

TABLE 9

AIR QUALITY IMPACTS
(peak hour)

	EMISSIONS (micrograms per cubic meter)				
	PARTI-CULATES	SULFUR OXIDES	CARBON MONOXIDE	HYDRO-CARBONS	NITROGEN OXIDES
1975					
SINGLE ENGINE	0.0040	0.0020	0.0020	0.0800	0.0100
TWIN ENGINE	0.0006	0.0003	0.0003	0.0105	0.0014
TURBO JET	0	0	0	0	0
TOTALS	0.0046	0.0023	0.0023	0.0905	0.0114
1995					
SINGLE ENGINE	0.0090	0.0045	0.0045	0.1800	0.0225
TWIN ENGINE	0.0018	0.0009	0.0009	0.0315	0.0041
TURBO JET	0.0120	0.0375	0.0015	0.3465	0.1590
TOTALS	0.0228	0.0429	0.0069	0.5580	0.1856

If nothing is done to the airport the tendency for airport encroachment will become stronger and environmental incompatibility could become a serious problem in a few years. The existing runway length accommodates several turbojet aircraft now, and it is doubtful that a do-nothing alternative would reduce their environmental impact significantly. If no improvements are made to the airport, the airport would be expected to continue to support growing numbers of traffic with reduced safety standards.

Therefore it has been deemed best for the environment to develop the airport with a positive approach to minimizing adverse environmental impacts as development is accomplished.

In fact it is the policy of this Master Plan to assume that the airport owner and local public agencies will take action to inform the public and to discourage incompatible land uses. Action in this direction has already been taken by the Aeronautics Division as evidenced by the public involvement program itemized in the APPENDIX. Marion County's current action to down-zone to EFU (Exclusive Farm Use) around the airport represents another measure that will insure continued land use compatibility.

The airport is an established public facility providing a significant contribution to the Oregon Transportation System. Serious consideration to closing the airport does not appear warranted because the unfavorable environmental impacts are not severe. Closure itself would have a serious adverse impact because there would be a need to relocate several persons and businesses. Following this secondary social and economic problems would occur.

Exhibit 5
Page 49 of 70

MAG.
20.5°
PUDDING
RIVER
TO MARION
SOUTHERN PACIFIC RAILROAD
CHARBONNEAU
TO PORTLAND
NEF 25
NEF 30
NEF 35
6,000'
NEF 35
NEF 30
NEF 25
WILLAMETTE
OREGON ELECTRIC RAILROAD
TO SALEM
1995
4,100'
NEF 25
1980
5,000'
NEF 30
NEF 25
1985
NOTE:
NOISE CONTOURS SHOWN ARE BASED ON NOISE EXPOSURE FORECAST (NEF) CRITERIA
1000 0 1000 2000
SCALE IN FEET
AURORA STATE AIRPORT
FUTURE NOISE EXPOSURE
FIGURE 27
CH2M HILL

LAND USE PLAN AND RECOMMENDED ZONING

Although the airport has been found to be providing a service to large numbers of users, it can remain in public acceptance only as long as its compatibility with the surrounding land use is preserved. This Master Plan has developed a Land Use Plan for adjacent areas, shown in Figure 28. That plan is compatible with development proposed by the Airport Layout Plan.

The Land Use Plan shows land uses recommended in the vicinity of the airport which are closely in conformance with the comprehensive plans of Marion County and Clackamas County. Unique to these comprehensive/plans would be the indicated airport buffer overlay which this Master Plan recommends for adoption by both counties. The buffer zone overlay follows the NEF 30 contour and will protect both the airport and the citizens who might otherwise move into noise impacted areas.

The airport Master Plan has been submitted to Marion County and Clackamas County for guidance in adopting new zoning in agreement with the airport. Figure 29, recommends a zoning plan and three new zones. The first zone is an Airport Development Zone, described on Figure 29. This zone is presently mostly PA, Public Amusement, for the airport and RA, Residential Agricultural, which is propsed for change to F-20, Farm-20 acres or EFU, Exclusive Farm Use.

The second zone is an Airport Buffer Overlay Zone, also shown on Figure 29. Restrictions imposed by this overlay should take precedence over any conflicting permitted uses in the zones under the overlay.

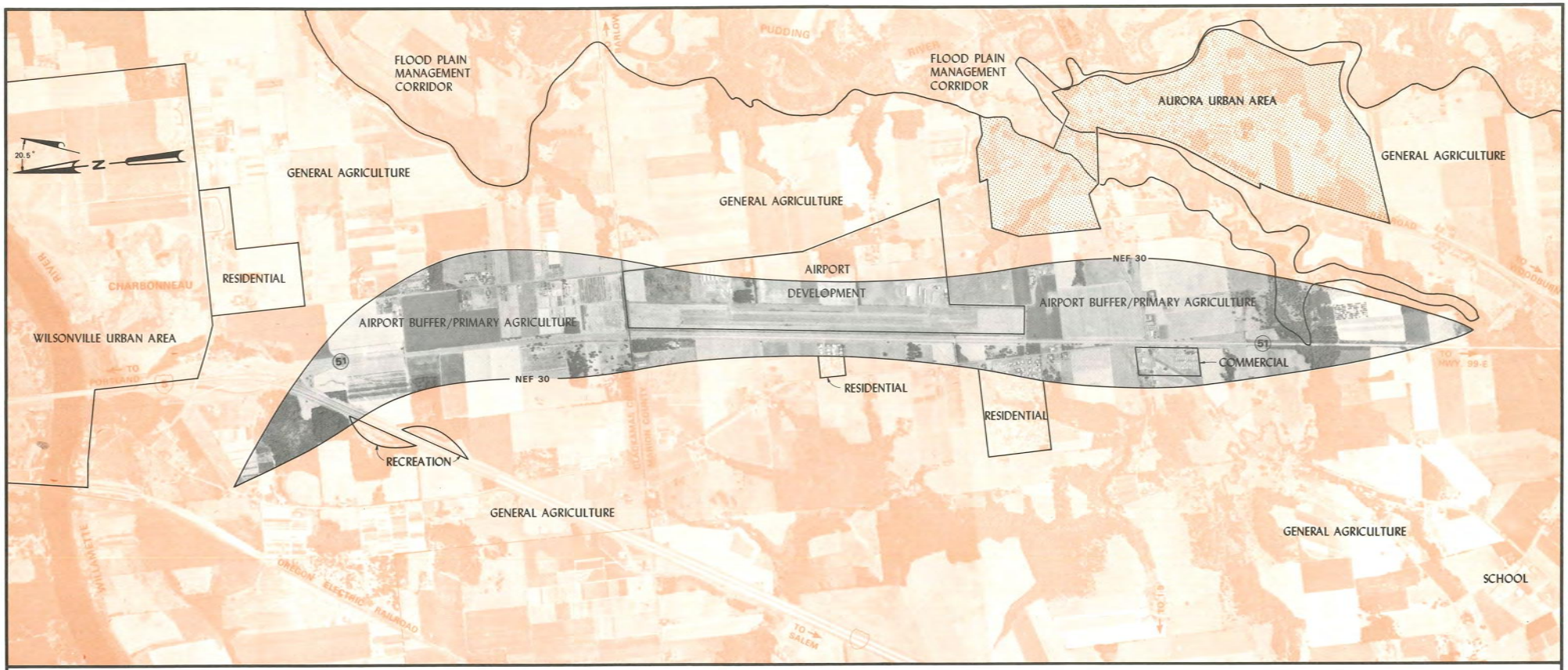
The third zone is an Airport Obstruction Surfaces Overlay Zone. It is an additional overlay superimposed over and surrounding the proposed airport. It is the same as all FAR Part 77 surfaces except the Conical Surface, which is omitted because of being over flat terrain and being very burdensome to administer. These surfaces are shown on Figure 24, Ultimate Airport Imaginary Surfaces, page 33. All surfaces are dimensioned according to FEDERAL AVIATION REGULATIONS, Part 77, Objects Affecting Navigable Airspace.

Other solutions have been considered instead of overlay zones, but they neither provide as complete and clear information nor are they as practical to administer and accomplish. Based upon experience in other parts of the nation FAA recommends overlay zones as the most practical approach after fee acquisition. Fee acquisition is time consuming and unwieldy, expensive for the the airport owner, and reduces the tax base.

As regards the land adjacent to the airport but not directly in either overlay zone the Master Plan encourages both counties to rezone that land. In the airport vicinity in Marion County EFU (Exclusive Farm Use Zone) is suggested. Marion County is currently proposing EFU in zone area number 6, which includes this area. In Clackamas County, EFU or possibly RF-F (Residential Farm-Forest Zone) is suggested.

For additional discussion refer to the letter of 20 April 1976 from CH2M HILL to Marion County regarding rezoning, which is found in the APPENDIX.

Exhibit 5
Page 51 of 70



SUGGESTED LAND USE DESIGNATIONS

COMMERCIAL:

INCLUDES LIGHT INDUSTRIAL, DISTRIBUTION AND FARM AND BUSINESS SERVICE

RESIDENTIAL:

ENCOMPASSES MEDIUM TO HIGH DENSITY RESIDENTIAL AREAS, INCLUDING PROPER OPEN SPACE, RECREATION, UTILITY AND TRANSPORTATION FACILITIES.

URBAN AREAS:

INCLUDES THOSE USES NORMALLY ASSOCIATED WITH URBAN AREA DEVELOPMENT, SUCH AS RESIDENTIAL, COMMERCIAL, INDUSTRIAL AND PUBLIC USES. USUALLY LIMITED TO AREAS WHERE ADEQUATE MUNICIPAL FACILITIES ARE AVAILABLE.

RECREATION:

CONSISTS OF AREAS WITHIN THE FLOOD PLAIN MANAGEMENT CORRIDOR THAT PROVIDE SPORT AND LEISURE OPPORTUNITIES. THE REST AREA ALONG INTERSTATE FIVE IS ALSO INCLUDED.

FLOOD PLAN MANAGEMENT CORRIDOR:

INCLUDES AREA WITHIN 100 YEAR FLOOD PLAIN LIMITS. USES ARE PRIMARILY AGRICULTURAL, FORESTRY, PARK, RECREATION, OPEN SPACES, AND EXTRACTION OF SAND AND GRAVEL.

AIRPORT DEVELOPMENT:

INCLUDES THE ACTUAL FACILITIES OF THE AIRPORT SUCH AS, THE RUNWAY, TAXIWAYS, PARKING APRONS, HANGARS, ADMINISTRATION AND OPERATION BUILDINGS, CLEAR ZONES, ETC. AVIATION RELATED INDUSTRIAL AND COMMERCIAL BUSINESSES ALSO ALLOWED IN APPROPRIATE AREAS.

AIRPORT BUFFER OVERLAY:

ENCOMPASSES AN AREA AROUND THE AIRPORT, BOUNDED BY THE FUTURE NEF 30 CONTOUR, WITHIN WHICH LAND USES ARE DESIGNATED THAT WILL BE MINIMALLY AFFECTED BY AIRCRAFT OPERATIONS AT THE AIRPORT. PREFERRED LAND USES WOULD BE PRIMARY AGRICULTURE AND COMMERCIAL USE LIMITED TO LOW DENSITY CONCENTRATION OF PEOPLE.

PRIMARY AGRICULTURE:

PRIMARILY FOR AGRICULTURAL USES, INCLUDING FARMSTEADS. ADDITIONAL USES PERMITTED ARE RURAL COMMUNITY FACILITIES SUCH AS SCHOOLS, CHURCHES, PARKS, ETC. THESE SHOULD NOT BE ALLOWED UNDER THE AIRPORT BUFFER OVERLAY. EXISTING NONCONFORMING RESIDENTIAL AND COMMERCIAL USES MAY BE CONTINUED BUT SHOULD NOT BE ALLOWED TO EXPAND BEYOND PRESENT LIMITS SHOWN.

GENERAL AGRICULTURE:

GENERALLY FOR AGRICULTURAL USES INCLUDING LARGE FARMS, LOW DENSITY ACREAGE RESIDENTIAL AREAS AND SMALL HOBBY FARMS. ADDITIONAL USES PERMITTED INCLUDE RESIDENTIAL SUBDIVISIONS, PRIVATE COMMERCIAL RECREATION FACILITIES, FARM PRODUCTS PROCESSING OPERATIONS AND SAND AND GRAVEL EXTRACTION.

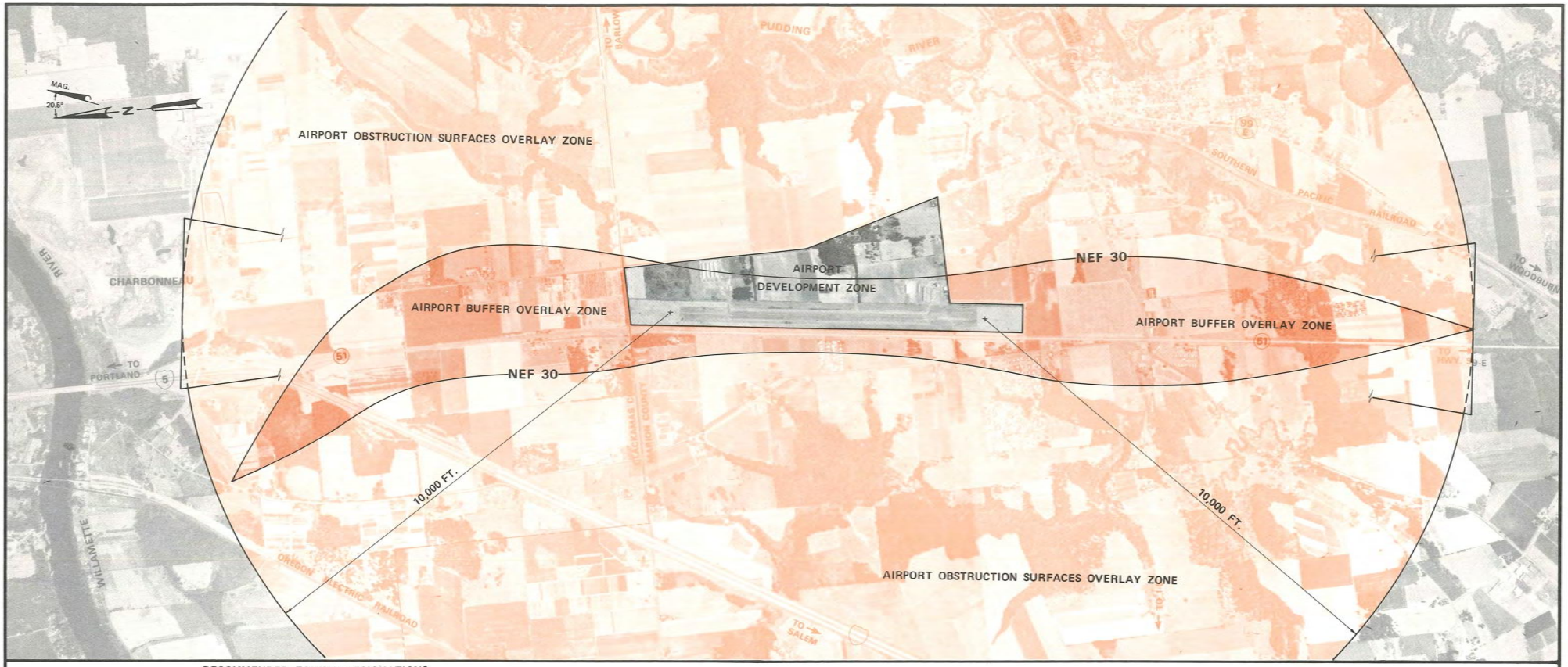
1000 0 1000 2000
SCALE IN FEET

AURORA STATE AIRPORT

LAND USE PLAN

FIGURE **28**

CH2M HILL



RECOMMENDED ZONING DESIGNATIONS

0 1000 2000
SCALE IN FEET

AIRPORT DEVELOPMENT ZONE:

PERMITTED USES TO INCLUDE OPERATION OF AN AIRPORT. CONDITIONAL USES TO BE LIMITED TO AVIATION RELATED COMMERCIAL AND/OR INDUSTRIAL BUSINESSES IN APPROPRIATE AREAS WITH RESPECT TO AERONAUTICAL FACILITIES. THERE MUST BE A DEMONSTRATED AVIATION LINK TO COMMERCIAL AND/OR INDUSTRIAL USE IN THIS ZONE.

AIRPORT BUFFER OVERLAY ZONE:

AN OVERLAY SURROUNDING AN EXISTING OR POTENTIAL AIRPORT IMPACT AREA. TO BE SUPERIMPOSED OVER AND USED IN CONJUCTION WITH EXISTING ZONING. IT IS DEFINED BY THE EXISTING OR FORECAST NEF 30 NOISE CONTOUR, WHICHEVER ENCOMPASSES THE LARGEST AREA. THE PURPOSE IS TO PROVIDE FOR USES THAT PRECLUDE CONCENTRATIONS OF PEOPLE. FOR THE AURORA STATE AIRPORT BUFFER ZONE EXCLUSIVE FARM USE (EFU), WITH LIMITED COMMERCIAL AREA, IS RECOMMENDED. THE PERMITTED USES IN THE OVERLAY ZONE OVERRIDE CONFLICTING USES IN THE ZONES BENEATH THE OVERLAY.

AIRPORT OBSTRUCTION SURFACES OVERLAY ZONE

AN ADDITIONAL OVERLAY SUPERIMPOSED OVER AND SURROUNDING THE PLANNED AIRPORT DEVELOPMENT AND DIMENSIONED ACCORDING TO FEDERAL AVIATION REGULATION PART 77, OBJECTS AFFECTING NAVIGABLE AIRSPACE. THE OBSTRUCTION SURFACES ARE SHOWN ON FIGURE 24, ULTIMATE AIRPORT IMAGINARY SURFACES. THE CONICAL SURFACE HAS BEEN EXCLUDED FROM THE OVERLAY SO THAT NO AREA FARTHER THAN 10,000 FEET FROM THE PRIMARY AIRPORT SURFACE IS AFFECTED.

AURORA STATE AIRPORT

RECOMMENDED ZONING PLAN

FIGURE 29

CH2M HILL

IMPLEMENTATION PLAN

IMPLEMENTATION PLAN

DEVELOPMENT SCHEDULE AND STAGING 43
ECONOMIC FEASIBILITY 45
FINANCING PLAN 45
MANAGING A CONTINUING PROGRAM 46

IMPLEMENTATION PLAN

DEVELOPMENT SCHEDULE AND STAGING

Table 10, Development Schedule, shows the stage development proposed through the short-range (1975-1980), the mid-range (1980-1985), and the long-range (1985-1995), periods.

This follows the requirements developed in AIRPORT REQUIREMENTS and shown on Table 7, page 26. The developments are according to the Airport Layout Plan and are illustrated on Figure 30. It has been assumed that all new pavements will last the duration of this Master Plan period (20 years).

The quantity of work required to match capacity improvements to demand requirements is shown for each item. The quantities are slightly more than demands require at the time specified. Otherwise the owner could construct smaller facilities earlier or more frequently, particularly as regards apron space.

The major development items in Stage I are land acquisition and a parallel taxiway. All land must be acquired initially to insure that the airport remains a complete unit and that the owner has control to carry out the rest of the Master Plan program.

Other major developments are: parking aprons for more than 100 aircraft, based and transient, runway rehabilitation, major airfield lighting, and site development of the terminal area.

During the Stage II development period the runway will be extended 900 feet with MALSF lighting and NDB. This anticipates a demand for more complex aircraft and longer trip distances with resultant greater takeoff requirements. Most of the other improvements are for developing the terminal area.

The timing for Stage III long-range development needs is less definite. The Master Plan calls for a 6000 feet runway at 60,000 pounds S.G. strength and other pavement strengthening. An MLS or equivalent landing system should be added by that time to maintain adequate airport utilization.

Significant additions to the terminal area will include more parking, a control tower, a terminal/administration building, a heliport and a crash/fire/rescue station.

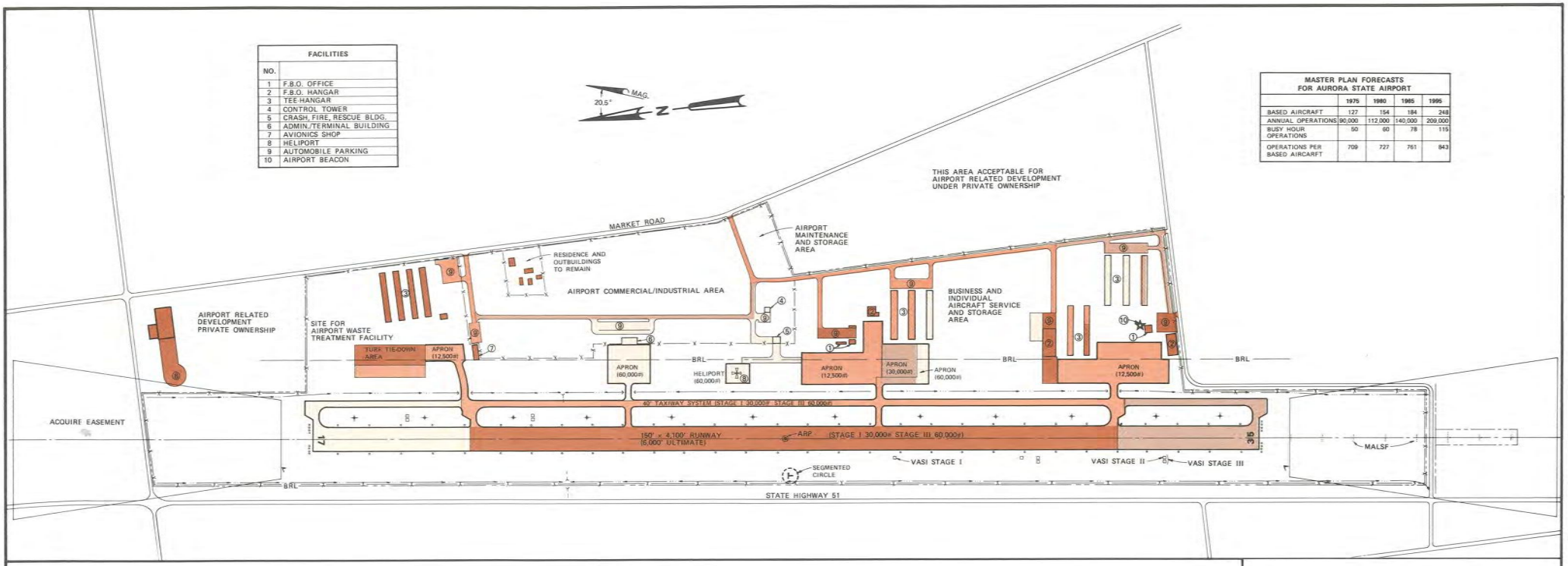


TABLE 10

DEVELOPMENT SCHEDULE

STAGE I — 1975-1980

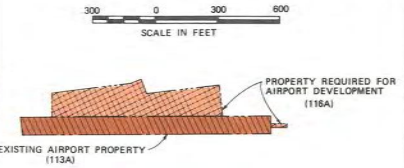
PROJECT DESCRIPTION	QUANTITY
ACQUIRE LAND FOR AIRPORT DEVELOPMENT	116 ACRES
ACQUIRE AIR EASEMENTS	18 ACRES
REMOVE OBSTRUCTIONS	1.5 ACRES
PAVE AND MARK PARALLEL TAXIWAY SYSTEM (30,000#)	5,100 L.F.
PAVE AND MARK HOLDING APRONS (30,000#)	10,000 S.F.
PAVE AND MARK PARKING APRONS (12,500#)	305,000 S.F.
CONSTRUCT TURF PARKING AREA	10 AIRCRAFT
INSTALL ROTATING BEACON AND TOWER	1 EACH
INSTALL LIGHTED WIND TEE AND SEGMENTED CIRCLE	1 EACH
STRENGTHEN RUNWAY (TO 30,000#)	4,100 L.F.
INSTALL NON-PRECISION RUNWAY MARKING	4,100 L.F.
INSTALL MEDIUM INTENSITY RUNWAY LIGHTS	4,100 L.F.
INSTALL VASI SYSTEM	2 ENDS
INSTALL NON-DIRECTIONAL BEACON	1 EACH
INSTALL TAXIWAY REFLECTORS	5,100 L.F.
PAVE AND MARK AIRPORT ROADWAYS	3,800 L.F.
PAVE AND MARK AUTOMOBILE PARKING FACILITIES	80 AUTOS
CONSTRUCT FENCING	6,000 L.F.
CONSTRUCT TEE-HANGARS (PRIVATE DEVELOPMENT)	34 AIRCRAFT

STAGE II - 1980-1985

PROJECT DESCRIPTION	QUANTITY
EXTEND, PAVE AND MARK RUNWAY (30,000#)	900 L.F.
EXTEND MEDIUM INTENSITY RUNWAY LIGHTS	900 L.F.
EXTEND, PAVE AND MARK TAXIWAY SYSTEM (30,000#)	1,000 L.F.
PAVE AND MARK HOLDING APRON (30,000#)	5,000 S.F.
REPOSITION VASI SYSTEM	1 END
INSTALL MEDIUM INTENSITY EXIT TAXIWAY LIGHTS	700 L.F.
INSTALL LIGHTED WIND CONES	2 EACH
PAVE AND MARK PARKING APRON (30,000#)	56,000 S.F.
INSTALL MALSF APPROACH LIGHT SYSTEM	1 END
INSTALL PARKING APRON LIGHTING	600 L.F.
PAVE AND MARK AIRPORT ROADWAYS	3,200 L.F.
PAVE AND MARK AUTOMOBILE PARKING FACILITIES	30 AUTOS
EXTEND FENCING	3,400 L.F.
CONSTRUCT TEE-HANGARS (PRIVATE DEVELOPMENT)	10 AIRCRAFT

STAGE III — 1985-1995

PROJECT DESCRIPTION	QUANTITY
EXTEND, PAVE AND MARK RUNWAY (60,000#)	1,000 L.F.
STRENGTHEN AND MARK RUNWAY (TO 60,000#)	5,000 L.F.
EXTEND MEDIUM INTENSITY RUNWAY LIGHTS	1,000 L.F.
EXTEND, PAVE AND MARK TAXIWAY SYSTEM (60,000#)	1,200 L.F.
STRENGTHEN AND MARK TAXIWAY SYSTEM (TO 60,000#)	6,100 L.F.
PAVE AND MARK HOLDING APRON (60,000#)	5,000 S.F.
INSTALL MEDIUM INTENSITY TAXIWAY LIGHTS	6,500 L.F.
PAVE AND MARK PARKING APRONS (60,000#)	98,000 S.F.
EXPAND VASI SYSTEM	2 ENDS
INSTALL MICROWAVE LANDING SYSTEM (OR EQUIVALENT)	1 END
INSTALL PARKING APRON LIGHTING	1,200 L.F.
CONSTRUCT CRASH, FIRE, RESCUE STATION	2,500 S.F.
CONSTRUCT CONTROL TOWER (BY FAA)	1 EACH
PAVE AND MARK HELIPORT	19,000 S.F.
PAVE AND MARK AIRPORT ROADWAYS	500 L.F.
PAVE AND MARK AUTOMOBILE PARKING FACILITIES	90 AUTOS
CONSTRUCT TERMINAL/ADMINISTRATION BUILDING	5,000 S.F.
EXTEND FENCING	2,500 L.F.
CONSTRUCT TEE-HANGARS (PRIVATE DEVELOPMENT)	90 AIRCRAFT



ULTIMATE AIRPORT PROPERTY

AURORA STATE AIRPORT

DEVELOPMENT STAGING

FIGURE 30

CH2M HILL

ECONOMIC FEASIBILITY

The basis for capital improvements needs has been carefully developed in previous tasks of this study. The safety, capacity, and service benefits to the users have been established. The economic feasibility of including these projects in the Master Plan depends much upon the availability of funds.

Total funds for capital investments over the 20-year forecast period are $3.3 million. A breakdown of these costs is shown in Table 11 in 1975 dollars. Costs are planning capital cost estimates based on industry data. Site characteristics adjustments have been made but without specific engineering design analyses.

Of the total, much of the capital development would be done entirely with federal or with private funds. Most of the remaining work is eligible for FAA cost sharing. The FAA share has been 83.54 percent and may be increased to 90 percent. Oregon State funds required at 83.54 percent funding would be $767,000 or an average of $38,300 for the 20-year period.

The Master Plan accepts this investment level as practical. It also accepts the benefits to the public to be reasonable although it is difficult to determine the distribution of benefits due to the regional impact of the airport.

FINANCING PLAN

The ability to implement the Master Plan depends to a large measure upon the soundness of the airport's financial plan. The Master Plan recommends that the Airport be financially self-supporting.

At such time as there is definite assurance that the Master Plan will be implemented it will be necessary to develop detailed financial and management plans.

Table 12 shows the level of revenues required to meet projected expenses in terms of 1975 dollars. In developing a management program for the airport revenue goals should be established and a program carried out to develop income for the airport.

TABLE 11

CAPITAL DEVELOPMENT PROGRAM

PROJECT DESCRIPTION	ESTIMATED COST* (including contingency) ($000)	ELIGIBLE FAA SHARE** ($000)	OAD SHARE ($000)
STAGE I – 1975-1980			
ACQUIRE LAND FOR AIRPORT DEVELOPMENT	580	485	95
ACQUIRE AIR EASEMENTS	36	30	6
REMOVE OBSTRUCTIONS	3	2	1
PAVE AND MARK PARALLEL TAXIWAY SYSTEM (30,000#)	166	139	27
PAVE AND MARK HOLDING APRONS (30,000#)	7	6	1
PAVE AND MARK PARKING APRONS (12,500#)	206	172	34
CONSTRUCT TURF PARKING AREA	3	2	1
INSTALL ROTATING BEACON AND TOWER	9	7	2
INSTALL LIGHTED WIND TEE AND SEGMENTED CIRCLE	4	3	1
STRENGTHEN RUNWAY (TO 30,000#)	185	155	30
INSTALL NON-PRECISION RUNWAY MARKING	5	4	1
INSTALL MEDIUM INTENSITY RUNWAY LIGHTS	39	33	6
INSTALL VASI SYSTEM	15	13	2
INSTALL NON-DIRECTIONAL BEACON	10	–	10
INSTALL TAXIWAY REFLECTORS	4	3	1
PAVE AND MARK AIRPORT ROAWAYS	61	51	10
PAVE AND MARK AUTOMOBILE PARKING FACILITIES	19	–	19
CONSTRUCT FENCING	29	24	5
CONSTRUCT TEE-HANGARS (PRIVATE DEVELOPMENT)	212	–	–
TOTALS	1,381*	1,129*	252*
STAGE II – 1980-1985			
EXTEND, PAVE AND MARK RUNWAY (30,000#)	98	82	16
EXTEND MEDIUM INTENSITY RUNWAY LIGHTS	9	7	2
EXTEND, PAVE AND MARK TAXIWAY SYSTEM (30,000#)	35	29	6
PAVE AND MARK HOLDING APRON (30,000#)	4	3	1
REPOSITION VASI SYSTEM	3	2	1
INSTALL MEDIUM INTENSITY EXIT TAXIWAY LIGHTS	5	4	1
INSTALL LIGHTED WIND CONES	3	2	1
PAVE AND MARK PARKING APRONS (30,000#)	39	33	6
INSTALL MALSF APPROACH LIGHT SYSTEM	30	25	5
INSTALL PARKING APRON LIGHTING	9	7	2
PAVE AND MARK AIRPORT ROADWAYS	53	44	9
PAVE AND MARK AUTOMOBILE PARKING FACILITIES	8	–	8
EXTEND FENCING	21	17	4
CONSTRUCT TEE-HANGARS (PRIVATE DEVELOPMENT)	63	–	–
TOTALS	317*	255*	62*
STAGE III – 1985-1995			
EXTEND, PAVE AND MARK RUNWAY (60,000#)	113	94	19
STRENGTHEN AND MARK RUNWAY (TO 60,000#)	343	287	56
EXTEND MEDIUM INTENSITY RUNWAY LIGHTS	10	8	2
EXTEND, PAVE AND MARK TAXIWAY SYSTEM (60,000#)	43	36	7
STRENGTHEN AND MARK TAXIWAY SYSTEM (TO 60,000#)	93	78	15
PAVE AND MARK HOLDING APRON (60,000#)	10	8	2
INSTALL MEDIUM INTENSITY TAXIWAY LIGHTS	49	41	8
PAVE AND MARK PARKING APRONS (60,000#)	73	61	12
EXPAND VASI SYSTEM	10	8	2
INSTALL MICROWAVE LANDING SYSTEM (OR EQUIVALENT)	94	94	–
INSTALL PARKING APRON LIGHTING	18	15	3
CONSTRUCT CRASH, FIRE, RESCUE STATION	106	–	106
CONSTRUCT CONTROL TOWER (BY FAA)	400	400	–
PAVE AND MARK HELIPORT	14	12	2
PAVE AND MARK AIRPORT ROADWAYS	9	7	2
PAVE AND MARK AUTOMOBILE PARKING FACILITIES	21	–	21
CONSTRUCT TERMINAL/ADMINISTRATION BUILDING	188	–	188
EXTEND FENCING	50	42	8
CONSTRUCT TEE-HANGARS (PRIVATE DEVELOPMENT)	188	–	–
TOTALS	1,644*	1,191*	453*
GRAND TOTALS	3,342*	2,575*	767*

*Costs are shown in 1975 dollars. Appropriate escalation factors must be applied for extrapolation to future years.

**FAA share based on 1975 criteria. Pending legislation many alter amounts shown.

TABLE 12

AIRPORT REVENUE GOALS

($000-1975 Dollars)

	SHORT RANGE 1975-1980		MID-RANGE 1980-1985		LONG RANGE 1985-1995		20 YEAR PERIOD 1975-1995	
	ANNUAL AVERAGE	TOTAL	ANNUAL AVERAGE	TOTAL	ANNUAL AVERAGE	TOTAL	ANNUAL AVERAGE	TOTAL
EXPENDITURES TO MEET MASTER PLAN GOALS								
OPERATION AND MAINTENANCE								
MAINTENANCE AND REPAIR	8	40	9	45	11	110	9.8	195
MATERIALS AND EQUIPMENT	3	15	3	15	4	40	3.5	70
SALARIES	0	0	6	30	20	200	11.5	230
ADMINISTRATION	2	10	2	10	3	30	2.5	50
TOTAL	13	65*	20	100*	38	380*	27.3	545*
CAPITAL IMPROVEMENTS								
STATE'S SHARE **	50.4	252*	12.4	62*	45.3	453*	38.4	767*
TOTAL REVENUES REQUIRED TO MAKE AURORA STATE AIRPORT FINANCIALLY INDEPENDENT	63.4	317*	32.4	162*	83.3	833*	65.6	1312*

*Cost are shown in 1975 dollars. Appropriate escalation factors must be applied for extrapolation to future years.

**State's share based on 1975 criteria. Pending legislation may alter amounts shown.

MANAGING A CONTINUING PROGRAM

These actions are required by the Division of Aeronautics:

- This airport Master Plan should be adopted and implementation commenced immediately.
- Application should be made to the FAA for funds to support the Implementation Plan.
- In order for the State to implement the Master Plan the State needs to control the land involved. Therefore acquisition of the land for the terminal area should be accomplished without delay.
- The parallel taxiway and exit taxiway system must be constructed immediately. This is necessary to protect public safety and to provide adequate runway capacity.
- Other needed developments should be started as indicated by the Master Plan.
- The airport maintenance program should be accelerated, particularly as regards runway pavement rehabilitation and airfield surface drainage improvements.
- The State should continue to work closely with Marion and Clackamas Counties to develop compatible land use planning.
- The State should work closely with Marion and Clackamas Counties to develop zoning changes on and near the airport as recommended by the Master Plan.
- At this time no appropriate alternatives for airport ownership seem to exist. The State should retain ownership of the airport because its closure would have a critical adverse impact on the Oregon Aviation System.
- The State should take a more active part in the management of the entire airport and particularly give more attention to user service and problems.
- The State should develop an airport management program and increase its airport staff as necessary to administer the airport operation and development program.
- The State's financial policy should be to make the airport more self-supporting. This should be accomplished by obtaining more direct control of the sources of airport revenues. Revenues should be increased in accordance with area competition and inflation rates. Lease rates should be reviewed frequently and kept up-to-date.
- Airport traffic surveys should be made periodically and incorporated into the Master Plan and the Oregon Aviation System Plan.
- A program to collect weather data should be initiated and used for facility planning.
- The State should schedule periodic reviews of the Master Plan. It should be revised whenever necessary to keep it current.
- In updating the Master Plan the State should work closely with the airport users, local governments, and citizens. A flexible attitude and approach to the planning process should be maintained.
- Also it is important to keep the public and public agencies informed as to what impacts off-airport plans may impose on this public facility. Also it is important to provide encouragement and assistance to other agencies having jurisdiction over matters that affect this airport.

APPENDIX

APPENDIX

- BIBLIOGRAPHY
- CORRESPONDENCE
- SUMMARY OF MEETINGS
- TECHNICAL DATA
  - SITE SUFFICIENCY STUDY
  - AVIATION FORECASTS
  - NEF LAND USE COMPATIBILITY
  - WIND DATA

APPENDIX

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AC 150/5900-1A The Planning Grant Program

AC 150/5300-6 Airport Design Standards - General Aviation Airports - Basic and General Transport

AC 150/5300-4B Utility Airports - Air Access to National Transportation

AC 150/5060-2 Airport Site Selection

AC 150/5060-1A Airport Capacity Criteria Used in Preparing the National Airport Plan

AC 150/5060-3A Airport Capacity Criteria Used in Long-Range Planning

AC 150/5300-2C Airport Design Standards - Site Requirements for Terminal Navigational Facilities

AC 150/5050-4 Citizen Participation in Airport Planning

AC 150/5070-3 Planning the Airport Industrial Park

AC 150/5090-2 National Airport Classification System (Airport System Planning)

AC 150/5100-5 Land Acquisition in the Federal-Aid Airport Program

AC 150/5190-3A Model Airport Hazard Zoning Ordinance

AC 150/5210-6B Aircraft Fire and Rescue Facilities and Extinghishing Agents

AC 150/5300-5 Airport Reference Point

AC 150/5320-10 Environmental Enhancement at Airports - Industrial Waste Treatment

AC 150/5325-5B Aircraft Data

AC 150/5340-24 Runway and Taxiway Edge Lighting System

AC 150/5340-14B Economy Approach Lighting Aids

AC 150/5340-21 Airport Miscellaneous Lighting Visual Aids

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CORRESPONDENCE

DEPARTMENT OF TRAN ORTATION
FEDERAL AVIATION ADMINI..RATION

NORTHWEST REGION
FAA BUILDING, BOEING FIELD
SEATTLE, WASHINGTON 98108

JAN 8 1976

Mr. Paul Burket
Aeronautics Division
Oregon State Department
of Transportation
Salem, Oregon 97310

Original filed - Airport Section
Copy assigned to Reg. by ol
Attachments to
Date 1/12/76 Suspense date

Attention: Mr. Roy Raasina

Dear Paul:

We have completed our review of the Site Sufficiency Study and Summary of Findings for Aurora State Airport transmitted by your letter of November 25, 1975.

This study assembles the best available information on airport sites in the vicinity of the existing Aurora State Airport, and it has been concluded that the existing airport should be tentatively approved for initial development as a utility airport conditioned on approval of an airport layout plan.

This tentative approval is necessary because there have been no previous ADAP or FAAP grants at this location. Tentative approval of the site permits the PGP project to proceed to the airport layout plan phase which will determine the precise nature of future development including the potential for ultimate development as a transport airport. This approval also establishes eligibility of the site for federal funds under the ADAP program.

This approval does not indicate that airport development at the site is environmentally acceptable in accordance with the National Environmental Policy Act of 1969 (P.L. 91-190) and does not imply any commitment of federal funding.

Sincerely,

for George L. Bailey
ROBERT O. BROWN
Chief, Airports Division, ANW-600

cc:
Ray Costello
Mal Miner
Dick Reynolds

REC'D AERONAUTICS
JAN 12 1976

STATE OF OREGON
AERONAUTICS DIVISION

3040 25th STREET S.E. • SALEM, OREGON • 97310 • Phone 378-4880

ROBERT W. STRAUB
GOVERNOR

PAUL E. BURKET
Aeronautics Administrator

March 31, 1976

Marion County Board of Commissioners
Marion County Courthouse
Salem, OR 97301

Gentlemen:

Thank you for the privilege of presenting the Aurora State Airport Master Plan Final Draft at your regular meeting this date.

Representatives of state, your county and city planning departments have been members of the Advisory Committee during the planning process, and in addition to personal contact with our staff and planners, they have had opportunities to review the draft plan and submit comments. Two Planning Advisory Committee meetings have been held in Salem and two public meetings in North Marion County. All comments received to date have been reviewed, considered and incorporated in this Revised Final Draft.

It is of great importance that we receive your comments on this draft so they may also be considered in the final report. Our goal is to complete a comprehensive master plan for the airport which will assist us in developing a facility to meet the aeronautical needs of the area. We consider this airport to be of great importance, not only locally within its immediate environs, but on a regional, state-wide and national basis.

The plan is scheduled for final printing on or about the 21st of April and submittal to the FAA soon thereafter. It is of much concern to our Division and the FAA that the land use and environmental aspects of the plan are in reasonable and acceptable conformity with your county's comprehensive plans. Should you or your planning staff require additional assistance in review of the plan prior to your submittal of comments, please notify us in order that our planners will be ready to clarify any subject matter in the plan that may be questionable or unclear to you.

A DIVISION OF THE DEPARTMENT OF TRANSPORTATION
A MEMBER OF NATIONAL ASSOCIATION OF STATE AVIATION OFFICIALS

Your assistance and comments in finalyzing this plan will be greatly appreciated.

Sincerely,

PAUL E. BURKET,
Aeronautics Administrator

PEB:RMR:sh

cc: Mr. Mal Miner
Mr. Ray Costello

CH2M HILL
engineers
planners
economists
scientists

20 April 1976

C9198.70

Mr. Randy Curtis
Marion County Planning Department
3180 Center Street N. E., Room 230
Salem, Oregon 97301

Dear Mr. Curtis:

Subject: Zone Change Case No. 76-8
Woodburn-Hubbard Area-Wide Rezoning

As mentioned in the letter of 13 April 1976 from the Oregon Aeronautics Division, I am submitting comments on the subject rezoning. Our comments pertain strictly to the Aurora State Airport and its master plan, for which CH2M HILL is consultant to the Aeronautics Division, owner.

The airport master plan's purpose is to identify airport needs and to determine practical solutions to satisfying those needs with minimum impact upon the airport environs. The master plan identifies traffic growth projections through 1995 and establishes facilities layouts, schedules and budget requirements for airport development through that period. It also sets forth recommendations for zoning on the airport and for zoning and land use around the airport, particularly where measurable impacts are predicted to occur.

The revised final draft of the Aurora State Airport master plan is in the hands of the Marion County Commissioners and was most recently discussed at the Commissioners' hearing 31 March 1976. No subsequent revisions have been made.

The recommendations of the airport master plan are a result of analysis of the on-airport needs of future air traffic and analysis of the off-airport impacts of this traffic. The recommendations for layout development and airport and air traffic management, if carried out, will minimize but will not altogether eliminate impacts.

In order to minimize impacts, which will be mostly from aircraft noise, and to make airport and adjacent land use compatible, the following comments relate the airport master plan to Case No. 76-8, Woodburn-Hubbard Area-Wide Rezoning.

1. The present airport zone, Public Amusement (PA), is inappropriate because permitted uses are incompatible with a publicly owned and operated airport. Also the term "amusement" is a misnomer and is misleading. The Oregon Aeronautics Division is not operating an amusement facility. In fact, both the national and state departments of transportation identify the Aurora State Airport as a vital link in the national and state air transportation systems. We suggest that Marion County adopt the airport master plan recommendation for an Airport Development Zone (or similar such term) described as follows:

   > Permitted uses to include operation of an airport. Conditional uses to be limited to aviation related commercial and/or industrial businesses in appropriate areas with respect to aeronautical facilities. There must be a demonstrated aviation link to commercial and/or industrial use in this zone.

   The dimensions recommended in the airport master plan are slightly larger than those shown on the proposed rezoning map. Adoption of the master plan recommendations will both protect the airport and will prevent non-aviation commercial development in the airport development zone. As minimum rezoning the zoning of the Aurora State Airport should at least match that of the other public airport in Marion County, McNary Field. It presently does not.

2. Increased densities of residential development or concentrations of people should be discouraged off the runway ends for the citizens' own well being because of the potential noise exposure forecasts explained in the airport master plan. Fortunately, existing land use is generally compatible with operation of the airport and would be further improved by the proposed F-20 rezoning. However, we would prefer the rezoning to be EFU for still better compatibility. We continue to recommend that the airport buffer zone be identified and defined by an Airport Buffer Overlay Zone, described in the master plan as follows:

An overlay surrounding an existing or potential airport impact area to be superimposed and used in conjunction with existing zoning. It is defined by the existing or forecast NEF 30 noise countour whichever encompasses the largest area. The purpose is to provide for uses that preclude concentrations of people in the Aurora State Airport Buffer Zone. Exclusive farm use (EFU) with limited commercial area is recommended. The permitted uses in the overlay zone override conflicting uses in the zones beneath the overlay.

3. Additionally, the airport master plan proposes an Airport Obstruction Surfaces Overlay Zone to restrict construction of high objects hazardous to flight and thus to public safety. The suggested overlay zone is defined in the airport master plan as follows:

> An additional overlay superimposed over and surrounding the planned airport development and dimensioned according to Federal Aviation Regulation Part 77, Objects Affecting Navigable Airspace. The obstruction surfaces overlay shown in the master plan match imaginary surfaces for the ultimate airport without the conical surface. No area farther than 10,000 feet from the airport primary surface is affected.

The failure of Marion County to adopt this overlay zone would expose the county population to little adverse impact, but inaction would expose the most potential for restricting safe flight operations near the airport during low visibility weather.

The zoning and land use recommendations in the Aurora State Airport master plan are provided to assist Marion and Clackamas counties to maintain compatible land use in the vicinity of this busy, growing public airport. While these recommendations may not be the only solutions, they were developed through analysis by the study team and through the citizen involvement process and are the preferred solutions. They are also based upon precedence established at other public airports and are recommended by the Federal Aviation Administration as being highly successful, tested solutions.

Thank you for this opportunity to submit these comments. Please feel free to contact Roy Raasina at the Oregon Aeronautics Division or me if you have any questions.

Yours very truly,

Malcolm R. Miner
Manager, Aurora State Airport
Master Plan Project

skl

(Same letter sent (with variations as to dates, etc., and omitting last paragraph, page 2,) to Clackamas County and Mayors of Wilsonville and Aurora.)

STATE OF OREGON
AERONAUTICS DIVISION

3040 25th STREET S.E. • SALEM, OREGON • 97310 • Phone 378-4880

ROBERT W. STRAUB
Governor

PAUL E. BURKET
Aeronautics Administrator

May 20, 1976

Marion County Board of Commissioners
Marion County Courthouse
Salem, OR 97301

Gentlemen:

Aurora State Airport Master Plan,
Coordination with Local Governments

In continuation of our coordination with local governments on this project, this letter is to inform you that the Aurora State Airport Master Plan will be published shortly. Elected officials and their planning staffs of the jurisdictions involved, as well as local citizens, have received information from the Airport Master Plan including discussion of impacts on areas surrounding the airport. The plan presents recommendations as to how local governments may use the Airport Master Plan to their advantage in local planning.

At this time, the airport master planning process is nearing completion. The latest document, the revised final draft plan dated March 1976, was formally presented to you March 31, 1976. It is the result of approximately one year's study by the Consultant, who was assisted by the staff of the Division of Aeronautics and the multi-agency Advisory Committee. The Citizen Involvement Process and our coordination with interested local governments also provided significant input into the plan.

The study's development process has included ten review and coordination meetings and presentations. A list of such meetings and presentations is attached. Notices of master plan meetings were published in 15 newspapers, and through United Press International and Associated Press. Notices were also sent out for bulletin boards at ten airports including Aurora. Approximately 200 citizens have attended the public meetings, and the Advisory Committee representing the

following organizations has been in close contact with the study throughout.

Aurora Planning Commission
Clackamas County Planning Department
Columbia Region Association of Governments (CRAG)
Oregon Department of Environmental Quality (DEQ)
Oregon Division of Aeronautics
Federal Aviation Administration
Land Conservation and Development Commission (LCDC)
Marion County Planning Department
Mid-Willamette Valley Council of Governments
Oregon Department of Transportation (ODOT)
Port of Portland
Soil Conservation Service, U.S. Department of Agriculture

We believe there is adequate assurance that all important issues have been addressed and that all interested parties have had opportunity to provide comments.

Final planning coordination according to LCDC requirements has been accomplished with all concerned units of local government. According to procedures advised by LCDC, the Oregon Division of Aeronautics, airport owner, has presented the revised final draft Airport Master Plan to all affected local governments. The Plan has been explained, questions answered, and comments have been invited. Offers were made for the study team to attend work sessions with local government staffs.

It is the hope of the Division of Aeronautics to see the Aurora State Airport Master Plan recognized and taken under advisement by surrounding jurisdictions as they develop their comprehensive plans. We recommend that you adopt the Aurora State Airport Master Plan as an element in your comprehensive plan, at least on an interim basis. We also anticipate that your local government will keep the Airport Master Plan recommendations under advisement and maintain close coordination with the Division of Aeronautics in any action affecting this important public airport.

We trust that Marion County will take prompt action to adopt airport zoning recommendations contained in the Plan. This will assist greatly in reducing the confusion regarding current development plans and will permit land owners to properly plan development of their property in conformance with public interests. Proper zoning will assure protection of the airport through continued compatible land use. (Please refer to CH2M-Hill's letter of 20 April 1976 to Randy Curtis, Planning Director, regarding Zone Change Case No. 76-8, copy attached.)

When we announced in our letter to you dated March 31, 1976 our intentions to print the Airport Master Plan report about 21 April, we understood that you needed a little more time for review. However, more than 45 days have elapsed since the Plan was presented to you and we are now well behind our programmed printing schedule. Neither comments nor requests for further information have been received. Airport tenants, users and neighbors are being somewhat adversely affected by the delays being experienced, and further delays can only add to the total costs of the project.

Since no communications have been received from you, we have scheduled presentation of the Plan to the Oregon Transportation Commission at its regular meeting on May 25, 1976. Following their acceptance of the plan the final document will be printed and it should be available in early June.

We look forward to receiving your response indicating your acceptance of the Plan, at least on an interim basis or with qualifications, so this planning study may be brought to an orderly conclusion. We also anticipate continuing communications with you for necessary refinement, updating and implementation of the Plan and sincerely thank you for your past cooperation.

Sincerely,

PAUL E. BURKET,
Aeronautics Administrator

PEB:sh
Enc: 2
cc: Mr. Malcolm Miner, CH2M-Hill, Inc.
Mr. George Buley, FAA

DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

NORTHWEST REGION
FAA BUILDING KING COUNTY INT'L AIRPORT
SEATTLE, WASHINGTON 98108

JUN 11 1976

Mr. Paul Burket, Administrator
Aeronautics Division
Oregon Department of Transportation
3040 25th Street Southeast
Salem, Oregon 97310

Dear Mr. Burket:

The Aurora State Airport Layout Plan received May 24, 1976, is conditionally approved and a copy is enclosed. The plan appears to be excellent in both format and content, and we accept it as compliance with the Grant Agreement dated May 5, 1975.

Approval of the plan does not indicate that the United States will participate in the cost of any development proposed other than that which is presently programmed. When airport construction, alteration, or deactivation is undertaken, such action requires notification and review in accordance with the provision of either Part 77 or Part 157 of the Federal Aviation Regulations.

This approval considers only the safety, utility, and efficiency of the airport, and it is conditioned on acceptance of the plan under local and state land use laws. Please provide documentation which indicates that the plan is acceptable for use by all local agencies with jurisdiction over area-wide planning and land development controls. We encourage the appropriate agencies to adopt land use and height restrictive zoning ordinances based on this plan in a timely manner since action toward this end is a prerequisite of the Airport Development Aid Program (ADAP).

The approval indicated by my signature is given subject to the condition that portions of the proposed land acquisition and the runway extensions may not be undertaken without prior written environmental approval by the FAA in accordance with Order 5050.2B.

Original filed - Airports Section
Copy Assigned to Ray by sk
Attachments to Ray
Date 6/14/76 Suspense date _____

REC'D AERONAUTICS
JUN 14 1976

We have enjoyed working with you and your consultant on this project and we look forward to implementation of the plan. Please attach this letter to the Airport Layout Plan and retain it in your files for future use under ADAP.

Sincerely,

George L. Buley

GEORGE L. BULEY
Chief, Airports Planning Branch, ANW-610

Enclosure

cc:
Mr. Ray Costello
Mr. Mal Miner
Mr. Dick Reynolds

SUMMARY OF MEETINGS

Date: 2 July 1975
Where: Salem, Oregon
Who: Advisory Committee
Purpose: To start up the project, to discuss the initial inventory findings, to invite the Advisory Committee to provide input to the project and to outline the procedures for so doing.
Attendees: Oregon Division of Aeronautics, CH2M HILL, Oregon Department of Transportation (ODOT), Marion County Planning Department, Clackamas County Planning Department, Aurora Planning Commission, Columbia Region Association of Governments (CRAG), Mid-Willamette Valley Council of Governments (COG), Oregon Land Conservation and Development Commission (LCDC), Port of Portland and U.S. Department of Agriculture, Soil Conservation Service (USDA, SCS).

Date: 24 October 1975
Where: Salem, Oregon
Who: Advisory Committee
Purpose: To review the first interim report, "Airport Requirements" and to obtain comments.
Attendees: Division of Aeronautics, CH2M HILL, Aurora Planning Commission, Marion County Planning Department, Federal Aviation Administration (FAA), Mid-Willamette Valley COG, CRAG, Port of Portland, Oregon Department of Environmental Quality (DEQ), ODOT, USDA, SCS and LCDC.

Date: 18 November 1975
Where: North Marion Union High School, Hubbard, Oregon
Who: Public Meeting
Purpose: To review the interim report, "Airport Requirements," to discuss the adequacy of the existing airport site, and to get public input. The meeting was announced through press releases to UPI, AP; it was advertised in 15 local newspapers; and notices were furnished for bulletin boards at ten airports. Approximately 75 citizens attended.

Date: 25 February 1976
Where: Salem, Oregon
Who: Advisory Committee
Purpose: To review the final draft of the Airport Master Plan and to obtain comments for incorporation into the final report.
Attendees: Division of Aeronautics, CH2M HILL, LCDC, USDA, SCS, ODOT, Port of Portland, Marion County Planning Department, and the DEQ.

Date: 26 February 1976
Where: North Marion Union High School, Hubbard, Oregon
Who: Public Meeting
Purpose: To present and discuss the final draft of the Airport Master Plan and to obtain public input. The presentation was made by the Division of Aeronautics, the Federal Aviation Administration, and CH2M HILL.
Attendees: Approximately 50 citizens

Date: 4 March 1976
Where: Salem Airport, Salem, Oregon
Who: The LCDC/Marion County representative, Oregon Division of Aeronautics, and CH2M HILL.
Purpose: To verify the LCDC coordination requirements under the 1973 Land Use Act (ORS Chapter 197) and to insure that they are adequately met under the project.

Date: 31 March 1976
Where: Marion County Courthouse, Salem, Oregon
Who: Marion County Commissioners and Public
Purpose: To present the final draft Airport Master Plan and to finally coordinate with Marion County local government.
Attendees: Two County Commissioners, Marion County planning staff, and approximately five citizens.

Date: 5 April 1976
Where: Wilsonville, Oregon
Who: City Council and Public
Purpose: To present the final draft Airport Master Plan and to coordinate with the City Council and attending public.
Attendees: Four City Councilmen, Mayor, City Administrator and approximately 25 citizens.

Date: 6 April 1976
Where: Aurora, Oregon
Who: City Council and Public
Purpose: To present and coordinate the final draft Airport Master Plan with the City of Aurora.
Attendees: Three City Councilmen, Mayor, Chairman of the Planning Commission, the Section 208 study team and approximately 25 citizens.

Date: 9 April 1976
Where: Clackamas County Courthouse, Oregon City, Oregon
Who: County Commissioners and Public
Purpose: To present and explain the final draft of the Airport Master Plan to the Clackamas County Commissioners.
Attendees: Approximately 20 citizens. No County Commissioners or County staff attended.

Date: 25 May 1976
Where: Salem, Oregon
Who: Oregon Transportation Commission
Purpose: During this regular monthly Commission meeting the Aurora State Airport Master Plan was unanimously approved by the Commission.
Attendees: Full Commission, ODOT officials including Aeronautics Division, CH2M HILL, and spectators.

TECHNICAL DATA

AURORA STATE AIRPORT MASTER PLAN

REPORT OF SITE SUFFICIENCY STUDY

November 1975
By CH2M HILL

INTRODUCTION

The Airport Master Plan work program includes Task G, Site Sufficiency Study. It is a logical conclusion to Phase I work, Airport Requirements, and is required to be submitted to FAA prior to proceeding to Phase III work, Airport Plans.

RECOMMENDATION

The conclusions of this study are that the existing Aurora State Airport site is adequate and that the airport should not be relocated.

PURPOSE

The purpose of this study was first to review the adequacy of the present airport site in light of the needs and impacts developed in previous tasks of the Master Plan.

Second, it includes locating alternative airport sites and comparing them to the present site. The objective of this study is either to recommend to continue using the present airport or to advise investigating alternative sites for a replacement airport.

METHOD

This analysis has been conducted primarily in the office using base data gathered for other tasks and using analyses developed in previous tasks. Limited aerial and ground inspection was made of alternative sites.

The first step of the study was to establish the factors or items upon which to evaluate the airport's adequacy. The procedure for site investigation followed FAA Order NW 5030.1, Airport Site Investigation and Approval; FAA advisory Circular 150/5060-2, Airport Site Selection, and FAA advisory circulars specifying airport planning and design criteria.

Next the existing airport and existing airport site were rated. For this purpose the data from and the findings of Phase I, Airport Requirements, were used.

The final step of the analysis was to identify and compare alternative sites to the present airport. Basic to the identification of alternative sites is identifying the size and boundaries of the area within which alternative airport sites could be considered.

Three main factors influenced this determination. First, an alternative airport site must be able to conveniently serve the same service area that Aurora State Airport serves. Second, within that service area, physical factors must suit airport development and operation. And third, the location of an alternative airport site should be generally convenient to the same access routes as the Aurora State Airport, and should not be considerably closer to another airport. Impacts were examined after sites were chosen.

Consideration was given to operational factors, airspace, navigational aids, physical and engineering factors, area for development, land values, economic factors, and environmental and land use planning aspects. In establishing and identifying alternative airport sites, the Basic Transport airport category was used. Although prior tasks indicate that one runway will suffice for the 20-year period, it was thought that the site should provide adequate space for a short parallel runway, if practical. All sites including the existing airport site would permit this.

FINDINGS

Basically, analysis of the adequacy of the Aurora Site and the evaluation of the alternative sites resulted in a determination that the present Aurora State Airport should continue to fulfill the present airport function. First, the Aurora State Airport has no serious or insurmountable problems. It is well engineered and meets operational criteria. Expansion to meet forecast needs appears feasible.

Airport use is in accordance with compatible land use and the existing airport has minimum environmental impacts. Also, the site has been an airport continuously for 32 years. It has been accepted by the City of Aurora in their Draft Land Use Plan as well as by the Marion County Comprehensive Plan. In a public meeting 18 November 1975, a discussion of this matter indicated unanimous concurrence of those attending to retain the present airport rather than to relocate.

Adequate services are presently being provided by fixed base operators and a considerable hardship on operators and on users could be expected if the airport were to be closed or relocated. As regards land available for development area, there is adequate area just east of the existing runway. Acquisition problems appear to be less for a new airport than elsewhere because of the lack of zoning conflicts at the existing airport as opposed to the need to rezone for a new airport.

As regards economic factors, the cost in developing a new airport could be expected to be significantly higher than that of improving an existing airport. an exact dollar amount, however, cannot be determined because of lack of detailed engineering data and because of uncertainties regarding the cost of land. However, it can be assumed that land values would be approximately the same for all areas. In the case of Aurora State Airport, considerably less acreage (approximately 52 acres) is required, so that even if cost per acre were to be higher, total land cost would be less. A sample comparison is shown below using about $5,000 per acre for land acquisition.

COMPARISON OF APPROXIMATE COSTS*
ESTIMATED FOR 1995 AIRPORT NEEDS

Item	Existing Airport	New Site
Land Acquisition	$ 260,000	$ 830,000
Site Preparation	160,000	250,000
Pavement	540,000	800,000
Lighting	90,000	90,000
Miscellaneous	90,000	120,000
Non-ADAP Items	310,000	600,000
Total Cost Estimate	$1,450,000	$2,690,000

*Using cost estimating methods similar to Oregon Aviation System Plan -- to be refined in Phase III.

Three alternative airport sites were evaluated.

The first alternative site considered is located close to the existing Aurora Airport in northern Marion County. This site is designated as the Freeway Site, as it is located beside the freeway. Possibilities for development here include: to the east of the freeway, a single runway, or to the west of the freeway, two runways.

The second alternative site is located in Clackamas County and is designated as the Clackamas Site. It is that site slightly southeast of the City of Aurora, and lies about 2 miles north of the Lenhardt Airprt. This site includes an area large enough to permit considerable shifting of the runway location and would easily permit development of a parallel runway.

The third alternative site is that shown to the south of the first site. It is located near the City of Hubbard and is designated as the Hubbard Site. It also occupies a sufficient space to permit development of a parallel runway.

All three alternative sites near the Aurora State Airport are generally in the same kind of geographical region. Rural population densities are generally similar and the primary business is agriculture. The same general surface transportation networks serve all three airports. However, the Clackamas Site is somewhat less convenient to major highways. All sites are located in areas designated as Agricultural Use in County Comprehensive Plans.

Topographic features of all sites are generally similar. The area lacks terrain obstructions, is generally level with slow surface runoff, has generally similar good agricultural soil types, and experiences the same general metereological and climatological conditions as for the Aurora State Airport. Engineering problems appear to be about equal for all airport sites and utilities appear to be more or less equally convenient as regards electricity and water. However, approval for waste treatment facilities at new sites will give some problems because of the difficulty of soils meeting the requirements of the DEQ for septic disposal.

In all cases, runway orientation is generally north-south, with a slight shift to the southwest to allow for southwest winds during wintertime cold front passage. Experience at the Aurora State Airport indicates that this orientation would be favorable.

A part of the evaluation of alternative sites included evaluating the effort necessary to develop the alternative site to the condition that exists at the present airport. This would be mainly acquisition of land, grading and paving a General Utility category runway. A second part of the evaluation considered development needed through 1995.

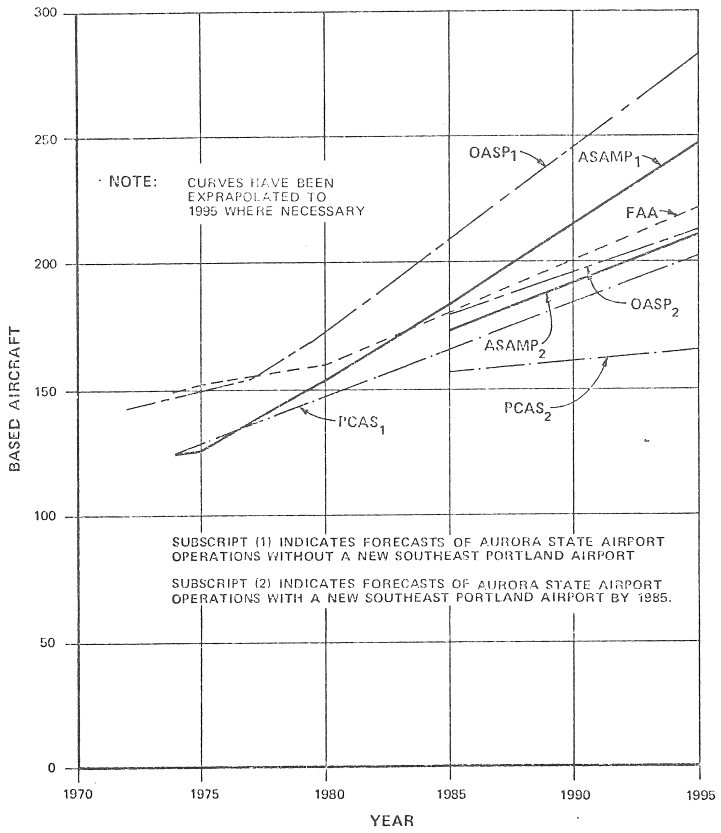
By far the most significant problem at alternative sites would be that of obtaining permission to use the land as an airport. This would necessitate changes in either County Comprehensive Plan. Comprehensive Plans require considerable justification before they can be changed, and public sentiment demonstrated at recent meetings does not indicate support for a new airport (examples are several meetings held in 1975 by the Port of Portland regarding the Portland-Clackamas Airport Study and a meeting held 18 November 1975 to present and discuss the work accomplished by Phase I of the Aurora State Airport Master Plan). Another problem is in actually acquiring the land. This would probably necessitate condemnation and costs could run very high (in the range of $500,000 to $1 million). As shown earlier, development costs would be about double for a new airport.

All of the alternative sites have certain advantages, but they also have disadvantages. One principal disadvantage is the time required to acquire and develop an airport. Another is the high costs anticipated. Another problem is that in moving away from the Aurora State Airport it would probably be necessary to sell the present property and discontinue its use as an airport. This would undoubtedly cause a hardship on the operators presently based at the airport and might create the need to provide relief to them. As regards the Clackamas Site, the people in Clackamas County have already rejected a proposed new airport in that county. Furthermore, the Clackamas site development might necessitate closing the Lenhardt Airport.

On the other hand, the advantage common to all alternative sites is that a fresh new airport could be developed starting with present-day knowledge of needs and present-day criteria. This would permit more flexibility in the development program for the future.

The following Site Comparison Matrix summarizes why it was concluded advisable to retain the airport at the present site. Mainly the benefits do not appear to warrant the costs.

Note: The above matrix table and an illustration showing the sites compared are shown on page 28, Figure 22, Alternative Airport Sites.

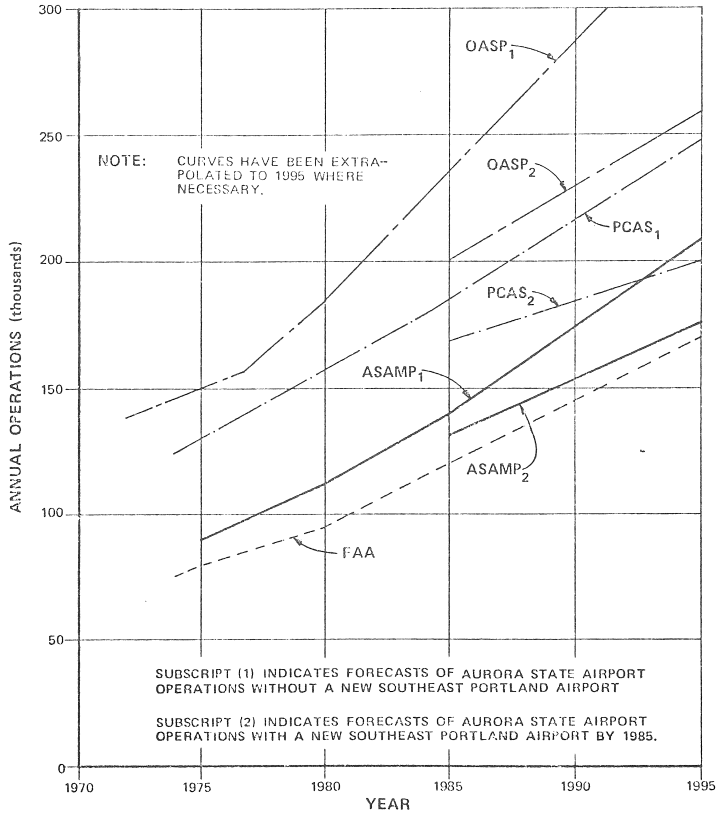


LEGEND

ASAMP – AURORA STATE AIRPORT MASTER PLAN
OASP – OREGON AVIATION SYSTEM PLAN
PCAS – PORTLAND CLACKAMAS AIRPORT STUDY
FAA – FEDERAL AVIATION ADMINISTRATION

AURORA STATE AIRPORT

BASED AIRCRAFT FORECASTS



LEGEND

ASAMP – AURORA STATE AIRPORT MASTER PLAN
OASP – OREGON AVIATION SYSTEM PLAN
PCAS – PORTLAND CLACKAMAS AIRPORT STUDY
FAA – FEDERAL AVIATION ADMINISTRATION

AURORA STATE AIRPORT

ANNUAL OPERATIONS FORECASTS

NEF LAND USE COMPATIBILITY

GENERALIZED LAND USE	NEF RANGE	GENERAL LAND USE RECOMMENDATION
Residential and Educational	less than 30	Satisfactory, with little noise impact and requiring no special noise insulation requirements for new construction.
	30 to 35	New construction or development should be undertaken only after an analysis of noise reduction requirements is made and needed noise insulation features included in the design.
	greater than 35	New construction or development should not be undertaken.
Commercial	less than 35	Satisfactory, with little noise impact and requiring no special noise insulation requirements for new construction.
	35 to 45	New construction or development should be undertaken only after an analysis of noise reduction requirements is made and needed noise insulation features included in the design.
	greater than 45	New construction or development should not be undertaken unless related to airport activities or services. Conventional construction will generally be inadequate and special noise insulation features should be included in construction.
Industrial	less than 40	Satisfactory, with little noise impact and requiring no special noise insulation requirements for new construction.
	40 to 50	New construction or development should be undertaken only after an analysis of noise reduction requirements is made and needed noise insulation features included in the design.
	greater than 50	New construction or development should not be undertaken unless related to airport activities or services. Conventional construction will generally be inadequate and special noise insulation features should be included in construction.
Open	less than 40	Satisfactory, with little noise impact and requiring no special noise insulation requirements for new construction.
	greater than 40	Land uses involving concentrations of people (spectator sports and some recreational facilities) or of animals (livestock farming and animal breeding) should generally be avoided.

AURORA STATE AIRPORT

WIND DATA

PERIOD: May 1968 thru April 1970

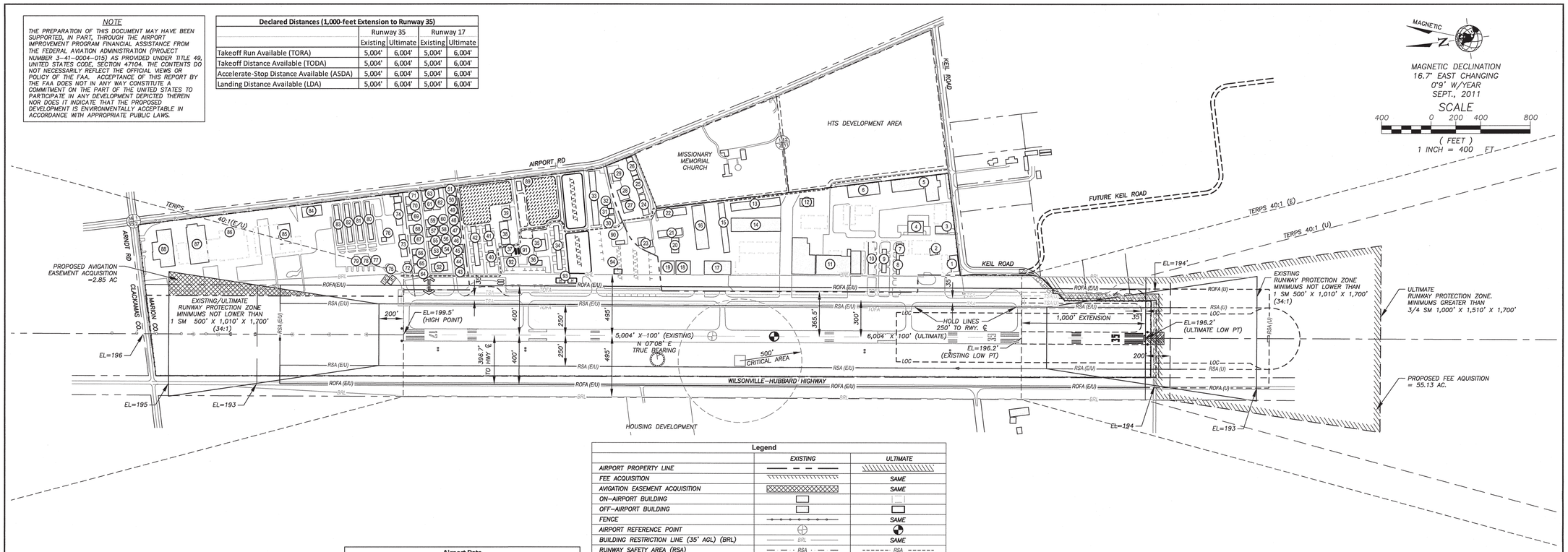
	CALM M (MPH)		(5.5) 4-7		(10) 8-12		(15.5) 13-18		(21.5) 19-24		(28) 25-31		(35) 32-38		39+		TOTAL		AVG. VEL. (MPH)	
	OBS	%	OBS	%	OBS	%	OBS	%	OBS	%	OBS	%	OBS	%	OBS	%	OBS	%		
N			568	4.32	117	0.89	4	0.03	0	0							689	5.23	6.32	N
NNE			402	3.05	72	0.55	0	0	1	0.01	0	0					475	3.61	6.22	NNE
NE			58	0.44	0	0											58	0.44	5.50	NE
ENE			61	0.46	2	0.02	4	0.03	0	0							67	0.51	6.23	ENE
E			30	0.23	0	0											30	0.23	5.50	E
ESE			85	0.65	10	0.08	1	0.01	0	0							96	0.73	6.08	ESE
SE			188	1.43	56	0.43	16	0.12	6	0.05	0	0					266	2.02	7.41	SE
SSE			186	1.41	75	0.57	37	0.28	17	0.13	0	0					315	2.39	8.61	SSE
S			484	3.68	258	1.96	104	0.79	17	0.13	1	0.01	0	0			864	6.56	8.39	S
SSW			313	2.38	66	0.50	23	0.17	1	0.01	0	0					403	3.06	6.85	SSW
SW			66	0.50	11	0.08	4	0.03	1	0.01	0	0					82	0.62	6.79	SW
WSN			78	0.59	18	0.14	6	0.05	0	0	0	0					102	0.77	6.88	WSW
W			26	0.20	10	0.08	3	0.02	0	0							39	0.30	7.42	W
WNW			30	0.23	3	0.02	1	0.01	0	0							34	0.26	6.19	WNW
NW			256	1.94	12	0.09	1	0.01	0	0							269	2.04	5.74	NW
NNW			549	4.17	62	0.47	4	0.03	0	0							615	4.67	6.02	NNW
CALM	8758	66.54															8758	66.54		CALM
TOTAL	8758	66.54	3380	25.68	772	5.87	208	1.58	43	0.33	1	0.01	0	0	0	0	13162	100.00		TOTAL

NOTE

THE PREPARATION OF THIS DOCUMENT MAY HAVE BEEN SUPPORTED, IN PART, THROUGH THE AIRPORT IMPROVEMENT PROGRAM FINANCIAL ASSISTANCE FROM THE FEDERAL AVIATION ADMINISTRATION (PROJECT NUMBER 3--41--0004--015) AS PROVIDED UNDER TITLE 49, UNITED STATES CODE, SECTION 47104. THE CONTENTS DO NOT NECESSARILY REFLECT THE OFFICIAL VIEWS OR POLICY OF THE FAA. ACCEPTANCE OF THIS REPORT BY THE FAA DOES NOT IN ANY WAY CONSTITUTE A COMMITMENT ON THE PART OF THE UNITED STATES TO PARTICIPATE IN ANY DEVELOPMENT DEPICTED THEREIN NOR DOES IT INDICATE THAT THE PROPOSED DEVELOPMENT IS ENVIRONMENTALLY ACCEPTABLE IN ACCORDANCE WITH APPROPRIATE PUBLIC LAWS.

Declared Distances (1,000-feet Extension to Runway 35)

	Runway 35		Runway 17	
	Existing	Ultimate	Existing	Ultimate
Takeoff Run Available (TORA)	5,004'	6,004'	5,004'	6,004'
Takeoff Distance Available (TODA)	5,004'	6,004'	5,004'	6,004'
Accelerate-Stop Distance Available (ASDA)	5,004'	6,004'	5,004'	6,004'
Landing Distance Available (LDA)	5,004'	6,004'	5,004'	6,004'



Legend

	EXISTING	ULTIMATE
AIRPORT PROPERTY LINE		
FEE ACQUISITION		SAME
AVIGATION EASEMENT ACQUISITION		SAME
ON--AIRPORT BUILDING		
OFF--AIRPORT BUILDING		
FENCE		SAME
AIRPORT REFERENCE POINT		
BUILDING RESTRICTION LINE (35' AGL) (BRL)	BRL	SAME
RUNWAY SAFETY AREA (RSA)	RSA	RSA
RUNWAY OBJECT FREE AREA (ROFA)	ROFA	ROFA
RUNWAY PROTECTION ZONE (RPZ)		
EXTENDED RUNWAY CENTERLINE		SAME
DISPLACED THRESHOLD	N/A	
RUNWAY HOLDLINE		SAME
TAXIWAY SAFETY AREA (TSA)	TSA	TSA
TAXIWAY OBJECT FREE AREA (TOFA)	TOFA	TOFA
SERVICE ROAD	N/A	
HANGAR DEVELOPMENT AREA		SAME
APRON / TIEDOWN AREA		
WINDCONE & SEGMENTED CIRCLE		SAME
VASI		SAME
PAPI	N/A	
REIL		SAME
ODAL		
LOCALIZER		
LOCALIZER CRITICAL AREA	LOC	SAME
CARGO APRON	N/A	
PAVEMENT		
PAVEMENT REMOVAL		SAME
FUEL TANKS		
HELICOPTER PARKING	H	H
RESIDENTIAL THROUGH THE FENCE ACCESS (RTTF)		SAME

Airport Data

	Existing	Ultimate
Airport Elevation (MSL)	199.5'	Same
Airport Reference Point (ARP)		
Latitude	45°14'54.085"N	45°14'44.758"N
Longitude	122°46'11.405"W	122°46'13.040"W
Mean Maximum Temperature	84°	Same
Airport Reference Code (ARC)	C-II	C-II
Airport Service Level	General Aviation	Same
Design Aircraft	IAI Astra 1125	Cessna Citation X

Runway 17/35 Data

	Existing	Ultimate
Percent Effective Gradient	0.06%	Same
Percent Wind Coverage (10.5 kts)	98.93%	Same
Maximum Elevation Above MSL	199.5'	Same
Runway Length	5,004'	6,004'
Runway Width	100'	Same
Runway Surface Type	Asphalt	Same
Runway Strength (Dual Wheel Gear)	45,000 lbs	60,000 lbs
FAR Part 77 Approach Category		
Runway 17	C (NP)	Same
Runway 35	C (NP)	D (NP)
Approach Type	Nonprecision	Same
Runway 17	Not lower than 1 sm	Same
Runway 35	Not lower than 1 sm	Not lower than 3/4 sm
Approach Slope (Required / Clear)	34:1 / 34:1	Same
Runway Lighting	MIRL	Same
Runway Marking	Precision	Same
Taxiway Lighting	MITL / Reflectors	Same
Taxiway Marking	Standard	Same
Navigation Aids	LOC/DME, NDB	Same
Visual Aids	ODALS, VASI, REIL	ODALS, PAPI, REIL
Runway Safety Area Dimension	500' x 1,000' beyond rwy end	Same
Runway Object Free Area Dimension	800' x 1,000' beyond rwy end	Same
Runway Obstacle Free Zone (OFZ)	No OFZ Penetrations	Same
Runway End Coordinates		
Runway 17 Latitude	45°15'14.166"N	Same
Longitude	122°46'07.828"W	Same
Runway 35 Latitude	45°14'25.148"N	45°14'15.350"N
Longitude	122°46'16.515"W	122°46'18.251"W

Notes

Horizontal datum is NAD 1983, vertical datum is NAVD88.
The Airport is flat. Elevations / ground contours vary by less than 5 feet and are not shown. Drainage features are typically 2-3 feet lower than adjacent land.
Building restriction line is based on a 35-foot building located 495 feet from the runway centerline not penetrating FAR Part 77 surfaces for the Airport.
A Residential Through The Fence (RTTF) access exists at hangar #64 at the Wylee Condominium Association. The tenant is the resident caretaker for the airport.

Modifications to Standards

	Standard Being Modified	Proposed Action
1	Advisory Circular (AC) 150/5300-13, para 307 (Runway Object Free Area)	The standard runway object free area (OFA) for Airport Reference Code C-II airports is 800 feet. Highway 551 runs north/south parallel to Runway 17/35; the approximate distance from the Runway 17/35 centerline to the Highway 551 centerline is 400 feet. As the airport geometry is not changing from the current condition, the Oregon Department of Aviation (ODA) requests a modification of the OFA design standard to allow the runway and highway to remain in their current positions.
2	AC 150/5300-13, Appendix 14 (Declared Distances)	The ODA requests the existing threshold for Runway 17 be referenced in determining FAR Part 77 surfaces and design standard surfaces referenced in AC 150/5300-13 (*i.e.*, RSA, RPZ, OFA, OFZ).

Airport Facilities and Buildings Legend

Building No. Existing	Building No. Ultimate	Name / Owner	Use	Estimated Top Elevation (AGL)
1		Leased by Aurora Jet Center	Maintenance, Aircraft Storage	27'
2		Aurora Jet Center	Fixed Base Operator	22'
3		Private Southend Hangar	Aircraft Storage	19'
4		BPS Associates	Aircraft Storage	23'
5		Van's Aircraft	Business	30'
6		Artex	Business	26'
7, 8		Foxtrot Hangars / Southend Airpark	Aircraft Storage	21'
9		Hangar Row G / Southend Airpark	Aircraft Storage	13'
10		Hangar Row H / Southend Airpark	Business, Aircraft Storage	21'
11		Hangar India, Juliet & Kilo / Southend Airpark	Business, Aircraft Storage	38'
12		Winco	Business	29'
13		Hangar November / Southend Airpark	Business, Aircraft Storage	29'
14		Hangar Mike / Southend Airpark	Business, Aircraft Storage	31'
15 – 17		Airport Aviation Condo Association	Aircraft Storage	32'
18		Airport Aviation Condo Association	Aircraft Storage	32'
19		Aurora Aviation	Maintenance	26'
20 – 22		Airport Aviation Condo Association	Aircraft Storage	25'
23		Columbia Aviation Association	Clubhouse	21'

Airport Facilities and Buildings Legend

Building No. Existing	Building No. Ultimate	Name / Owner	Use	Estimated Top Elevation (AGL)
24 – 26		Meridian Condos	Business	23'
27 – 29		Pacific Coast Aviation	Business	26'
30 – 33		Oregon Dept. of Aviation	Aircraft Storage	25'
34		Columbia Helicopters	Aircraft Storage	22'
35		Columbia Helicopters	Maintenance	28'
36		Aurora Aviation	Fixed Base Operator	16'
37		Pitts Hangar	Aircraft Storage	26'
38 – 42		Aurora Business Park	Aircraft Storage	25'
43 – 71		Wylee Condo Association	Aircraft Storage	27'
72		Civil Air Patrol Building	Aircraft Storage	26'
73		Sunset Helicopters	Business	26'
74		Aerometal	Business	27'
75		Willamette Aviation	Aircraft Fueling	7'
76		Willamette Aviation	Fixed Base Operator	12'
77 – 83		Willamette Aviation	Aircraft Storage	16'
84		Marlow Treit	Aircraft Storage	22'
85 – 88		Columbia Helicopters	Business	30'
89		Fire Suppression Tanks	Fire Suppression	12'
	90	Aurora Rural Fire Protection District	Emergency Response	TBD
	91	Aurora Aviation	Aircraft Fueling	16'
	92	Oregon Dept. of Aviation	Cargo Apron	N/A
	93	Oregon Dept. of Aviation	Helicopter Parking	N/A
	94	Oregon Dept. of Aviation	Air Traffic Control Tower	90'

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OREGON DEPARTMENT OF AVIATION

APPROVAL BLOCK
OREGON DEPARTMENT OF AVIATION
SIGNATURE: Michael Ismert
TITLE: Director DATE: 10/17/2012
FEDERAL AVIATION ADMINISTRATION
SIGNATURE: David Suomi
TITLE: Manager, Seattle ADO DATE: 10/18/12
APPROVAL LETTER DATED: See Letter dated 10/19/12

SHEET INFO	
DESIGNED	SML
DRAWN	RAI
CHECKED	REA
APPROVED	----
LAST EDIT	10/17/2012
PLOT DATE	6/28/2012
SUBMITTAL	

REVISIONS

NO.	BY	DATE	REMARKS

AIRPORT LAYOUT PLAN DRAWING

OREGON DEPARTMENT OF AVIATION
AURORA STATE AIRPORT ~ MASTER PLAN UPDATE

PROJECT NUMBER	DRAWING FILE NAME	SCALE
034317	034317-XREF-MSTR-ALP	1"=400'

SHEET NUMBER 1
2 of 10

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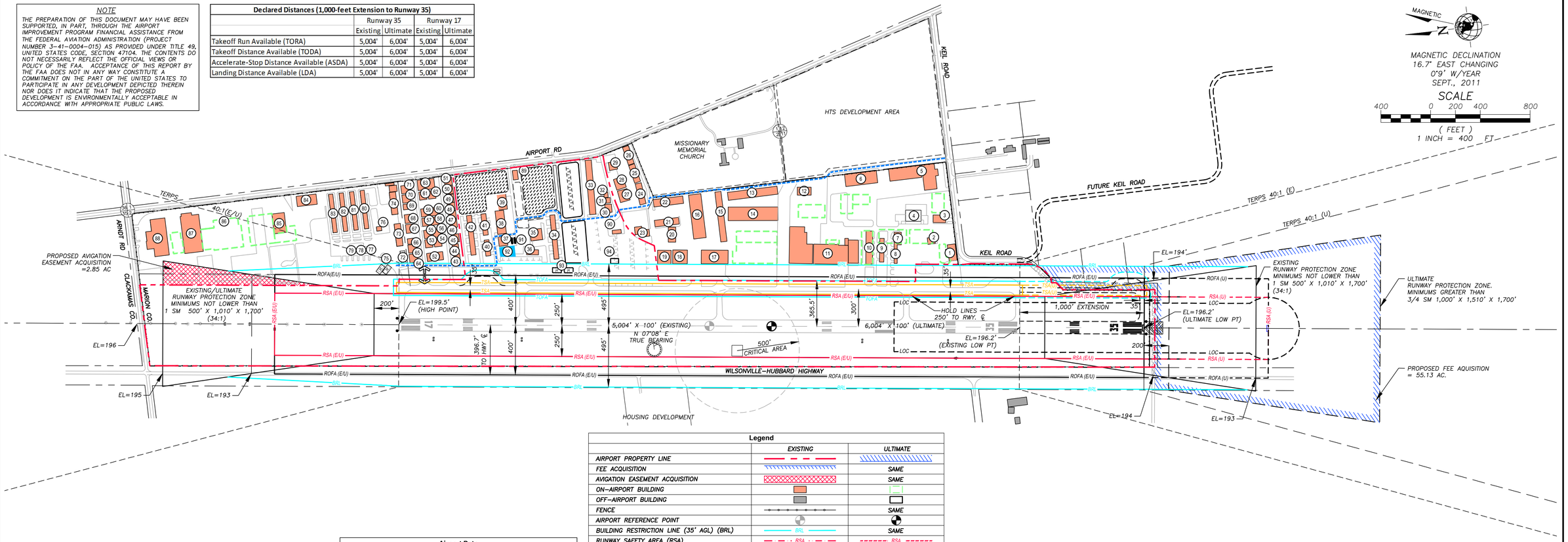

Legend

	EXISTING	ULTIMATE
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AVIGATION EASEMENT ACQUISITION		SAME
ON-AIRPORT BUILDING		
OFF-AIRPORT BUILDING		
FENCE		SAME
AIRPORT REFERENCE POINT		
BUILDING RESTRICTION LINE (35' AGL) (BRL)	BRL	SAME
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RUNWAY OBJECT FREE AREA (ROFA)	ROFA	ROFA
RUNWAY PROTECTION ZONE (RPZ)		
EXTENDED RUNWAY CENTERLINE		SAME
DISPLACED THRESHOLD	N/A	
RUNWAY HOLDLINE		SAME
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WINDCONE & SEGMENTED CIRCLE		SAME
VASI		SAME
PAPI	N/A	
REIL		SAME
ODAL		
LOCALIZER		
LOCALIZER CRITICAL AREA	LOC	SAME
CARGO APRON	N/A	
PAVEMENT		
PAVEMENT REMOVAL		SAME
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HELICOPTER PARKING	H	H
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Runway Surface Type	Asphalt	Same
Runway Strength (Dual Wheel Gear)	45,000 lbs	60,000 lbs
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Approach Type	Nonprecision	Same
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Navigation Aids	LOC/DME, NDB	Same
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84		Marlow Treit	Aircraft Storage	22'
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	90	Aurora Rural Fire Protection District	Emergency Response	TBD
	91	Aurora Aviation	Aircraft Fueling	16'
	92	Oregon Dept. of Aviation	Cargo Apron	N/A
	93	Oregon Dept. of Aviation	Helicopter Parking	N/A
	94	Oregon Dept. of Aviation	Air Traffic Control Tower	90'

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OREGON DEPARTMENT OF AVIATION

APPROVAL BLOCK

OREGON DEPARTMENT OF AVIATION

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TITLE DATE:

FEDERAL AVIATION ADMINISTRATION

SIGNATURE

TITLE DATE:

APPROVAL LETTER DATED:

SHEET INFO	
DESIGNED	SML
DRAWN	RAI
CHECKED	REA
APPROVED	----
LAST EDIT	10/17/12
PLOT DATE	6/28/2012
SUBMITTAL	

REVISIONS

NO.	BY	DATE	REMARKS

AIRPORT LAYOUT PLAN DRAWING

OREGON DEPARTMENT OF AVIATION
AURORA STATE AIRPORT ~ MASTER PLAN UPDATE

PROJECT NUMBER	DRAWING FILE NAME	SCALE
034317	034317-XREF-MSTR-ALP	1"=400'

SHEET NUMBER 1

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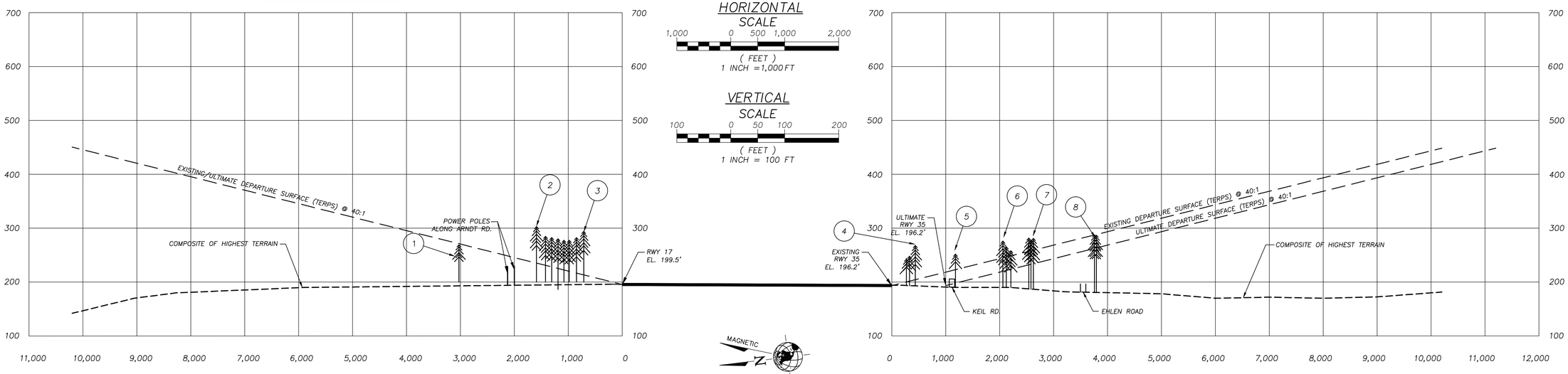
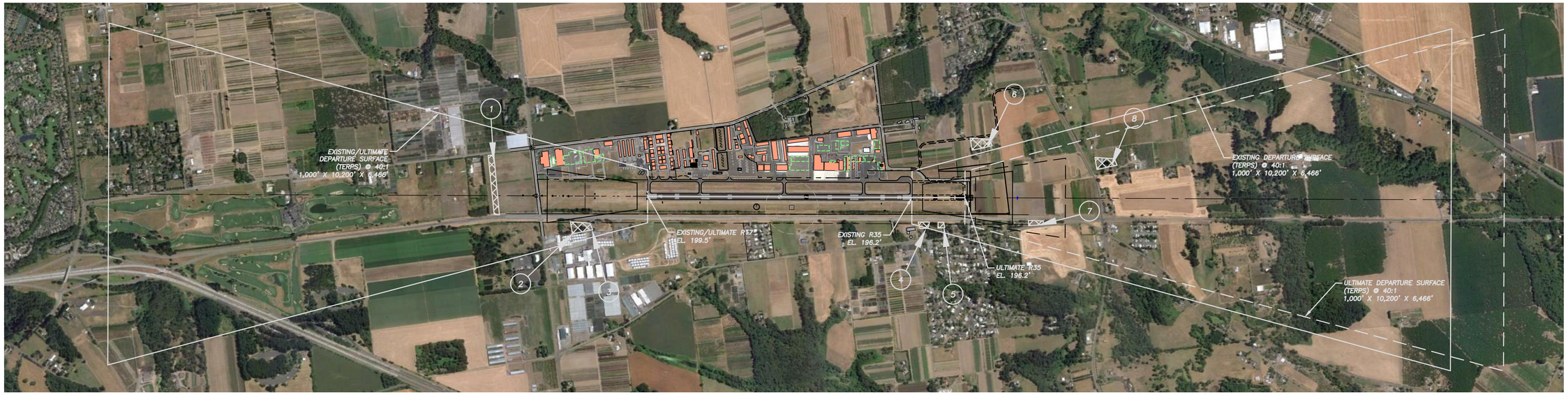


NO. ⊗	ITEM	PART 77 SURFACE	FUTURE PART 77 SURFACE	ELEV	OFFSET FROM RWY CL	DISTANCE FROM RWY END	ESTIMATED AMOUNT OF PENETRATION	AIRPORT PROPERTY	DISPOSITION
1	TREE GROUP	APPROACH (RWY 17)	SAME	269'	0 R	3028'	(–2)	NO	CLEAR TREES
2	W. END TREE LINE	NONE	APPROACH (RWY 17)	303'	491' R	1590'	67'	NO	CLEAR TREES
3	E. END TREE LINE	NONE	APPROACH (RWY 17)	294'	491' R	715'	80'	NO	CLEAR TREES
4	TREE GROUP	TRANSITIONAL (RWY 35)	APPROACH (RWY 35)	248'	453' L	270'	51'	NO	CLEAR TREES
5	TREE GROUP	TRANSITIONAL (RWY 35)	APPROACH (RWY 35)	268'	460' L	435'	68'	NO	CLEAR TREES
6	TREE GROUP	TRANSITIONAL (RWY 35)	TRANSITIONAL (RWY 35)	276'	940' R	2060'	30'	NO	CLEAR TREES
7	TREE GROUP	TRANSITIONAL (RWY 17)	APPROACH (RWY 35)	282'	423' L	2540'	20'	NO	CLEAR TREES
8	TREE GROUP	APPROACH (RWY 35)	APPROACH (RWY 35)	286'	557' R	3760'	(–2')	NO	CLEAR TREES



NOTE: NO OBSTRUCTIONS EXIST WITHIN THE AIRPORT'S TERPS SURFACES.

WHPacific
9755 SW Barnes Rd, Suite 300
Portland, OR 97225
503-626-0455 Fax 503-526-0775
www.whpacific.com

OREGON DEPARTMENT OF AVIATION

THE PREPARATION OF THIS DOCUMENT MAY HAVE BEEN SUPPORTED, IN PART, THROUGH THE AIRPORT IMPROVEMENT PROGRAM FINANCIAL ASSISTANCE FROM THE FEDERAL AVIATION ADMINISTRATION (PROJECT NUMBER 3–41–0004–015) AS PROVIDED UNDER TITLE 49, UNITED STATES CODE, SECTION 47104. THE CONTENTS DO NOT NECESSARILY REFLECT THE OFFICIAL VIEWS OR POLICY OF THE FAA. ACCEPTANCE OF THIS REPORT BY THE FAA DOES NOT IN ANY WAY CONSTITUTE A COMMITMENT ON THE PART OF THE UNITED STATES TO PARTICIPATE IN ANY DEVELOPMENT DEPICTED THEREIN NOR DOES IT INDICATE THAT THE PROPOSED DEVELOPMENT IS ENVIRONMENTALLY ACCEPTABLE IN ACCORDANCE WITH APPROPRIATE PUBLIC LAWS.

SHEET INFO	
DESIGNED	SML
DRAWN	RAI
CHECKED	REA
APPROVED	----
LAST EDIT	1/3/2013
PLOT DATE	1/3/2013
SUBMITTAL	

REVISIONS			
NO.	BY	DATE	REMARKS

RUNWAY DEPARTURE SURFACES DRAWING

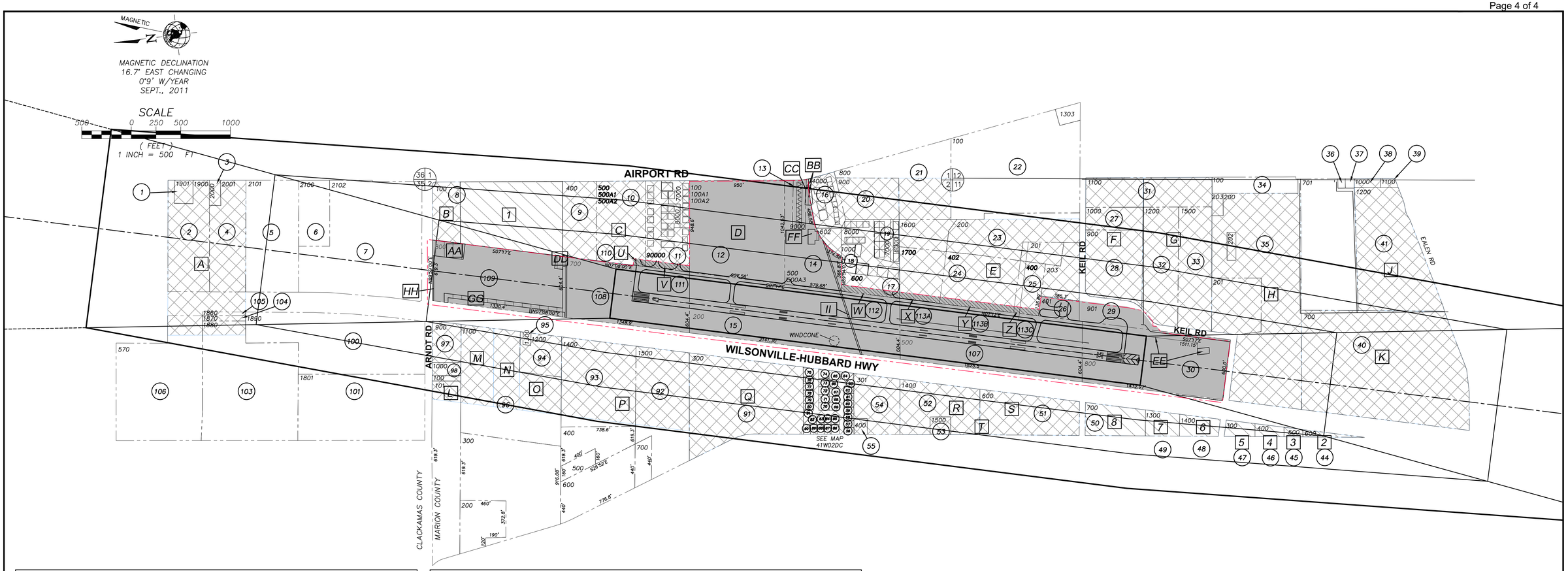
OREGON DEPARTMENT OF AVIATION
AURORA STATE AIRPORT ~ MASTER PLAN UPDATE

PROJECT NUMBER	DRAWING FILE NAME	SCALE
034317	034317-AIRP-DS01	1"=1,000'

SHEET NUMBER 7

[DATE: 1/3/2013 10:28 AM] [AUTHOR: riwosaki] [PLOTTER: DWG To PDF.pc3] [STYLE: WHP–Standard.ctb]
[PATH: P:\Oregon Department of Aviation\034317\Design\Drawings\Civil\034317–AIRP–DS01.dwg] [LAYOUT: Layout1]

From original - Record 4220



PROPERTY ACQUIRED UNDER FEDERAL AID PROJECTS

AREA	DATE	RECORDING INFORMATION	INTEREST ACQUIRED	EASEMENT TYPE	PREVIOUS OWNER	LAND AQUISITION
A *	03-20-43	4715A, BOOK 312 PAGE 697	EASEMENT	AVIGATION	CHARLES & LILA WALTER	ADAP 3-41-0056-01
B *	12-30-42	3221B, BOOK 279, PAGE 49	EASEMENT	AVIGATION	LEWIS & BERTHA KEIL	ADAP 3-41-0056-01
C *	04-19-43	3222B, BOOK 282 PAGE 662	EASEMENT	AVIGATION	WILLIAM & MANDY JESKY	ADAP 3-41-0056-01
D	1-18-43	BOOK 279, PAGE 530	FEE	OWNERSHIP	OTTO & MATILDA KNORR	ADAP 3-41-0056-01
E *	12-31-42	3216B, BOOK 279, PAGE 84	EASEMENT	AVIGATION	MILDRED STEINHOFF	ADAP 3-41-0056-01
F *	01-30-43	10619A, BOOK 280, PAGE 26	EASEMENT	AVIGATION	KENNETH & BERTHA BROWN	ADAP 3-41-0056-01
G *	01-19-43	10620A, BOOK 279, PAGE 365	EASEMENT	AVIGATION	IRVIN & MARLEA LEFFLER	ADAP 3-41-0056-01
H *	12-30-42	3213B, BOOK 279, PAGE 43	EASEMENT	AVIGATION	IRVIN & MARLEA LEFFLER	ADAP 3-41-0056-01
J *	12-31-42	10644, BOOK 279, PAGE 88	EASEMENT	AVIGATION	IRVIN & MARLEA LEFFLER	ADAP 3-41-0056-01
K *	12-30-42	3212A, BOOK 279, PAGE 46	EASEMENT	AVIGATION	IRVIN & MARLEA LEFFLER	ADAP 3-41-0056-01
L *	12-30-42	3221B, BOOK 279, PAGE 49	EASEMENT	AVIGATION	LEWIS & BERTHA KEIL	ADAP 3-41-0056-01
M *	01-09-43	3219B, BOOK 279, PAGE 359	EASEMENT	AVIGATION	DAVID KEIL	ADAP 3-41-0056-01
N *	01-09-43	3220B, BOOK 279, PAGE 362	EASEMENT	AVIGATION	HENRY & SOFIA KEIL	ADAP 3-41-0056-01

*INFORMATION FROM DEVCO ENGINEERING FUNDED BY A.I.P. NO. 3-41-004-03 AND APPROVED 5/11/1996

PROPERTY ACQUIRED UNDER FEDERAL AID PROJECTS

AREA	DATE	RECORDING INFORMATION	INTEREST ACQUIRED	EASEMENT TYPE	PREVIOUS OWNER	LAND AQUISITION
O *	04-02-43	3218B, BOOK 282, PAGE 121	EASEMENT	AVIGATION	WILLIAM & EDNA KEIL	ADAP 3-41-0056-01
P *	04-19-43	3222B, BOOK 282, PAGE 662	EASEMENT	AVIGATION	WILLIAM & MANDY JESKY	ADAP 3-41-0056-01
Q *	12-31-42	3217B, BOOK 279, PAGE 91	EASEMENT	AVIGATION	OTTO & MATILDA KNORR	ADAP 3-41-0056-01
R *	03-01-43	10734, BOOK 1089, PAGE 188	EASEMENT	AVIGATION	IRVIN & MARLEA LEFFLER	ADAP 3-41-0056-01
S *	12-05-42	10735, BOOK 1184, PAGE 694	EASEMENT	AVIGATION	IRVIN & MARLEA LEFFLER	ADAP 3-41-0056-01
T *	12-31-42	3216B, BOOK 279, PAGE 84	EASEMENT	AVIGATION	MILDRED STEINHOFF	ADAP 3-41-0056-01
U (110)	08-14-07	REEL 2857, PAGE 98	FEE	OWNERSHIP	TRI-PROP LLC	A.I.P. 3-41-0004-12
V (111)	08-13-07	REEL 2857, PAGE 77	FEE	OWNERSHIP	LLOYD B JANZEN/ JOHN WESSMAN	A.I.P. 3-41-0004-12
W (112)	08-13-07	REEL 2857, PAGE 416	FEE	OWNERSHIP	VERA L BENNETT	A.I.P. 3-41-0004-12
X (113A)	08-27-07	REEL 2859, PAGE 302	FEE	OWNERSHIP	TLM HOLDINGS, LLC	A.I.P. 3-41-0004-12
Y (113B)	08-27-07	REEL 2859, PAGE 302	FEE	OWNERSHIP	TLM HOLDINGS, LLC	A.I.P. 3-41-0004-12
Z (113C)	08-27-07	REEL 2859, PAGE 302	FEE	OWNERSHIP	TLM HOLDINGS, LLC	A.I.P. 3-41-0004-12
(26) a	1993		FEE	OWNERSHIP	STATE OF OREGON DOT	A.I.P. 3-41-0004-003
(29) b	1993		FEE	OWNERSHIP	STATE OF OREGON DOT	A.I.P. 3-41-0004-003
(14) c	1985		FEE	OWNERSHIP	STATE OF OREGON DOT	A.I.P. 3-41-0004-001

a GRANT PARCEL A b GRANT PARCEL B c GRANT PARCEL C

EASEMENTS TO BE ACQUIRED

AREA	CURRENT OWNERSHIP	APPROXIMATE AREA
1	COLUMBIA HELICOPTERS, INC. P.O. BOX 3500 PORTLAND, OR 97208	16.32 A
2	THOMA AND JO ETTA SCHOMUS 21810 BOONES FERRY RD, NE AURORA, OR 97002	0.60 A
3	DAN AND JANET ANDERSON 15260 SE MINERVA MILWAUKIE, OR 97267	0.52 A
4	GARY AND KATHRYN HAMLET 21860 BOONES FERRY RD, NE AURORA, OR 97002	1.00 A
5	GENE AND DIANA BRUNO P.O. BOX 8 AURORA, OR 97002	1.05 A
6	HERMAN AND GRACE MCCUNE TIMOTHY AND EVELYN HOWLAND 22050 BOONES FERRY RD, NE AURORA, OR 97002	1.92 A
7	NORMAN AND BETTY MENNICK 22090 BOONES FERRY RD, NE AURORA, OR 97002	2.00 A
8	LYLE AND VICKI HAWORTH 22190 BOONES FERRY RD, NE AURORA, OR 97002	5.03 A

	LEGEND
DESCRIPTION	EXISTING
EXISTING FEE OWNERSHIP	X
EXISTING AVIGATION EASEMENT	A
EASEMENT TO BE AQUIRED	1
PROPERTY AQUIRED UNDER AIP 12	
PARCEL OWNERSHIP IDENTIFICATION NUMBER	(72)
TAX LOT NUMBER	1800
EXISTING STATE OF OREGON DEPARTMENT OF TRANSPORTATION, DIVISION OF AERONAUTICS PROPERTY OWNERSHIP LINE	
PARCEL BOUNDARY	
RUNWAY PROTECTION ZONE	

WHPacific
9755 SW Barnes Rd, Suite 300
Portland, OR 97225
503-626-0455 Fax 503-526-0775
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OREGON DEPARTMENT OF AVIATION

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SHEET INFO	
DESIGNED	SML
DRAWN	RAI
CHECKED	REA
APPROVED	----
LAST EDIT	3/23/2012
PLOT DATE	1/3/2013
SUBMITTAL	

REVISIONS			
NO.	BY	DATE	REMARKS

EXHIBIT 'A' ~ PROPERTY MAP

OREGON DEPARTMENT OF AVIATION
AURORA STATE AIRPORT ~ MASTER PLAN UPDATE

PROJECT NUMBER	DRAWING FILE NAME	SCALE
034317	32690-AIRP-EXHIBITA	CUSTOM

SHEET NUMBER 8
9 of 10

[DATE: 1/3/2013 10:30 AM] [AUTHOR: -----] [PLOTTER: DWG To PDF.pc3] [STYLE: WHP-Standard.ctb]
[PATH: P:\Oregon Department of Aviation\034317\Design\Drawings\Civil\32690-airp-ExhibitA.dwg] [LAYOUT: Exhibit A]

GeoTerra
Date of Photography: July 31, 2024
Approximate Scale: 1"=100'
#1
#2
#3
#4
#5
#6
#7
#8
COLUMBIA HELICOPTERS
Building #1 Main Office
Building #2
Thick Shop #4
WILLAMETTE AVIATION
HANGAR A
HANGAR B
HANGAR C
HANGAR D
Willamette
23123
AURORA BUSINESS PARK
WYLEE CONDO ASSOCIATION
AURORA HANGAR ASSOC.
Aurora
Airport
Entrance
Fuel Island
Restroom
Pilot's Lounge
Courtesy Car
Flight Service
Weather
Rotating Beacon
Tie Down
Hangar
Taxiway
Runway
AURORA AIRPARK AVIATION CONDO HANGARS
A-101-A-102 A-103A-104
B-101 B-102 B-103
C-101 C-102 C-103 C-104 C-105 C-106 C-107
D-101 D-102 D-103 D-104 D-105 D-106 D-107 D-108 D-109 D-110
E-101 E-102 E-103 E-104 E-105 E-106 E-107
F-101 F-102
G-101
NORTH MARION COUNTY VERTIPORT
HELICOPTER TRANSPORT SERVICE
HTS
SOUTH END CORPORATE AIRPARK
ATLANTIC AVIATION
VAN'S AIRCRAFT
VAN'S AIRCRAFT (FUTURE)
ROMEO
WINCO
OSCAR
PAPA
FOXTROT
ECHO
DELTA
BRAVO
GOLF
HOTEL
INDIA
JULIET
KILO
LIMA NORTH
LIMA SOUTH
NOVEMBER
MIKE
MIKE
MIKE
MIKE
NOVEMBER
NOVEMBER
17
35

EXHIBIT D

3217 Ø

FLIGHT STRIP EASEMENT

VOL. 279 PAGE 91

KNOW ALL BY THESE PRESENTS That we, the undersigned, are the owners in fee simple of the following described real property, to-wit:

PARCEL #1. A parcel of land lying in the south half (S½) of Section 2, Township 4 South, Range 1 West, W. M., Marion County, Oregon, the said parcel being all that portion of the grantor's property lying east of the 600 foot width flight strip and being described as follows:

Beginning at the east quarter corner of said Section 2; thence west along the east and west center line of said Section 945 feet to the east line of the said flight strip; thence South 7° 08' West along said east line 2129 feet to the south line of the grantor's property; thence east 1205 feet to the east line of Section 2; thence North 2112 feet to the point of beginning.

PARCEL #2. All that portion of the grantor's property lying between the westerly right of way line of the West Portland-Hubbard Highway and the existing County Road and being more particularly described as follows:

Beginning at the intersection of the east and west center line of said Section 2 and the westerly right of way line of said highway; said intersection being 1752 feet west of the east quarter corner of said Section 2; thence west along said east and west center line 1154 feet to the center of said County Road; thence southerly along the center of said Road 2165 feet, more or less, to the south line of the grantor's property; thence east along said south line 625 feet to the westerly right of way line of said highway; thence North 7° 08' East along said right of way line 2129 feet to the point of beginning.

AND, WHEREAS, the United States of America has designated and established a flight strip for the use and benefit of aircraft, all or a portion of which flight strip is in the vicinity of the property above described; and

WHEREAS, the undersigned desire to cooperate with the United States of America and the State of Oregon to the extent and in the manner hereinafter set forth in the creation and development of said flight strip and the area required therefor.

THEREFORE, we, the undersigned, in consideration of the sum of Four Hundred fifty five and —20/00 Dollars, receipt of which said sum hereby is acknowledged, do for ourselves, our heirs, successors and assigns, grant to and vest in the United States of America and the State of Oregon the right, privilege and license to use the space over the real property hereinabove described for the use and benefit of aircraft; and we further grant to the United States of America and the State of Oregon the right to limit, control and remove obstructions extending in space above the hereinafter defined inclined plane.

We, the undersigned, hereby covenant and agree for ourselves, our heirs and assigns as a covenant binding the above described real property and for the benefit of the United States of America, the State of Oregon and the said flight strip that no building, structure, object, obstruction or other thing shall be erected, placed or maintained on the above described real property or any part thereof [illegible] which shall extend above the hereinafter

VOL 279 PAGE

EXHIBIT D

The said inclined plane directly above Parcel #1 of said real property, the southeast corner of which plane has an elevation of 192 feet, the southwest corner of which has an elevation of 190 feet, the northeast corner of which has an elevation of 327 feet, and the northwest corner of which has an elevation of 192 feet, and which plane has also the following elevations:

The said inclined plane is the space directly above Parcel #2 of said real property, the southeast corner of which plane has an elevation of 218 feet, the southwest corner of which has an elevation of 312 feet, the northeast corner of which has an elevation of 220 feet, and the northwest corner of which has an elevation of 385 feet, and which plane has also the following elevations:

The above elevations refer to the standard datum established by the U. S. Coast and Geodetic Survey (1929 Adjustment).

We, the undersigned, further covenant and agree that the State of Oregon and/or the United States of America and/or their assigns shall have and hereby are given the right, through their respective officers, agents, contractors, or representatives to enter from time to time upon the said described real property and to trim, cut, and/or fell trees or other natural growth which may extend above, or within any period of five years could reasonably be anticipated to extend above, the said inclined plane. All trees or other natural growth cut or felled by the grantee shall remain the property of the grantors and may be removed at the option and convenience of the owners.

We further covenant and agree that we, at our own expense, will remove or alter any buildings, structures, objects, obstructions or other things other than trees or natural growth and other than telephone, telegraph, power lines or other utility facilities which are now on said real property, [illegible] of the [illegible]

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EXHIBIT D

...urther covenant that the covenants herein specified shall run with the above described real property and shall be binding upon our heirs, administrators, successors and assigns and shall continue in full force and effect so long as the said flight strip is maintained for aircraft purposes, provided that in the event the said flight strip is abandoned by competent governmental action, then this easement, grant and covenant shall cease and be of no further force or effect.

Dated this 4th day of December, 1942.

Executed in the presence of:

H. B. Denson

Otto Knaus (SEAL)

Matilda L. Knaus (SEAL)

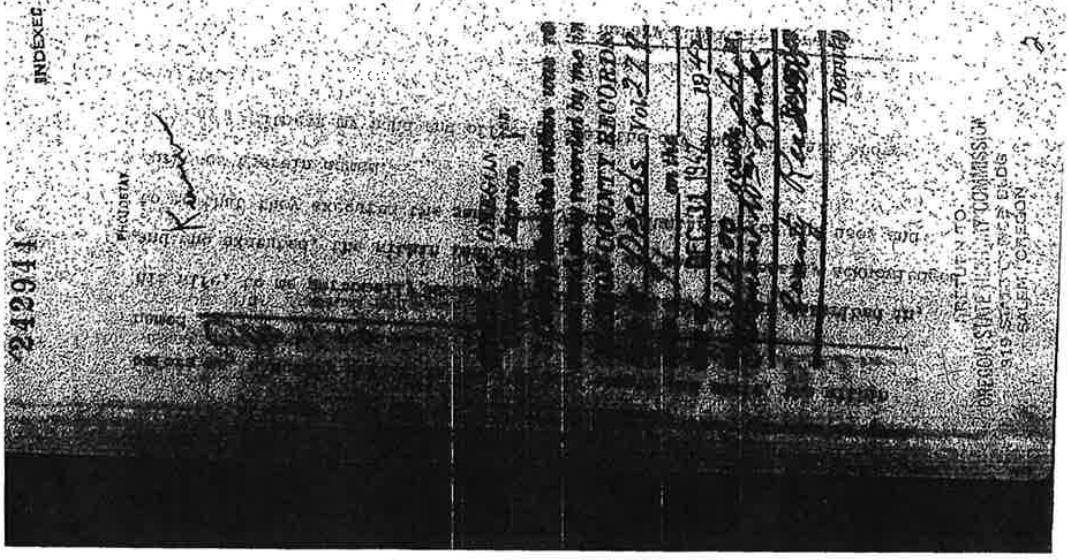
STATE OF OREGON,
County of Marion) ss

On this 4th day of December, 1942, personally came before me, a Notary Public in and for said county and state, the within named Otto Knaus and Matilda L. Knaus, his wife, to me personally known to be the identical persons described in, and who executed, the within instrument, and who each personally acknowledged to me that they executed the same freely and voluntarily for the uses and purposes therein named.

Witness my hand and official seal the day and year last above written.

Harry F. Denson
Notary Public for Oregon

My commission expires: Sept 26 1944



219911

Columbia Aviation Association
Management West
TLM
Property to
be Adjusted
into Airport
Boundary
YELLOW PORTION
PURCHASED BY
ODAV
105' wide taxilane
83' width available
here
Life Flight Network
HTS
Winco Powerline Services
Google Earth
Image © 2024 Airbus
N
700 ft

ORIGINAL

Fidelity National Title 07-765

Space above this line for Recorder's use.

After recording, return to:
TLM Holdings, LLC
14355 Keil Road. NE
Aurora, OR 97002

Send tax statements to:
(same)

TAXIWAY ACCESS EASEMENT

For value received, the STATE OF OREGON, acting by and through its Department of Aviation, **Grantor**, hereby grants to TLM HOLDINGS, LLC, an Oregon limited liability company, **Grantee**, its successors and assigns, an easement on and over the Grantor's real property more particularly described in the attached Exhibit A (the "**Burdened Parcel**") across the Taxiway Obstacle Free Area (OFA), as defined by the Federal Aviation Authority (FAA) and shown on the attached Exhibit B, subject to FAA regulations and temporary restrictions for construction purposes and aircraft operations in the OFA for access to Grantor's taxiway from and to the real property of Grantee more particularly described in the attached Exhibit C (the "**Benefited Parcel**");

TOGETHER WITH the right of Grantee to allow its licensees to use the easement granted above for access to Grantor's taxiway from and to the Benefited Parcel, subject to FAA regulations and temporary restrictions for construction purposes and aircraft operations in the OFA;

TOGETHER WITH the right of Grantee and Grantee's successors and assigns to construct improvements within the OFA at Grantee's sole expense, subject to Oregon Department of Aviation approval and Grantee's compliance with FAA design standards; and

TOGETHER WITH the right of Grantee and Grantee's successors and assigns to construct aviation-related improvements in the "transition area" shown on attached Exhibit B, subject to FAA review and Grantor's determination that such improvements do not have a negative effect on Grantor's airport or airport operations.

Grantor shall not unreasonably withhold its approval, and shall diligently seek approval by FAA, of Grantee's proposed improvements in the OFA and the "transition area" shown on Exhibit B.

Grantee shall indemnify and hold Grantor harmless against any damages, claims, liabilities, costs or expenses arising out of any act or omission of Grantee, its licensees, successors or assigns, in connection with Grantee's activities under this easement. To the

extent permitted by Article XI, Section 7 of the Oregon Constitution, and subject to the limits of the Oregon Tort Claims Act, ORS 30.260 through 30.300, Grantor shall indemnify and hold Grantee harmless against any damages, claims, liabilities, costs or expenses arising out of any act or omission of Grantor, its successors or assigns, in connection with Grantor's activities under this easement.

At Grantor's election, all rights granted under this easement will cease and the easement will terminate if Grantee fails for a period of five consecutive years to engage in any of the activities permitted under this easement. In such event, Grantee shall cooperate with Grantor in executing and recording any instrument necessary or useful for extinguishing this easement.

This easement is subject to all prior easements or encumbrances of records affecting the Burdened Parcel.

This easement is appurtenant to the Benefited Parcel and the benefit of this easement is intended to run with the Burdened and Benefited Parcels, including any division or partition of them, and to be binding upon the heirs, successors and assigns of Grantor and Grantee with respect to these Parcels.

Failure of either party to comply with any term or condition or fulfill any obligation of this easement agreement within 20 days after receiving written notice from the other party specifying the nature of the failure with reasonable particularity is a default. Upon default by either party, the other party may seek such remedies as may be available under applicable law or in equity including (without limitation) the remedies of injunction and specific performance.

No provision of this easement agreement may be deemed to have been waived unless the waiver is in writing signed by the waiving party. Otherwise, no modification or amendment of any provision of this easement agreement is binding on Grantor or Grantee unless signed by both Grantor and Grantee and recorded in the Marion County, Oregon real property records. Failure at any time to require performance of any provision of this easement agreement does not limit Grantor's or Grantee's right to enforce the provision. Any waiver of any breach of any provision is not a waiver of any succeeding breach or a waiver of any provision of this easement agreement.

Communications made pursuant to this easement agreement are effective when actually delivered or when delivered by facsimile or when deposited in the United States mail, certified or registered mail, correct postage prepaid and addressed to Grantor and Grantee as follows:

Grantor: The Oregon Department of Aviation
3040 25th St. SE
Salem, OR 97302-1125
Fax: (503) 373-1688

Grantee: TLM Holdings, LLC
14355 Keil Rd NE, Suite 11
Aurora, OR 97002
Fax: (503) 678-6204

Any party may change its address for notices by written notice to the others in the manner set forth above.

AGREED TO this 29 day of August, 2007.

GRANTOR:
The State of Oregon, acting by and through its Department of Aviation

By: _____
Daniel E. Clem

As: Interim Director

GRANTEE:
TLM Holdings, LLC,
an Oregon limited liability company

By: _____
Ted L. Millar, Trustee of the
Ted L. Millar Living Trust

As: Managing Member

STATE OF OREGON)
) ss.
County of Marion)

This instrument was acknowledged before me on this 24 day of August, 2007, by **Daniel E. Clem**, as the Interim Director of the Oregon Department of Aviation, acting under authority granted to him by the Oregon Department of Aviation.

OFFICIAL SEAL
JENNIFER KELLAR
NOTARY PUBLIC – OREGON
COMMISSION NO. 412989
MY COMMISSION EXPIRES DEC. 28, 2010

_____
Notary Public for Oregon
My Commission expires: 12/28/10

STATE OF OREGON)
) ss.
County of Marion)

This instrument was acknowledged before me on this 27th day of August, 2007, by **Ted L. Millar**, as Trustee of the Ted L. Millar Living Trust, the managing member of TLM Holdings, LLC, an Oregon limited liability company, acting under authority granted to him by the company.

OFFICIAL SEAL
VICKI G. BAYLESS
NOTARY PUBLIC-OREGON
COMMISSION NO. 375196
MY COMMISSION EXPIRES DECEMBER 5, 2007

_____
Notary Public for Oregon
My Commission expires: 12/5/07

EXHIBIT A
Burdened Parcel

Parcel 1:
A TRACT OF LAND BEING A PORTION OF PARCEL 1 OF PARTITION PLAT 2006-58 RECORDED IN MARION COUNTY PLAT RECORDS AND LOCATED IN THE NORTHEAST ONE-QUARTER OF SECTION 11, TOWNSHIP 4 SOUTH, RANGE 1 WEST OF THE WILLAMETTE MERIDIAN, CITY OF AURORA, MARION COUNTY, OREGON AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHWEST CORNER OF SAID PARCEL 1, THENCE NORTH 07°07'40" EAST, 260.93 FEET TO THE NORTHWEST CORNER OF SAID PARCEL; THENCE ALONG THE NORTH LINE OF SAID PARCEL SOUTH 82°23'49" EAST, 64.80 FEET TO A POINT 365.50 FEET FROM THE CENTERLINE OF AURORA AIRPORT RUNWAY, WHEN MEASURED PERPENDICULAR THERETO; THENCE SOUTH 07°10'21" WEST, 260.42 FEET TO THE SOUTH LINE OF SAID PARCEL 1, BEING 365.50 FEET FROM THE CENTERLINE OF SAID RUNWAY CENTERLINE; THENCE ON SAID SOUTH LINE NORTH 82°50'42" WEST, 64.59 FEET TO THE POINT OF BEGINNING.

CONTAINS APPROXIMATELY 16,864 SQUARE FEET OR 0.39 ACRES, MORE OR LESS.

THE BASIS OF BEARINGS FOR THIS LEGAL DESCRIPTION IS THE PLAT OF "WYLEE HANGAR CONDOMINIUMS".

Parcel 2:
A TRACT OF LAND BEING A PORTION OF PARCEL 2 OF PARTITION PLAT 2006-58 RECORDED IN MARION COUNTY PLAT RECORDS AND LOCATED IN THE NORTHEAST ONE-QUARTER OF SECTION 11, TOWNSHIP 4 SOUTH, RANGE 1 WEST OF THE WILLAMETTE MERIDIAN, CITY OF AURORA, MARION COUNTY, OREGON AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHWEST CORNER OF SAID PARCEL 2, THENCE NORTH 07°07'40" EAST, 445.63 FEET; THENCE NORTH 07°11'56" EAST, 306.32 FEET TO THE NORTHWEST CORNER OF SAID PARCEL; THENCE ALONG THE NORTH LINE OF SAID PARCEL SOUTH 82°51'44" EAST, 65.00 FEET TO A POINT 365.50 FEET FROM THE CENTERLINE OF AURORA AIRPORT RUNWAY, WHEN MEASURED PERPENDICULAR THERETO; THENCE SOUTH 07°10'21" WEST, 752.48 FEET TO THE SOUTH LINE OF SAID PARCEL 2, BEING 365.50 FEET FROM THE CENTERLINE OF SAID RUNWAY CENTERLINE; THENCE ON SAID SOUTH LINE NORTH 82°23'49" WEST, 64.80 FEET TO THE POINT OF BEGINNING.

CONTAINS APPROXIMATELY 48,902 SQUARE FEET OR 1.12 ACRES, MORE OR LESS.

THE BASIS OF BEARINGS FOR THIS LEGAL DESCRIPTION IS THE PLAT OF "WYLEE HANGAR CONDOMINIUMS".

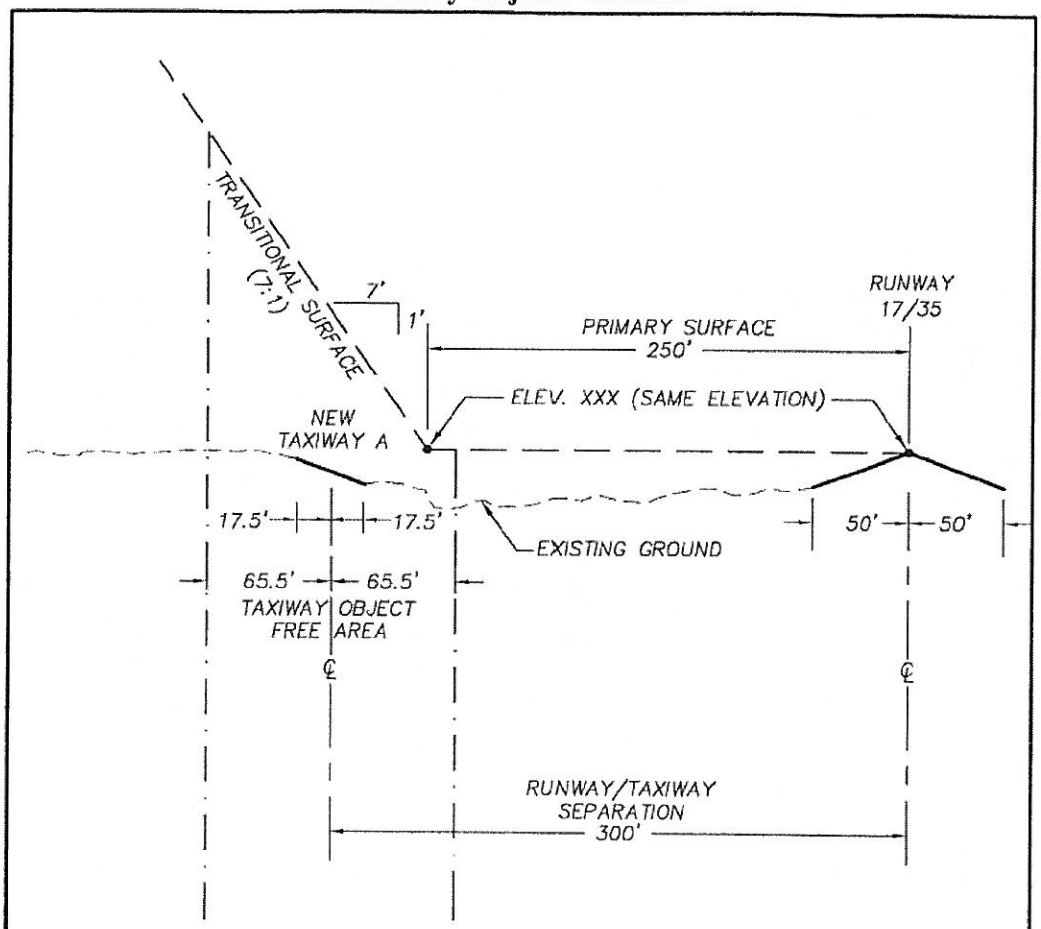
Parcel 3:
A TRACT OF LAND BEING A PORTION OF PARCEL 3 OF PARTITION PLAT 2006-58 RECORDED IN MARION COUNTY PLAT RECORDS AND LOCATED IN THE SOUTHEAST ONE-QUARTER OF SECTION 2, TOWNSHIP 4 SOUTH, RANGE 1 WEST OF THE WILLAMETTE MERIDIAN, CITY OF AURORA, MARION COUNTY, OREGON AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST CORNER OF SAID PARCEL 3, THENCE NORTH 89°47'39" EAST ALONG THE NORTH LINE OF SAID PARCEL, 65.36 FEET TO A POINT 365.50 FEET FROM THE CENTERLINE OF AURORA AIRPORT RUNWAY, WHEN MEASURED PERPENDICULAR THERETO; THENCE SOUTH 07°10'21" WEST, 417.99 FEET TO THE SOUTH LINE OF SAID PARCEL 3, BEING 365.50 FEET FROM THE CENTERLINE OF SAID RUNWAY CENTERLINE; THENCE ON SAID SOUTH LINE NORTH 82°51'44" WEST, 65.00 FEET; THENCE NORTH 07°11'56" EAST, 409.64 FEET TO THE POINT OF BEGINNING.

CONTAINS APPROXIMATELY 26,860 SQUARE FEET OR 0.62 ACRES, MORE OR LESS.

THE BASIS OF BEARINGS FOR THIS LEGAL DESCRIPTION IS THE PLAT OF "WYLEE HANGAR CONDOMINIUMS".

EXHIBIT B
Taxiway Object Free Area



FAA PART 77 CATEGORY C
PRIMARY SURFACE WIDTH
- 500' TOTAL
- 250' ONE SIDE

TAXIWAY WIDTH – 35'

AIRPLANE DESIGN GROUP – B–II
LOWER THAN 3/4 MILE VISIBILITY

REF: FEDERAL AVIATION REGULATIONS PART 77: OBJECTS AFFECTING NAVIGABLE AIRSPACE

FAA ADVISORY CIRCULAR 150/5300–13: AIRPORT DESIGN

OFA – OBJECT FREE AREA

DESIGNED BY: KLB	CHECKED BY: PJM		
DRAWN BY: KLB	APPROVED BY: RMK		
LAST EDIT: 4/03/07	PLOT DATE: 04/10/07		

DATE	BY	REV#	REVISION	CK'D	APPR

W&H PACIFIC

OREGON DEPARTMENT OF AVIATION
AURORA PROPERTY ACQUISITION

AURORA STATE AIRPORT TAXIWAY OFA & TRANSITIONAL SURFACE

AURORA OREGON

SCALE:	PROJECT NO.	DRAWING FILE NAME:	SHEET
NTS	032690	32690–airp–ex03	1

EXHIBIT C
Benefited Parcel

PARCELS 1, 2 AND 3, PARTITION PLAT NO. 2006-58, RECORDED JUNE 19, 2006, IN REEL 2663, PAGE 33, RECORDS FOR MARION COUNTY.

SAVE AND EXCEPT THE FOLLOWING:
PARCEL I:

A TRACT OF LAND BEING A PORTION OF PARCEL 1 OF PARTITION PLAT 2006-58 RECORDED IN MARION COUNTY PLAT RECORDS AND LOCATED IN THE NORTHEAST ONE-QUARTER OF SECTION 11, TOWNSHIP 4 SOUTH, RANGE 1 WEST OF THE WILLAMETTE MERIDIAN, CITY OF AURORA, MARION COUNTY, OREGON AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHWEST CORNER OF SAID PARCEL 1, THENCE NORTH 07°07'40" EAST, 260.93 FEET TO THE NORTHWEST CORNER OF SAID PARCEL; THENCE ALONG THE NORTH LINE OF SAID PARCEL SOUTH 82°23'49" EAST, 64.80 FEET TO A POINT 365.50 FEET FROM THE CENTERLINE OF AURORA AIRPORT RUNWAY, WHEN MEASURED PERPENDICULAR THERETO; THENCE SOUTH 07°10'21" WEST, 260.42 FEET TO THE SOUTH LINE OF SAID PARCEL 1, BEING 365.50 FEET FROM THE CENTERLINE OF SAID RUNWAY CENTERLINE; THENCE ON SAID SOUTH LINE NORTH 82°50'42" WEST, 64.59 FEET TO THE POINT OF BEGINNING.

PARCEL II:

A TRACT OF LAND BEING A PORTION OF PARCEL 2 OF PARTITION PLAT 2006-58 RECORDED IN MARION COUNTY PLAT RECORDS AND LOCATED IN THE NORTHEAST ONE-QUARTER OF SECTION 11, TOWNSHIP 4 SOUTH, RANGE 1 WEST OF THE WILLAMETTE MERIDIAN, CITY OF AURORA, MARION COUNTY, OREGON AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE SOUTHWEST CORNER OF SAID PARCEL 2, THENCE NORTH 07°07'40" EAST, 445.63 FEET; THENCE NORTH 07°11'56" EAST, 306.32 FEET TO THE NORTHWEST CORNER OF SAID PARCEL; THENCE ALONG THE NORTH LINE OF SAID PARCEL SOUTH 82°51'44" EAST, 65.00 FEET TO A POINT 365.50 FEET FROM THE CENTERLINE OF AURORA AIRPORT RUNWAY, WHEN MEASURED PERPENDICULAR THERETO; THENCE SOUTH 07°10'21" WEST, 752.48 FEET TO THE SOUTH LINE OF SAID PARCEL 2, BEING 365.50 FEET FROM THE CENTERLINE OF SAID RUNWAY CENTERLINE; THENCE ON SAID SOUTHLINE NORTH 82°23'49' WEST, 64.80 FEET TO THE POINT OF BEGINNING.

PARCEL III:

A TRACT OF LAND BEING A PORTION OF PARCEL 3 OF PARTITION PLAT 2006-58 RECORDED IN MARION COUNTY PLAT RECORDS AND LOCATED IN THE SOUTHEAST ONE-QUARTER SECTION OF SECTION 2, TOWNSHIP 4 SOUTH, RANGE 1 WEST OF THE WILLAMETTE MERIDIAN, CITY OF AURORA, MARION COUNTY, OREGON AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST CORNER OF SAID PARCEL 3, THENCE NORTH 89°47'39" EAST ALONG THE NORTH LINE OF SAID PARCEL, 65.36 FEET TO A POINT 365.50 FEET FROM THE CENTERLINE OF AURORA AIRPORT RUNWAY, WHEN MEASURED PERPENDICULAR THERETO; THENCE SOUTH 07°10'21" WEST, 417.99 FEET TO THE SOUTH LINE OF SAID PARCEL 3, BEING 365.50 FEET FROM THE CENTERLINE OF SAID RUNWAY CENTERLINE; THENCE ON SAID SOUTH LINE NORTH 82°51'44" WEST, 65.00 FEET; THENCE NORTH 07°11'56" EAST, 409.64 FEETTO THE POINT OF BEGINNING.

EXHIBIT "C" BENEFITED PARCEL continued

A tract of land located in the northeast quarter of Section 11, Township 4 North, Range 1 West, Willamette Meridian, Marion County, Oregon, being more Particularly described a follows:

Beginning at the northwest corner of Parcel 1 of Partition Plat 98-0105 of Marion County Partition Plat records; thence following the north line of said Parcel 1, South 82 43 05 East a distance of 240.03 feet to the northeast corner of said Parcel 1; thence following the east line of said Parcel 1, South 00 08 01 West a distance of 158.06 feet to the southeast corner of said parcel 1 and being a point on the north right-of-way line of Keil Road NE, thence following the south line of said Parcel 1, South 89 48 45 West a distance of 261.41 feet to the southwest corner of said Parcel 1; thence continuing along the north right-of way line of Keil Road NE, South 89 49 29 West a distance of 328.54 feet to 5/8 iron rod with a yellow plastic cap marked 'Deveo Eng LS 2088' marking the most southerly southwest corner of that property described in reel 2037, page 118 of Marion County Deed records and being the southeast corner of that property described In Book 868, Page 298 of Marion County Deed Records, thence 07 07 45 East a distance of 385.31 feet to a 5/8 iron rod with a yellow plastic cap marked," Devio Eng LS 2088" Marking the northeast corner of said property described in Book 868, page 298, thence South 82 50 28 East a distance of 325.86 feet to a point on the west line of Parcel 2 of Partition Plat 98-0105; thence following the west line of said Parcel 2 South 07 07 48 West a distance of 152.46 feet to the point of Beginning having a area of 162.268 square feet 3.73 acres more or less.

REEL:2859 **PAGE: 303**

August 29, 2007, 11:37 am.

CONTROL #: 204513

State of Oregon
County of Marion

I hereby certify that the attached instrument was received and duly recorded by me in Marion County records:

FEE: $ 61.00

BILL BURGESS
COUNTY CLERK

THIS IS NOT AN INVOICE.

REEL 3581 PAGE 83
MARION COUNTY
BILL BURGESS, COUNTY CLERK
02-10-2014 09:38 am.
Control Number 355454 $ 446.00
Instrument 2014 00004077

AFTER RECORDING, RETURN TO, AND
PREPARED BY:

Michelle D. DaRosa
Stoel Rives LLP
900 SW Fifth Avenue, Suite 2600
Portland, Oregon 97204

DECLARATION SUBMITTING
SOUTHEND CORPORATE AIRPARK CONDOMINIUM
TO CONDOMINIUM OWNERSHIP

DECLARANT

YELLOW GATE CORPORATE HANGARS LLC

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DECLARATION SUBMITTING
SOUTHEND CORPORATE AIRPARK CONDOMINIUM
TO CONDOMINIUM OWNERSHIP

THIS DECLARATION, pursuant to the provisions of the Oregon Condominium Act, is made and executed by **YELLOW GATE CORPORATE HANGARS LLC**, an Oregon limited liability company ("**Declarant**").

Declarant proposes to create a condominium to be known as Southend Corporate Airpark Condominium, which will be located in Marion County, Oregon. The purpose of this Declaration is to submit the property described in Article 2 below to the condominium form of ownership and use in the manner provided by the Oregon Condominium Act.

NOW, THEREFORE, Declarant does hereby declare and provide as follows:

Article 1

DEFINITIONS

When used in this Declaration the following terms shall have the following meanings:

1.1 "**Additional Property**" means the real property legally described in the attached Exhibit C.

1.2 "**Annexation Owner**" means TLM Holdings LLC, an Oregon limited liability company, and/or H. D. Aviation, Corp., an Oregon corporation, and their respective assignees of the annexation rights granted herein to each Annexation Owner.

1.3 "**Association**" means the association of unit owners established pursuant to Article 14 below.

1.4 "**Attached Unit**" means a unit that is attached to another unit, the boundaries of which will be as described in Section 4.3(b).

1.5 "**Aviation Laws**" means the ordinances, regulations and statutes of the Federal Aviation Administration, the Transportation Security Administration, and the Oregon Department of Aviation, to the extent the same affect the use and construction of the Condominium and access to the Aurora State Airport ("**Airport**").

1.6 "**Bylaws**" means the Bylaws of the Southend Corporate Airpark Condominium Owners Association adopted pursuant to Section 14.4 below as they may be amended from time to time.

1.7 "**Commercial Unit Expenses**" means that subset of common expenses as defined in Section 8.1(b).

1.8 "**Commercial Hangar Units**" means those units designated as such in the attached Exhibit B or in any supplemental declaration annexing property to the Condominium.

1.9 "**Commercial Units**" means Commercial Hangar Units and any other type of unit that may be created in any supplemental declaration annexing property to the Condominium, which permits the same use as the Commercial Hangar Units as set forth in the Bylaws.

1.10 "**Condominium**" means all of the property submitted to the condominium form of ownership by this Declaration plus any Additional Property annexed to the project pursuant to Article 15 below.

1.11 "**Declarant**" means Yellow Gate Corporate Hangars LLC, an Oregon limited liability company, and its successors and assigns.

1.12 "**Declaration**" means this Declaration as it may hereafter be amended and any supplemental declaration annexing property to the Condominium.

1.13 "**Freestanding Unit**" means a unit that is unattached to any other unit, the boundaries of which will be as described in Section 4.3(b).

1.14 "**General Expenses**" mean those common expenses as defined in Section 8.1(a).

1.15 "**Individual Expenses**" means those expenses as defined in Section 8.1(b).

1.16 "**Mortgage**" and "**Mortgagee**" mean, respectively, a recorded mortgage, trust deed or contract of sale that creates a lien against a unit, and the holder, beneficiary or vendor of such a mortgage, trust deed or contract of sale.

1.17 "**Plat**" means the plat of Southend Corporate Airpark Condominiums recorded simultaneously with the recording of this Declaration.

1.18 "**Specially Allocated Expenses**" means that subset of common expenses as defined in Section 8.1(b), which does not include General Expenses.

1.19 "**Shared Limited Common Element Expenses**" means that subset of common expenses as defined in Section 8.1(b).

1.20 "**Yellow Gate Hangar Units**" means those units designated as such in the attached Exhibit B or in any supplemental declaration annexing property to the Condominium.

1.21 "**Yellow Gate Hangar Expenses**" means that subset of common expenses as defined in Section 8.1(b).

1.22 **Incorporation by Reference.** Except as otherwise provided in this Declaration, each of the terms defined in ORS 100.005, a part of the Oregon Condominium Act, shall have the meaning set forth in that section.

Article 2

SUBMISSION OF PROPERTY TO CONDOMINIUM STATUTE

The property submitted to the Oregon Condominium Act by this Declaration includes the real property in Marion County, Oregon, which is owned and conveyed in fee simple by the Declarant, as legally described in the attached Exhibit A. The property submitted includes the land so described, all buildings, improvements and structures, all easements, and rights and appurtenances located on, belonging to, or used in connection with such land, including but not limited to all rights to use wells, well permits, and water rights or water permits, to the extent that they benefit the Condominium, the following appurtenant easements in which Declarant owns an easement interest:

(a) Taxiway Easement Agreement, recorded December 7, 2005 at Reel 2577 Page 63, as amended by the Amendment to Taxiway Easement Agreement recorded December 7, 2005 at Reel 2577 Page 64, as amended by the Amendment to Taxiway Easement Agreement recorded February 2, 2007 at Reel 2769 Page 101;

(b) (80 foot) Taxilane Easement Agreement, recorded August 26, 2009 at Reel 3098 Page 278;

(c) Loop Road Easement Agreement, recorded November 1, 2005 at Reel 2560, Page 245, and amended by Amendment to Loop Road Roadway Easement Agreement and Declaration, recorded October 30, 2008 at Reel 3006, Page 119;

(d) 100-foot East Taxiway Easement Agreement, recorded November 18, 2013 at Reel 3561 Page 233;

(e) Shared Well Water Agreement, November 18, 2013 at Reel 3561 Page 234;

(f) Fifteen Foot (15') Utility Easement Agreement November 18, 2013 at Reel 3561 Page 235;

(g) Storm Sewer Easement, recorded November 18, 2013 at Reel 3561 Page 236;

(h) North-South Utility Corridor Extension Easement recorded November 18, 2013 at Reel 3561 Page 237; and

(i) Roadway Easement, recorded November 18, 2013 at Reel 3561 Page 238 (altogether, the "**Appurtenant Easements**").

Article 3

NAME OF CONDOMINIUM

The name by which the Condominium shall be known is "**Southend Corporate Airpark Condominium.**"

Article 4

UNITS

4.1 **General Description of Buildings**. Stage 1 consists of two one-story buildings without basement, which are commonly known as Hangar Mike ('M' on the Plat) and Hangar November ('N' on the Plat). The buildings are of steel beam and siding construction on a concrete slab foundation and steel roofs.

4.2 **General Description, Location and Designation of Units.** Stage 1 contains 16 Attached Yellow Gate Hangar Units and no Freestanding or Attached Commercial Hangar Units. The area of each unit in square feet is shown on the Plat and the attached Exhibit B.

4.3 **Boundaries of Units**.

(a) **Boundaries of Attached Units**. Each Attached Unit shall be bounded by the interior surfaces of its perimeter and bearing walls, slab foundation, roof, window frames, doors and door frames, trim and the exterior surface of window glazing. Where no boundary wall separates two Attached Units or a unit and a common element, the boundary shall be a vertical plane as shown on the Plat. The Attached Unit shall include all drywall, paint, finished flooring, if any, and any other materials constituting any part of the unit's finished surfaces, except those portions of the walls, floors or ceilings that materially contribute to the structural or shear capacity of the Condominium. All other portions of the walls, floors, or roofing shall be a part of the common elements. In addition, each Attached Unit shall include the following: (a) all spaces, nonbearing interior partitions (including dropped ceilings or ceilings constituting an interior partition that are below the roof of the unit), window glazing and screens, window frames, unit access doors and frames, aircraft and vehicle access doors, frames, and electric or hydraulic door openers and other related equipment, and interior doors and door frames, and all other fixtures and improvements within the boundaries of the unit; (b) all outlets of utility and communications service lines, including but not limited to power, light, gas, hot and cold water, heating, refrigeration, air conditioning, waste disposal, security, cable television and telephone, within the boundaries of the unit, but shall not include any part of such lines, pipes, or ducts themselves if they are shared with or serve other units or a common element; otherwise, all such lines and ducts serving only the unit shall be part of the unit; and (c) all interior security equipment, cameras, alarms, cabling, wi-fi and recording equipment that serve only the unit. Notwithstanding that they may be attached to or protrude into the common elements, window frames, door frames, canopies, awnings, signs and sign overhangs are part of the unit.

(b) **Boundaries of Freestanding Units**. Each Freestanding Unit shall be comprised of a single building, which is bounded by (i) the surface of the slab foundation of the

building, (ii) by the vertical exterior surfaces of the building's windows, perimeter, and bearing walls, and (iii) by the exterior surface of the roof of the building.

Each Freestanding Unit shall include all structural components of the building of which it is constructed, including girders, beams, joists, columns, and foundation, framing and siding, roofing sheeting and membrane, ceilings, windows and window frames, access and interior doors and door frames and trim, aircraft and vehicle access doors and frames, electric or hydraulic door openers, and other related equipment, except any common elements that are identified as such on the Plat. A Freestanding Unit shall include all finishing materials within the boundaries of the unit, including but not limited to, all drywall, paneling, tiles, dropped ceilings, paint, finished flooring and any other materials constituting any part of its finished surfaces. Freestanding Units shall also include all outlets of utility and communications service lines, conduits and pipes, including but not limited to power, light, gas, hot and cold water, heating, refrigeration, air conditioning, waste disposal, security, cable television and telephone, within the interior of the unit, but shall not include any part of such lines, pipes, or ducts themselves if they are shared with or serve other units or a common element, otherwise, all such lines and ducts serving only the unit shall be part of the unit; and all interior security equipment, cameras, alarms, cabling, wi-fi, and recording equipment that serve only the unit. Notwithstanding that they may protrude into the common elements, window frames, door frames, gutters and downspouts, roof overhangs, canopies, awnings, signs, and sign overhangs and the like on a Freestanding Unit building, are part of such unit.

Article 5

GENERAL COMMON ELEMENTS

The general common elements consist of all portions of the Condominium that are not part of a unit or a limited common element, including, but not limited to, the following:

5.1 The land, pathways, driveways, roadways, fences, grounds, landscaped areas, aircraft taxilanes, aircraft ramps, aircraft turnaround and staging areas, trash enclosures, and parking areas.

5.2 The fire suppression system and alarm system, riser rooms, and communication and water lines; security systems, including but not limited to server rooms, surveillance cameras, card reading system and security cards, and any other aspects or components of such life safety and security systems serving all units.

5.3 All septic tanks, water treatment equipment, if any, and sewer and water lines.

5.4 All other elements of the buildings and the Condominium necessary or convenient to their existence, maintenance and safety, or normally in common use, except as may be expressly designated in this Declaration as part of a unit or a limited common element.

Article 6

LIMITED COMMON ELEMENTS

The following shall constitute limited common elements, the use of which shall be restricted to the Yellow Gate Hangar Units based on the relative square footage of each Yellow Gate Hangar Unit compared to all Yellow Gate Hangar Units combined:

(a) Septic tanks and lines serving only the Yellow Gate Hangar Units.

(b) Security systems and equipment, including but not limited to surveillance cameras, servers, and communications lines, fire suppression lines, risers, and controllers, which serve only the Yellow Gate Hangar Units.

(c) Pipes, ducts, conduits, wires and other utility and communications installations pertaining to the Yellow Gate Hangar Units (and not just a single unit).

(d) Roofs, foundations, bearing and shear walls, perimeter walls, any common walls added to separate units at the boundary demised by a vertical plane designated on the Plat, beams, columns, and girders to the interior surfaces thereof pertaining to the Yellow Gate Hangar Units.

(e) Utility room that is not part of a unit and which are marked as "**LCE-Utility**" on the Plat.

Article 7

ALLOCATION OF UNDIVIDED INTERESTS IN COMMON ELEMENTS

Each unit will be entitled to an undivided ownership interest in the common elements determined by the ratio by which the square footage of the particular unit bears to the total square footage of all units combined, as shown on the attached Exhibit B. Such allocation will change if additional stages are added to the Condominium as is more particularly described in Section 15.4 below. If units are ever consolidated or if a Commercial Hangar Unit or Yellow Gate Hangar Unit is ever subdivided, the percentage ownership interest in the common elements shall be allocated among the consolidated or subdivided units in the proportion by which the square footage in the individual unit bears to the total square footage of all of the affected units. Each unit's interest in the common elements shall be inseparable from the unit and any conveyance, encumbrance, judicial sale, or other transfer, voluntary or involuntary, of an undivided interest in the common elements shall be void unless the unit to which that interest is allocated is also transferred.

Article 8

COMMON PROFITS AND EXPENSES; VOTING

8.1 **Allocation of Common Profits and Expenses**. The common profits of the Condominium shall be allocated to the owner of each unit according to the ratio by which the square footage of the particular unit bears to the total square footage of all units combined. Except upon termination of the Condominium or as otherwise provided in the Bylaws with respect to damage, destruction or condemnation, any such common profits shall be used solely

for the purpose of maintaining, repairing, and replacing the common elements or for other expenses or reserves of the Association.

(a) **Allocation of General Expenses**. Except as otherwise set forth below, the common expenses shared by all units of the Condominium are referred to herein as "**General Expenses**," which shall be allocated to the owner of each unit according to the ratio by which the square footage of the particular unit bears to the total square footage of all units combined. The following expenses shall be General Expenses: (i) the cost of insuring, maintaining, repairing or replacing the general common elements, including without limitation the exterior of the building and roofing of general common element structures, the aircraft taxilanes, aircraft turnaround and staging areas, and vehicle parking areas and spaces, which are not designated as limited common elements, and the reserves for the same; (ii) the cost of exterior lighting and landscaping; (iii) the cost of professional management of the Association; (iv) the cost associated with maintenance of recorded easements appurtenant to the Condominium; and all other common expenses not specifically allocated in Section 8.1(b); and (v) common services for the Condominium such as security, alarm, trash and recycling disposal services.

(b) **Allocation of Specially Allocated Expenses**. As a subset of common expenses that does not include General Expenses, the following Specially Allocated Expenses shall be allocated as follows:

(1) **Yellow Gate Hangar Expenses**. Yellow Gate Hangar Expenses are expenses attributable only to the Yellow Gate Hangar Units, including: (i) the costs of maintaining, repairing or replacing and insuring the Yellow Gate Hangar Limited Common Elements and reserves for the same; (ii) the costs of maintaining, repairing or replacing the septic and water delivery system, including all elements of which serve only the Yellow Gate Hangar Units, and reserves for the same, and for any other utilities serving only the Yellow Gate Hangar Units with a common meter; and (iii) security and fire suppression equipment and other life safety equipment or services exclusively used by the Yellow Gate Hangar Units. Yellow Gate Hangar Expenses shall be shared among the Yellow Gate Hangar Units based on the ratio by which the square footage of the particular Yellow Gate Hangar Unit bears to the total square footage of all Yellow Gate Hangar Units combined as set forth in Exhibit B, except as otherwise provided below.

(2) **Commercial Unit Expenses**. Commercial Unit Expenses are expenses attributable only to the Commercial Units, including: (i) the costs of maintaining, repairing, and replacing the Commercial Limited Common Elements and reserves for the same; (ii) the costs of maintaining, repairing or replacing the central septic and water delivery system, including, all elements of which serve only the Commercial Units and reserves for the same, and any other utilities serving only the Commercial Units with a common meter; and (iii) security equipment, security and fire suppression equipment exclusively for the Commercial Units. Commercial Unit Expenses shall be shared among the Commercial Units based on the ratio by which the square footage of the particular Commercial Unit bears to the total square footage of all Commercial Units combined, as set forth in any supplemental declaration of the Condominium.

(3) **Individual Expenses**. Individual Expenses are maintenance, repair, or replacement expenses borne by the Association that only benefit certain individual units, including: (i) the costs of maintaining, repairing and replacing an individual Attached Units' skylights, if any; (ii) the costs of water and sewer according to the sub-meter(s) for an individual unit; (iii) any services for which an individual unit contracts separately with the Association; and (iv) any fees assessed by the Oregon Department of Aviation for ingress and egress of the aircraft to and from the Airport based in the owner's unit that is billed to the Association. Additionally, if the board of directors determines that a particular unit's use of any commonly billed utilities or services, including the utilization of common element parking spaces, is greater than the average of other unit owners' or that the use causes an increase in fire or other insurance premiums, the board may assess to such owner the cost attributable to such extra use as an Individual Expense. Individual Expenses shall be charged to the individual unit owner as individual assessments.

(4) **Shared Limited Common Element Expenses**. Shared Limited Common Element Expenses are expenses attributable only to the property insurance, maintenance, repair and replacement of limited common elements, pertaining to some but not all of the units, or to some but not all of a particular type of unit, which expenses are not Yellow Gate Hangar Expenses or Commercial Unit Expenses. Shared Limited Common Element Expenses shall be shared among the units to which such limited common element pertains, as set forth on the Plat or Declaration or any supplemental plat or Supplemental Declaration of the Condominium, based on the ratio by which the square footage of the particular unit bears to the total square footage of all units combined to which the particular limited common element pertains.

(5) **Shared Utility Expenses**. Shared Utility Expenses are those expenses incurred by the Association in respect of the costs for maintenance, repair and replacement of the wells, irrigation, fire suppression, water and septic system serving the Condominium. To the extent such expenses are not billed separately by a service provider as between the Yellow Gate Hangar Units and Commercial Units, or as between individual units, or to the extent that there are not individual sub-meters that would provide the information regarding individual usage of such utility services necessary to charge utility expenses based on actual use, the board of directors shall make a reasonable estimation of use as the basis for designation of such expenses as Yellow Gate Hangar Expenses, Commercial Unit Expenses, Shared Limited Common Element Expenses, or Individual Expenses, as the board reasonably determines.

The board of directors shall have the authority to reasonably categorize common expenses under one of the Specially Allocated Expenses.

In the event the board of directors makes what a unit owner or group of owners believes to be an inequitable assignment and allocation of such common expenses to a given unit owner or owners, or an inequitable categorization of a given expense, whether General Expenses or one of the Specially Allocated Expenses, or if a board of directors voting deadlock prevents the board from making an equitable allocation or categorization of the same, then, a unit owner or a group of unit owners affected by such categorization or allocation of expenses may give the board notice requesting review of such allocation or categorization and an opportunity to be heard. If

following such review and opportunity to be heard the issue is not resolved, the dispute resolution process described in Bylaws Article 10 shall apply, notwithstanding anything to the contrary therein.

8.2 **Allocation of Voting Rights**. Each owner of a unit shall be entitled to a vote in the affairs of the Association based on the unit's allocation of undivided interest in the common elements of the Condominium; provided, however, that Declarant shall have three times the voting rights otherwise allocable to each unit owned by Declarant until the earlier of (a) when Declarant has sold and conveyed to a person other than a successor declarant or Annexation Owner 75 percent or more of the total number of units that Declarant may submit to the Condominium, or (b) seven years after the date of the first conveyance of a unit to a person other than a successor declarant or Annexation Owner. The method of voting shall be as specified in the Bylaws.

Article 9

SERVICE OF PROCESS

The designated agent to receive service of process in cases provided in subsection (1) of ORS 100.550 will be named in the Condominium Information Report to be filed in accordance with ORS 100.250(1)(a).

Article 10

USE OF PROPERTY

Each unit is to be used for the purposes set forth below. Additional limitations on use of units and common elements are contained in the Bylaws and the rules and regulations adopted pursuant to the Bylaws. Each unit owner shall be bound by each of these documents. Additionally, unit owners shall comply with all applicable Aviation Laws regulating the use of the Condominium, alterations to the units, and access to the Airport from the Condominium.

10.1 **Yellow Gate Hangar Units**. Yellow Gate Hangar Units shall be used primarily for Yellow Gate Hangar Unit purposes as defined in the Bylaws.

10.2 **Commercial Hangar Units**. Commercial Hangar Units shall be used for Commercial Hangar Unit purposes as defined in the Bylaws.

Article 11

MAINTENANCE OF COMMON ELEMENTS

11.1 **Responsibility for Maintenance.** Except as otherwise provided in Section 8.1, the necessary work to maintain, repair or replace the common elements shall be the responsibility of the board of directors of the Association and shall be carried out as provided in the Bylaws. Subject to Section 7.3 of the Bylaws regarding damage or destruction by casualty, the cleaning, maintenance, repair and replacement of any part of a unit, or utilities or security, life safety and fire systems that serve only such unit, shall be the responsibility of the owner of

the unit. Each unit owner will maintain its unit and limited common elements pertaining solely to the unit in good condition and repair. Any limited common element that pertains to more than one unit shall be maintained by the Association, with the cost of such maintenance allocated to the units pursuant to Section 8.1.

11.2 **Mortgagee's Rights upon Failure to Maintain**. If the Mortgagee of any unit determines that the board of directors is not providing an adequate maintenance, repair and replacement program for the common elements, such Mortgagee, at its option, may give a notice to the board of directors by delivering it to the registered agent, setting forth the particular defect that the Mortgagee believes exists in the maintenance, repair and replacement program. If the specified defects are not corrected within 90 days subsequent to receipt of such notice, then the Mortgagee, upon written notice to the registered agent that it is exercising its proxy rights, shall have the right to attend succeeding annual or special meetings of the Association and to cast a vote for each unit on which it holds a Mortgage on all business coming before such meeting. Such proxy rights shall continue until the defects listed on the notice are corrected.

Article 12

EASEMENTS

12.1 **In General.** Each unit has an easement in and through each other unit and the common elements for all support elements and utility, wiring, heat, plumbing, security and surveillance system equipment and communications from cabling, and service elements that were installed or constructed by Declarant prior to conveyance of the unit to an owner other than Declarant or a successor declarant, and for reasonable access thereto, as required to effectuate and continue proper operation of the Condominium, including, without limitation, easements as required for the electrical wiring and plumbing for each unit and an easement to locate and maintain air conditioning compressors or other air handling or ventilation equipment and easements to locate and maintain ventilation, security and other equipment serving a unit on the exterior walls or roof of the unit (whether common elements or part of the unit), but not including communications or cellular towers. The specific mention or reservation of any easement in this Declaration does not limit or negate the general easement for common elements reserved by law. Each unit owner has an unrestricted right of ingress and egress to his or her unit for pedestrian, vehicular, and aircraft access. This right is perpetual and passes with the ownership of the unit. Each unit owner shall have, in common with all other unit owners, an easement for ingress and egress through the Yellow Gate Hangar Limited Common Elements and the Commercial Limited Common Elements, as the case may be, to the extent necessitated by an emergency.

12.2 **Encroachments**. Each unit and all common elements shall have an easement over all adjoining units and common elements for the purpose of accommodating any present or future encroachment as a result of engineering errors, construction, reconstruction, repairs, settlement, shifting or movement of any portion of the property, or any other similar cause, and any encroachment due to building overhang or projection. There shall be valid easements for the maintenance of the encroaching units and common elements so long as the encroachments shall exist, and the rights and obligations of owners shall not be altered in any way by the encroachment. This provision does not relieve a unit owner of liability in the case of willful

misconduct of the unit owner or relieve Declarant or any contractor, subcontractor or materialman from any liability as a result of failure to adhere to the Plat. The encroachments described in this Section 12.2 shall not be construed to be encumbrances affecting the marketability of title to any unit.

12.3 **Granting of Easements by Association**. Subject to the requirements of ORS 100.405(6), the Association may grant, execute, acknowledge and deliver on behalf of the unit owners leases, easements, rights-of-way, licenses and similar interests affecting the common elements and consent to vacation of roadways within and adjacent to the Condominium. Any such instrument shall be executed by the chairperson and secretary of the Association. The granting of any such interest in a limited common element must have the approval or consent of the owner or owners to which the use of the limited common element is reserved and the holders of any first Mortgage affecting such unit or units, except that if the limited common element is reserved for five or more units, then the provisions of ORS 100.405(8) shall apply.

12.4 **Right of Entry**. Upon request given to the unit owner and any occupant, any person authorized by the Association may enter any unit and any limited common element to perform necessary maintenance, repair or replacement of the common elements or any unit for which the Association has maintenance, repair or replacement responsibility under this Declaration, the Bylaws or by law, to make emergency repairs to the unit or common elements that are necessary for the public safety or to prevent damage to common elements or to another unit or to enforce this Declaration, the Bylaws or the Rules and Regulations. Requests for entry must be made in advance and for a reasonable time, except in the case of an emergency, when the right of entry is immediate. An emergency entry does not constitute a trespass or otherwise create a right of action in the owner of a unit.

12.5 **Easements for Declarant**. Declarant and Declarant's agents, successors and assigns, and each of the Annexation Owners for the benefit of any portion of the Additional Property owned by an Annexation Owner, respectively, shall have an easement over and upon the common elements as may be reasonably necessary for the purpose of constructing additional stages and completing or making repairs to existing structures or the purpose of carrying out sales and rental activities necessary or convenient for the sale or rental of units, including, without limitation, the right to use the units owned by Declarant or an Annexation Owner as model units and the right to use a unit as a sales office and for the purpose of discharging any other obligation of Declarant or exercising any other special Declarant right, whether arising under the Oregon Condominium Act or reserved in this Declaration or the Bylaws. For a period of 10 years following closing of the sale of the last unit by Declarant to a person other than a successor declarant, Declarant and each of the Annexation Owners, their members, managers and their successors, agents and designees shall have a right to inspect the common elements of the Condominium and the Association's records regarding inspections and maintenance of the Condominium. Such persons shall have the right to enter units for the purpose of performing such inspections, provided that requests for entry are made in advance and that such entry is at a time convenient to the owner of the unit.

12.6 **Declarant's Personal Property**. Declarant reserves the right to retain all personal property and equipment used in the sales, management, construction and maintenance of the Condominium that has not been represented as property of the Association. Declarant and

each of the Annexation Owners reserves the right to remove from the Condominium (promptly after the sale and close of escrow of the last unit) any and all goods and improvements used in development, marketing and construction, whether or not they have become fixtures.

12.7 **Reservation of Easements for Future Development**. Declarant hereby reserves for the benefit of each and every portion of the real property described in Exhibit C (the "**Additional Property**") owned now or later acquired by the Declarant, and Declarant hereby grants to each Annexation Owner, respectively, for the benefit of each and every portion of the Additional Property owned now or later acquired by such Annexation Owner: (a) a nonexclusive easement for ingress and egress over all roadways, taxilanes, and driveways within the Condominium, and over such portion of the vacant land as may be necessary to connect roads with such roadway and driveway system, (b) an easement for the maintenance and use of all existing utility lines and systems within the Condominium, including without limitation water, sewer, gas, electrical, telephone, security, alarm, communication and cable television systems, (c) an easement for the installation, maintenance and use of new taxilanes, and for utility lines and systems upon the general common element land of the Condominium, provided Declarant or Annexation Owner restores any damage to the general common elements resulting from such utility and system installation or maintenance, and (d) an easement for use of the common element facilities of the Condominium, provided that Declarant or Annexation Owner, as applicable, pays a pro rata share of the costs of operating and maintaining such easement areas based on the number of units in the benefited property divided by the total number of units in the benefited property and the Condominium combined. Such easements shall be for the benefit of and shall run with the land constituting the entire portion of the Additional Property owned by such parties, and each and every portion thereof, whether or not such property is ultimately annexed to the Condominium as provided in Article 15 below.

12.8 **Declaration of Shared Easements**. Stage 1 of the Condominium is a part of a single, integrated aviation project (the "**Project**") comprised of Stage 1 of the Condominium and portions of the Additional Property. Until such time, if ever, that all of the Additional Property has been annexed to the Condominium pursuant to Article 15 of this Declaration, the Condominium and the remainder of the Project will share use of certain common utilities, roadways, taxilanes, security gates and gate houses, security card reading devices, and other Project common facilities and services, including those set forth in the Appurtenant Easements. The Condominium will be subject to and entitled to the benefit of the easements set forth in such Appurtenant Easements as if fully set forth herein. The maintenance costs associated with the Appurtenant Easements that serve only the Yellow Gate Hangar Units or Commercial Units, shall be Yellow Gate Hangar Expenses or Commercial Unit Expenses, respectively; all other maintenance costs associated with the Appurtenant Easements and any other easements benefitting or serving the Condominium shall be General Expenses.

Article 13

MORTGAGEES

13.1 **Approvals Required**. In addition to any other or greater approvals required by Oregon law, this Declaration or the Bylaws, the prior written approval of holders of first

Mortgages of units in the Condominium having two-thirds of the voting power of units subject to Mortgages must be obtained for the following:

(a) Abandonment or termination of the Condominium regime.

(b) Except as provided in Sections 15.2 and 16.1 any change in the pro rata interest or obligations of any individual unit for (a) the purpose of levying assessments or charges or allocating distributions of hazard insurance proceeds or condemnation awards, or (b) determining the pro rata share of ownership of each unit in the common elements.

(c) Except as provided in Section 16.1 the partition or subdivision of any unit.

(d) Abandonment, partition, subdivision, encumbrance, sale or transfer of the common elements. The granting of easements for public utilities or for other public purposes consistent with the intended use of the common elements by the Condominium Project shall not be deemed a transfer within the meaning of this clause.

(e) Use of hazard insurance proceeds for losses to any condominium property, whether to units or to common elements, for other than the repair, replacement or reconstruction of such improvements, except as provided by statute in cases of substantial loss to the units and/or common elements of the Condominium Project.

13.2 **Requests for Approvals**. Except as otherwise provided in the Oregon Condominium Act, any Mortgagee who receives a written request for approval under Section 13.1 above and who fails to submit a negative response to the requesting party within 60 days after it receives written notice of the proposal identifying the property securing the Mortgage by legal description or address, identifying the Mortgage by loan number or recording information and delivered by certified or registered mail, return receipt requested, shall be deemed to have approved such request.

13.3 **Notice to First Mortgagees**. Any first Mortgagee, upon request, will be entitled to written notification from the Association of any default in the performance by the owner of the Mortgaged unit of any obligation under this Declaration, the rules and regulations or the Bylaws that is not cured within 60 days.

13.4 **Amendment of this Article**. This article may not be amended without the prior written consent of all holders of first Mortgages on units in the Condominium.

Article 14

ASSOCIATION OF UNIT OWNERS

14.1 **Organization.** Upon the recording of this Declaration an association of unit owners shall be organized to serve as a means through which the unit owners may take action with regard to the administration, management and operation of the Condominium. The name of this association shall be "**Southend Corporate Airpark Condominium Owners Association**," and the Association shall be an Oregon nonprofit corporation.

14.2 **Membership; Board of Directors.** Each unit owner shall be a member of the Association. The affairs of the Association shall be governed by a board of directors as provided in the Bylaws.

14.3 **Powers and Duties.** The Association shall have such powers and duties as may be granted to it by the Oregon Condominium Act, including each of the powers set forth in ORS 100.405(4), together with such additional powers and duties afforded it by this Declaration or the Bylaws.

14.4 **Adoption of Bylaws, Declarant Control of Association.** Upon the execution and the recording of this Declaration, Declarant shall adopt Bylaws for the Association, which Bylaws are attached as Exhibit D. Declarant specifically reserves the right to control the Association by appointing the interim directors of the Association until the organizational and turnover meeting of the Association has been held and the unit owners have elected regular directors as provided in Sections 2.2 and 3.4 of the Bylaws. In addition, Declarant shall have the right to consent to any amendment to the Declaration or the Bylaws as provided in Section 18.2 below and Section 9.2 of the Bylaws, and a weighted vote in the Association as provided in Section 8.2 above.

Article 15

PLAN OF DEVELOPMENT

The Condominium may be developed in stages. By recording this Declaration, Declarant hereby submits Stage 1 to the Condominium form of ownership. Declarant reserves the right to add additional stages to the Condominium and to annex such additional stages by recording supplements to this Declaration pursuant to ORS 100.120, together with a plat of the stage being annexed bearing a completion certificate as required by ORS 100.120 and 100.115.

In respect of any portion of the Additional Property owned by an Annexation Owner, Declarant grants the right to add additional stages composed of such portion, at the Annexation Owner's expense and with written consent of Declarant, which consent shall not be unreasonably withheld or delayed, by recording supplements to this Declaration pursuant to ORS 100.120, together with a plat of the stage being annexed bearing a completion certificate as required by ORS 100.120 and 100.115.

15.1 **Maximum Number of Units**. If fully developed, the Condominium shall contain not more than 100 units.

15.2 **Termination Date.** No additional stage may be added more than seven years after the recording of this Declaration. The period may be extended not to exceed two years by an amendment adopted pursuant to Section 18.2.

15.3 **Additional Common Elements**. Declarant does not propose to include in future stages any common elements that would substantially increase the proportionate amount of the common expenses payable by owners of units in Stage 1.

15.4 **Allocation of Interests in Common Elements, Common Expenses and Profits, and Voting.** The allocation of undivided interests in the common elements, allocation of common expenses and profits, and allocation of voting of units in Stage 1 will change if additional stages are annexed to the Condominium. The method used for such allocation shall be determined as set forth in Article 7 and Article 8 of this Declaration. Declarant reserves the right to create additional types of units and corresponding types of shared expenses for such units in additional stages.

15.5 **Conditions to Annexation of Additional Property**. Annexation of any Additional Property shall include sufficient common element parking spaces to satisfy parking quotas required by ordinance or applicable conditional use permits affecting such property, or otherwise required by the local jurisdiction. All parking spaces in the Condominium shall be general common elements, which shall be open for the use by any unit owner in the Condominium and subject to the parking rules and regulations developed by the board of directors. Taxilanes or taxiways that will be useful only to certain units in the Condominium, given their location and proximity, shall be designated on the supplemental plat as a limited common element only pertaining to the units annexed pursuant to such supplemental plat.

15.6 **Legal Description of Additional Stages.** A legal description of the property on which the additional stages would be located is included in the attached Exhibit C.

Article 16

CHANGES TO UNITS

16.1 **Relocation or Elimination of Boundaries; Consolidation or Division of Units**. Subject to compliance with the provisions of this Article and the Oregon Condominium Act:

(a) the boundaries between adjoining Attached units may be relocated, or may be eliminated so as to consolidate two or more such units into one unit; and

(b) a Commercial Hangar Unit may be divided or subdivided by an owner, including Declarant, into a total of no more than four Commercial Hangar Units. A Yellow Gate Hangar Unit may be divided or subdivided by an owner, including Declarant, into a total of no more than two Yellow Gate Hangar Units.

16.2 **Proposed Amendment**. The owner or owners of the units to be changed as provided in Section 16.1 above shall submit to the board of directors of the Association a proposed amendment that shall (a) state the purposes of the amendment, (b) identify the units involved, (c) assign an identifying number to any new unit created, (d) reallocate the interest in the common elements and the use of any limited common elements, voting rights, common expense liability and the right to common profits on the basis of the relative square footage of the units, (e) provide a means of access for each unit to common elements in the case of division of units or conversion of units to common elements, (f) include words of conveyance in the case of a relocation or elimination of boundaries, and (g) include any additional provisions necessary to conform to any other provisions of this Declaration or the Bylaws.

16.3 **Approval of Board of Directors**. The board of directors shall approve the proposed amendment unless the board determines within 45 days that the amendment is inconsistent with this Declaration or the Bylaws or the change will impair the structural integrity or mechanical systems of the Condominium or lessen the support of any portion of the Condominium.

16.4 **Opinion of Engineer; Supervision**. The board of directors may require the owner or owners of the units to be changed to submit an opinion of a registered professional engineer as to whether the proposed change will impair the acoustic performance, structural integrity or fire, life, safety and mechanical systems of the Condominium or weaken support of any portion of the Condominium. The board of directors or any agent appointed by the board may supervise the work necessary to effect the change. Any expenses incurred under this section shall be charged to the owners requesting the change.

16.5 **Execution and Recording of Amendment and Plat**. The amendment shall be executed by the owner or owners and any Mortgagees of the affected units, certified by the chairperson and secretary of the Association and approved and recorded in accordance with the Oregon Condominium Act. In addition, a plat showing the change shall be recorded in accordance with the Act.

Article 17

RESTRICTIONS ON TRANSFER

No unit owner or lessee of a unit may sell, lease, assign, or otherwise transfer ("**transfer**") a unit, a part of a unit or any interest in a unit, except by complying with the provisions of this Article 17.

17.1 **Background Check**. Prior to any transfer of an owner's unit, the unit owner shall perform a background check of the prospective transferee.

17.2 **Restrictions on Transfer**. No unit owner shall sell, transfer, lease, or sublease his or her unit, a part of such unit or any interest in such unit, to any purchaser, tenant, or other transferee who is:

(a) currently identified on the Specially Designated Nationals and Blocked Persons List maintained by the Office of Foreign Assets Control, Department of the Treasury ("**OFAC**") and/or on any other similar list maintained by OFAC pursuant to any authorizing statute, executive order or regulation, and

(b) a person or entity with whom a citizen of the United States is prohibited to engage in transactions by any trade embargo, economic sanction, or other prohibition of United States Law, regulation, or Executive Order of the President of the United States,

(c) a person whose funds or other assets constitute property of, or are beneficially owned, directly or indirectly, by an Embargoed Person (as hereinafter defined),

(d) a person in which an Embargoed Person has any interest of any nature whatsoever (whether directly or indirectly),

17.3 **Restriction Definitions**. The term "**Embargoed Person**" means any person, entity or government subject to trade restrictions under U.S. law, including but not limited to, the International Emergency Economic Powers Act, 50 U.S.C. §1701 et seq., the Trading with the Enemy Act, 50 U.S.C. App. 1 et seq., and any Executive Orders or regulations promulgated thereunder with the result that an investment in Seller by such person is prohibited by law or Seller is in violation of law by transferring the unit to such person. This Section shall not apply to any person to the extent that such person's interest in the unit owner's transferee is through a U.S. Publicly-Traded Entity. As used in this Declaration, "**U.S. Publicly-Traded Entity**" means an entity or organization (other than an individual) whose securities are listed on a national securities exchange, or quoted on an automated quotation system, in the United States, or a wholly-owned subsidiary of such an entity or organization.

Article 18

AMENDMENT

18.1 **How Proposed.** Amendments to the Declaration shall be proposed by either a majority of the board of directors or by unit owners representing 30 percent or more of the voting rights. The proposed amendment must be reduced to writing and shall be included in the notice of any meeting at which action is to be taken thereon or attached to any request for consent to the amendment.

18.2 **Approval Required.** Except as may otherwise be provided in this Declaration or by the Oregon Condominium Act, this Declaration may be amended if the amendment is approved by unit owners representing 75 percent of the voting rights of the Condominium, without regard to any weighted vote otherwise allocable to units owned by Declarant. Declarant's prior written consent shall also be required for a period of 10 years from the date of closing of the sale by Declarant of the last unit to a person other than a successor declarant or Annexation Owner. Except as provided in Article 15 and except as otherwise permitted by the Oregon Condominium Act, no amendment may change the size, location, allocation of undivided interest in the common elements, the method of determining liability for common expenses, the method of determining the right to common profits or the method of determining voting rights of any unit unless the amendment has been approved by the owners and Mortgagees of the affected unit. Any amendment to this Declaration adversely and materially affecting the Commercial Hangar Units shall require the written consent of the owners of the Commercial Hangar Units.

18.3 **Regulatory Amendments**. Notwithstanding the provisions of Section 18.2 above, until the turnover meeting as described in the Bylaws has occurred, Declarant shall have the right to amend this Declaration or the Bylaws in order to comply with the requirements of the Federal Aviation Administration; the Rural Development or the Farm Service Agency of the United States Department of Agriculture; the Federal National Mortgage Association; the Government National Mortgage Association; any department, bureau, board, commission or agency of the United States or the state of Oregon; or any corporation wholly owned, directly or

indirectly by the United States or the state of Oregon that insures, guarantees or provides financing for a condominium or units in a condominium.

18.4 **Recordation**. The amendment shall be effective upon recordation in the Deed Records of Marion County, Oregon, of the Declaration as amended or of the amendment thereto, certified to by the chairperson and secretary of the Association as being adopted in accordance with this Declaration and the provisions of the Oregon Condominium Act, and approved by the county assessor and the Real Estate Commissioner if such approvals are required by the Oregon Condominium Act.

Article 19

SEVERABILITY

Each provision of this Declaration and the Bylaws shall be deemed independent and severable, and the validity or partial invalidity of any provision shall not affect the validity or enforceability of the remaining part of that or any other provision of this Declaration or the Bylaws.

Article 20

APPLICABILITY

Each unit owner, including Declarant or Annexation Owner, respectively, as to any unsold unit, shall be subject to all of the rights and duties assigned to unit owners under the terms of the Declaration and Bylaws. All present and future owners, tenants, subtenants and occupants of units, and all present and future employees, agents, visitors and licensees of unit owners, shall be subject to and comply with the provisions of this Declaration, the Bylaws, and all rules and regulations adopted thereunder, as they may be amended from time to time.

(Signature on following page)

YELLOW GATE CORPORATE HANGARS LLC,
an Oregon limited liability company

By: _____
Name: TED L. MILLAR
Title: Member

STATE OF OREGON)
)ss.
County of Multnomah)

The foregoing instrument was acknowledged before me this 9th day of January, 2014 by Ted L. Millar, Member of Yellow Gate Corporate Hangars LLC, an Oregon limited liability company, on its behalf.

_____
Notary Public for Oregon
My commission expires: 4-11-16
Commission No.: 467467

OFFICIAL SEAL
SUSAN D BRANCH
NOTARY PUBLIC-OREGON
COMMISSION NO. 467467
MY COMMISSION EXPIRES APRIL 11, 2016

The foregoing Declaration is approved this 7 day of FEBRUARY, 2014.

ASSESSOR ~~AND TAX COLLECTOR~~
FOR MARION COUNTY

By: _____

The foregoing Declaration is approved pursuant to ORS 100.110 this 30th day of January, 2014 and in accordance with ORS 100.110(8), this approval shall automatically expire if this Declaration is not recorded within one (1) year from this date.

OREGON REAL ESTATE COMMISSIONER

By: _____

The foregoing Declaration is approved this 14 day of FEBRUARY, 2014.

TAX COLLECTOR FOR MARION COUNTY

By: _____
REX WEISNER

EXHIBIT A

Legal Description Stage 1

Being Parcel 2 of Partition Plat 2008-103, situated in the N.E. ¼ of Section 2, Township 4 South, Range 1 West of the Willamette Meridian, Marion County, and the State of Oregon and more particularly described as follows:

Beginning at the initial point, which is a ⅝ inch iron rod with a yellow plastic cap stamped "Chase, Jones & Associates", located at the northwest corner of said Parcel 2; thence South 07°08'10" West, along the westerly line of said Parcel 2, a distance of 474.81 feet to the southwest corner of said Parcel 2; thence South 82°51'30" East, along the South line of said Parcel 2, a distance of 240.04 feet; thence South 53°38'27" East, along the South line of said Parcel 2, a distance of 148.11 feet to the southeast corner of said Parcel 2; thence North 00°04'03" East, along the East line of said Parcel 2, a distance of 61.91 feet; thence North 00°04'30" West, along the East line of said Parcel 2, a distance of 527.93 feet to the northeast corner of said Parcel 2; thence South 89°47'53" West, along the north line of said Parcel 2, a distance of 297.85 feet to the initial point.

This tract contains 166,877 square feet or 3.83 acres more or less.

EXHIBIT B

Unit Square Footages and Undivided Interests

Unit	Type	Attached or Freestanding	Square Footage	Undivided Interest and Voting Rights	Share of Yellow Gate Hangar Expenses
M61	Yellow Gate Hangar	Attached	4237	4237/63378	4237/63378
M62	Yellow Gate Hangar	Attached	4278	4278/63378	4278/63378
M63	Yellow Gate Hangar	Attached	4278	4278/63378	4278/63378
M64	Yellow Gate Hangar	Attached	4278	4278/63378	4278/63378
M65	Yellow Gate Hangar	Attached	3880	3880/63378	3880/63378
M66	Yellow Gate Hangar	Attached	4126	4126/63378	4126/63378
M67	Yellow Gate Hangar	Attached	4278	4278/63378	4278/63378
M68	Yellow Gate Hangar	Attached	4278	4278/63378	4278/63378
M69	Yellow Gate Hangar	Attached	4278	4278/63378	4278/63378
M70	Yellow Gate Hangar	Attached	4237	4237/63378	4237/63378
N71	Yellow Gate Hangar	Attached	3153	3153/63378	3153/63378
N72	Yellow Gate Hangar	Attached	3198	3198/63378	3198/63378
N73	Yellow Gate Hangar	Attached	4264	4264/63378	4264/63378
N74	Yellow Gate Hangar	Attached	4264	4264/63378	4264/63378
N75	Yellow Gate Hangar	Attached	3198	3198/63378	3198/63378
N76	Yellow Gate Hangar	Attached	3153	3153/63378	3153/63378
			63378	1	1

NOTICE

THE SQUARE FOOTAGE AREAS STATED IN THIS DECLARATION AND THE PLAT ARE BASED ON THE BOUNDARIES OF THE UNITS AS DESCRIBED IN THIS DECLARATION AND MAY VARY FROM THE AREA OF UNITS CALCULATED FOR OTHER PURPOSES.

EXHIBIT C

Future Stages

Tract 1:

A tract of land being in the northeast ¼ of Section 11 and the southeast ¼ of Section 2, Township 4 South, Range 1 West, Willamette Meridian, in the County of Marion, State of Oregon being more particularly described as follows:

Commencing at a ½ inch iron pipe at the northeast corner of Parcel 2 of Partition Plat 2008-103; thence South 0°04'30" East along the east line of said Parcel 3 a distance of 527.93; thence South 0°04'03" West along said east line 61.91 feet to the southeast corner thereof, said point also being the northeast corner of Parcel 1 of Partition Plat 2006-086 and the POINT OF BEGINNING of the herein described tract; thence South 0°04'03" West along the east line of said Parcel 1 a distance of 271.14 feet; thence South 89°54'33" East along the easterly north line of said Parcel 1 a distance of 60.00 feet to the easterly northeast corner of said Parcel 1; thence South 0°04'03" West along said east line of Parcel 1 a distance of 957.69 feet to the north line of Keil Road NE; thence South 89°49'41" West along the north line of said Keil Road NE 565.21 feet to the southwest corner of Parcel 1 of Partition Plat 1998-105; thence continuing along said north line of Keil Road NE South 89°49'41" West 328.55 feet to the southeast corner of that tract conveyed to ODOT in Reel 868, Page 298 and recorded July 15, 1991; thence North 7°07'45" East along the east line of said ODOT tract 385.30 feet to the northeast corner of said ODOT tract; thence North 82°50'28" West along the north line of said ODOT tract 135.43 feet, to the East line of that certain tract conveyed to the State of Oregon Recorded August 29, 2007 in Reel 2859 at Page 302; thence North 07°10'39" East along said East line, a distance of 1430.84 feet, to the north line of Parcel 3 of Partition Plat 2006-058, said point bears North 89°47'53" East 65.36 feet from the northwest corner of said Parcel 3 of Partition Plat 2006-58; thence North 89°47'53" East along the north line of said Parcel 3 a distance of 444.52 feet to the northwest corner of Parcel 2 of Partition Plat 2008-103; thence South 07°08'10" West along the west line of said Parcel 2 of Partition Plat 2008-103 a distance of 474.81 feet to the southwest corner thereof; thence South 82°51'30" East along the south line of said Parcel 2 of Partition Plat 2008-103 a distance of 240.04 feet; thence continuing along said south line South 53°38'27" East a distance of 148.11 feet to the POINT OF BEGINNING.

Tract 2:

A tract of land located in the northwest one-quarter of Section 12 and the northeast one-quarter of Section 11, Township 4 South, Range 1 West, Willamette Meridian, Marion County, Oregon, being more particularly described as follows:

Beginning at a 3¼" aluminum disk marking the Section corner common to sections 1, 2, 11 and 12; thence following the north line of said Section 12, South 89°44'34" East a distance of 413.97 feet to the centerline of Airport Road (County Road No. 59); thence following said centerline, South 15°26'41" East a distance of 1062.34 feet; thence leaving said centerline, South 74°33'19"

West a distance of 199.58 feet; thence South 14°17'37" East a distance of 245.57 feet to the centerline of Keil Road (County Road No. 429); thence following said centerline, South 89°49'52" West a distance of 567.59 feet; thence South 89°50'32" West a distance of 411.50 feet; thence leaving said centerline, North 00°04'03" East a distance of 30.00 feet to a ⅝" iron rod with a yellow plastic cap marked "Wolf Surveying Inc." marking the southeast corner of Parcel 3 of Partition Plat No. 98-105; thence following the northerly right-of-way line of said Keil Road, North 89°48'33" East a distance of 60.00 feet; thence North 00°04'03" East a distance of 957.35 feet; thence North 89°54'33" West a distance of 60.00 feet to a point on the east boundary of said Parcel 3; thence following the east boundary of said Parcel 3, North 00°04'03" East a distance of 231.91 feet to a ⅝" iron rod with a yellow plastic cap marked "Dehass & Associates Inc." marking the northeast corner of Parcel 1 of Partition Plat No. 2001-088; thence following the east boundary of Parcel 2 of Partition Plat No. 2001-088, North 00°04'03" East a distance of 101.23 feet to ½" iron pipe; thence following the north line of said Section 11, South 89°51'44" East a distance of 412.50 feet to the Point of Beginning.

Tract 3:

Beginning at the corner common to Sections 1, 2, 11 and 12 in Township 4 South, Range 1 West of the Willamette Meridian in Marion County, Oregon; thence West 412.5 feet to an iron pipe; thence North 0°15' West 1068.0 feet to an iron pipe; thence North 77°41' East 511.39 feet, more or less, to the center line of the County Road; thence South 15°30' East along said center line 1222.50 feet, more or less, to the South line of Section 1; thence North 89°50' West along said Section line 411.114 feet to a Point of Beginning.

Exhibit C

Depiction of Future Stage: Tract 1

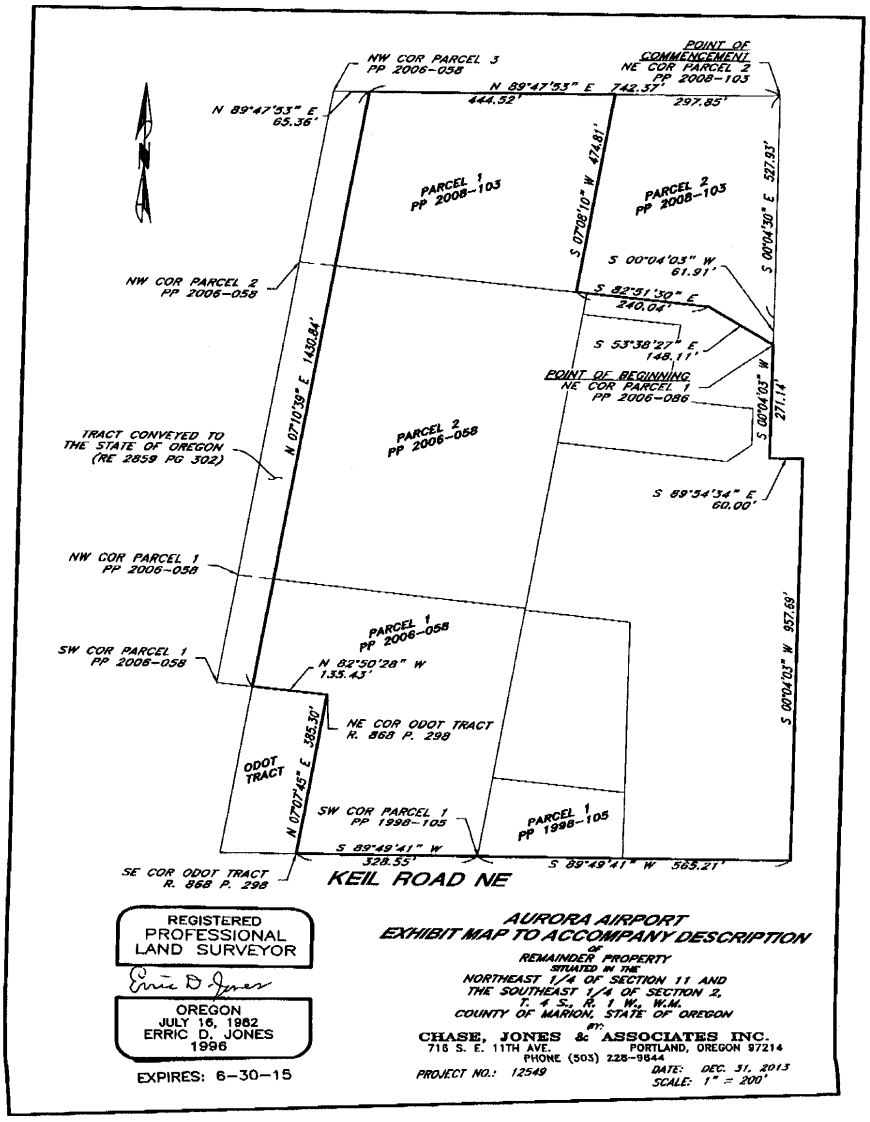

EXHIBIT D

BYLAWS

OF

SOUTHEND CORPORATE AIRPARK CONDOMINIUM OWNERS ASSOCIATION

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BYLAWS OF SOUTHEND CORPORATE AIRPARK CONDOMINIUM OWNERS ASSOCIATION

Article 1

PLAN OF CONDOMINIUM OWNERSHIP

1.1 **Name and Location**. These are the bylaws of the Southend Corporate Airpark Condominium Owners Association (the "**Association**"). Southend Corporate Airpark Condominium (the "**Condominium**") is located in Marion County, Oregon, and has been submitted to the Oregon Condominium Act by a declaration recorded simultaneously with these Bylaws and by supplemental declarations, if any, annexing property to the Condominium (collectively, the "**Declaration**"). The location of the Condominium is more specifically described in the Declaration.

1.2 **Principal Office**. The principal office of the Association shall be located at such address as may be designated by the board of directors from time to time.

1.3 **Purposes**. This Association is formed under the provisions of the Oregon Condominium Act to serve as the means through which the unit owners may take action with regard to the administration, management and operation of the Condominium.

1.4 **Applicability of Bylaws**. The Association, all unit owners, and all persons using the Condominium property shall be subject to these Bylaws and to all rules and regulations that may be adopted pursuant to these Bylaws.

1.5 **Composition of Association**. The Association shall be composed of all the unit owners of the Condominium, including Yellow Gate Corporate Hangars LLC, an Oregon limited liability company, and its successors and assigns (the "**Declarant**"), and the Association, itself, to the extent any of these own any unit or units of the Condominium. All unit owners shall notify the Association of the address and telephone number where such owner can be reached and shall keep such information current.

1.6 **Incorporation**. The Association shall be incorporated under the Oregon Non-Profit Corporation Law. The Articles of Incorporation of the Association shall be consistent with the Declaration and these Bylaws, and these Bylaws shall constitute the bylaws of the incorporated association.

1.7 **Definitions**. The definitions contained in or adopted by the Declaration shall be applicable to these Bylaws.

Article 2

MEETINGS OF ASSOCIATION

2.1 **Place of Meetings**. The Association shall hold meetings at such suitable place convenient to the unit owners as may be designated by the board of directors from time to time.

2.2 **Turnover Meeting**. Within seven years after the date of conveyance of the first unit to a person other than a successor declarant, or within 90 days after Declarant has sold and conveyed to a person other than a successor declarant, 75 percent or more of the total number of units that Declarant and the Annexation Owners may submit to the Condominium, whichever is earlier, Declarant shall call the first meeting of the unit owners to organize the Association and to elect directors. If a quorum of the unit owners is present, the unit owners shall elect not fewer than the number of directors sufficient to constitute a quorum of the board of directors. Notice of such meeting shall be given to all owners as provided in Section 2.5. If Declarant fails to call the meeting, the meeting may be called and notice given by any unit owner or Mortgagee of a unit. The expense of giving notice shall be paid or reimbursed by the Association. At the meeting, Declarant shall deliver to the Association such information and documents as may be required by the Oregon Condominium Act. Nothing in this Section shall be construed as preventing Declarant from calling the organizational and turnover meeting prior to such date, or from calling informal, informational meetings of the unit owners.

2.3 **Annual Meetings**. The annual meetings of the Association shall be held on such date each year as may be established by the board of directors from time to time, or if the board does not establish such a date, then in the month of February at such hour and on such date as the chairperson may designate, or if the chairperson should fail to designate such date by the first day of February then on the last Tuesday in February. The annual meetings shall be for the purpose of electing directors and for the transaction of such other business as may properly come before the meeting.

2.4 **Special Meetings**. Special meetings of the Association may be called by the chairperson or by a majority of the board of directors, and must be called by the chairperson or secretary upon receipt of a written request from unit owners owning at least 30 percent of the voting rights stating the purpose of the meeting. Business transacted at a special meeting shall be confined to the purposes stated in the notice of meeting.

2.5 **Notice of Meetings**. Notice of the annual meeting and all other meetings of the Association stating the time and place and the purpose or purposes for which the meeting is being called shall be given by the chairperson or secretary. Notice must be given in writing by mail or, to the extent permitted by law, by electronic mail, facsimile or other form of electronic communication acceptable to the board of directors not less than 10 days nor more than 50 days prior to the date of the meeting to each unit owner. If mailed, it shall be sent to the owner at his or her address as it appears on the books of the Association. A copy shall be sent to any first Mortgagee requesting such notice. Proof of such notice shall be given by the affidavit of the person giving the notice. For a period of 10 years following closing of the sale of the last unit by Declarant to a person other than a successor declarant, notices of meetings (including agendas) shall also be given to Declarant (or any designee of Declarant specified in any written notice to

the Association) in the same manner as given to unit owners, and Declarant or a representative of Declarant shall be entitled to attend such meetings. Notice of meeting may be waived by any unit owner before or after meetings. When a meeting is adjourned for less than 30 days, no notice of the adjourned meeting need be given other than by announcement at the meeting at which such adjournment takes place.

2.6 **Voting**. Each owner of a unit shall have a vote equal to the unit's allocation of undivided interest in the common elements of the Condominium; provided, however, that Declarant shall have three times the voting rights otherwise allocable to each unit owned by Declarant until the earlier of (a) when Declarant has sold and conveyed to a person other than a successor declarant 75 percent or more of the total number of units that Declarant may submit to the Condominium, or (b) seven years after the date of the first conveyance of a unit to a person other than a successor declarant or a Declarant Member. Declarant shall be entitled to vote as the unit owner of any then existing unit retained by Declarant, and the board of directors shall be entitled to vote on behalf of any unit that has been acquired by or on behalf of the Association; provided, however, that the board shall not be entitled to vote such units in any election of directors.

2.7 **Casting of Votes and Consents**. The voting rights or consent of a unit owner may be cast in person at a meeting of the Association or, at the discretion of the board of directors, by proxy in accordance with paragraph (a) of this Section, by absentee ballot in accordance with paragraph (b) of this Section, by written ballot in accordance with paragraph (c) of this Section, or by any other method specified in the Declaration, these Bylaws or the Oregon Condominium Act, except as otherwise provided in Section 2.8 below.

(a) **Proxies**. A proxy must be dated and signed by the unit owner, is not valid if it is undated or purports to be revocable without notice, and terminates one year after its date unless the proxy specifies a shorter term. The board of directors may not require that a proxy be on a form prescribed by the board. A unit owner may not revoke a proxy given pursuant to this paragraph except by actual notice of revocation to the person presiding over a meeting of the Association or to the board if a vote is being conducted by written ballot in lieu of a meeting. A copy of a proxy in compliance with this paragraph provided to the Association by facsimile, electronic mail or other means of electronic communication utilized by the board is valid.

(b) **Absentee ballots**. An absentee ballot, if authorized by the board of directors, shall set forth each proposed action and provide an opportunity to vote for or against each proposed action. All solicitations for votes by absentee ballot shall include instructions for delivery of the completed absentee ballot, including the delivery location and instructions about whether the ballot may be canceled if the ballot has been delivered according to the instructions. An absentee ballot shall be counted as a unit owner present for the purpose of establishing a quorum. Even if an absentee ballot has been delivered to a unit owner, the unit owner may vote in person at a meeting if the unit owner has returned the absentee ballot and canceled the absentee ballot, if cancellation is permitted in the instructions given under this paragraph.

(c) **Ballot meetings**. At the discretion of the board of directors, any action that may be taken at any annual, regular or special meeting of the Association may be taken without a meeting by written ballot to the extent and in the manner provided in ORS 100.425.

(d) **Electronic ballots**. To the extent authorized by the board of directors and permitted by the Oregon Condominium Act, any vote, approval or consent of a unit owner may be given by electronic ballot.

(e) **Mortgages**. A unit owner may pledge or assign such owner's voting rights to a Mortgagee. In such a case, the Mortgagee or its designated representative shall be entitled to receive all notices to which the unit owner is entitled under these Bylaws and to exercise the unit owner's voting rights from and after the time that the Mortgagee shall give written notice of such pledge or assignment to the board of directors. Any first Mortgagee may designate a representative to attend all or any meetings of the Association.

2.8 **Votes Involving Major Decisions**. For votes of the Association involving a Major Decision, 67 percent of the voting rights of the Association will be required to approve the Major Decision. Unit owners shall not be permitted to assign proxy voting discretion to any other person or entity on matters involving Major Decisions of the Association. The term "**Major Decision**" shall include the following:

(a) Any vote of the Association to terminate professional management pursuant to Section 3.7 below;

(b) Any vote of the Association to incur or commit the Association to incur legal fees in excess of $10,000 for any specific litigation or claim matter or enter into any contingent fee contract on any claim in excess of $100,000 pursuant to Section 3.6(e) below;

(c) Any vote of the Association relating to the modification, closure, removal, elimination or discontinuance other than on a temporary basis of any aircraft taxilane, pursuant to Section 3.6(l) below;

(d) Any vote of the Association proposing to borrow of any sum of money in excess of an amount or amounts, aggregated for the calendar year in question, exceeding 15 percent of the estimated budget of the Association pursuant to Section 3.6(h) below; and

(e) Any vote of the Association to approve an amendment to these Bylaws.

2.9 **Fiduciaries and Joint Owners**. An attorney-in-fact, executor, administrator, guardian, conservator or trustee may vote or grant consent with respect to any unit owned or held in a fiduciary capacity, whether or not the specific right has been transferred to his or her name; provided, that such person shall satisfy the secretary that he or she is the attorney-in-fact, executor, administrator, guardian, conservator or trustee, holding the unit in a fiduciary capacity. Whenever any unit is owned by two or more persons jointly, according to the records of the Association, the vote of such unit may be exercised by any one of the owners, in the absence of protest by a co-owner. In the event of disagreement among the co-owners, the vote of the unit shall be disregarded completely in determining the proportion of votes given with respect to such matter unless a valid court order establishes the authority of a co-owner to vote.

2.10 **Tenants and Contract Vendors**. Unless otherwise expressly stated in the rental agreement or lease, all voting rights allocated to a unit shall be exercised by the owner/landlord.

Unless otherwise stated in the contract, all voting rights allocated to a unit shall be exercised by the vendee of any recorded land sale contract on the unit.

2.11 **Quorum of Unit Owners**. At any meeting of the Association, members holding 20 percent of the voting rights, present in person, by proxy or by absentee ballot, if permitted by the board of directors, shall constitute a quorum. At any meeting of the Association where the members will be voting on decisions affecting only one category of unit or one class of director (Commercial or Yellow Gate Hangar), then members holding 20 percent of the voting rights of the respective class, present in person, by proxy or by absentee ballot (if permitted by the board of directors), shall constitute a quorum of that class or category. The subsequent joinder of a unit owner in the action taken at a meeting by signing and concurring in the minutes of the meeting shall constitute the presence of such person for the purpose of determining a quorum. When a quorum is once present to organize a meeting, it cannot be broken by the subsequent withdrawal of a unit owner or owners. If any meeting of members cannot be organized because of a lack of quorum, the members who are present, either in person or by proxy, may adjourn the meeting from time to time until a quorum is present.

2.12 **Majority Vote**. The vote of the holders of more than 50 percent of the voting rights of the members with authority to make a given decision or to give their approval to an action of the Association, present in person or by proxy at a meeting at which a quorum is constituted, shall be binding on all unit owners for all purposes unless a higher percentage vote is required by law, by the Declaration, or by these Bylaws.

2.13 **Continued Votes**. If at a meeting to consider action on a Major Decision, as defined in Section 2.8, insufficient votes are cast to approve the action, then the action shall be deemed rejected. The meeting or vote may not be continued in order to obtain additional votes. Any further voting on such matter must be taken at a new duly called meeting at which new votes must be cast in person or by proxy.

2.14 **Order of Business**. The order of business at annual meetings of the Association shall be:

(a) Calling of the roll and certifying of proxies;

(b) Proof of notice of meeting or waiver of notice;

(c) Reading of minutes of preceding meeting;

(d) Reports of officers;

(e) Reports of committees, if any;

(f) Election of directors;

(g) Unfinished business;

(h) New business; and

(i) Adjournment.

2.15 **Rules of Order**. Unless other rules of order are adopted by resolution of the Association or the board of directors, all meetings of the Association shall be conducted according to the latest edition of *Robert's Rules of Order* published by Robert's Rules Association.

Article 3

BOARD OF DIRECTORS

3.1 **Number and Qualification**. The affairs of the Association shall be governed by a board of directors composed of one to three interim directors or from three to seven regular directors, as provided in Sections 3.2 and 3.3 of this Article. All directors, other than interim directors appointed by Declarant, shall be owners or co-owners of units of the Condominium. For purposes of this Section, an officer, employee or agent of a corporation, a member, manager, employee or agent of a limited liability company, or a partner, employee or agent of a partnership may serve on the board if such corporation, limited liability company or partnership is an owner or co-owner of a unit. In addition, a trustee may serve on the board if the trustee holds legal title to a unit for the benefit of the owner of the beneficial interest in the unit; and an executor, administrator, guardian, conservator or other individual appointed by a court to serve in a fiduciary capacity for an owner of a unit, or an officer or employee of an entity if an entity is appointed, may serve on the board.

3.2 **Interim Directors**. Upon the recording of the Declaration submitting the Condominium to the Oregon Condominium Act Declarant shall appoint an interim board of one to three directors, who shall serve until replaced by Declarant or their successors have been elected by the unit owners as provided below.

3.3 **Election and Term of Office**. At the first organizational and turnover meeting called by Declarant pursuant to Section 2.2 of these Bylaws (the "**Turnover Meeting**"), the interim directors shall resign and successors shall be elected as follows. There shall be two classes of directors, Commercial Directors (who shall be owners of either Commercial Hangar Units or other types of unit(s) that may be established in any supplemental declaration the permitted use of which is the same as Commercial Hangar Units) and Yellow Gate Hangar Directors (who shall be owners of Yellow Gate Hangar Units). Three Yellow Gate Hangar Directors shall be elected by the Yellow Gate Hangar Unit owners based upon the voting rights assigned to such units, one to serve until the next annual meeting and two to serve until the second annual meeting after his or her election. If prior to the Turnover Meeting, Commercial Units have been annexed to the Condominium, then at the Turnover Meeting the Commercial Directors shall be elected by the Commercial Unit owners. If there are no Commercial Units in the Condominium at the time of the Turnover Meeting, then the first Commercial Directors shall be elected at the first Association annual meeting following annexation of Additional Property that includes at least one Commercial Unit. At the first election of Commercial Directors, (i) two, or (ii) one-third of the number of Commercial Units (whichever is greater subject to limitation as set forth below) Commercial Directors shall be elected by the Commercial Unit owners, a majority of which directors shall serve until the second annual meeting after his or her

election and the remainder to serve until the first annual meeting after his or her election. In both elections (of Yellow Gate Hangar Directors and of Commercial Directors) the directors receiving the greatest number of votes shall serve for the two-year term. In the event of a tie, the terms shall be determined by lottery. Thereafter, at the expiration of the initial term of office of each respective director, his or her successor shall be elected to serve for a term of two years, so that the term of less than half of the directors shall expire annually. Directors shall hold office until their respective successors have been elected by the unit owners. Election shall be by plurality of the members eligible to elect their respective class of directors. Notwithstanding anything to the contrary in this Section, the maximum number of Commercial Directors serving on the board shall be four. In the event that no Commercial Hangar Units have been annexed to the Condominium, the board of directors shall consist of three Yellow Gate Hangar Directors, all of whom shall be Yellow Gate Hangar Unit owners or co-owners, as defined in Section 3.1 above.

3.4 **Vacancies**. Vacancies in Commercial Directors caused by any reason other than the removal of a director by a vote of the Association shall be filled by the Commercial Unit owners. Vacancies in Yellow Gate Hangar Directors caused by any reason other than the removal of a director by a vote of the Association shall be filled by vote of the remaining Yellow Gate Hangar Directors. Each person so elected shall be a director elected to fill the unexpired term at the next annual meeting of the Association or the next special meeting of the Association called for that purpose. Vacancies shall be filled by the Yellow Gate Hangar or Commercial Unit owners, respectively, who elected the director. Vacancies in interim directors shall be filled by Declarant.

3.5 **Removal of Directors**. At any regular or special meeting of the Association duly called, any one or more of the directors, other than interim directors, may be removed with or without cause by a majority vote of the unit owners present in person or by proxy by the Yellow Gate Hangar or Commercial Unit owners, respectively, who elected the director. A successor shall be so elected at that meeting to fill the vacancy thus created. The unit owners must vote on the removal of each director separately. The notice and agenda of any such meeting shall state that such removal is to be considered, and any director whose removal has been proposed shall be given an opportunity to be heard at that meeting and prior to the vote. A removed director shall remain a director until the vacancy has been filled.

3.6 **Powers and Duties**. The board of directors shall have all the powers and duties necessary for the administration of the affairs of the Association, except such powers and duties that by law or by the Declaration or by these Bylaws may not be delegated to the board by the unit owners; provided, however, that the board may not take any action that could unreasonably interfere with the sale, lease or other disposition of units owned by Declarant or that could abridge, modify, eliminate or otherwise affect any right, power, easement, privilege or benefit reserved for Declarant or that would impose any discriminatory charge or fee against Declarant, without the prior written consent of Declarant. The powers and duties to be exercised by the board shall include, but shall not be limited to the following:

(a) Operation, care, upkeep, maintenance, repair and replacement of the general and limited common elements and Association property, except those limited common elements to be maintained by the unit owners, as provided in the Declaration or these Bylaws.

(b) Determination of the amounts required for operation, maintenance and other affairs of the Association, and the making of such expenditures.

(c) Preparation and adoption of budgets, preparation, review and update of reserve studies and establishment of reserves, if any, and assessment and collection of the common expenses, all in accordance with the provisions of these Bylaws and the Declaration.

(d) Employment and dismissal of such personnel as necessary for the efficient maintenance, upkeep and repair of the common elements.

(e) Employment of legal, accounting or other personnel for reasonable compensation to perform such services as may be required for the proper administration of the Association; provided, however, the board may not incur or commit the Association to incur legal fees in excess of $5,000 for any specific litigation or claim matter or enter into any contingent fee contract on any claim in excess of $100,000 unless the unit owners have enacted a resolution authorizing the incurring of such fees or contract by a vote of 75 percent of the total voting rights of the Association. These limitations shall not be applicable to legal fees incurred in defending the Association and the board of directors from claims or litigation brought against them. The limitations set forth in this paragraph shall increase by 10 percent on each fifth anniversary of the recording of the Declaration.

(f) Opening of bank accounts on behalf of the Association and designating the signatories required therefor.

(g) Preparation and distribution of annual financial statements in accordance with these Bylaws and annual preparation and filing of all required income tax returns or forms for the Association.

(h) Borrowing money on behalf of the Association when required in connection with the operation, care, upkeep, and maintenance of the common elements and Association property; provided, however, that (i) the consent of 75 percent of the voting rights shall be required for the borrowing of any sum in excess of an amount or amounts, aggregated for the calendar year in question, exceeding 15 percent of the estimated budget of the Association for that calendar year to cover the operation, care upkeep and maintenance of the common elements, and (ii) no lien to secure repayment of any sum borrowed may be created on any unit or its appurtenant interest in the common elements without the consent of the owner of such unit. If any sum borrowed by the board of directors on behalf of the Association pursuant to the authority contained in this paragraph is not repaid by the Association, a unit owner who pays to the creditor such proportion thereof equal to his interest in the common elements shall be entitled to obtain from the creditor a release of any judgment or other lien that the creditor shall have filed or shall have the right to file against such owner's unit.

(i) Purchasing units of the Condominium at foreclosure or other judicial sales in the name of the Association, or its designee, on behalf of all the unit owners as provided in these Bylaws, and selling, leasing, mortgaging, voting the votes appurtenant to (other than for the election of directors), or otherwise dealing with units of the Condominium acquired by the Association or its designee on behalf of all the unit owners.

(j) Obtaining insurance pursuant to the provisions of these Bylaws and at least annually reviewing the insurance coverage of the Association.

(k) Making additions and improvements to, or alterations of, the common elements; provided, however, that no such project may be undertaken by the board of directors if the total cost will exceed $20,000 unless the unit owners have enacted a resolution authorizing the project by a majority vote of the members, except that no such vote shall be required for work that is urgently needed for reasons of life, safety or structural integrity. This limitation shall not be applicable to maintenance, repairs or replacement undertaken pursuant to paragraph (a) above. The limitation set forth in this paragraph shall increase by $1,000 on each anniversary of the recording of the Declaration.

(l) Modify, close, remove, eliminate or discontinue the use of a general common element facility or improvement or portion of the common element landscaping, except that modification, closure, removal, elimination or discontinuance other than on a temporary basis of any aircraft taxilane or ramp must be approved by at least a majority of the unit owners voting on such matter at a meeting or by written ballot held or conducted in accordance with these Bylaws.

(m) Designating one or more committees that, to the extent provided in the resolution designating the committee, shall have the powers of the board of directors in the management of the affairs of the Association. At least one member of each committee shall be a member of the board.

(n) Enforcement by legal means of the provisions of the Oregon Condominium Act, the Declaration, these Bylaws and any rules and regulations adopted hereunder. Nothing in these Bylaws shall be construed as requiring the Association to take any specific action to enforce violations.

(o) Maintain a current mailing address for the Association, file an Annual Report and any amendment in accordance with ORS 100.250, and maintain and keep current the information required to enable the Association to comply with ORS 100.480(8).

(p) Subject to the restrictions in subsection (e) above, initiate or intervene in litigation or administrative proceedings (including mediation under Article 10 of these Bylaws) in the name of the Association, and without joining the individual unit owners, as permitted under ORS 100.405(4)(e) and (11); provided that no litigation or administrative proceeding may be initiated on a matter relating to or affecting the unit or interest of a unit owner unless the unit owner has consented in writing to such action after full disclosure of the potential cost, duration and possible outcomes of the proposed litigation or administrative proceeding. To the extent required by ORS 100.490, the board shall notify the owners prior to instituting litigation or administrative proceedings. With regard to any pending litigation involving the Association, the board shall periodically report to the unit owners as to the status (including settlement offers), progress, and method of funding such litigation. Nothing in this paragraph shall be construed as requiring the board of directors to disclose any privileged communication between the Association and its counsel.

3.7 **Managing Agent or Manager**. On behalf of the Association, the board of directors shall employ or contract for a managing agent or a manager at a compensation to be established by the board. The board may delegate to the managing agent or manager such duties and powers as the board may authorize. In the absence of such appointment, the board shall act as manager. The managing agent shall have the right to contract with any unit owner, individually or collectively with other unit owners, for personal services for a particular unit or units.

3.8 **Contracts Entered into by Declarant or Interim Board**. Notwithstanding any other provision of these Bylaws, any management contracts, service contracts or employment contracts entered into by Declarant or the interim board on behalf of the Association shall have a term not in excess of three years. In addition, any such contract shall provide that it may be terminated without cause or penalty by the Association or board of directors upon not less than 30 days' notice to the other party given not later than 60 days after election of the permanent board at the organizational and turnover meeting described in Section 2.2 of these Bylaws. The limitations contained in this Section 3.8 shall not apply to those contracts referred to in ORS 100.485(2).

3.9 **Organizational Meeting**. Unless otherwise agreed by the board of directors, within 14 days following the annual meeting of the Association or following any meeting at which an election of directors has been held, the board shall hold an organizational meeting at such place and time as shall have been fixed by the directors at the meeting at which the election was held.

3.10 **Regular and Special Meetings**. Regular meetings of the board of directors may be held at such time and place as shall be determined, from time to time, by a majority of the directors. Special meetings of the board may be called by the chairperson and must be called by the secretary at the written request of at least two directors. Notice of any special meeting shall be given to each director, personally or by mail, telephone or, to the extent permitted by the Oregon Condominium Act, by electronic mail, facsimile or other form of electronic communication acceptable to the board at least seven days prior to the day named for such meeting, and shall state the time, place and purpose of such meeting. For a period of 10 years following closing of the sale of the last unit by Declarant to a person other than a successor declarant, notices of meetings (including agendas) shall also be given to Declarant in the same manner as given to the directors. Unless other rules of order are adopted by resolution of the Association or the board, all meetings of the board shall be conducted according to the latest edition of *Robert's Rules of Order* published by Robert's Rules Association.

3.11 **Open Meetings**. All meetings of the board of directors shall be open to unit owners and, for a period of 10 years following closing of the sale of the last unit by Declarant to a person other than a successor declarant, to Declarant or a representative of Declarant; except that, in the discretion of the board, the board may close the meeting to owners other than board members and meet in executive session to consult with legal counsel or to consider personnel matters, including salary negotiations and employee discipline, negotiation of contracts with third parties or collection of unpaid assessments. Except in the case of an emergency, the board shall vote in an open meeting whether to meet in executive session. If the board votes to meet in executive session, the presiding officer shall state the general nature of the action to be

considered, as precisely as possible, when and under what circumstances the deliberations can be disclosed to owners. The statement, motion or decision to meet in the executive session shall be included in the minutes of the meeting, and any contract or action considered in executive session shall not become effective unless the board, following the executive session, reconvenes in open meeting and votes on the contract or action, which shall be reasonably identified in the open meeting and included in the minutes. The different classes of directors shall not hold separate meetings or separate executive sessions apart from the other class of directors.

Meetings of the board of directors may be conducted by telephonic communication or by other means of communication that allows all members of the board participating to hear each other simultaneously or otherwise to be able to communicate during the meeting, except that if a majority of the units are principal residences of the occupants, then: (i) for other than emergency meetings, notice of each board's meeting shall be posted at a place or places on the property at least three days prior to the meeting, or notice shall be provided by a method otherwise reasonably calculated to inform the unit owners of such meeting; and (ii) only emergency meetings of the board may be conducted by telephonic communication or such other means. The meeting and notice requirements of this Section may not be circumvented by chance or social meetings or by any other means.

3.12 **Waiver of Notice**. Any director may, at any time, waive notice of any meeting of the board of directors in writing, and such waiver shall be deemed equivalent to the giving of such notice. Attendance by a director at any meeting of the board shall constitute a waiver of notice by such director, unless the director attends the meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully called or convened. If all of the directors are present at any meeting of the board, no notice to directors shall be required and any business may be transacted at such meeting.

3.13 **Quorum of Board of Directors**. At all meetings of the board of directors, a majority of the directors shall constitute a quorum for the transaction of general business, or in the case of business or decisions for which only one class of directors has authority to decide, a majority of that certain class of directors shall constitute a quorum for the transaction of class-specific business. The agreement of both classes of directors as set forth in Section 3.17 below shall constitute the decision of the board for matters of general business to be determined by the whole board. In any case, a majority of the members of a class of directors, e.g., Commercial Directors or Yellow Gate Hangar Directors, shall constitute a quorum for determinations to be made exclusively by such class of directors as set forth in Section 3.17 below. The vote of a majority of the voting rights of any given class of directors shall constitute the decision of that class of directors of the board. If at any meeting of the board less than a quorum is present, a majority of those present may adjourn the meeting from time to time. At any such adjourned meeting at which a quorum is present, any business that might have been transacted at the meeting originally called may be transacted without further notice to the directors.

3.14 **Voting**. A director who is present at a meeting of the board of directors at which action is taken on any Association matter is presumed to have assented to the action (to the extent that his or her class of directors had the authority to vote on such matter), unless the director votes against the action or abstains from voting on the action because the director claims a conflict of interest. When action is taken on any matter at a meeting of the board, the vote or

abstention of each director present must be recorded in the minutes of the meeting. Directors may not vote by proxy or by secret ballot at meetings of the board, except that officers may be elected by secret ballot.

3.15 **Compensation**. No director shall receive any compensation from the Association for acting as director.

3.16 **Deadlock Resolution**. If the board of directors, or the Commercial or Yellow Gate Hangar Directors as to a decision to be made by only that certain class of directors, are respectively deadlocked on any matter properly before the board or such class of directors in accordance with these Bylaws, and the matter cannot be settled through direct discussions, the board or such class of directors shall resolve the matter by mediation within ten (10) business days following the date of the meeting. The mediation will be held in Clackamas or Marion County, Oregon by a mediator selected by the board. If the board cannot agree upon a mediator, then one shall be selected through the process provided by a recognized mediation service designated by the first director who notifies the others of the mediation service selected. Thereafter, if the matter cannot be resolved by mediation, the matter shall be resolved by arbitration as provided in Section 10.3 below.

3.17 **Determinations by Board of Directors.** All determinations of the permanent board of directors (as opposed to the interim board) are of three types: (i) those that affect only the Yellow Gate Hangar Units and Yellow Gate Hangar Limited Common Elements, and do not in any way affect directly or indirectly the Commercial Hangar Units or the Commercial Unit Limited Common Elements ("**Yellow Gate Hangar Decisions**"); (ii) those that affect only Commercial Hangar Units or the Commercial Unit Limited Common Elements, and do not in any way affect directly or indirectly the Yellow Gate Hangar Units or Yellow Gate Hangar Limited Common Elements ("**Commercial Hangar Decisions**"); and, (iii) all other decisions directly or indirectly affecting the Commercial Units, on the one hand, and Yellow Gate Hangar Units, on the other hand, or their respective limited common elements ("**General Board Decisions**"). General Board Decisions shall be made unanimously as between the two classes of directors, Commercial and Yellow Gate Hangar Directors. Yellow Gate Hangar Decisions and class voting for General Board Decisions shall be made by a majority of the Yellow Gate Hangar Directors. Commercial Hangar Decisions and class voting for General Board Decisions shall be made by a majority of the Commercial Directors. Any rules and regulations adopted by either the Yellow Gate Hangar Directors or Commercial Directors pursuant to Section 7.5(p) below may be modified or revoked only by the class of directors who originally adopted them. The vote of each class of directors for such General Board Decisions shall be made by a majority of the members of all such directors present at a meeting at which a quorum is present. To clarify, for purposes of this Section, any decision by the board that will affect or that may be reasonably expected to affect the operation of either the Commercial Units or the Yellow Gate Hangar Units, respectively, or any other new classification of unit type that Declarant may create pursuant to a supplemental declaration, or the business of the tenants or occupants of such type of unit, or the general appearance, quality or character of such units, or that may require the consent or approval of the holder of any mortgage (fee or leasehold) on a certain type of unit, shall be deemed to be a decision affecting that type of unit for purposes of authority of the class of directors to make such decisions or to take such actions. Approvals of annual operating budgets, reserve studies, and insurance policies shall be deemed General Board Decisions.

3.18 **Liability and Indemnification of Directors, Officers and Manager**. A member of the board of directors or an officer of the Association shall not be liable to the Association, any unit owner or any third party for any damage, loss or prejudice suffered or claimed on account of any action or failure to act in the performance of his or her duties as long as the individual acted in good faith, believed that the conduct was in the best interests of the Association, or at least was not opposed to its best interests, and in the case of criminal proceedings, had no reason to believe the conduct was unlawful. A director appointed under Section 3.2 of these Bylaws and Section 14.4 of the Declaration, or acting under ORS 100.200, shall not be liable to the Association, any unit owner or any third party under ORS 65.357-65.361, ORS 100.417 or associated rules of common law for any damage, loss or prejudice suffered or claimed on account of any action or failure to act that represents the exercise of authority established in Section 14.4 of the Declaration and ORS 100.200, including any action or failure to act requested by Declarant or resulting from any prior or concurrent duty or loyalty owed by such director to Declarant; provided that nothing in this section limits the liability of Declarant for such actions or failure to act by a director. If any member of the board or any officer of the Association is threatened with or made a party to any proceeding because the individual was or is a director or officer of the Association, the Association shall defend the individual against such claims and indemnify the individual against liability and expenses incurred to the maximum extent permitted by law. The manager of the Association, and its officers and employees, shall not be liable to the Association, the unit owners or any third party on account of any action or failure to act in the performance of its duties as manager, except for acts of gross negligence or intentional acts. Prior to the organizational and turnover meeting described in Section 2.2, the manager shall not be liable to the Association, any unit owner or any third party for any damage, loss or prejudice suffered or claimed on account of any action or failure to act that represents the exercise of authority established in Section 14.4 of the Declaration and ORS 100.200, including any action or failure to act requested by Declarant or resulting from any prior or concurrent duty or loyalty owed by such director to Declarant; provided that nothing in this Section limits the liability of Declarant for such actions or failure to act by the manager. If the manager is threatened with or made a party to any proceeding, the Association shall defend the manager against such claims and indemnify the manager and its officers and employees from any such claims to the maximum extent permitted by law.

3.19 **Insurance**. The board of directors shall obtain the insurance required in Article 8 of these Bylaws. In addition, the board, in its discretion, may obtain such other insurance as it deems necessary to protect the interests of the Association or unit owners. The board shall conduct an annual insurance review that, if appropriate, shall include an appraisal of all improvements contained in the Condominium.

Article 4

OFFICERS

4.1 **Designation**. The principal officers of the Association shall be the chairperson, the secretary and the treasurer, all of whom shall be elected by the board of directors. The directors may appoint a vice chairperson, an assistant treasurer, an assistant secretary, and such other officers as in their judgment may be necessary. The chairperson shall be a member of the board, but the other officers need not be directors or unit owners.

4.2 **Election of Officers**. The officers of the Association shall be elected annually by the board of directors at the organizational meeting of each new board and shall hold office at the pleasure of the board. If any office shall become vacant, the board shall elect a successor to fill the unexpired term at any regular meeting of the board, or at any special meeting of the board called for such purpose.

4.3 **Removal of Officers**. Upon the affirmative vote of a majority of the directors, any officer may be removed either with or without cause, and a successor may be elected at any regular meeting of the board of directors, or at any special meeting of the board called for such purpose.

4.4 **Chairperson**. The chairperson shall be the chief executive officer of the Association. He or she shall preside at all meetings of the Association and of the board of directors. The chairperson shall have all of the general powers and duties that are usually vested in the chief executive officer of an association, including but not limited to the power to appoint committees from among the unit owners from time to time as the chairperson may in his or her discretion decide is appropriate to assist in the conduct of the affairs of the Association.

4.5 **Secretary**. The secretary shall keep or supervise the keeping of the minutes of all proceedings of the board of directors and the minutes of all meetings of the Association. He or she shall attend to the giving and serving of all notices to the unit owners and directors and other notices required by law. The secretary shall keep the records of the Association, except for those of the treasurer, and shall perform all other duties that are incidental to the office of secretary of an association and as may be required by the directors or the chairperson. In addition, the secretary shall act as vice chairperson, taking the place of the chairperson and performing the chairperson's duties whenever the chairperson is absent or unable to act, unless the directors have appointed another vice chairperson.

4.6 **Treasurer**. The treasurer shall have the responsibility for Association funds and securities and shall be responsible for keeping full and accurate financial records and books of account showing all receipts and disbursements, and for the preparation of required financial statements. He or she shall be responsible for overseeing the deposit of all moneys and other valuable effects in such depositories as may from time to time be designated by the board of directors, and shall disburse or cause to be disbursed funds of the Association upon properly authorized vouchers. The treasurer shall perform all other duties incident to the office of treasurer of an association and such other duties as may be assigned to him or her by the board of directors.

4.7 **Execution of Instruments**. All agreements, contracts, deeds, leases and other instruments of the Association, except checks, shall be executed by such person or persons as may be designated by general or special resolution of the board of directors and, in the absence of any general or special resolution applicable to any such instrument, then such instrument shall be signed by the chairperson. All checks shall be signed by the manager or by the treasurer, or in the absence or disability of the treasurer, by the chairperson or any duly elected assistant treasurer.

4.8 **Compensation of Officers**. No officer who is a member of the board of directors shall receive any compensation from the Association for acting as an officer, unless such compensation is authorized by a resolution duly adopted by the unit owners. The board may fix any compensation to be paid to any officers who are not also directors.

Article 5

BUDGET, EXPENSES AND ASSESSMENTS

5.1 **Budget**. The board of directors shall from time to time, and at least annually, prepare a budget for the Association, estimate the common expenses expected to be incurred, less any previous over assessment and plus any underassessment, and assess the common expenses to each unit owner in the proportion set forth in the Declaration. Within 30 days after adopting the annual budget, the board of directors shall provide a summary of the budget to all owners. If the board fails to adopt an annual budget, the last adopted budget shall continue in effect.

5.2 **Determination of General Expenses**. General Expenses shall include:

(a) Expenses of administration, including management fees.

(b) Expenses of operation, maintenance, repair or replacement of common elements, any other portions of the Condominium required to be maintained by the Association pursuant to the Declaration or these Bylaws, and any Association property.

(c) Cost of insurance or bonds for or in respect of general common elements, the board of directors, or the administration of the Association, which is obtained in accordance with these Bylaws. To clarify, the cost of property insurance covering only Yellow Gate Hangar Limited Common Elements or only Commercial Limited Common Elements shall be shared by those respective units as Specially Allocated Expenses pursuant to Section 8.2 of the Declaration.

(d) A general operating reserve, including an amount sufficient to cover the deductible under the property damage insurance policy.

(e) Reserves (if established by the board of directors) for replacements, repairs and maintenance of common elements for which the Association has the responsibility to maintain.

(f) Costs, if any, associated with appurtenant easements benefitting the Condominium.

(g) Any deficit in common expenses for any prior period.

(h) Utilities and services for the common elements and other utilities and services with a common meter or commonly billed, such as trash collection, fire and safety or security monitoring for the Condominium, or water and sewer, including well maintenance costs, if any. If the board of directors determines that a particular unit's use of such services is greater

than the average of other unit owners', the board may assess such owner for the cost attributable to such extra use.

(i) Any other items properly chargeable as an expense of the Association, which is not allocated as a Specially Allocated Expense.

If the board of directors determines that a particular unit's use results in an increase in the premiums for one or more of the Association's insurance policies, or that a particular unit's use or a class of units' use of common elements or services provided by the Association is greater than the average of other units or type of units, the board may assess to such unit owner(s) the cost attributable to the extra use or impact as an Individual Expense or other Specially Allocated Expense, in its reasonable judgment, in accordance with Section 8 of the Declaration. A unit owner or a group of unit owners affected by such categorization or allocation of expenses may give the board of directors notice requesting review of such allocation or categorization and an opportunity to be heard. If following such review and opportunity to be heard the issue is not resolved, the dispute resolution process described in Article 10 shall apply, notwithstanding anything to the contrary therein.

5.3 **Assessment of Common Expenses**.

(a) **Obligation to pay**. All unit owners shall be obligated to pay common expenses assessed to them by the board of directors on behalf of the Association pursuant to these Bylaws and the Declaration. No unit owner by the owner's own action may claim exemption from liability for contribution toward common expenses by waiver by the owner of use or enjoyment of any of the common elements or by abandonment by the owner of the owner's unit. A unit owner may not claim an offset against an assessment for failure of the Association to perform its obligations and no unit owner may offset amounts owing or claimed to be owing by the Association or Declarant to the unit owner. If the board determines that any loss or cost incurred by the Association is the fault of one or more unit owners, the Association may assess the amount of the loss or cost exclusively against the units of the responsible owners. Declarant shall be assessed as the unit owner of any unsold unit, but such assessments shall be prorated to the date of sale of the unit. The board, on behalf of the Association, shall assess the common expenses against the unit owners from time to time, and at least annually, and shall take prompt action to collect from a unit owner any common expense due that remains unpaid for more than 30 days from the due date for its payment. The board may elect to round assessments to the nearest dollar.

(b) **Commencement of regular operating expense assessments**. Regular monthly assessments for common operating expenses for units in the first stage of the Condominium shall commence upon closing of the first sale of a unit in such stage of the Condominium and for subsequent stages shall commence for all units in such stage upon recording of the applicable Supplemental Declaration.

(c) **Commencement of assessment for replacement reserves**. If established by the board of directors, regular monthly assessments for replacement reserves as described in Section 5.5 for all units in the Condominium shall commence upon the closing of the sale or transfer of the first unit in the Condominium to a person other than the Declarant or upon the

establishment of a reserve fund by the board of directors, in its discretion. Such reserve assessments shall commence with respect to subsequent stages upon recording of the applicable supplemental declaration for such stage. Declarant may elect to defer payment of such reserve assessments to the Association for each unit owned by Declarant until the closing of the sale of such unit, but not beyond the date of the turnover meeting referred to in Section 2.2 above, or if no turnover meeting is held, the date on which the owners assume administrative control of the Association. The books and records of the Association shall reflect the amount owing from Declarant for all reserve assessments.

(d) **Annexation of additional stages**. If additional units are annexed to the Condominium, the board of directors shall promptly prepare a new budget reflecting the addition to the Condominium and shall recompute any previous assessment covering any period after the closing of the sale of the first unit in the new stage.

5.4 **Special or Extraordinary Assessments**.

(a) **Special assessments for capital improvements**. In the case of any duly authorized capital improvement to the common elements, the board of directors may by resolution establish separate assessments for the same, which may be treated as capital contributions by the unit owners, and the proceeds of which shall be used only for the specific capital improvements described in the resolution. The Association shall not assess units owned by Declarant for additional capital improvements to the Condominium without the written consent of Declarant as long as Declarant owns more than 20 percent of the units then submitted to the Condominium or as long as the time specified in the Declaration for annexing additional stages has not expired.

(b) **Other special or extraordinary assessments**. If the board of directors determines that the assessments established upon adoption of the budget as provided in Section 5.1 above will be insufficient to pay the common expenses, or the board determines that additional funds will be needed to meet unexpected or unbudgeted common expenses, the board may levy an additional special or extraordinary assessment against those units to which such expenses are allocable. Such assessment shall be allocated to each unit in the same proportion set forth in the Declaration and may be payable in installments over a specified period, in a lump sum, or in a lump sum with option to pay in installments with interest, as determined by the board.

Any special or extraordinary assessment assessed by the board of directors shall be made in accordance with the allocation of assessments for General Expenses or Specially Allocated Expenses, as the case may be as set forth in Article 8 of the Declaration, and shall be subject to the dispute resolution process set forth therein.

5.5 **Replacement Reserves**.

(a) **Establishment of account**. In its discretion, the board of directors may conduct an initial reserve study as described in paragraph (c) of this Section and establish a reserve account to fund major maintenance, repair or replacement of those common elements all or a part of which will normally require replacement in more than one and less than 30 years, and

for exterior painting if the common elements include exterior painted surfaces. The reserve account need not include those items that can reasonably be funded from the general budget or other funds of the Association or for common elements for which maintenance and replacement are the responsibility of one or more, but less than all, unit owners under the provisions of the Declaration or these Bylaws.

(b) **Funding of account**. If established by the board of directors, the reserve account shall be funded by assessments against the individual units for the purposes for which the reserve account is being established, which sums shall be included in the regular monthly assessment for the unit. The reserve account shall be established in the name of the Association, which shall be responsible for administering the account and for making periodic payments into the account. The board of directors or the unit owners may not vote to eliminate funding the reserve account unless the board determines that the reserve account will be adequately funded for the following year, except that after the Turnover Meeting the board, with the approval of 75 percent of the voting power of the unit owners, may, on an annual basis, elect not to fund the reserve fund for the following year.

(c) **Reserve studies**. The board of directors annually shall conduct a reserve study or review and update an existing study to determine the reserve account requirements for the items described in paragraph (a) of this Section and may adjust the amount of payments in accordance with the study or review and may provide for other reserve items that the board, in its discretion, may deem appropriate. The reserve account need not include items that could reasonably be funded from operating assessments. The reserve study shall:

(1) Identify all items for which reserves are or will be established;

(2) Include, the estimated remaining useful life of each item as of the date of the reserve study; and

(3) Include for each item, as applicable, an estimated cost of maintenance and repair and replacement at the end of the item's useful life.

(d) **Use of reserve funds**. The reserve account shall be used only for the purposes for which the reserves have been established and shall be kept separate from other funds. After the organizational and turnover meeting described in Section 2.2, however, the board of directors may borrow funds from the reserve account to meet high seasonal demands on the regular operating funds or to meet unexpected increases in expenses if the board has adopted a resolution, which may be an annual continuing resolution, authorizing the borrowing of funds. No later than the adoption of the budget for the following year, the board shall adopt by resolution a written payment plan providing for repayment of the borrowed funds within a reasonable period.

(e) **Sale of units**. Assessments paid into the reserve account are the property of the Association and are not refundable to sellers of units. Sellers of the units, however, may treat their outstanding share of the reserve account as a separate item in any sales agreement.

(f) **Investment of reserve account**. Nothing in this Section shall prohibit prudent investment of the reserve account; provided that any investment of the reserve account is made in compliance with the Oregon Condominium Act.

5.6 **Default in Payment of Assessments**.

(a) **Interest**. In the event of default by any unit owner in paying any assessments to the Association, including assessed common expenses and any other charge imposed or levied by the Association pursuant to the provisions of the Declaration, these Bylaws or the Oregon Condominium Act, such unit owner shall be obligated to pay interest at the rate of 12 percent per annum on such assessment from the due date thereof, or at such greater rate as may be established by the board of directors from time to time, not to exceed the maximum lawful rate, if any.

(b) **Late charges and expenses**. The defaulting unit owner shall pay a late charge for any assessment not paid within 10 days of its due date in the amount of five percent of the delinquent payment, or such other reasonable late charge or administrative fee, or both, as may be established by the board of directors from time to time by resolution that is delivered to each unit, mailed to the mailing address of each unit or mailed to the mailing address designated by the unit owner in writing, together with all expenses incurred by the Association in collecting such unpaid assessments, including attorneys' fees (whether or not suit is instituted, and at trial or any appeal or petition for review therefrom).

(c) **Acceleration**. If the assessment is not paid within 30 days of its due date, the board of directors may declare any remaining installments of assessments for the balance of the fiscal year immediately due and payable and may terminate the right to receive utility services paid for out of assessments or the right of access to and use of service facilities of the Condominium until assessments have been brought current.

(d) **Enforcement**. The board of directors shall have the right to recover for the Association such assessments, together with such charges, interest and expense of the proceeding, including attorneys' fees, by an action brought against such unit owner or by foreclosure of the lien upon the unit granted by the Oregon Condominium Act. Each unit owner assigns to the Association all rents, revenues, income, issues and profits from the unit to secure such obligations.

(e) **Notices to first Mortgagees**. The board of directors shall notify the holder of any first Mortgage upon a unit of any default not cured within 60 days of the date of default.

5.7 **Foreclosure of Liens for Unpaid Assessments**. In any suit brought by the Association to foreclose a lien on a unit because of unpaid assessments, the unit owner shall be required to pay a reasonable rental for the use of the unit during the pendency of the suit, and the plaintiff in such foreclosure suit shall be entitled to the appointment of a receiver to collect such rental. The board of directors, acting on behalf of the Association, shall have the power to purchase such unit at the foreclosure sale and to acquire, hold, lease, mortgage, vote the votes appurtenant to, convey, or otherwise deal with the unit. A suit or action to recover a money

judgment for unpaid assessments shall be maintainable without foreclosing the liens securing them.

5.8 **Statement of Assessments**. The board of directors shall advise each unit owner in writing of the amount of assessments payable by such owner, and furnish copies of each budget on which such assessments are based to all unit owners and, if requested, to their Mortgagees. The board shall promptly provide any unit owner who makes a request in writing with a written statement of the owner's unpaid assessments.

5.9 **Priority of Lien; First Mortgages**. To the extent provided by the Oregon Condominium Act, any lien of the Association against a unit for assessments shall be subordinate to tax and assessment liens and any first Mortgage of record. Unless otherwise provided in the Oregon Condominium Act, if the purchaser or Mortgagee of a unit obtains title to the unit as a result of foreclosure of a first Mortgage, such purchaser or Mortgagee, its successors and assigns, shall only be liable for a maximum of six months of the assessments that are chargeable to such unit and that became due prior to the acquisition of title to the unit by such purchaser or Mortgagee. Any additional unpaid share of assessments shall be a common expense and be reallocated on a pro rata basis for all units, including the Mortgaged unit. The purchaser or Mortgagee shall not be relieved of the obligation to pay further assessments. A deed in lieu of foreclosure accepted by the holder of a first Mortgage shall extinguish a lien filed by the Association to secure unpaid assessments under the circumstances described in ORS 100.465.

5.10 **Voluntary Conveyance**. In a voluntary conveyance of a unit, the grantee shall be jointly and severally liable with the grantor for all unpaid assessments against the grantor of the unit up to the time of the grant or conveyance, without prejudice to the grantee's right to recover from the grantor the amounts paid by the grantee therefor. However, upon request of an owner or an owner's agent, for the benefit of a prospective purchaser, the board of directors shall make and deliver a statement of the unpaid assessments against the prospective grantor or the unit effective through a date specified in the statement, and the grantee in that case shall not be liable for any unpaid assessments against the grantor not included in the written statement.

Article 6

RECORDS AND AUDITS

6.1 **General Records**. The board of directors and the manager, if any, shall keep detailed records of the actions of the board and the manager, minutes of the meetings of the board and minutes of the meetings of the Association. The board shall maintain a book of resolutions containing the rules, regulations and policies adopted by the Association, board and the manager. The board shall maintain a list of owners entitled to vote at meetings of the Association and a list of all Mortgagees of units. All documents, information and records delivered to the Association by Declarant pursuant to ORS 100.210 and other records of the Association shall be kept within the State of Oregon for the time periods specified in ORS 100.480.

6.2 **Financial Records and Accounts**. The board of directors or its designee shall keep within the State of Oregon financial records sufficient for proper accounting purposes and as required by the Oregon Condominium Act. All assessments shall be deposited and maintained in the name of the Association in one or more separate federally insured accounts, including certificates of deposit, at a financial institution as defined in ORS 706.008, other than an extranational institution. Such funds may be used to purchase obligations of the United States government. All expenses of the Association shall be paid from the Association's bank account.

6.3 **Assessment Roll**. The assessment roll shall be maintained in a set of accounting books in which there shall be an account for each unit. The account shall designate the name and address of the owner or owners, the amount of each assessment against the owners, the dates and amounts in which the assessment comes due, the amounts paid on the account and the balance due on the assessments.

6.4 **Payment of Vouchers**. The treasurer or manager shall pay all vouchers for all budgeted items and for any nonbudgeted items up to $3,000 signed by the chairperson, managing agent, manager or other person authorized by the board of directors. Any voucher for nonbudgeted items in excess of $3,000 (or such other amount as may be established by the board) shall require the authorization of the chairperson. Any checks written on reserve accounts must be signed by a member of the board.

6.5 **Reports and Audits**. An annual financial statement consisting of a balance sheet and income and expense statement for the preceding fiscal year shall be rendered by the board of directors to all unit owners and to all Mortgagees of units who have requested it within 90 days after the end of each fiscal year. Commencing with the fiscal year following the turnover meeting, if the annual assessments exceed $75,000 for the year, then the board shall cause such financial statements to be reviewed within 180 days after the end of the fiscal year by an independent certified public accountant licensed in Oregon in accordance with the Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants, or if the annual assessments are $75,000 or less, shall cause such review within 180 days after receipt of a petition requesting such review signed by owners holding at least a majority of the voting rights. The board need not cause such a review to be performed if so directed by an affirmative vote of unit owners holding at least 60 percent of the voting rights, not including votes of Declarant with respect to units owned by Declarant. Upon written request, any holder, insurer or guarantor of a first Mortgage shall be entitled to an audited financial statement for the immediately preceding fiscal year at the expense of the requesting party, if the statement is not otherwise available.

6.6 **Notice of Sale, Mortgage, Rental or Lease**. Upon the sale, mortgage, rental or lease of any unit, such unit owner shall promptly inform the secretary or manager of the name and address of the vendee, Mortgagee, lessee, or tenant.

6.7 **Availability of Records**. Except as otherwise provided in ORS 100.480, during normal business hours or under other reasonable circumstances, the Association shall make reasonably available for examination and, upon written request, available for duplication, by unit owners, lenders and holders, insurers or guarantors of any first Mortgage that make the request in good faith for a proper purpose, current copies of the Declaration, Bylaws, other rules

concerning the Condominium, amendments or supplements to such documents, and the books, records, financial statements and current operating budget of the Association. The Association also shall be required to make available to prospective purchasers current copies of the Declaration, Bylaws, other rules governing the Condominium, and the most recent annual audited financial statement, if such is prepared. The Association, within 10 business days after receipt of a written request by a unit owner, shall furnish copies of such documents to the requesting unit owner. Upon written request, the Association shall make such documents, information and records available to such persons for duplication during reasonable hours. The board of directors, by resolution, may adopt reasonable rules governing the frequency, time, location, notice and manner of examination and duplication of Association records and the imposition of a reasonable fee for furnishing copies of such documents, information or records. The fee may include reasonable personnel costs incurred to furnish the information.

6.8 **Statement of Assessments Due**. The Association shall provide, within 10 business days of receipt of a written request from an owner, a written statement that provides: (a) the amount of assessments due from the owner and unpaid at the time the request was received, including regular and special assessments, fines and other charges, accrued interest, and late payment charges; (b) the percentage rate at which interest accrues on assessments that are not paid when due; and (c) the percentage rate used to calculate the charges for late payment or the amount of a fixed rate charge for late payment. The Association is not required to comply with this Section if the Association has commenced litigation by filing a complaint against the owner and the litigation is pending when the statement would otherwise be due.

Article 7

MAINTENANCE AND USE OF CONDOMINIUM PROPERTY

7.1 **Maintenance and Repair**. Except as otherwise provided in Section 7.3 for damage or destruction caused by casualty:

(a) **Units**. All maintenance of and repairs to any unit shall be made by the owner of the unit, who shall keep the unit in good order, condition and repair. Owners of Attached Units shall do all repairs, maintenance, or painting to the interior of the unit that at any time may be necessary to maintain the good appearance and condition of the unit. For Freestanding Units, the unit owner's maintenance responsibility extends to all structural features that are part of the Freestanding Unit, including the painting, staining, maintenance, repair and timely replacement of the interior and all structural features of the unit, including the exterior walls and the roofing system. Each unit owner, regardless of the type of unit, shall be responsible for the maintenance, repair, and replacement of windows, glazing and window frames, access doors and frames, aircraft access doors and framing, automatic door openers and ancillary equipment; heating and air conditioning fixtures and ducting serving only the owner's unit and located in within the boundaries of the unit; any plumbing, telephones, water heaters, fans, vents, lighting fixtures, electrical outlets, which serve only the Owner's unit; any cabinetry, appliances and accessories, and any interior partitions or other structures that may be constructed within the boundaries of the unit or connected with the owner's unit, including those constructed by the unit owner within the boundaries of the unit. The Association, however, may repair or replace, at the Association's expense, portions of units to the extent reasonably necessary for the

preservation of the general appearance of the Condominium as a first-class aviation center or of the common elements in good condition and working order, if a unit owner fails to do so after written notice to such unit owner.

(b) **Common elements**. Except as otherwise provided in Section 11.1 of the Declaration, all maintenance, repairs and replacements to the general and limited common elements and to Association property and other General Expenses shall be made by the Association and shall be charged to all the unit owners as a common expense. The expense of maintaining, repairing and replacing the Yellow Gate Hangar Limited Common elements and services used only by the Yellow Gate Hangar Units, and other Yellow Gate Hangar Expenses, if any, shall be charged as a common expense only to the Yellow Gate Hangar Units. The expense of maintaining, repairing and replacing the Commercial Unit Limited Common Elements and services used only by the Commercial Units, and other Commercial Expenses, if any, shall be charged as a common expense only to the Commercial Units. Each unit owner, however, shall maintain the limited common element pertaining solely to such unit in a neat and well maintained condition and keep the limited common elements that pertain solely to the owner's unit in a safe, neat, clean and sanitary condition.

(c) **Skylights and roof-mounted equipment**. All maintenance, repairs and replacements of any roof-mounted heating or cooling, or ventilation fixtures, or security equipment, and appurtenant lines and equipment, which are outside the boundaries of an Attached Unit shall be performed by the Association. All maintenance, repairs and replacements (except for interior cleaning) of the skylights to an Attached Unit and appurtenant roofing features outside the boundaries of such Attached Unit shall be performed by the Association. The expense of maintaining, repairing and replacing an individual Attached Unit's roof-mounted ventilation fixtures or skylights, or other equipment, shall be charged to the respective Attached Unit that such heating or cooling, ventilation, or security fixtures or skylight or equipment serves solely, as an Individual Expense.

7.2 **Additions, Alterations or Improvements**.

(a) A unit owner may make any improvements or alterations to such owner's unit that do not impair the water tightness, acoustic performance, structural integrity, or fire, life, safety and mechanical systems of the Condominium or lessen the support of any portion of the Condominium, reduce its value, impair any easement or increase the common expenses; provided, however, if such alterations affect the exterior of a unit, they shall be subject to any architectural design guidelines adopted by the board. An Attached Unit owner is expressly prohibited from drilling into or attaching anything to the common elements, including without limitation, signs or satellite dishes, or to windows or window frames and from making any penetration into the building envelope or cement slab foundation without prior written consent from the board of directors. Any alterations, including change in paint color, roofing materials, or cladding exterior materials, that a Freestanding Unit owner wishes to make to the exterior of his or her Freestanding Unit, must first obtain prior written consent from the board. The board of directors may adopt architectural design review guidelines regarding such architectural review. The board shall approve the proposed alteration unless it determines within 30 days that the proposed change will impair the structural integrity, or the fire, life, security, safety or mechanical systems of the Freestanding Unit or the Condominium, or is not in harmony with the

architectural design and appearance of the Condominium as a first-class aviation center. A unit owner may not submit a unit to condominium ownership without the prior approval of the board and, up until the Turnover Meeting, the Declarant.

(b) Each unit owner shall be responsible for providing proper notice through the Oregon Department of Aviation to the Federal Aviation Administration of any proposed construction or alteration to be performed by unit owner, in conformity with Federal Aviation Regulations, Part 77.

(c) After acquiring an adjoining unit or an adjoining part of an adjoining unit, a unit owner may submit a written request to the board of directors for permission to remove or alter any intervening partition or to create apertures therein, even if the partition in whole or in part is a common element. The board shall approve the change unless it determines within 45 days that the proposed change will impair the structural integrity or the fire, life, security, safety or mechanical systems of the Condominium or lessen the support of any portion of the Condominium. The board may require the unit owner, at the owner's own expense, to submit an opinion of a registered architect or registered professional engineer that the proposed change will not impair the structural integrity or mechanical systems of the Condominium or lessen the support of any portion of the Condominium. Removal of partitions or creation of apertures under this paragraph is not an alteration of boundaries.

(d) A unit owner may not change the appearance of the common elements without the prior written permission of the board of directors. A unit owner may not change the appearance of the exterior of the owner's unit, whether Freestanding or Attached, including the installation of any exterior canopy or awning except as authorized by the board of directors in advance, except that the owner of a unit may install or change such unit's entry doors or windows, aircraft and vehicle access doors, provided that such installations and changes meet the Association's written architectural design and color guidelines. Except as set forth in Section 7.5(g) below, no person shall install wiring for electrical installation, surveillance cameras, television antennas or satellite dishes, cell towers, machines or air conditioning units or similar devices or equipment on the exterior of the Condominium (including any Freestanding Unit) or cause them to protrude through the walls or the roof of the Condominium (including any Freestanding Unit) except as authorized by the board in advance.

(e) Any owner performing any additions, alterations or improvements shall be liable for any damages caused by or resulting from such work and neither the Association or its directors, officers or managers nor Declarant or its design professionals, contractors and subcontractors and their consultants, including, without limitation, all of their officers, members, managers, directors, employees, agents and brokers, shall have any liability therefor, and the owner shall indemnify such persons and entities from and against any claims by unit owners or other persons or entities for loss or damage resulting from such work. All additions, alterations or improvements shall be performed in compliance with all applicable laws, codes and ordinances.

(f) The owner of a unit shall have access to building systems and common areas as necessary or convenient for the build-out, use and maintenance of the units, including, without limitation, heating or cooling, or ventilation equipment and shafts, fans and filters, and

the right to run utility lines through the common elements at the owner's expense, with prior written consent of the board of directors, provided such lines do not interfere with the use of such spaces for the purposes for which they were intended.

7.3 **Damage or Destruction by Casualty of Condominium Property**. In the case of damage or destruction that affects a material portion of the Condominium, timely written notice shall be given to the unit owners and their Mortgagees and the following provisions shall apply:

(a) In the event of damage or destruction by casualty of Condominium property, the damage or destruction shall be repaired, reconstructed or rebuilt unless, within 14 days of such damage or destruction, the board of directors or unit owners holding more than 10 percent of the voting rights shall have requested a special meeting of the Association. Such special meeting must be held within 60 days of the date of damage or destruction. At the time of such meeting, unless unit owners holding 90 percent of the voting rights, whether in person, by writing or by proxy, with the approval of Mortgagees as required by the Declaration, vote not to repair, reconstruct or rebuild the damaged property, the damage or destruction shall be repaired, reconstructed or rebuilt. If the damage or destruction is not repaired, reconstructed or rebuilt, then the property shall be removed from condominium ownership in the manner provided in the Oregon Condominium Act.

(b) The Association shall be responsible for repairing, reconstructing or rebuilding all such damage or destruction to the common elements and, to the extent of the Association's insurance coverage, all such damage or destruction to the units. Each unit owner shall be responsible for the cost of such repairing, reconstructing or rebuilding of his or her unit that is not covered by the Association's insurance and to the extent of any deductible under the Association's insurance.

(c) If, due to the act or neglect of a unit owner, or of a member of the owner's family or household pet or of a guest or other occupant or visitor of such unit owner, damage shall be caused to the common elements or to a unit owned by others, or maintenance, repairs or replacements shall be required that would otherwise be a common expense, then such unit owner shall pay for the damage and the maintenance, repairs and replacements as may be determined by the Association, to the extent not fully covered by the Association's insurance.

(d) If any portion of the insurance proceeds paid to the Association is not used to repair, reconstruct or rebuild the damaged or destroyed property, the Association shall distribute the proceeds among the unit owners and their Mortgagees (as their interests may appear) in the same proportion as common expenses are shared, unless the property is removed from unit ownership. If the property is removed from unit ownership, the insurance proceeds, together with the proceeds from the sale of the property, shall be distributed to the unit owners and their Mortgagees (as their interests may appear) in the manner described in the Oregon Condominium Act.

7.4 **Condemnation**. If any portion of the Condominium is made the subject matter of any condemnation or eminent domain proceeding or is otherwise sought to be acquired by a condemning authority, notice of the proceeding or proposed acquisition shall promptly be given to each unit owner and to each Mortgagee. The Association shall represent the unit owners in

any condemnation proceedings or in negotiations, settlements and agreements with the condemning authority for acquisition of any portion of the common elements, and each unit owner appoints the Association to act as his attorney-in-fact for such purposes. All compensation, damages or other proceeds of the taking, other than any award for moving expenses of specific unit owners, shall be payable to the Association and allocated and distributed as provided in this Section 7.4.

(a) **Complete taking**. If the entire Condominium property is taken, or if unit owners holding 90 percent of the voting rights agree that such a substantial portion of the Condominium has been taken as to make the project obsolete, then the property shall be deemed removed from unit ownership. In such event, any proceeds of the condemnation paid to the Association, together with any other proceeds upon sale of the remaining Condominium property, shall be distributed among the unit owners and their Mortgagees, as their interests may appear, in accordance with the provisions of the Oregon Condominium Act.

(b) **Partial taking**. If less than the entire Condominium property is taken and the property is not determined to be obsolete as provided in paragraph (a) above, then as soon as practicable the board of directors shall, reasonably and in good faith, allocate the award among the units in accordance with the reduction in the value of each unit and its interest in the common elements, compared to the total reduction in value of all units and their interest in the common elements. If any unit owner or Mortgagee objects to the allocation determined by the board of directors, the matter shall be submitted to arbitration in accordance with Article 10 below. The cost of such determination shall be paid out of the proceeds of the condemnation. Any portion of the award allocated to a unit owner under this paragraph shall be paid first to all Mortgagees and holders of liens on the unit owner's interest in accordance with the existing priorities, and the balance to the unit owner. If any reconstruction or repair is undertaken as a result of the condemnation, the board may retain and apply such portion of each unit owner's share of the award as is necessary to discharge the owner's liability for any special assessment arising from such reconstruction or repair.

7.5 **Restrictions and Requirements Respecting Use of Condominium Property**. The following restrictions and requirements are in addition to all other restrictions and requirements contained in the Declaration and these Bylaws:

(a) **Yellow Gate Hangar Unit use**. The Yellow Gate Hangar Units shall be used only for the storage and maintenance of aircraft. Ancillary to the storage and maintenance of aircraft, vehicles, equipment, or tools may be stored in the Unit so long as the vehicles and equipment are used by the unit owner or the owner of an aircraft based in the Yellow Gate Hangar unit, and further, so long as the primary use of the Unit is storage and maintenance of aircraft. The only aircraft maintenance work permitted to be performed in a Yellow Gate Hangar Unit shall be done on aircraft based in the unit, and the unit shall not be used for maintenance for aircraft not based in the unit. Except for bookkeeping, record keeping, and other activities closely associated with the storage, maintenance, and operation of private aircraft, no other commercial or industrial use of the Yellow Gate Hangar Units is permitted.

(b) **Commercial Hangar Unit use**. The Commercial Units shall be used only for the sale, storage, assembling, and general maintenance of aircraft, for office uses ancillary to

such activities, and for parking passenger vehicles of the unit owner, and the guests, customers, tenants, and employees of the unit owner. Commercial Hangar Unit owners shall also have the right to store their customers' aircraft in their unit(s). For purposes of this Section 7.5 "unit owner's customers" shall mean those parties for whom the unit owner manages or maintains their aircraft. Additionally, to the extent such use is a necessary part of a Commercial Hangar Unit owner's ongoing day-to-day business activities, Commercial Hangar Units may be used for the temporary overnight lodging of aircraft crews to comply with applicable Federal Aviation Administration regulations.

(c) **Conditional residential use of Commercial Hangar Units and Yellow Gate Hangar Units.** Notwithstanding anything to the contrary herein, a Commercial Hangar Unit or a Yellow Gate Hangar Unit, or a portion thereof, may be used as a caretaker residence to the extent allowed by applicable ordinances, and provided that the unit owner has properly obtained any conditional use permit required under applicable law for such use of the owner's unit, as well as the prior written consent of Declarant, or following turnover, the board of directors. In no case, however, will there be more than a total of five caretaker residences in the Condominium.

(d) **Use of common elements**. The common elements shall be used for the furnishing of services and facilities for which they are reasonably intended, for the enjoyment of the units, for the staging, taxiing, and for ingress and egress of aircraft and passenger vehicles. Other than incidental crossings by pedestrians or vehicles, no taxilane shall be used for anything other than the staging and movement of aircraft, in accordance with applicable FAA regulations. The use, operation, and maintenance of the common elements shall not be obstructed, damaged or unreasonably interfered with by any unit owner. Unit owners shall take such steps to ensure that the performance of all aircraft maintenance work and operation shall not damage the common elements of the Condominium.

(e) **Offensive or unlawful activities**. Only uses permitted under applicable zoning ordinances are permitted in the Condominium. No noxious or offensive activities shall be carried on in any unit nor shall anything be done in or placed upon any unit or common element that interferes with or jeopardizes the enjoyment of other units or the common elements or which is a source of annoyance to occupants. No painting (other than of walls) shall be done in the unit, except in commercial painting booths in compliance with all applicable air quality and OSHA standards. No storage of any flammables is permitted in any unit except in fire department approved containers or in the tank of an aircraft stored in a unit. No open flame welding, grinding, metal polishing or related activities shall be conducted in a unit.

(f) **Animals**. No animals or fowls shall be raised, kept, or permitted within the Condominium or any part thereof, except a reasonable number of domestic pets kept within a unit or a designated dog run area. Pets shall not be left overnight alone in a unit and shall not be permitted to run at large, nor shall pets be kept, bred, or raised for commercial purposes. Any inconvenience, damage or unpleasantness caused by a pet shall be the responsibility of the owner thereof, and the owner shall be responsible for cleanup and removal of wastes of the owner's animal. All pets shall be kept under reasonable control at all times and shall be securely carried or kept on a leash while outside a unit or dog run. Each owner and occupant, contractor, guest, customer, or employee of a unit owner shall be responsible for seeing that his or her pets do not

endanger health, make objectionable noise, or constitute a nuisance or inconvenience to the owners and occupants of other units. The board of directors, after notice and a hearing, may require the permanent removal of any animal that the board determines to be a danger to the health and safety of anyone in the Condominium, or otherwise to be a nuisance within the Condominium. The board may find that an animal is a nuisance if the animal or its owner continues to violate these Bylaws or the rules regulating pets after receipt by the owner of a written demand from the board to comply with these Bylaws or the rules or regulations established by the board.

(g) **Electrical usage**. No electrical device creating an overload of standard circuits may be used without permission from the board of directors. Misuse or abuse of appliances or fixtures within a unit that affects other units or the common elements is prohibited. Any damage resulting from such misuse shall be the responsibility of the owner who caused such damage. Total electrical usage in any unit shall not exceed the capacity of the circuits as labeled on the circuit breaker boxes.

(h) **Exterior lighting or noisemaking devices and antennas**. Except with the consent of the board of directors of the Association, no exterior lighting or noisemaking devices (other than those that are a standard part of a security system) shall be installed or maintained on any unit. Seasonal holiday lighting and decorations are permissible if consistent with any applicable rules and regulations, including any Aviation Laws, and if removed within 30 days after the celebrated holiday. A unit owner may install antennas, satellite receiver, or transmission dishes, and other communication or security devices serving the owner's unit (but only on the portion of the roof of the Condominium covering the owner's unit) without board approval, provided such installation is in compliance with applicable law, including Aviation Law, and does not require any structural alterations, cause any structural damage, or cause roof leaks. The owner installing any such device shall indemnify and hold harmless the Association, Declarant, the architectural and engineering consultants, the original contractor or subcontractor and each other unit owner and unit lessee from any damage, loss, or liability resulting from such installation.

(i) **Parking of vehicles in common element areas**. Except with the consent of the board of directors of the Association, no vehicle in an extreme state of disrepair, no tractor trailer, trailer, truck camper, boat or boat trailer, or other recreational vehicle or truck rated as more than one two tons shall be parked on any portion of the Condominium, except within units or in areas designated for such purpose by the board of directors if the board elects to do so. A vehicle shall be deemed in an "extreme state of disrepair" when the board reasonably determines that its presence offends the occupants of the Condominium due to its appearance or continued inoperability. The Association, by rule, may regulate the length of time vehicles may be parked in driveways, general common element parking spaces, and aircraft taxilanes. The Condominium includes general common element parking spaces that are available for use by a handicapped person and to the extent required by law, the board may designate additional spaces for such use. The parking spaces designated as general common elements are intended for use of automobiles and motorcycles of unit owners, employees, tenants, flight crews, customers, and guests. The board may designate certain parking areas for temporary overnight parking. The board may make such rules necessary to govern the use of any general common element parking areas and driveways by which all unit owners and other users shall be bound, including but not

limited to speed limits and the maximum time a vehicle may be parked in the common element parking spaces. No unit owner may use any parking spaces in the Condominium for vehicle or equipment storage.

(j) **Signs**. To the extent permitted by applicable laws and codes, and subject to a unit owner obtaining the necessary permits and the board of director's prior written approval, a Freestanding Unit owner shall have the right to place signs bearing unit owner's name or logo as well as those names and logos of aircraft it is licensed to sell or maintain on the common elements exterior walls or roof of the owner's unit; likewise Freestanding Unit owners shall have the right to place signs on the exterior of the owner's unit. No sign or billboard of any kind shall be displayed elsewhere on the common elements, except project signs or directories installed by the Association. All electricity to illuminate signs installed on the exterior of the owner's unit shall be the responsibility of the unit owner. Ownership of and responsibility to maintain signs installed on any common element will remain with the unit owner who installed them. Declarant, however, may erect and maintain such signs and other advertising devices or structure as it may deem necessary or proper in connection with the conduct of its operations for the development, improvement and sale of the Condominium units. The board shall not withhold consent for an exterior sign for a unit, provided such sign complies with all applicable governmental regulations and any rules or regulations adopted by the board that governs signs.

(k) **Trash**. No part of any unit or any part of the common elements shall be used or maintained as a dumping ground for rubbish, trash, garbage, recycling materials, machine or aircraft parts, or other waste. No garbage, trash, recycling materials or other waste shall be kept or maintained on any part of the property, except in sanitary containers in the designated areas.

(l) **Insurance**. Nothing shall be done or kept in any unit or in the common elements that will increase the cost of insurance on the common elements. No owner shall permit anything to be done or kept in his or her unit or in the common elements that will result in cancellation of insurance on any unit or any part of the common elements. If any use shall lead to an increase in fire or other insurance premiums otherwise payable on the insurance obtained by the board of directors pursuant to Article 8 of these Bylaws, or insurance procured by an individual unit owner, the party causing such increase shall be liable for payment of the same to the board of directors or individual unit owner, as the case may be. The party so charged with increasing the premium cost shall have the right to contest the validity of such increase. A levy made against such unit owner for such increase in premiums may be enforced by the board by adding the levy to the common charges allocable to such unit owner.

(m) **Aircraft and vehicle access doors.** All vehicle and aircraft access doors shall remain closed after regular business hours except to permit the entrance and exit of vehicles or aircraft.

(n) **Smoking**. Smoking is not allowed anywhere within the units or common elements of the Condominium.

(o) **Hazardous substances.** No unit owner shall generate, transport, transfer or store any hazardous substances in, on, above, to or from the Condominium or adjacent public

air field, including but not limited to, state and federally defined hazardous substances. Unit owners are permitted, in the ordinary course of their business, to use and store the following in the unit: flammables and lubricants, all of which must be in compliance with all applicable law and regulations, in permissible quantities, containers, and given adequate ventilation. No diesel, gasoline, propane, natural gas, or aircraft fuel shall be stored in a unit in containers larger than 5 gallons or other amount designated by the board, except in the tank of an aircraft that is stored in the unit or the tank of equipment handling machines operated in the unit. In the event of a leak, spill, or release of a hazardous substance in, on, or above a unit or any common element of the Condominium, the unit owner will immediately notify the Association and the proper authorities and will undertake all emergency response necessary to contain, clean up, and remove the hazardous substance and within a reasonable time investigate, remediate, or otherwise take action necessary or appropriate to insure that any contamination by the hazardous substance is eliminated. The unit owner shall provide certification acceptable to the board of directors that all such contamination has been eliminated.

(p) **Prohibited uses**. By way of clarification, but in no way limiting the permissible uses of the units set forth in this Section 7.5, the following activities in and uses of units in the Condominium are not permitted:

(1) Storing fuels in larger than 5 gallon containers; dispensing or selling fuels, or fueling aircraft, vehicles, or any other machine; and

(2) Mortuary or crematorium, machine shop or manufacturing except for aircraft; automotive or bicycle repair businesses; adult book and/or video store; movie production; amusement center; betting parlor; bingo parlor; bowling alley, carnival; check cashing services; electronic, mechanical games or amusement arcade; facility primarily devoted to training or education; flea market; tattoo or body piercing parlor, fortune telling, palm reading or other business relating to the occult; gambling establishment; gym, health or aerobic club, spa or studio; illegal, offensive, noisy or dangerous trade; massage parlor; novelty shop or store; nude or partially nude entertainment; pet grooming or boarding; pornographic shop or store or production; sale or storage of firearms and/or ammunition; thrift shop; sale, growing, or storage of drugs or drug paraphernalia; self-service laundry; skating rink, store or shop engaged primarily in the sale of used products; veterinarian's services.

(3) No use of a building in the Condominium, or other structure or facility, that results in violation of the airport imaginary surfaces regulations, as defined in the Federal Aviation Regulations, Part 77 (or a regulation that replaces Part 77).

Notwithstanding anything to the contrary, if the portion of the Additional Property utilized as a fixed base operator as of the date the Declaration is recorded, including commercial fueling services for aircraft, is ever annexed as a unit to the Condominium, neither sub-paragraph (p)(1) above nor the 5-gallon sized maximum sized container in sub-paragraph (o) shall apply to such unit. If the existing fixed base operator ceases to offer commercial fuel services for aircraft, the Declarant, and following turnover, the board of directors, shall have the authority to authorize one alternative fixed base operator in the Project to provide fuel to the unit owners and aircraft based at the Condominium with fueling services; the same may approve such use in no more than one unit at a time in the Condominium.

(q) **Association rules and regulations**. In addition, the full board of directors from time to time may adopt, modify, or revoke such rules and regulations governing the conduct of persons and the operation and use of the units and common elements as it may deem necessary or appropriate in order to insure the peaceful and orderly use and enjoyment of the Condominium property, including, without limitation, establishment of reasonable administrative fees. Any rules or regulations concerning only the Commercial Units shall be adopted, modified or revoked only by the Commercial Directors; any rules or regulations concerning only the Yellow Gate Hangar Units shall be adopted, modified or revoked only by the Yellow Gate Hangar Directors. Rules or regulations concerning the Commercial Units and the Yellow Gate Hangar Units must be approved by the full board of Directors. Any action by the board to adopt, modify or revoke a rule or regulation may be overruled by a vote of not less than 75 percent of the voting rights eligible to elect the directors who adopted the rule or regulation to be overruled, whether the Commercial or Yellow Gate Hangar Directors or the full board pursuant to this Section, which voting rights are present, in person or by proxy, at any meeting, the notice of which shall have stated that such adoption, modification or revocation of rules and regulations will be under consideration. A copy of the rules and regulations, upon adoption, and a copy of each amendment, modification or revocation thereof, shall be delivered by the secretary promptly to each unit owner and shall be binding on all unit owners and occupants of all units from the date of delivery.

7.6 **Movement and Staging of Aircraft**. Unit owners, their tenants, guests, customers, employees and contractors, shall take care to move and stage aircraft in common element areas so as not to block or impede the movement of other aircraft over the common elements and shall comply with all Aviation Laws and with the , and shall not engage in any activity that would negatively affect the Association's or any unit owner's rights of ingress and egress to the public use area of the Aurora State Airport. The board of directors may adopt rules and regulations regarding the use of common element areas for staging and moving aircraft.

7.7 **Security Services**. The Association may provide patrolling of the common elements, and monitoring of the Condominium common element areas and repair of the common element security, surveillance, and alarm systems, and may enter an agreement with a security or alarm company for such purposes, the cost of which will be a common expense. The Association shall provide each unit owner with a certain number of "proximity" security cards assigned to the owner's unit for access to the Condominium, which shall belong to the Association and shall only be for the use of the unit owner, and the unit owner's tenants, guests, employees, contractors, agents and family members ("**Owner Parties**"). The name of each card holder shall be filed with the Association by each unit owner, which list must be kept current. The Association reserves the right to fine any Owner Party or to revoke any such security cards, in the event of card misuse, unauthorized copying or distribution to any party other than an Owner Party permitted herein without notice to the Association, in accordance with rules and regulations that the Association may adopt. **Neither the Association, Declarant nor any managing agent shall be considered insurers or guarantors of security or safety within the Condominium, nor shall either be held liable for any loss or damage by reason of failure to provide adequate security or ineffectiveness of security or safety measures undertaken. No representation or warranty is made that any system or measure, including any mechanism or system for limiting access to the Condominium, cannot be compromised or circumvented, nor that any such system or measure undertaken will in all cases prevent**

loss or provide the detection or protection for which it is designed or intended. Each unit owner and Owner Party acknowledges and agrees that the Association, the board of directors and any managing agent are not insurers and that each Person using the Condominium assumes all risks for personal injury and loss or damage to property resulting from acts of third parties.

7.8 **Leasing and Rental of Units**. The following shall apply to all leases, subleases, and rentals of units.

(a) Any owner who wishes to lease or rent his or her unit must meet each of the following requirements, and the lease or rental agreement will be subject to these requirements whether or not they are included within the lease or rental agreement:

(1) all leases and rentals must be in writing;

(2) all such leases and rentals shall be subject in all respects to provisions of the Declaration, these Bylaws, and all rules and regulations adopted by the board;

(3) all owners who lease or rent their units shall promptly notify the Association in writing of the names of all tenants and members of tenants' family and employees occupying such units and shall provide the Association with a complete copy of the lease or rental agreement.

(b) Any failure of a tenant to comply with the Declaration, Bylaws, and Association rules and regulations, shall be a default under the lease or rental agreement, regardless of whether the lease or rental agreement so provides. In the event of any such default, the owner immediately shall take all actions to cure the default including, if necessary, eviction of the tenant.

(c) If any tenant is in violation of the provisions of the Declaration, Bylaws, or rules and regulations of the Association, the Association may bring an action in its own name and/or in the name of the owner to have the tenant evicted or to recover damages, or both. If the court finds that the tenant is violating, or has violated any of the provisions of the Declaration, these Bylaws or the rules and regulations of the Association, the court may find the tenant guilty of unlawful detainer notwithstanding the fact that the owner is not the plaintiff in the action or that the tenant is not otherwise in violation of tenant's lease. The remedy provided by this subsection is not exclusive and is in addition to any other remedy or remedies that the Association may have. If permitted by present or future law, the Association may recover all its costs, including court costs and reasonable attorneys' fees incurred in prosecuting the unlawful detainer action.

(d) The Association shall give the tenant and the owner notice in writing of the nature of the violation, and 20 days from the mailing of the notice in which to cure the violation before the Association may file for eviction.

(e) Each owner shall provide a copy of the Declaration, these Bylaws and all rules and regulations of the Association to each tenant of his or her unit. By becoming a tenant, each tenant agrees to be bound by the Declaration, these Bylaws and the rules and regulations of

the Association, and recognizes and accepts the right and power of the Association to evict a tenant for any violation by the tenant of the Declaration, these Bylaws, and rules and regulations of the Association.

7.9 **Abatement and Enjoining of Violations**. The violation of any provision of the Declaration or these Bylaws, of any rule or regulation adopted pursuant to these Bylaws, or of any decision of the Association made pursuant to such documents, shall give the board of directors, acting on behalf of the Association, the right, in addition to any other rights set forth in these Bylaws, to do any or all of the following after giving written notice and an opportunity to be heard:

(a) to summarily abate and remove, at the expense of the defaulting unit owner, any structure, thing, or condition that may exist contrary to the intent and meaning of such provisions, and the board of directors shall not thereby be deemed guilty of any manner of trespass; provided, however, that judicial proceedings shall be instituted before any items of construction may be altered or demolished; or

(b) to enjoin, abate, or remedy such thing or condition by appropriate legal proceedings; or

(c) to levy reasonable fines based on a resolution adopted by the board of directors that is delivered to each unit, mailed to the mailing address of each unit or mailed to the mailing address designated by the owner of each unit in writing; or

(d) to terminate the right to receive utility services paid for out of assessments or the right of access to and use of service facilities of the Condominium until the correction of the violation has occurred.

The offending unit owner shall be liable to the Association for a reasonable administrative fee as established by the board of directors and all costs and attorneys' fees incurred by the Association, whether or not legal proceedings are instituted and including attorneys' fees at trial, in arbitration or on appeal or petition for review, together with any expense incurred by the Association in remedying the default, damage incurred by the Association or unit owners, or fines so levied. Such sums shall be assessed against the offending unit as an assessment and enforced as provided in Article 5. In addition, any aggrieved unit owner may bring an action against such other unit owner or the Association to recover damages or to enjoin, abate, or remedy such thing or condition by appropriate legal proceedings.

Article 8

INSURANCE

8.1 **Types of Insurance**. For the benefit of the Association and the unit owners, the board of directors shall obtain and maintain at all times, and shall pay for out of the common expense funds, the following insurance:

(a) **Property damage insurance**.

(1) The Association shall maintain a policy or policies of insurance covering loss or damage from fire, with standard extended coverage and "all risk" endorsements, and such other coverages as the Association may deem desirable.

(2) The amount of the coverage shall be for not less than 100 percent of the current replacement cost of the Attached Units and common elements (exclusive of land, foundation, excavation and other items normally excluded from coverage), subject to a reasonable maximum deductible.

(3) The policy or policies shall include all fixtures and building service equipment to the extent that they are part of the common elements and all personal property and supplies belonging to the Association, together with all fixtures, improvements and alterations composing a part of each Attached Unit.

(4) Such policy or policies shall name the Association as insured, and shall provide for loss payable in favor of the Association, as a trustee for each unit owner and each such unit owner's Mortgagee, as their interests may appear. The policies shall contain the standard mortgage clause, or equivalent endorsement (without contribution) that is commonly accepted by institutional mortgage investors in Oregon.

(b) **Liability insurance**.

(1) The Association shall maintain comprehensive general liability insurance coverage insuring Declarant, the Association, the board of directors, and the unit owners and the manager, against liability to the public or to the owners of units and of common elements, and their invitees or tenants, incident to the operation, maintenance, ownership or use of the property, including legal liability arising out of lawsuits related to employment contracts of the Association. Such policy or policies may exclude coverage of a unit owner (other than as a member of the Association or board) for liability arising out of acts or omission of such unit owner and liability incident to the ownership and/or use of the part of the property as to which such unit owner has the exclusive use or occupancy.

(2) Limits of liability under such insurance shall not be less than $1,000,000 on a combined single limit basis.

(3) Such policy or policies shall be issued on a comprehensive liability basis and shall provide a cross-liability endorsement wherein the rights of named insured under the policy or policies shall not be prejudiced as respects his, her or their action against another named insured.

(c) **Workers' compensation insurance**. The Association shall maintain workers' compensation insurance to the extent necessary to comply with any applicable laws.

(d) **Fidelity insurance**.

(1) The Association shall maintain fidelity insurance for all officers, directors, trustees and employees of the Association and all other persons handling or responsible for funds of or administered by the Association. If the Association has retained a manager, such manager shall maintain fidelity insurance for its officers, employees and agents handling or responsible for funds of, or administered on behalf of, the Association.

(2) The total amount of fidelity insurance coverage required shall be based on the best business judgment of the board of directors.

(3) Such fidelity insurance shall name the Association as obligee and shall contain waivers by the issuers of the insurance of all defenses based on the exclusion of persons serving without compensation from the definition of "employees" or similar terms or expressions. The insurance shall provide that it may not be canceled or substantially modified (including cancellation for nonpayment of premium) without at least 10 days' prior written notice to the Association.

(e) **Directors' and officers' liability insurance**. The Association shall maintain a policy of directors' and officers' liability insurance with coverage in the amount of not less than $1,000,000 subject to a reasonable deductible, which deductible shall be the responsibility of the Association. Such insurance shall cover both interim and regular directors and shall include coverage for claims brought by the Association, unit owners and/or third parties, including, without limitation, claims arising out of construction defects or failure to maintain adequate reserves. Directors and officers will be accepting such positions in reliance upon such insurance protection being maintained by the Association. Therefore, in the event the Association fails to carry such insurance or amends these Bylaws to delete or reduce these insurance requirements, the Association and unit owners shall be deemed to have released such claims and deemed to have covenanted not to sue or prosecute any claims against its current or former directors or officers that would have been insured under such a policy.

(f) **Insurance by unit owners.** The Association has no responsibility to procure or assist in procuring property loss insurance for any owner or tenant for (i) damage to a unit or limited common elements not covered by the Association's policy (because of the deductible amount or because the claim for loss or damage is one not covered by fire and property loss insurance policies required by these Bylaws or held by the Association); or (ii) for any damage or loss to the owner's or tenant's personal property, including any aircraft. Owners must purchase insurance policies insuring their units and appurtenant limited common elements, (Freestanding Unit owners shall carry property insurance policies for their units comparable to the insurance described in Section 8.1(a)(1)), which policies shall also cover the deductible amount under the Association's policies, and the unit owner's own personal property, including aircraft. Additionally each unit owner shall maintain a hangar keeper's policy if aircraft not belonging to the unit owner is stored, repaired, or maintained in such owner's unit, for any loss or damage. Proof of such insurance coverage must be provided to the Association by the unit owner at least annually, or more frequently as the Association may require. Tenants must be responsible under their leases for insuring their own personal property, including aircraft, for any loss or damage. The Association shall notify all owners of the amount of the deductible under

the Association policies. To the extent reasonably practicable, the Association shall give at least 30 days' notice to the owners of any increase in the deductible proposed in renewal or replacement insurance policies. Owners and tenants of all units must procure and maintain comprehensive liability policies having combined limits in amounts reasonably set by the board of directors no more often than every three years. Such insurance must provide coverage for, without limitation, the negligent acts of the owner and tenant and their guests or other occupants of the unit for damage to the general and limited common elements and other units and the personal property of others located therein.

8.2 **Other Insurance Requirements**. Insurance obtained by the Association shall be governed by the following requirements:

(a) All policies shall be written with the State of Oregon or a company that is licensed to do business in the State of Oregon and that falls into a "B" or better general policyholder's rating or a "6" or better financial performance index rating in Best's Insurance Reports, an "A" or better general policyholder's rating and a financial size category of "VIII" or better in Best's Insurance Reports – International Edition, an "A" or better rating in Demotech's Hazard Insurance Financial Stability Ratings, a "BBBq" qualified solvency ratio or a "BBB" or better claims—paying ability rating in Standard and Poor's Insurer Solvency Review, or a "BBB" or better claims – paying ability in Standard and Poor's International Confidential Rating Service.

(b) Notwithstanding the provisions of Section 8.1 above, there may be named as an insured, on behalf of the Association, the Association's authorized representative, including any trustee with whom the Association may enter into any Insurance Trust Agreement, or any successor to such trustee. Such insurance trustee shall have exclusive authority to negotiate losses under any property or liability insurance policy. Each unit owner appoints the Association, or any insurance trustee or substitute trustee designated by the Association, as attorney-in-fact for the purpose of purchasing and maintaining such insurance including: the collection and appropriate disposition of the proceeds thereof, the negotiation of losses and execution of releases of liability, the execution of all documents, and the performance of all other acts necessary to accomplish such purchase. The Association or insurance trustee shall receive, hold or otherwise properly dispose of any proceeds of insurance in trust for unit owners and their first Mortgage holders, as their interests may appear.

(c) All property insurance policies shall contain a "Special Condominium Endorsement" or its equivalent providing for the following: recognition of any Insurance Trust Agreement, a waiver of the right of subrogation against unit owners individually, a provision that the insurance is not prejudiced by any act or neglect of individual unit owners that is not in the control of such owners collectively, and a provision that the policy is primary in the event that the unit owner has other insurance covering the same loss.

(d) For purposes of this article, insurance policies are unacceptable if (i) under the terms of the insurance carrier's charter, bylaws or policy, contributions or assessments may be made against the Association or unit owners, or (ii) by the terms of the carrier's charter, bylaws or policy, loss payments are contingent upon action by the carrier's board of directors,

policy holders or members, or (iii) policy includes any limiting clauses (other than insurance conditions) that could prevent the owners from collecting insurance proceeds.

(e) All policies required by this article shall provide that they may not be canceled or substantially modified without at least 10 days' prior written notice to the Association and to each holder of a first Mortgage that is listed as a scheduled holder of a first Mortgage in the insurance policy. Evidence of insurance shall be issued to each unit owner and Mortgagee upon request.

(f) All policies required by this article shall contain a waiver of subrogation as to claims against Declarant and its members and managers, and their respective employees, representatives, offices, directors, managers and members.

(g) Any unit owner who obtains individual insurance policies covering any portion of the property other than such owner's personal property and fixtures shall file a copy of such individual policy or policies with the Association within 30 days after the purchase of such insurance.

8.3 **Optional Provisions**. The board of directors shall make every effort to secure insurance policies that provide for the following:

(a) To the extent appropriate and available at reasonable cost, the Association shall maintain additional coverages against such other risks as are customarily covered with respect to projects similar in construction, location and use, including but not limited to, host liquor liability, contractual and all-written contract insurance, employer's liability insurance, comprehensive automobile liability insurance, and an endorsement patterned after "use and occupancy" insurance providing relief from monthly assessments while a unit is uninhabitable due to a covered loss.

(b) If reasonably available, the insurance policies shall include Inflation Guard Endorsement, and Construction Code Endorsements (such as a Demolition Cost Endorsement, a Contingent Liability from Operation of Building Laws Endorsement, and an Increased Cost of Construction Endorsement).

(c) Flood Insurance, if the Condominium is in a Special Flood Hazard Area.

(d) If reasonably available, waiver of subrogation by the insurer as to any claims against the board of directors, any unit owner or any guest of a unit owner.

Article 9

AMENDMENTS TO BYLAWS

9.1 **How Proposed**. Amendments to the Bylaws shall be proposed by either a majority of the board of directors or by unit owners holding 30 percent of the voting rights. The proposed amendment must be reduced to writing and shall be included in the notice of any meeting at which action is to be taken thereon or attached to any request for consent to the amendment.

9.2 **Adoption**. A resolution adopting a proposed amendment may be proposed by either the board of directors or by the unit owners and may be approved by the unit owners at a meeting called for this purpose or by ballot vote. Unit owners not present at the meeting considering such amendment may express their approval in writing or by proxy. Any resolution must be approved by unit owners holding a majority of the voting rights and by Mortgagees to the extent required by the Declaration, except that (a) any provision of these Bylaws that is also contained in the Declaration must be approved by the same voting requirement for amendment of such provision of the Declaration, and (b) any amendment relating to age restrictions, pet restrictions, limitations on the number of persons who may occupy units, or limitations on the rental or leasing of units must be approved by unit owners holding 75 percent of the voting rights. Declarant's consent shall also be required for a period of 10 years from the date of closing of the sale of the last unit by Declarant to a person other than a successor declarant or Declarant Member. Any amendment to these Bylaws adversely and materially affecting the Commercial Units shall require the written consent of a majority of the owners of the Commercial Units; any amendment to these Bylaws adversely and materially affecting the Yellow Gate Hangar Units shall require the written consent of a majority of the owners of the Yellow Gate Hangar Units.

9.3 **Regulatory Amendments**. Notwithstanding the provisions of Section 9.2 above, until the turnover meeting as described in Section 2.2 has occurred, Declarant shall have the right to amend these Bylaws in order to comply with the requirements of the Rural Development or the Farm Service Agency of the United States Department of Agriculture; the Federal National Mortgage Association; the Government National Mortgage Association; the Federal Home Mortgage Loan Corporation; any department, bureau, board, commission or agency of the United States or the State of Oregon; or any corporation wholly owned, directly or indirectly by the United States or the State of Oregon that insures, guarantees or provides financing for a condominium or units in a condominium.

9.4 **Execution and Recording**. An amendment shall not be effective until certified by the chairperson and secretary of the Association as being adopted in accordance with these Bylaws and the provisions of the Oregon Condominium Act and recorded as required by law. Any amendment adopted within five years after the recording of the initial Bylaws shall be approved by the Oregon Real Estate Commissioner to the extent required by the Oregon Condominium Act.

Article 10

DISPUTE RESOLUTION

10.1 **Claims Other Than for Defective or Negligent Construction or Condition**. The following provisions of this Section 10.1 shall apply to any claim, controversy or dispute by or among Declarant (including members, officers, directors, shareholders and affiliates of Declarant), the Association, the manager or one or more unit owners, or any of them, arising out of or related to the Declaration, these Bylaws or the Condominium, other than claims relating to defective or negligent construction or condition as provided in Section 10.2 below:

(a) **Mediation**.

(1) Except as otherwise provided in this Section 10.1(a), before initiating litigation, arbitration or an administrative proceeding in which the Association and an owner have an adversarial relationship, the party that intends to initiate litigation, arbitration or an administrative proceeding shall offer to use any dispute resolution program available within Marion County, Oregon, that is in substantial compliance with the standards and guidelines adopted under ORS 36.175. The written offer must be hand-delivered or mailed by certified mail, return receipt requested, to the address, contained in the records of the Association, for the other party.

(2) If the party receiving the offer does not accept the offer within 10 days after receipt by written notice hand-delivered or mailed by certified mail, return receipt requested, to the address, contained in the records of the Association, for the other party, the initiating party may commence the litigation, arbitration or the administrative proceeding. The notice of acceptance of the offer to participate in the program must contain the name, address and telephone number of the body administering the dispute resolution program.

(3) If a qualified dispute resolution program exists within Marion County, Oregon, and an offer to use the program is not made as required under paragraph (1) of this Section 10.1(a), litigation, arbitration or an administrative proceeding may be stayed for 30 days upon a motion of the noninitiating party. If the litigation, arbitration or administrative action is stayed under this paragraph, both parties shall participate in the dispute resolution process.

(4) Unless a stay has been granted under paragraph (3) of this Section 10.1(a), if the dispute resolution process is not completed within 30 days after receipt of the initial offer, the initiating party may commence litigation, arbitration or an administrative proceeding without regard to whether the dispute resolution is completed.

(5) Once made, the decision of the court, arbitrator or administrative body arising from litigation, arbitration or an administrative proceeding may not be set aside on the grounds that an offer to use a dispute resolution program was not made.

(6) The requirements of this Section 10.1(a) do not apply to circumstances in which irreparable harm to a party will occur due to delay or to litigation, arbitration or an administrative proceeding initiated to collect assessments, other than assessments attributable to fines.

(b) **Arbitration**. Any such claim, controversy or dispute shall be first subject to mediation as provided in Section 10.1(a) above or otherwise, and, if not timely settled by mediation, resolved by arbitration in accordance with this Section 10.3 below. The decision and award of the arbitrator shall be final, binding and nonappealable.

(c) **Excluded matters**. Notwithstanding the foregoing, the following matters shall not be subject to mediation or arbitration under this Section 10.1 (but shall be subject to the applicable provisions of Section 10.1(d) below): (i) actions relating to the collection of fees, assessments, fines and other charges imposed or levied by the Association (other than disputes as

to the validity or amount of such fees, assessments, fines or charges, which disputes shall be subject to mediation/arbitration as provided above), and (ii) actions to enforce any order, decision or award rendered by arbitration pursuant to Section 10.3. The filing of a lis pendens or the application to any court for the issuance of any provisional process or similar remedy described in the Oregon or Federal Rules of Civil Procedure shall not constitute a waiver of the right or duty to utilize the procedures specified in this Section 10.1.

(d) **Costs and attorneys' fees**. The fees of any mediator and the costs of mediation shall be divided and paid equally by the parties. Each party shall pay its own attorneys' fees and costs in connection with any mediation. The fees of any arbitrator and the costs of arbitration shall be paid by the nonprevailing party or parties; if none, such fees and costs shall be divided and paid equally by the parties. In any suit or action brought by the Association to foreclose its lien or to collect delinquent assessments or in any suit or action brought by Declarant, the Association or any owner or class of owners to enforce compliance with the terms and provisions of the Oregon Condominium Act, the Declaration or these Bylaws, including all amendments and supplements thereto or any rules or regulations adopted by the Association, the prevailing party shall be entitled to recover reasonable attorney fees and costs and disbursements therein and in any appeal therefrom. The determination of who is the prevailing party and the amount of reasonable attorneys' fees to be paid to the prevailing party shall be decided by the arbitrator (with respect to attorneys' fees incurred prior to and during the arbitration proceeding) and by the court or courts, including any appellate or review court, in which such matter is tried, heard or decided, including a court that hears a request to compel or enjoin arbitration or that hears exceptions made to an arbitration award submitted to it for confirmation as a judgment (with respect to attorneys' fees incurred in such proceedings).

10.2 **Claims for Negligent or Defective Construction or Condition**. The following alternative dispute resolution procedures shall apply to any claim by the Association or any unit owner against Declarant, an Annexation Owner, or their members or managers, or any contractor, subcontractor, supplier, consultant or design professional of every tier performing any work or services in connection with the Condominium, and their agents, brokers, successors, employees, representatives, officers, directors, managers and members, and any of their insurers and reinsurers, related to the design, construction or condition of the Condominium, including, but not limited to, claims for defective or negligent construction or design or failure to disclose a defective condition.

(a) **Initial dispute resolution procedures**. In the event of a claim for a construction defect governed by ORS 701.560 to 701.595, the parties shall first comply with the provisions contained therein. In the event the claim is not for a construction defect governed by such provisions, but relates to a claimed defect in the condition of the project, the parties shall follow the same procedures as set forth in such provisions, except that the notice of defect shall include a statement of the basis on which the recipient is claimed to be liable for the defect. Compliance with the procedures contained in this Section 10.2(a) shall be a condition precedent to mediation, arbitration or litigation of any such claims.

(b) **Mediation**. If the initial dispute resolution proceedings under Section 10.2(a) do not resolve the claims, the parties shall then engage in mediation to resolve the claims. The fees of any mediator and the costs of mediation shall be divided and paid equally by the

parties. Each party shall pay its own attorneys' fees and costs in connection with any mediation. Completion of the mediation process under this section shall be a condition precedent to the filing of any arbitration or litigation proceedings or any claims relating to the matter with the Oregon Construction Contractors Board, and the Association and unit owners waive any right to file any such claims if the Association and unit owners have not fully complied with this Section 10.2(b). The mediation shall be conducted in accordance with the following procedures:

(1) Within 60 days after completion of the proceedings under Section 10.2(a) and delivery of a demand for mediation by one of the parties to the other parties, the parties shall agree on a neutral mediator. If the parties are unable to agree on a mediator within that period, upon application of any party, the presiding judge of the Circuit Court of Marion County, Oregon, shall designate the mediator.

(2) Within 60 days after delivery of the demand for mediation, the parties shall exchange with each other all inspection and consultant's reports in their possession pertaining to the claims.

(3) The parties shall have 90 days after exchanging reports in which to perform additional inspections. Any additional reports resulting from such inspections shall be furnished to the other parties prior to mediation.

(4) The mediation shall be conducted after completing parts (1) through (3) above, but within 180 days following delivery of the demand for mediation. The mediator may elect to adjourn the mediation to additional sessions if the mediator determines that further sessions would be beneficial in resolving the disputes.

(5) Each party shall send to the mediation a representative with authority to settle the dispute and will attempt in good faith to resolve all disputes in the mediation.

(6) Any settlement agreed on in mediation shall be documented and executed within 60 days following completion of the mediation.

(c) **Arbitration**. All claims that have not been resolved by mediation shall be resolved by arbitration in accordance with Section 10.3 below. The decision and award of the arbitrator shall be final, binding and nonappealable.

(d) **Third parties**. Upon demand by any party, claims between or among the parties and third parties shall be submitted in a single, consolidated arbitration. Notwithstanding the provisions of Section 10.2(c) above, if any claim involves a claim by either party against a third party who is not required to and does not voluntarily agree to submit such claim to arbitration, then either party may elect to have the claim and the third party claim determined by a court of law in a consolidated proceeding, rather than by arbitration. In such case, the parties waive trial by jury and agree that the matter shall be determined by a judge sitting without a jury.

(e) **Attorneys' fees**. Except to the extent otherwise provided by law, in the event of any claim determined by arbitration or by a court of law under Sections 10.2(c) or 10.2(d) above, each party shall bear its own costs, including, without limitation, filing fees,

attorney's fees, investigation expenses, consultant's fees and expert's fees. The other costs of arbitration and other court costs shall be divided and paid equally by the parties. To the extent permitted by law, statutory attorney's fees under the Unlawful Trade Practices Act or any other applicable statute are hereby waived.

(f) **Confidentiality**. The parties shall keep all discussions of disputes, settlements and arbitration awards and decisions confidential and shall not disclose any such information, whether directly or indirectly, to any third parties other than their attorneys and consultants, unless compelled to do so by an order of a court of competent jurisdiction. In the event of a breach of this confidentiality obligation, the other party shall be entitled to seek and obtain any and all equitable remedies, including injunctive relief and specific performance, and the breaching party waives any claim or defense that the other party has an adequate remedy at law for any such breach, and such party shall not be required to post any bond or other security in connection with any such equitable relief.

(g) **Time periods within which claims must be asserted**. Any claims under this Section 10.2, including, without limitation allegations of property damage or personal injury claims arising out of fungus, spores, or mold, any water intrusion or dampness, or otherwise, regardless of the legal theory or basis of alleged causation, including but not limited to, negligence, professional errors or omissions, strict liability or breach of contract, must be commenced under Section 10.2(a) above within 90 days after the date the Association or the unit owner knew or reasonably should have known of facts sufficient to put them on notice of the claim, **or if earlier**, with respect to the unit and related limited common elements, by no later than the first anniversary of the closing date of the sale of the unit to the first purchaser or, with respect to the general common elements, within 90 days after the date of the turnover meeting as described in Section 2.2 of these Bylaws. Any arbitration or litigation based upon such claims must be instituted within 90 days after completion of the mediation proceedings under Section 10.2(b), or if shorter, the applicable statute of limitations. Any and all such claims not brought within these time periods will be deemed time barred, regardless of when the Association or unit owners actually discovered the alleged basis for the claim.

10.3 **Arbitration**. Any arbitration under these Bylaws shall be conducted in Clackamas or Marion County, or such other location as may be agreed upon by the parties, pursuant to the arbitration statutes of the State of Oregon and any arbitration award may be enforced by any court with jurisdiction. Filing for arbitration shall be treated the same as filing in court for purposes of meeting any applicable statute of limitations or for purposes of filing a notice of pending action ("lis pendens").

(a) **Selection of arbitrator**. The arbitration shall be conducted by a single arbitrator selected by mutual agreement of the parties. The arbitrator selected shall be neutral and unbiased, except to the extent that the arbitrator's prior relationship with any party is fully disclosed and consented to by the other party or parties. If the parties are unable to agree on the arbitrator within 30 days after a party's demand for arbitration, upon application of any party, the presiding judge of the Circuit Court of Marion County, Oregon shall designate the arbitrator.

(b) **Consolidated arbitration**. Upon demand by any party, claims between or among the parties and third parties shall be submitted in a single, consolidated arbitration.

Notwithstanding the provisions of Section 10.2(c), if any claim, controversy or dispute involves a claim by either party against a third party who is not required to and does not voluntarily agree to submit such claim to arbitration, then either party may elect to have the matter determined by a court of law in a consolidated proceeding, rather than by arbitration. In such case, the parties hereby waive trial by jury and agree that the matter shall be determined by a judge sitting without a jury.

(c) **Discovery**. The parties to the arbitration shall be entitled to the same discovery that would be available to them in an action in Marion County Circuit Court. The arbitrator shall have all of the authority of the court incidental to such discovery, including without limitation authority to issue orders to produce documents or other materials, to issue orders to appear and submit to deposition, and to impose appropriate sanctions, including, without limitation, award against a party for failure to comply with any order.

(d) **Evidence**. The parties to the arbitration may offer such evidence as they desire and shall produce such additional evidence as the arbitrator deems necessary for an understanding and determination of the dispute. The arbitrator shall determine the admissibility of the evidence offered. All evidence shall be taken in the presence of the arbitrator and all of the parties, unless any of the parties is absent, in default or has waived its right to be present.

10.4 **Survival**. The mediation and arbitration agreements set forth in this Article 10 shall survive the transfer by any party of its interest or involvement in the Condominium and any unit therein and the termination of the Declaration or these Bylaws.

Article 11

MISCELLANEOUS

11.1 **Notices**. All notices to the Association or to the board of directors shall be sent care of the manager, or if there is no manager, to the principal office of the Association or to such other address as the board of directors may designate from time to time. All notices to any unit owner shall be sent to such address as may have been designated by such owner from time to time, in writing, to the board, or, if no address has been designated, then to the owner's unit. In the discretion of the board, any notice, information or other written material required to be given to a unit owner or director under the Declaration or these Bylaws or pursuant to the Oregon Condominium Act, may be given by electronic mail, facsimile or other form of electronic communication acceptable to the board, except for the following notices: failure to pay an assessment; foreclosure of an association lien under ORS 100.405; an action the Association may take against a unit owner; or an offer to use the dispute resolution program under ORS 100.405. A unit owner or director may decline to receive notice by electronic mail, facsimile or other form of electronic communication and may direct the board to provide notice in any other manner permitted under the Declaration or these Bylaws or the Oregon Condominium Act.

11.2 **Waiver**. No restriction, condition, obligation, or provision contained in these Bylaws shall be deemed to have been abrogated or waived by reason of any failure to enforce the same, regardless of the number of violations or breaches thereof which may occur.

11.3 **Action Without a Meeting**. Any action that the Oregon Condominium Act, the Declaration or these Bylaws require or permit the owners or directors to take at a meeting or ballot meeting may be taken without a meeting or ballot meeting if a consent in writing setting forth the action so taken is signed by all the owners or directors entitled to vote on the matter. The consent, which shall have the same effect as a unanimous vote of the owners or directors, shall be filed in the records of minutes of the Association.

11.4 **Invalidity; Number; Captions**. The invalidity of any part of these Bylaws shall not impair or affect in any manner the validity, enforceability or effect of the balance of these Bylaws. As used in these Bylaws, the singular shall include the plural, and the plural the singular. The masculine and neuter shall each include the masculine, feminine and neuter, as the context requires. All captions are intended solely for convenience of reference and shall in no way limit any of the provisions of these Bylaws.

11.5 **Conflicts**. These Bylaws are intended to comply with the Oregon Condominium Act and the Declaration. In case of any irreconcilable conflict, such statute and document shall control over these Bylaws or any rules and regulations adopted hereunder.

YELLOW GATE CORPORATE HANGARS LLC,
an Oregon limited liability company

By: _____
Name: _____
Title: _____

REEL: 3581 **PAGE: 83**

February 10, 2014, 09:38 am.

CONTROL #: 355454

State of Oregon
County of Marion

I hereby certify that the attached instrument was received and duly recorded by me in Marion County records:

FEE: $ 446.00

BILL BURGESS
COUNTY CLERK

THIS IS NOT AN INVOICE.

Marion County
OREGON

PUBLIC WORKS

BOARD OF COMMISSIONERS
Sam Brentano
Janet Carlson
Patti Milne

DIRECTOR
Bill Worcester, P.E.

ADMINISTRATION

BUILDING INSPECTION

DOG CONTROL

EMERGENCY MANAGEMENT

ENGINEERING

ENVIRONMENTAL SERVICES

OPERATIONS

PARKS

PLANNING

SURVEY

MEMORANDUM

TO: Marion County Hearings Officer

FROM: Marion County Planning Division/Reich

SUBJECT: Zone Change/Comprehensive Plan/Conditional Use
Case 09-5/US Leaseco Inc.

DATE: May 12, 2009

The Marion County Planning Division has reviewed the above named case and offers the following comments:

FACTS:

1. The subject property consists of 2 tax lots containing a total of 27.48 acres designated Primary Agriculture in the Marion County Comprehensive Plan (MCCP) and zoned EFU (EXCLUSIVE FARM USE) in the Marion County Rural Zoning Ordinance (MCRZO).

2. The properties are located at the northwest corner of Keil Road and Airport Road and consist of tax lot 400 (T04; R1W; S12B) and tax lot 100 (T04; R1W; S11A). Each of the two tax lots contains a dwelling, wells, septic systems, and accessory structures. Based on previous land use decisions and building permit approvals, the tax lots are considered legal parcels for land use purposes.

3. Surrounding properties to the east, south, and north are zoned EFU and consist of various sized parcels in farm use. A religious retreat facility borders to the north. Property to the west is zoned P and in use as Aurora State Airport.

4. The applicants are requesting to change the Comprehensive Plan designation from Primary Agriculture to Public, to change the zone from EFU (EXCLUSIVE FARM USE) to P (PUBLIC) and for a conditional use to establish airport related commercial and industrial uses on the newly zoned property.

5. Marion County Tax Office provided information on the tax status of the properties.

City of Aurora comments on the agricultural designation of the lands, concerns of the septic system affecting wells in the area, roadway traffic, and the applicant's Goal 14 exception reasons.

All other contacted agencies contacted either failed to respond or stated no objection to the proposal at the time this report was written.

In addition to other agencies' comments, comments were received from interested persons at and near the airport. These comments expressed concerns over air traffic, noise, development on high-value soils, traffic, lack of a tower at the airport, stormwater runoff, and whether the criteria for goal exceptions is met.

STAFF FINDINGS AND ANALYSIS:

6. In land use actions of this type, the applicants have the burden of proving all applicable standards and criteria are met. This report will outline the standards and criteria that must be satisfied in order for an approval to be granted. If the applicants supplied argument or evidence to address specific criteria, their response will be summarized.

GOAL 14 EXCEPTION:

7. The applicants are requesting to change the Comprehensive Plan designation from Primary Agriculture to Public and to change the zoning from EFU (Exclusive Farm Use) to P (Public). Land use applications of this nature must be consistent with Statewide Planning Goals. In this specific case, Statewide Planning Goal 3—Agriculture and Goal 14—Urbanization pertain to the proposal, and an exception to these goals must be obtained in order for the proposed change to be approved.

The mechanism for not applying a specific goal, in this case the agricultural lands goal and the urbanization goal is the goal exception process. The process requires specific findings justifying why lands are not available for resource use. There are three types of exceptions that can be made: physically developed, irrevocably committed and reasons. In this instance the applicants indicate that they are requesting a reasons exceptions to the goals.

8. Goal exceptions are governed by Statewide Planning Goal 2 and implemented by OAR 660-004. Planning and zoning for exception areas is governed by OAR 660-04-018, which states:

(1) Purpose. This rule explains the requirements for adoption of plan and zone designations for exceptions. Exceptions to one goal or portion of a one goal do not relieve a jurisdiction from the remaining goal requirements and to not authorize uses, densities, public facilities and services, or activities other than those recognized or justified by the applicable exception. Physically developed or

irrevocably committed exceptions under OAR 660-004-0025 and 660-004-028 are intended to recognize and allow continuation of existing types of development in the exception area. Adoption of plan and zoning provisions that allow changes in existing types of uses, densities, or services requires the application of the standards outlined in this rule.

(4) Reasons Exceptions:

(a) When a local government takes an exception under the "Reasons" section of ORS 197.732(1)(c) and OAR 660-004-0020 through 660-004-0022, plan and zone designations must limit the uses, density, public facilities and services, and activities to only those that are justified in the exception;

(b) When a local government changes the types or intensities of uses or public facilities and services within an area approved as a "Reasons" exception, a new Reasons exception is required.

9. OAR 660-014-0040 establishes a specific set of criteria for an exception to Goal 14 to permit the establishment of new urban development on undeveloped rural lands:

(1) As used in this rule, "undeveloped rural land" includes all land outside of acknowledged urban growth boundaries except for rural areas committed to urban development. This definition includes all resource and nonresource lands outside of urban growth boundaries. It also includes those lands subject to built and committed exceptions to Goals 3 or 4 but not developed at urban density or committed to urban level development.

The property is outside any urban growth boundary on rural land. An exception to Goal 3 is requested, also, as part of this request, but not required to approve an exception to Goal 14.

(2) A county can justify an exception to Goal 14 to allow establishment of new urban development on undeveloped rural land. Reasons that can justify why the policies in Goals 3, 4, 11 and 14 should not apply can include but are not limited to findings that an urban population and urban levels of facilities and services are necessary to support an economic activity that is dependent upon an adjacent or nearby natural resource.

The applicants argue that economically, this location next to the airport is under the ownership of the applicant, is situated next to suppliers of goods and services they use, concentrates airport related businesses in one area, and contributes to the economic activity in the region.

Staff would also point out that the existing airport is a quasi-urban use, having been found as to be an "urban public facility" in Murray et al. v. Marion County, 23 OR LUBA 268 (1992). Also, airports tend to be located away from, or on the periphery

of, urban land. Therefore, it would not be unusual to find an airport providing a more urban level of development on rural land.

(3) To approve an exception under section (2) of this rule, a county must also show:

(a) That Goal 2, Part II (c)(1) and (c)(2) are met by showing that the proposed urban development cannot be reasonably accommodated in or through expansion of existing urban growth boundaries or by intensification of development in existing rural communities;

The applicant points out that the airport and surrounding property zoned public was originally intended to be included in the Aurora Comprehensive Plan, but that the city was unable to justify that amount of industrial/commercial land. It also wouldn't be reasonable to extend the existing UGB to the airport because of intervening resource land. Since the business depends on air traffic for its operation, it must be located at an airport. No other rural communities (such as Brooks, Mehama, Labish Village, etc.) have an airport. Adding air traffic to an existing rural community would greatly intensify the use; therefore, development of this use in a rural community would not be practical.

(b) That Goal 2, Part II (c)(3) is met by showing that the long-term environmental, economic, social and energy consequences resulting from urban development at the proposed site with measures designed to reduce adverse impacts are not significantly more adverse than would typically result from the same proposal being located on other undeveloped rural lands, considering:

(A) Whether the amount of land included within the boundaries of the proposed urban development is appropriate, and

(B) Whether urban development is limited by the air, water, energy and land resources at or available to the proposed site, and whether urban development at the proposed site will adversely affect the air, water, energy and land resources of the surrounding area.

According to the applicant, the amount of land needed for the use includes outdoor storage, parking, and access areas, as well as well and septic facilities. Due to the size of the equipment worked on, a large structure is also necessary: 120,000 square feet. The applicant points out that the 2000 Aurora State Airport Master Plan references the need for additional fixed based operators, of which this use would be one. This use would also help provide some of the need for services and aircraft at the airport identified in the master plan. The applicant has provided evidence that the property can be adequately serviced by rural facilities, such as a well and septic system. The rural transportation system should be adequate to handle the additional

traffic introduced by the proposed development. The Public zone requires a Traffic Impact Analysis for each new use established at the airport. It can be made a condition of the conditional use portion of this application that the applicant provide evidence that the use will not adversely impact the traffic facilities in the area, or that any impacts can be adequately mitigated.

In addition, staff would point out that the consequences of establishing this use on other undeveloped rural lands could be far more significant that establishing it in proximity to an existing airport. Aurora Airport offers an existing runway for aircraft and roadway surfaces for parking, hanger storage, and access to surrounding roads that other rural lands would not offer. Also, the airport is able to better control aircraft approach patterns and noise having all the aircraft activity concentrated at one location than if it existed on various undeveloped rural parcels. Locating adjacent to the existing airport significantly reduces the environmental, economic, social and energy consequences that would result if this use were established on other undeveloped rural land away from the airport. Since rural services will be able to be adequately established on the property, there should be no impact to water resources. Surrounding landowners will be able to continue the use of their properties, predominately farming, as they have next to the existing airport in the past. The energy savings are significant over locating on other undeveloped rural land. Although the air resource in the area will not necessarily be impacted, the noise from the use may impact surrounding uses. However, since the airport use of this parcel is next to the existing airport, the noise impacts would be centered at and approaching the airport. The addition of 27 acres of land in airport use to the existing 271 acres of airport should not significantly increase the impact of noise on neighbors to the airport. In addition, any commercial or industrial airport related used would have to be approved as conditional uses in the Public zone and compatibility with surrounding uses would have to be ensured through that process.

(c) That Goal 2, Part II (c)(4) is met by showing that the proposed urban uses are compatible with adjacent uses or will be so rendered through measures designed to reduce adverse impacts considering:

(A) Whether urban development at the proposed site detracts from the ability of existing cities and service districts to provide services; and

(B) Whether the potential for continued resource management of land at present levels surrounding and nearby the site proposed for urban development is assured.

Existing cities and service districts will not have to provide services to the newly zoned area. The property may connect to the existing fire suppression

district at the airport, but does not have to; it can provide its own fire suppression consistent with the requirements of the Oregon Fire Marshall and Aurora Fire Department. The applicants have provided an analysis of traffic that determines the roadways surrounding the property are adequate to handle additional traffic of uses allowed in the Public zone. The airport has not had a significant impact on the ability of surrounding lands to be farmed since the inception of the airport in 1943. Staff would point out that large parcel, open space uses, such as agricultural uses, surrounding an airport are preferred over more densely populated uses because of safety concerns.

(d) That an appropriate level of public facilities and services are likely to be provided in a timely and efficient manner; and

The property will depend entirely on rural services; no urban facilities will be required.

(e) That establishment of an urban growth boundary for a newly incorporated city or establishment of new urban development on undeveloped rural land is coordinated with comprehensive plans of affected jurisdictions and consistent with plans that control the area proposed for new urban development.

Demonstration of the proposed rezoning with the goals and policies of the Marion County Comprehensive Plan will be evaluated later in this report. The applicant points out that the proposal is consistent with the state master plans for the airport.

10. Based on the above discussion, staff determined that the proposal meets the requirements for an exception to Goal 14 and that it would be appropriate to locate this level of urban development at this location.

GOAL 3 EXCEPTION

11. In addition to meeting the requirements for an exception to Goal 14, the applicant must demonstrate that an exception go Goal 3 is appropriate. The "reasons" exception process is outlined in OAR 660-004-0018 (4), 660-004-0020 (2) and 660-004-0022 (1):

OAR 660-004-0018 (4):

(a) When a local government takes an exception under the "Reasons" section of ORS 197.732(1)(c) and OAR 660-004-0020 through 660-004-0022, plan and zone designations must limit the uses, density, public facilities and services, and activities to only those that are justified in the exception;

(b) When a local government changes the types or intensities of uses or public facilities and services within an area approved as a "Reasons" exception, a new "Reasons" exception is required;

The request is to rezone the property to Public to accommodate airport and airport related uses. It can be made a condition of the zone change that other urban types uses not be permitted without a new goal exception.

660-004-0020 (2)

(2) The four factors in Goal 2 Part II(c) required to be addressed when taking an exception to a Goal are:

(a) "Reasons justify why the state policy embodied in the applicable goals should not apply": The exception shall set forth the facts and assumptions used as the basis for determining that a state policy embodied in a goal should not apply to specific properties or situations including the amount of land for the use being planned and why the use requires a location on resource land;

The applicant argues that some of the facts and evidence were already presented as part of the Goal 14 exception.

(b) "Areas which do not require a new exception cannot reasonably accommodate the use":

The applicant argues that the site adjacent to the Aurora Airport features a "unique combination of attributes not found on any other property in the region." Among these attributes are being located next to an existing airport, being near service and parts providers for the business, being located in an area with a concentration of other airport suppliers to and customers of the business, being located near the resource pool of potential employees of the business, good access to surrounding roads, and access to the airport runway via "through the fence" operations. Also, the proposed location minimizes the impact on residential, commercial or industrial uses that would otherwise experience a significant impact if this use were located in nearby cities or on undeveloped rural land away from the airport.

(c) The long-term environmental, economic, social and energy consequences resulting from the use at the proposed site with measures designed to reduce adverse impacts are not significantly more adverse than would typically result from the same proposal being located in other areas requiring a Goal exception [remainder of section not reproduced in this report].

Among the other sites analyzed by the applicant to locate this business, were other farm properties adjacent to the airport. Other farm properties are being more intensely farmed than the subject property, or contain large amounts of native stands of timber that would have to be removed, at a significant cost to energy resources. The existing location is directed away from surrounding residential uses as much as possible and is buffered from other uses in the area by adjacent roads. Other locations in the state were also considered by the applicant, but only Aurora offered the best mix of customers, suppliers, and employees necessary for the business to operate. Staff notes that, as mentioned in the Goal 14 exception discussion, locating the proposed use elsewhere could have significant impacts on surrounding uses and on energy, environmental, land and other resources. These impacts are minimized by locating the use on this property.

(d) "The proposed uses are compatible with other adjacent uses or will be so rendered through measures designed to reduce adverse impacts". The exception shall describe how the proposed use will be rendered compatible with adjacent land uses. The exception shall demonstrate that the proposed use is situated in such a manner as to be compatible with surrounding natural resources and resource management or production practices. "Compatible" is not intended as an absolute term meaning no interference or adverse impacts of any type with adjacent uses.

The applicant argues that the Aurora Airport was established in 1943 and has been compatible with surrounding uses since then. The small amount of expansion should not significant increase the impact on surrounding land uses or render the airport not compatible with surrounding uses. Portions of the property that are not developed at this time would remain in agricultural use until such time as they are developed, and the appropriate conditional use applications are approved.

Staff would point out that the airport is not always compatible with surrounding uses. Sometimes, agricultural practices, or surrounding water impoundments, attract birds, which pose a severe threat to planes taking off and landing at the airport. Also, use of the airport has impacted residences with the impacts of noise and over flight patterns. While a tower would lessen the impact to neighboring property owners by controlling the approach and takeoff patterns and an instrumentation approach would minimize the noise of aircraft by modifying the angles of approach, these have not yet been constructed at the airport. While the airport works with pilots to voluntarily reduce their impact on surrounding land uses, there are no regulations the county can enforce regarding flight patterns since air traffic at this airport is regulated by the Federal Aviation Administration and there are no structural efforts in place (such as a tower or instrumentation approach) to minimize the impact on surrounding land use. The county does apply an Airport Safety Overlay Zone, which applies safety

standards to airspace surrounding and approaching the airport. While the existing airport may not be entirely compatible with surrounding uses, the impact of this additional 27 acres should not significantly increase the impact on surrounding uses or render the airport incompatible with surrounding uses.

660-004-0022 (1)

An exception Under Goal 2, Part II(c) can be taken for any use not allowed by the applicable goal(s). The types of reasons that may or may not be used to justify certain types of uses not allowed on resource lands are set forth in the following sections of this rule:

(1) For uses not specifically provided for in subsequent sections of this rule or in OAR 660-012-0070 or chapter 660, division 14, the reasons shall justify why the state policy embodied in the applicable goals should not apply. Such reasons include but are not limited to the following:

(a) There is a demonstrated need for the proposed use or activity, based on one or more of the requirements of Goals 3 to 19; and either

(b) A resource upon which the proposed use or activity is dependent can be reasonably obtained only at the proposed exception site and the use or activity requires a location near the resource. An exception based on this subsection must include an analysis of the market area to be served by the proposed use or activity. That analysis must demonstrate that the proposed exception site is the only one within that market area at which the resource depended upon can reasonably be obtained; or

(c) The proposed use or activity has special features or qualities that necessitate its location on or near the proposed exception site.

The applicant, while not addressing these criteria specifically, provides evidence that there is a need for additional airport and airport related uses at the Aurora Airport and that the proposed use is dependent on being located at Aurora Airport, not other exception land, rural land, or land inside cities away from the economic activity at the airport. The applicant addresses the special features and qualities that necessitate the location of the proposed exception site on this property.

12. Based on the above discussion, the applicant meets the criteria for a goal exception to Goal 3—Agricultural Lands on the subject property.

13. The applicant provides an analysis of how the other statewide planning goals are met by the proposal, aside from Goals 3 and 14, for which exceptions are taken as part of this application.

COMPREHENSIVE PLAN AMENDMENT

14. All Comprehensive Plan changes are subject to review by the State Department of Land Conservation and Development (DLCD). The DLCD was notified as required by State Law and has not commented prior to this report being prepared.

15. The MCCP establishes procedures to be used when considering plan amendments. Plan changes directly involving 5 or fewer properties will be considered a quasi-judicial amendment. The amendment will be reviewed by the zone change procedures established in the MCRZO. A plan amendment of this type may be processed simultaneously with a zone change request with the zone change procedure outlined in Chapter 123 of the MCRZO.

16. The MCCP does not contain specific review criteria for plan amendments, however, any amendment must be consistent with its applicable goals and policies. The policies that need to be addressed by applicant include:

Agricultural Land Policy #2: Maintain primary agricultural lands in the largest areas with large tract to encourage larger scale commercial agricultural production.

Although the applicant has requested an exception to Goal 3, the applicant points out that the property is not as conductive to farming as other parcels in Marion County. It is 27 acres, smaller than the minimum parcel size in the EFU zone and is bordered by roads on two sides and the airport on one site, not allowing the property to be expanded or easily farmed with another adjacent parcel.

Agricultural Land Policy #3: Discourage development of non-farm uses on high value farmland and ensure that if such uses are allowed that they do no cause adverse impacts on farm uses.

As discussed earlier under the Goal 3 and 14 exceptions, the non-farm use of the proposed parcel will not have an adverse impact on surrounding farm uses.

Rural Service Policies:

1. The impact on existing services and the potential need for additional facilities should be evaluated when rural development is proposed.

2. It is the intent of Marion County to maintain the rural character of the areas outside of urban growth boundaries by only allowing those uses that do not increase the potential for urban services.

3. Only services necessary to accommodate planned rural uses should be provided unless it can be shown that the proposed service will not encourage development inconsistent with the rural density and character of the area. These uses would encourage inconsistent development in the adjoining rural area.

4. The sizing of public or private service facilities shall be based on maintaining the rural character of the area.

The applicant has demonstrated that the use would be dependent solely on rural services. Provision of the necessary services to serve the property developed with airport and airport related uses would not encourage development inconsistent with the rural density and character of the area or encourage development of the adjoining rural area. It has already been demonstrated that the proposed use adjacent to the airport is consistent with those airport uses. The Public zone has provisions to ensure that newly proposed uses have adequate transportation and septic facilities in place prior to development.

Air, Rail, Water, Energy and Pipeline Transportation Policies #1: Airports and airstrips shall be located in areas that are safe for air operations and should be compatible with surrounding uses.

The applicant argues that the airport has been in operation since 1943 and has proven during that time to be a safe location for an airport. The airport overlay zone is applied to the property and surrounding properties to ensure the continued safe operation of the airport. Surrounding uses are predominately agricultural operations. The low density development at the airport has ensured it stay reliant on rural services only. The proposal is not for a new airport, but to expand an existing airport operation that has a proven safety record. The proposed expansion would be compatible with surrounding uses, as described elsewhere in this report.

Right-Of-Way Policies #2: New transportation facilities of all types should use existing rights-of-way to the extent possible to minimize disruption to existing land use.

The property would use existing roadways for access to the parcel.

Economic Development Goals:

a. Provision of increased employment opportunities for all residents of the County;
b. Maintenance of a strong agricultural economy;
d. Diversification of the economic base of communities, and expansion of seasonal employment opportunities to year-round status wherever possible;
e. Provision of sufficient areas for future industrial land use;
f. Development of a transportation system for the safe and efficient movement of persons and goods for present needs;
g. Coordination of planning and development of public facilities;
h. Development of a strong tourist economy in appropriate areas;
i. Achievement of a natural resource use pattern that provides for tomorrow's needs, today's needs and the protection of the environment.

The applicant argues that the economic impacts of the proposed use would further the economic development goals in the Marion County Comprehensive Plan, while not significantly affecting the agricultural economy. The use would augment the

existing transportation system by utilizing the airport runway for additional commercial and industrial uses.

17. Based on the above discussion, the proposal is consistent with the applicable goals and policies contained in the Marion County Comprehensive Plan.

ZONE CHANGE

18. The applicant identified and addressed zone change criteria outlined in the Marion County Rural Zoning Ordinance Chapter 123.060. The criteria that apply in this instance are:

    (a) The proposed zone is appropriate for the Comprehensive Plan land use designation on the property and is consistent with the goals and policies of the Comprehensive Plan and the description and policies for the applicable land use classification in the Comprehensive Plan; and

    (b) The proposed change is appropriate considering the surrounding land uses and the density and pattern of development in the area; and

    (c) Adequate public facilities, services, and transportation networks are in place, or are planned to be provided concurrently with the development of the property; and

    (d) The other lands in the County already designated for the proposed use are either unavailable or not as well suited for the anticipated uses due to location, size or other factors; and

    (e) If the proposed zone allows uses more intensive than uses in other zones appropriate for the land use designation, the new zone will not allow uses that would significantly adversely affect allowed uses on adjacent properties zoned for less intensive uses.

19. The P (Public) zone is the only zone that implements the Public designation. That this zone and designation is consistent with the goal and policies of the Comprehensive Plan has been demonstrated elsewhere in this report. It has been demonstrated that the proposed use is compatible with surrounding uses and consistent with the pattern of development in the area (adjacent to an existing airport). The property would rely on rural facilities and not require any urban facilities. There are no other lands in Marion County designated Public which are near an airport and could accommodate this use. No other zone implements the Public designation. The proposal meets the criteria for a zone change.

CONDITIONAL USE

20. The applicant is also applied for a conditional for airport related commercial and industrial uses in the Public zone. The criteria that apply to this are found in Chapter 119.070 of the Marion County Rural Zoning Ordinance:

(a) That it has the power to grant the conditional use;

(b) That such conditional use, as described by the applicant, will be in harmony with the purpose and intent of the zone;

(c) That any condition imposed is necessary for the public health, safety or welfare, or to protect the health or safety of persons working or residing in the area, or for the protection of property or improvements in the neighborhood.

20. The conditional use is dependent on the comprehensive plan change and zone change. Only the Board of Commissioners can grant a comprehensive plan change; therefore, only the Board can grant the conditional use in this case. As has been demonstrated previously, the proposed use is appropriate in the P zone and will be compatible with surrounding uses. It will be determined below whether the proposal meets the criteria for development in the Public zone. Any condition imposed will be necessary for the public health, safety or welfare, or to protect the health or safety of persons working or residing in the area, or for the protection of property or improvements in the neighborhood. The proposal meets the criteria for a conditional use.

PUBLIC ZONE

21. The Public zone contains criteria regarding the scale of commercial uses and property development standards that also must be satisfied by this proposal. The criteria that apply to this are found in Chapter 171.040 and 171.060 of the Marion County Rural Zoning Ordinance:

SCALE OF COMMERCIAL USES:

(A) New commercial uses in conjunction with public uses may be established up to a maximum of 3,500 square feet of floor area.

(B) Lawfully established commercial uses existing as of the date of adoption of this ordinance may be expanded up to 3,500 square feet of floor area, or an additional 25% of the floor area that existed as of the date of adoption of this ordinance, whichever is greater.

(C) Airport related uses located at the Aurora Airport are not subject to the size limitations in (A) and (B) of this section.

(D) Except as established in (B), for a commercial use to exceed the square foot limitations requires taking an exception to Goal 14. Such exception shall be processed as an amendment to the Marion County Comprehensive Plan.

The county has previously taken an exception to Goal 14 to permit development of uses at the Aurora Airport and surrounding land zoned Public to exceed the size limitations in the Public zone. This exception was taken because of the large existing sizes of development at the airport (such as hangars, aircraft storage, aircraft maintenance facilities, etc.). These uses tend to be larger than the size limits because aircraft are large and require large open areas around them for safe storage, repair and operation. No size limits apply to the proposed development consistent with 171.040(C) above.

PROPERTY DEVELOPMENT STANDARDS:

(A) HEIGHT. No building or structure in a P zone shall exceed 6 stories or 70 feet, provided that buildings or structures shall set back from every street and lot line 1 foot for each foot of height of the building in excess of 35 feet in addition to all other yard and setback requirements herein specified.

(B) FRONT YARD. Front yard shall be a minimum of 20 feet. No parking shall be permitted within the minimum front yard area.

(C) SIDE YARDS. Where the side of a lot in a P zone abuts upon the side of a lot in any "R" zone, there shall be a minimum side yard of 10 feet. Otherwise there shall be no minimum side yard setback. Where the side of a lot abuts upon a street there shall be a minimum side yard of 20 feet wherein no parking shall be permitted.

(D) REAR YARD. In a P zone there shall be a rear yard that shall have a minimum depth of 30 feet.

(E) LOT AREA AND COVERAGE. The minimum requirements in P zones for dwellings shall be 1 acre except 6,000 square feet inside an unincorporated community boundary where public sewer and water service is provided. No main building, including dwellings, shall occupy more than 30% of the lot area.

(F) OPEN STORAGE.

(1) All yard areas, exclusive of those required to be landscaped as provided in Section 171.060 (G), may be used for materials and equipment storage areas related to a use permitted in the P zone, provided such area is screened so it cannot be seen from public roads, or from dwellings on property in other zones.

(2) The surface of open storage areas, including automobile and truck parking area shall be paved or graveled and maintained at all times in a dust-free condition.

(G) LANDSCAPING. The area within 20 feet of a street shall be landscaped. As a condition of approval for a conditional use additional landscaping may be required if necessary to make the use compatible with the area.

(H) PERFORMANCE STANDARDS. No land or structure shall be used or occupied unless maintained and operated in continuing compliance with all applicable standards adopted by the Oregon Department of Environmental Quality.

(I) SEWAGE DISPOSAL. Demonstrate that the development will not exceed the existing carrying capacity of the local sewage disposal system or has an on-site sewage disposal site approved by Marion County or the Department of Environmental Quality.

(J) TRAFFIC ANALYSIS. Demonstrate that the development will be consistent with the identified function, capacity, and level of service of transportation facilities serving the site. A transportation impact analysis, approved by the Marion County Department of Public Works, may be required prior to building permit approval.

The standards in 171.060 (A) through (G) would be applied during the permitting process for any structure on the property and a site plan demonstrating compliance with the standards can be made a condition of any approval. Demonstration of the standards in (H) through (J) can be made a condition of any approval.

CONCLUSION

22. Based on the above discussion, the applicant had demonstrated that exceptions to Goals 3 and 14 should be approved, that other Statewide Land Use Goals are satisfied by the proposal, that the goals and policies contained in the Marion County Comprehensive Plan are met by the proposal, that the criteria for a zone change and conditional use are satisfied, and that the standards in the Public zone can be complied with consistent with conditions of approval. Staff recommends the Hearings Officer approve the Comprehensive Plan/Zone Change/Conditional Use as described.

23. If the request is approved, the following are recommended conditions for this proposal:

1. Prior to issuance of building permits, the applicant shall provide a Transportation Impact Analysis meeting the approval of Marion County Public Works.

2. Prior to issuance of building permits, the applicant shall provide a site plan demonstrating compliance with the development standards in the Public zone.

3. Prior to issuance of building permits, the applicant shall provide evidence of compliance with Oregon Department of Environmental Quality standards.

4. Prior to issuance of building permits, the applicant shall provide evidence of an approved fire suppression system by either the State Fire Marshall or Aurora Fire District.

5. Prior to issuance of building permits, the applicant shall provide evidence of adequate on-site sewage disposal.

6. Prior to issuance of building permits, the applicants shall sign and submit a Farm/Forest Declaratory Statement to the Planning Division for each parcel. The applicant shall record this statement with the Marion County Clerk after it has been reviewed and signed by the Planning Director.

7. The comprehensive plan/zone change is approved for airport and airport related uses only. All other uses in the Public zone would require a new goal exception and justification for that use.

EXHIBIT M

**BEFORE THE BOARD OF COMMISSIONERS
FOR MARION COUNTY, OREGON**

In the Matter of the	)	Case No. ZC/CP/CU09-005
	)	
Application of:	)	Clerk's File No. 5636
	)	
US Leaseco, Inc.	)	

AN ADMINISTRATIVE ORDINANCE

ORDINANCE NO. 1303

THE MARION COUNTY BOARD OF COMMISSIONERS HEREBY ORDAINS AS FOLLOWS:

SECTION I. Purpose

This matter comes before the Marion County Board of Commissioners ("Board") on the application of US Leaseco, Inc, to change the zone from EFU (Exclusive Farm Use) to P (Public), to change the Comprehensive Plan designation from Primary Agriculture to Public, to take exceptions to Statewide Planning Goal 3 (Agricultural Lands) and Goal 14 (Urbanization), and for a conditional use for airport related uses on 27.48 acres located at 14497 Keil Road NE and 22265 Airport Road NE, Aurora, Oregon. [T4S, R1W, (Section 11A, tax lot 100) and (Section 12B, tax lot 400).

SECTION II. Procedural History

The Marion County Hearings Officer held a duly noticed public hearing on this application on June 3, 2009. Mailed notice was provided to all property owners within 750 feet of the subject property at least 20 days before the hearing. On December 1, 2009, the Hearings Officer issued a report recommending the Board grant the request on 15 acres. The Board held a duly noticed public hearing on the application on January 13, 2010. The hearing was closed and record was left open for written testimony until January 27, 2010. At its regular session on February 10, 2010, the Board considered the Panning Division file, the Hearings Officer's recommendation, all arguments of the parties and is otherwise fully advised in the premises.

SECTION III. Adoption of Findings and Conclusion

After careful consideration of all facts and evidence in the record, the Board adopts as its own the Findings of Facts and Conclusions of Law contained in Exhibit A, attached hereto, and by this reference incorporated herein.

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SECTION IV. Action

The requested Comprehensive Plan designation change from Primary Agriculture to Public is hereby **GRANTED.** The requested zone change from (Exclusive Farm Use) to P-LU (Public – Limited Use Overlay) zone and conditional use to operate an airport related use is hereby **GRANTED,** subject to conditions identified in Exhibit B, attached hereto, and by this reference incorporated herein.

The property rezoned by this Ordinance is described in Exhibit C, attached hereto and by this reference incorporated herein. The Official Marion County Zoning Map shall be changed pursuant to the Marion County Zone Code 17.110.660 to reflect the new zoning.

SECTION V. Effective Date

Pursuant to Ordinance 669, this is an Administrative Ordinance and shall take effect 21 days after the adoption and final signatures of the Marion County Board of Commissioners.

SIGNED and FINALIZED this 10th day of March, 2010, at Salem, Oregon.

MARION COUNTY BOARD OF COMMISSIONERS

Janet Carlson
Chair

D. Kim Hulett
Recording Secretary

JUDICIAL NOTICE

Oregon Revised Statutes, Chapter 197.830, provides that land use decisions may be reviewed by the Land Use Board of Appeals by filing a notice of intent to appeal within 21 days from the date this Ordinance becomes final.

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EXHIBIT A

FINDINGS OF FACT AND CONCLUSIONS OF LAW

The Marion County Board of Commissioners, after careful consideration of all the testimony and evidence in the record, makes the following findings of fact and conclusions of law in Planning Case No. ZC/CP/CU 09-005.

1. The subject property consists of two tax lots containing a total of 27.48 acres designated Primary Agriculture in the Marion County Comprehensive Plan (MCCP) and zoned EFU (EXCLUSIVE FARM USE) in the Marion County Rural Zoning Ordinance (MCRZO).

2. The properties are located at the northwest corner of Keil Road and Airport Road and consist of tax lot 400 (T04; R1W; S12B) and tax lot 100 (T04; R1W; S11A). Each of the two tax lots contains a dwelling, wells, septic systems, and accessory structures. Based on previous land use decisions and building permit approvals, the tax lots are considered legal parcels for land use purposes.

3. Surrounding properties to the east, south, and north are zoned EFU and consist of various sized parcels in farm use. A religious retreat facility borders to the north. Property to the west is zoned Public (P) and in use as Aurora State Airport.

4. The Applicant is requesting to change the Comprehensive Plan designation from Primary Agriculture to Public, to change the zone from EFU to P, and for a conditional use to establish airport related commercial and industrial uses on the newly zoned property.

5. Approval of the proposed Zone Change, Comprehensive Plan Change and Conditional Use (ZC/CP/CU) would allow a zone change from EFU to P, a Comprehensive Plan change from Primary Agriculture to Public with an exception to Statewide Planning Goals 3 and 14, and for a conditional use for airport related uses on a 27.48-acre property.

6. The Marion County Planning Division requested comments on the subject application from various governmental agencies and area advisory committee members.

A. **Marion County Department of Public Works (DPW)** reviewed the proposal and indicated that the following requirements address impacts created by approval of the proposed ZC/CP/CU:

STREETS

1. In accordance with Marion County Rural Transportation System Plan (MCRTSP) Section 10.3.5, Policy #10: The number of access points on Arterial and Major Collector roadways shall be kept to a minimum to reduce the interruption to traffic flow and to promote safety. Hence, no new direct access will be permitted to Airport Road. Upon redevelopment of the remainder of the property, the existing accesses serving the private residences shall be closed including drainage ditch lines restored, and access gained through a common access to Keil Road. Based on the Applicant's statement that the proposed facility will be limited to 70 employees, only one access to Keil Road will

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be allowed and shall meet spacing standards. An additional access to Yellow Gate would be acceptable.

2. In accordance with Marion County Ordinance #651, access permits are required for any new access or change in use of the existing access to the public right-of-way. If this ZC/CP/CU is approved, the Applicant will be required to apply for an "Access Permit." Driveways must meet sight distance, design, spacing, and safety standards.

3. SR 551 (Hubbard Cutoff Road NE) in this vicinity is under the jurisdiction of the Oregon Department of Transportation (ODOT). The Applicant shall meet ODOT requirements for traffic analysis, mitigation, etc. It will be the Applicant's responsibility to provide proof that this condition has been met.

4. The traffic from the proposed development may impact the City of Aurora roads. The Applicant shall also meet the City of Aurora's requirements for traffic analysis and mitigation. It will be the Applicant's responsibility to provide proof that this condition has been met.

5. Notwithstanding Public Works requirements for access, the local fire district has authority to require that driveways and private easements either meet fire district standards for access, have a fire sprinkler suppression system installed on any proposed structure, or be approved by waiver of the local fire marshal, prior to the issuance of building permits. The *Marion County Fire Code Applications Guide* also specifies a suitable turnaround area for emergency vehicles for an access in excess of 150 feet in length, and turnouts every 400 feet, as applicable.

6. Chapter 172 of the Marion County Rural Zoning Ordinance requires the Applicant to show sufficient dedicated right-of-way (R/W) on the plat to provide an R/W half-width of 30 feet along the entire subject property frontage, including 30-foot property radius corners. The nexus for this requirement is the potential for additional traffic associated with the development. Based on review of county tax assessor maps, it appears that a 30-foot corner radius is needed in the southeast corner of 22265 Airport Road NE. The R/W shall be dedicated prior to issuance of a building permit and/or operation of the proposed airport related uses. All dedications shall be to the public, not Marion County. Please contact Right-of-Way Coordinator, Patricia Nordhal, at (503) 365-3104 concerning this matter.

7. A Transportation Impact Analysis (TIA) is typically required for a zone change. In this case, the change from EFU to P will not increase the trip potential significantly. Therefore, a TIA was not required for the zone change. However, the conditional use does have the potential to create a significant traffic impact, and therefore a TIA was required for the conditional use. The TIA prepared by Group Mackenzie, dated May 27, 2009, for the subject property assumes a cap of 70 employees. Based on this level of development, there is a small level of impact to the operational capacity of the county and state roadway systems. The TIA proposes, and staff concurs, that it is appropriate to contribute a share of the cost of identified projects in the area in proportion to their impact. The following conditions are recommended to mitigate the traffic impacts of the development:

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a. The developer agrees to a LU (Limited Use) overlay with a maximum of 70 employees. If the use were to intensify, then additional mitigation may be required in the future.

b. The Applicant shall contribute a proportional share of the cost of planning, designing, and constructing a signal and turn lanes on Ehlen Road at the intersection with Airport Road, improvements to the OR551/Ehlen Road intersection as identified in the 2010-2013 Draft Oregon Statewide Transportation Improvement Program (STIP), and a left turn lane on Airport Road at the intersection with Keil Road. The basis for the proportional share shall be the percentage of traffic added by the development. This is calculated to be $51,125 and shall be paid as a condition of the conditional use. If the use changes, or additional employees are needed, then additional proportional share contributions may be required.

8. A civil site plan is required for 0.5-acres or more of proposed development. This should be submitted in advance of application for building permits to allow adequate time for review. A traffic circulation plan needs to be included.

9. In accordance with Chapter 172 of the Marion County Rural Zoning Ordinance, if this development is approved, the Applicant will be required to improve Airport Road NE and Keil Road NE along their frontages to county standards as directed by the Public Works Department. This is anticipated to include vegetation clearing, slope and drainage work, and the addition of gravel shoulder along the roadways. These frontage improvements shall be included on the engineering plans for the proposed development, and will need to be complete prior to construction of any buildings and/or commencement of the proposed uses.

10. Prior to building permit approval, the Applicant shall provide a Declaration of Covenants for Road Maintenance Agreement regarding any non-county maintained access easements (form available from Public Works). Please contact Tedd Joling at (503) 584-7714 for information on this matter.

11. The Applicant is reminded of its responsibility to preserve and protect nearby roads and ditches to the satisfaction of Marion County Public Works throughout the use of the airport. Failure to preserve and protect the road and ditches may result in the user being responsible for replacing or reconstructing the damaged road or ditch at their expense.

STORM DRAINAGE / ENVIRONMENTAL

12. The Applicant is advised that construction of improvements on the property should not block historical or naturally occurring runoff from adjacent properties. Furthermore, site grading should not impact surrounding properties, roads, or drainage ways in a negative manner. The Applicant shall submit a site drainage plan to demonstrate that there is no negative impact.

13. The county requires any development 0.5 acre or larger to provide storm water detention for any increase in runoff. The existing site already has a storm water master plan and multiple detention systems. The Applicant will need to show that stormwater

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detention systems will retain enough of the storm-water runoff on site so that there is no net rate increase in storm-water flow from the subject property. Such a system shall be sized and modified so that it will detain the difference between a 5-year frequency storm with pre-development conditions and a 10-year frequency storm with development conditions. Storm drainage shall be discharged to a suitable outlet and, where applicable, evidence provided that an adequate easement exists for transit of the water to this outlet. Storm drainage improvements shall be built to Marion County Engineering and Construction Standards. Prior to issuance of building permits, the Applicant shall provide a storm drainage plan for the site that addresses drainage issues and includes detention elements. Acceptable drainage and detention systems must be in place prior to final building inspections.

14. Proof of issuance to the county of a National Pollutant Discharge Elimination System (NPDES) 1200-C permit is required for all construction activities that disturb one acre or more. If necessary, the NPDES permit is obtained through the DEQ.

GENERAL

15. The subject property is within the unincorporated area of Marion County. Transportation System Development Charges may be assessed upon development of the property.

16. Any work in the public right-of-way will require a permit from Public Works Land Development Engineering & Permits.

B. **Marion County Tax Office** provided information on the tax status of the properties.

C. **Department of State Land Conservation and Development (DLCD)** commented to the Hearings Officer that the Applicant's Goal 3 exception should be limited to only the acreage actually needed for the proposed building and operation.

All other contacted agencies either failed to respond or stated no objection to the proposal at the time this report was written.

7. **Application Background**. Applicant owns and operates a fleet of heavy, large helicopters focused almost exclusively in the United States on fire suppression activity for the United States Forest Service. Applicant desires to consolidate its United States repair and maintenance facilities, including its Corvallis facility, at the Aurora State Airport. Applicant's proposed, state-of-the-art, 126,000 square-feet facility will be used predominantly for the repair and maintenance of the helicopters as well as warehousing and storage of helicopter parts. The annual winter overhaul of each helicopter involves the complete dismantling of each aircraft and re-assembly for maintenance and repair. This facility will become HTS' United States headquarters.

Applicant owns 27 acres adjacent to the Aurora State Airport at the northwest corner of the intersection of Keil Road and Airport Road. By consolidating its operations near Portland International Airport, which serves as a critical transport hub for personnel and parts, Applicant estimates it will reduce its time and fuel costs by 75%. This efficiency will reduce its impact on the environment and the State's highway system. Aside from its proximity to Portland, the Aurora Airport is strategically important to HTS as it is home to two, very unique vendors and it is at the heart of the human resource pool that

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supplies HTS with the skilled labor force necessary for its operations. A similar operation and one of HTS's largest competitors, Columbia Helicopters, already operates a facility at the Airport. The Oregon Department of Aviation's Airport Layout Plan specifically identifies Applicant's property as being suitable for airport expansion.

Applicant's operations will bring numerous benefits to the area without imposing significant, negative impacts. Generally, after a brief period of test flights in the spring, Applicant's helicopters leave for the fire season and remain in the field from May to November. The helicopters are then flown back in November and grounded for winter overhaul until the following season. This brings the economic benefits and airport synergies of the facility without excessive impacts on either the airport or the surrounding community. In addition, Applicant's pilots are specialized and highly trained. The minimal number of flights and professional pilots minimize interference with existing airport operations and impact on neighboring properties. Applicant's commitment to compatibility with neighbors, as well as recognition of Applicant's need to locate in Aurora, is affirmed by a letter from the Manager of the Corvallis Airport, where Applicant is currently located. In addition, a letter from Russ Langbehn, a homeowner in the nearby neighborhood of Deer Creek Estates, supports Applicant's proposal and includes a petition of support signed by a majority of Deer Creek Estates residents.

Upon opening the facility, Applicant estimates it will contract for goods and services locally in the amount of $5,000,000 annually, increasing to $8,000,000 annually after completion of consolidation and anticipated growth in the following five years. Construction of the new facility is estimated to cost approximately $20,000,000 and will be contracted locally. The county's tax revenues on the assessed value of the facility are estimated to be approximately $150,000 annually. Upon occupancy, Applicant estimates this facility will generate 85 jobs with average salaries of approximately $50,000 to $60,000 annually, increasing to 160 jobs after full consolidation and growth. However, because over half the employees are in the field for extended periods of time, the traffic impacts of these jobs are minimal (at most, 70 employees will be onsite in any given day). This economic opportunity comes at a time when another significant employer at the airport, Artex Aircraft Supplies, Inc., is closing its doors and consolidating its operations away from Aurora to Arizona. Artex's closure has resulted in the loss of 154 jobs at the Aurora Airport. Unlike Artex, which leased its space at the airport, HTS is committing its resources to the Aurora Airport by consolidating its United States operations *to the airport* on land that it owns.

Applicant seeks an exception from Statewide Planning Goal 14 to site an urban use on rural land. Applicant also seeks an exception to Statewide Planning Goal 3 to amend the Comprehensive Plan designation from Primary Agriculture (PA) to Public (P), and the zoning from Exclusive Farm Use (EFU) to Public (P) on the subject property. Finally, because airport related operations are conditional uses in the P zone, Applicant also requests a conditional use permit to operate an airport related use on the site.

MCCP POLICIES AND GOALS

8. The comprehensive plan amendment must be consistent with the applicable MCCP goals and polices. The MCCP plan amendments Policy 2 provides that:

The procedures which Marion County will use to consider Comprehensive Plan amendments in addition to the requirements in state law, is as follows:

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Individual Property or Quasi-Judicial Amendments:

> Plan changes directly involving five or less properties will be considered a quasi-judicial amendment. Quasi-judicial amendments may be initiated by the subject property owners with an application form supplied by the Marion County Planning Division. The amendment will be reviewed by the zone change procedure established in the Marion County Zoning Ordinance. A plan amendment application of this type may be processed simultaneously with a zone change request.

This application involves one ownership of 27.48 acres. This is a non-legislative plan amendment. The application includes a plan amendment and zone change request as well as a request for a conditional use permit.

9. Applicant is seeking to have the comprehensive plan changed from Primary Agriculture to Public. The Board finds the proposed use to be industrial in nature. "Industrial Use" is defined in OAR 660-009-005(3) as follows:

> "Industrial Use" means employment activities generating income from the production, handling or distribution of goods. Industrial uses include, but are not limited to: manufacturing; assembly; fabrication; processing; storage; logistics; warehousing; importation; distribution and transshipment; and research and development. Industrial uses may have unique land, infrastructure, energy, and transportation requirements. Industrial uses may have external impacts on surrounding uses and may cluster in traditional or new industrial areas where they are segregated from other non-industrial activities.

Applicant's proposed facility on this site is a substantial employment activity that will be predominantly characterized by its use as a hub for the maintenance overhaul (disassembly and assembly) and repair of large, industrial-grade helicopters and the associated warehousing, storage, and distribution of parts and equipment for those helicopters. As the definition of Industrial Use contemplates, this industrial use has a unique land and transportation requirement that it be located at an airport.

While the facility will contain offices of those who manage the firefighting operations of the company, the predominant purpose and the majority of the space of the proposed facility is the repair and maintenance of industrial-grade aircraft (including complete disassembly and re-assembly) and substantial storage and warehousing for both spare parts and the aircraft themselves. While aerial transportation services are a necessary part of Applicant's operations at the subject property, the predominant use at the site are the industrial uses explained above.

Furthermore, even if the proposed facility were classified by Applicant's business of wilderness firefighting and oil exploration, the Board finds such classification more industrial than commercial. "Commercial use" is defined in OAR 660-022-0010(1) as "the use of land primarily for the retail sale of products or services, including offices. *It does not include factories, warehouses, freight terminals, or wholesale distribution centers.*"[1] (*emphasis added*)

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1 OAR 660-022-0010 contains an additional definition of "Industrial Use" that would further justify characterization of the proposed facility as industrial in nature: ""(4) 'Industrial Use' means the use of land primarily for the manufacture, processing, storage, or wholesale distribution of products, goods, or materials. It does not include commercial uses."

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10. The general development policies applicable to rural lands in Marion County provide:

1. All land divisions should be reviewed by Marion County for their compatibility with County goals and policies.

2. "Strip-type" commercial or residential development along roads in rural areas shall be discouraged.

3. Rural industrial, commercial and public uses should be limited primarily to those activities that are best suited to a rural location and are compatible with existing rural developments and agricultural goals and policies.

11. This application does not concern a land division but rather the use of land. General Development policy 1 is not applicable.

12. The Applicant is seeking to relocate its helicopter transport service to the Aurora State Airport. The plan includes constructing a 126,000 square foot building to house its business. This will not be a strip-type commercial or residential development. General development policy 2 is not applicable.

13. The subject property abuts the airport and an airport overlay zone has already been applied to the property. Airports are a public use and the zoning designation for the Aurora Airport is P. It should be noted that the ASA came about in 1943 as the result of WWII, long before any land use planning/zoning was initiated. The application proposes to locate a helicopter transport service adjacent to the airport and change the zoning designation from EFU to P. The area surrounding the airport is zoned EFU with the exception of a small area to the northwest that is zoned AR. Properties to the east, across Airport Road, are all zoned EFU as is property to the south across Keil Road. Those properties are in agricultural use. The surrounding uses have long co-existed successfully with the airport. The uses at the airport are very similar to the proposed uses, both are airport related uses. As such, the proposed use will be compatible with the surrounding uses.

The MCCP agricultural goals and policies discourage the development of non-farm use on agricultural lands and endeavor to keep large tracts of land in agricultural use. The proposed use is not a farm use and, if approved, approximately 27 acres will be taken out of agricultural production. Although the proposed use would take land out of agricultural production, as detailed below, there are reasons under Marion County goals and policies as well as under applicable State Goals and regulations for this exception. The Board finds that the application is consistent with general development policy 3.

The Board reviews the application against the applicable comprehensive plan policies in totality, not as individual criteria that each apply independently to the application.

14. *Rural Industrial Policy #1: Industrial uses in conjunction with farm or forest uses shall be evaluated to determine if they need to be located on resource lands or whether an equally suitable location is available in an urban area or on non-resource lands in a rural area.*

The Board finds this policy is not applicable because the proposed, airport-related industrial use is not in conjunction with farm or forest uses.

15. *Rural Industrial Policy #2: Rural industries should be compatible with existing development and farm or forest uses in the vicinity, should not involve a large number of employees, should not*

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require heavy truck traffic through residential areas or on unimproved roads, and should not have the potential to exceed the environmental capacity of the site or require urban services.

The airport related uses proposed by Applicant will be consistent with the development immediately adjacent to the west at the airport. As addressed in the application at length, the proposed development will have little to no impact on farm and forest uses in the vicinity. The subject property is not directly adjacent to any farm and forest uses as the airport lies directly to the west, Keil Road NE and Airport Road NE lie to the south and east, and a religious retreat has been developed to the north. The farm and forest uses in the vicinity will be adequately buffered from the proposed uses located on the subject property either by intervening development or roadways adjacent to the subject property. The facility is proposed to be located on the southerly portion of the subject property, a substantial distance from the religious retreat located to the north.

Unlike a rural industrial use that is entirely surrounded by rural and resource uses, Applicant's facility is a unique rural industrial development in that it will be located immediately adjacent to the Aurora State Airport where a very large number of employees are already located. Up to approximately 70 employees will be on the subject property after complete consolidation. This location as well as the capacity and condition of affected transportation facilities justify the proposal in this case, particularly as conditioned by this approval. The proposal will not require heavy truck traffic through residential areas. The site has the environmental capacity for the proposed use without requiring urban services. The application is consistent with Rural Industrial Policy 2..

16. *Rural Industrial Policy #3: A non-resource related industrial use should not be permitted on resource lands unless an evaluation of the relevant County and State Goals and the feasibility of locating the proposed use in an urban growth boundary or rural non-resource lands show that the proposed site on resource lands is the most suitable.*

The application and this approval contain a thorough evaluation of the relevant county and state goals, as well as an analysis of the feasibility of locating the non-resource related proposed industrial use on non-resource land or within urban growth boundaries. The proposed use must be located at an airport, and this airport has several amenities important to Applicant's use, the combination of which is exclusive to this property, including proximity to a custom vendor located at the Aurora Airport (Metal Innovations, Inc.), proximity to the specially trained human resource pool due to competitors in the vicinity, proximity to the Portland International Airport, and the availability of the access road adjacent to the property for taxiway purposes. Airport-related uses are not normally allowed in urban areas for safety reasons. The facts and analysis contained in the application establish that the proposed airport related uses are most suitably located next to the Aurora State Airport on the subject property. The application is consistent with Rural Industrial Policy 3.

17. *Rural Services Policy #1: The impact on existing services and the potential need for additional facilities should be evaluated when rural development is proposed.*

Under the MCCP, rural service facilities are those services and facilities necessary to provide basic support systems for rural development. Rural development includes farm and forest related development, acreage residential development and rural commercial and industrial uses.

No new service facilities are required with this proposal. The water, septic and stormwater needs will be met on site or by connection to existing facilities at the airport. The transportation facilities and services are already in place and their condition is addressed at length in Public Works staff comments

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and the Traffic Impact Analysis (TIA) provided by the Applicant's traffic engineer. The traffic engineer coordinated with County Public Works Staff as well as Oregon Department of Transportation. This approval is conditioned on Applicant's improvement or contribution toward improvements of transportation facilities. The use, as conditioned, is consistent with Rural Services Policy 1.

18. *Rural Services Policy #2: It is the intent of Marion County to maintain the rural character of areas outside of urban growth boundaries by only allowing those uses that do not increase the potential for urban services.*

The city of Aurora's urban growth boundary (UGB) is approximately 1,300 feet from the subject property and there currently are no plans to extend the UGB or urban services to include the subject property. The Board finds that the proposed project does not increase the potential for urban services. The subject property and the immediately adjacent airport have adequate resources to service the water and sewer needs for the proposed use. The subject property is located adjacent to the airport, and the airport has existed for sometime without being connected to urban services. The proposed use will be similar to the airport, both are airport related uses, and will maintain the rural character of the area to the extent possible. This application is consistent with Rural Services Policy 2.

19. *Rural services policy #3: Only those facilities and services that are necessary to accommodate planned rural land uses should be provided unless it can be shown that the proposed service will not encourage development inconsistent with maintaining the rural density and character of the area.*

The predominate feature of the surrounding area is the airport. No new proposed urban services are planned for the proposed development. The proposed use is adjacent to the airport and will be very similar in character to the uses that are already on site. The proposed use will not encourage development that is inconsistent with the already existing uses at the airport and will maintain the rural density and character of the area. The application is consistent with Rural Services Policy 3.

20. *Rural Services Policy #4: The sizing of public or private service facilities shall be based on maintaining the rural character of the area. Systems that cannot be cost effective without exceeding the rural densities specified in this Plan shall not be approved. The County shall coordinate with private utilities to ensure that rural development can be serviced efficiently.*

The service facilities will be almost entirely self-contained on the subject property or connecting to the existing water system at the immediately adjacent airport for fireflow purposes. The proposed use will also be served by a well. The service facilities proposed by Applicant are consistent with services in the area and will help maintain the rural character of the area. Fire and police protection are already provided to the subject property. The Applicant will be required to comply with the applicable fire district regulations. The TIA provided by Applicant is discussed below. The application, as conditioned, is consistent with Rural Services Policy 4.

21. *Air, Rail, Water, Energy, and Pipeline Transportation Policy #1: Airports and airstrips shall be located in areas that are safe for air operations and should be compatible with surrounding uses.*

The proposed use includes a helipad for the Applicant's fleet of helicopters. The use is adjacent to the airport which has successfully existed for over 65 years. Helicopter operations have safely taken place at the airport over the years and have been compatible with other uses at the airport. The county has established an airport overlay zone that restricts development in the area to uses that are compatible with airport uses. The testimony from other airport users as well as evidence of long-standing similar

helicopter use by Applicant's competitor at the airport demonstrate that that the proposed use will be compatible with and complementary to airport uses. The surrounding uses are otherwise agricultural operations, compatibility with which is addressed in detail in discussion of the Goal exceptions below. Because the development at the airport has been low density, the airport is reliant on rural services only. The application is consistent with Air, Rail, Water, Energy, and Pipeline Transportation Policy 1.

22. *Economic Development Goal (a): Provision of increased employment opportunities for all residents of the County.*

The Board finds that securing Applicant's company at this location would significantly advance this Goal and be a benefit for not only the airport, but the city, county, and state as well. The direct benefit from the consolidation of the company in Aurora would mean that there will be an immediate need for 85 additional jobs in the region (though not all onsite), with average salaries ranging from $50,000 to $60,000 per year. Applicant projects an anticipated growth to approximately 160 employees by the 5th year. Currently, Applicant subcontracts approximately $5 million to local Oregon companies and estimates that the number should increase to $8 million within the first year after consolidation of the operation is complete at Aurora. With Applicant reaching $80 million in sales in 2007, and still experiencing a steady rate of growth, Applicant estimates that its sales will reach $110 million in 2010. Not only does this increase the direct employment of more people, but it also increases the amount spent by the company back into the local economy on subcontracts and other goods and services, which incidentally increases other employment opportunities in the county as well.

23. *Economic Development Goal (b): Maintenance of a strong agricultural economy.*

Although the proposal is to take 27.48 acres out of agricultural use, the proposed use will have little effect on the overall agricultural economy in the area. The subject property is below the minimum parcel size of 80 acres in an EFU zone. Testimony from a resident of 70 years in the area confirmed that the subject parcel has never been in extended agricultural production due to poor soil hydration. Applicant provided information from the *Gross Farm Sales and Estimated Acreage Summary* tables from the Oregon State University Extension Service report, "2008 Oregon County and State Agricultural Estimates, Special Report 790-08, revised February 2009." According to the report, there are 156,012 acres of crop land (excluding other types of resource land) in Marion County. On average, the crop land generates approximately $2,954.23 per acre annually (gross farm sales, all crop summary total of $460,896,000 divided by 156,012 acres = $2,954.23/acre). The subject property, could, therefore, generate $81,200 per year total in agricultural production ($2,954.23 X 27 acres = $81,200). The Board finds that in light of the property's historically minimal agricultural production and the relatively minimal loss of agricultural revenue, particularly in light of the economic gains associated with the proposal, the proposal is consistent with Economic Development Goal (b).

24. *Economic Development Goal (d): Diversification of the economic base of communities, and expansion of seasonal employment opportunities to year-round status whenever possible.*

The Applicant's business will bring new jobs to the area. Workers will be needed for the development of the proposed project including the construction of the 126,000 square foot building as well as parking and storage areas. Although not all of the Applicant's employees will be at the site at all times due to the nature of their work, the business will provide approximately 70 new jobs based in this area with the possibility of expanding up to 160 new jobs. The newly created jobs will not be in the agricultural area which is the predominate types of jobs in the surrounding areas and county.

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Accordingly, the new jobs will help diversify the economic base of the county. The Board finds that airport uses are unique and opportunities to create jobs within the airport context are rare. This opportunity brings new jobs in this unique sector, does so in a substantial number with high-wage jobs in a manner that supports the economy of other businesses at the airport. This is particularly important with the loss of other employment at the airport such as Artex, the closure of which has resulted in the loss of 154 jobs. The application is consistent with Economic Development Goal (d).

25. *Economic Development Goal (e): Provision of sufficient areas for future industrial land use.*

Though appropriately designated in the P zone, Applicant's use is industrial in nature and provides jobs at industrial wages. The approval of this application advances the county goal of providing both immediate industrial land use and future land use by providing enough land for the full consolidation and expansion of Applicant's operations. The application is consistent with Economic Development Goal (e).

26. *Economic Development Goal (f): Development of a transportation system for the safe and efficient movement of persons and goods for present needs.*

Public airports form an important and integral part of the state and county transportation system. Applicant has provided evidence that the Aurora State Airport, the busiest state-owned airport, needs to expand to improve its capacity and service to existing and potential users. The Board finds that the proposed use will stimulate economy at the airport and maintain if not increase its effectiveness as part of the transportation system. Siting the proposed use at this location utilizes an existing road system currently serving the same use and located relatively close to the Portland International Airport in order to reduce impacts on the state and county's road system. The Board finds that while Applicant's proposed use will increase airport capacity and provide a substantial economic benefit to the county, the nature of Applicant's use minimizes the adverse impacts on air traffic congestion at the airport and vehicle traffic congestion in the surrounding areas. The primary helicopter traffic occurs in two, relatively brief periods of the year. While based out of the airport and the Aurora area, many of the employees spend significant portions of the year away from the site, thereby reducing traffic impacts on county roads. The Board finds this proposal consistent with Economic Development Goal (f).

27. For the reasons discussed above as well as for the reasons demonstrating compliance with criteria for Exceptions to Statewide Planning Goals as discussed below, the Board finds that the proposal is consistent with the applicable Goals and Policies of the Marion County Comprehensive Plan.

EXCEPTIONS TO STATEWIDE PLANNING GOALS

28. Applicant proposed that under OAR 660-012-0065 exceptions to Goals 3, 4, 11, and 14 are not needed. Applicant's position is that its application is an expansion of the airport and relies on OAR 660-012-0065 and *Lentz v. Lane County*, 38 OR LUBA 669 (2000) for that proposition. It is unclear from the OARs, ORS and Applicant's various written statements if the application is technically an expansion of the airport. It appears that the proposed use is outside of the airport boundaries.

Applicant asserts OAR 660-012-0065(3)(n) provide that exceptions to statewide goals are not required for airport expansions. The rule provides in pertinent part:

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(1) This rule identifies transportation facilities, services and improvements which may be permitted on rural lands consistent with Goals 3, 4, 11, and 14 without a goal exception.

(3) The following transportation improvements are consistent with Goals 3, 4, 11, and 14 subject to the requirements of this rule:

(n) Expansions or alterations of public use airports that do not permit service to a larger class of airplanes; and . . .

The Board finds that the proposed use is not a transportation improvement to the airport. It is development on private property for the benefit of the property owners. It does not appear that the subject property is within the airport boundaries as defined by and for the purposes of the 1976 Airport Master Plan attached as Exhibit H to Applicant's application. The airport appears to be bounded on the side adjacent to the subject property by a security fence and the subject property is labeled: "This area acceptable for airport related development under private ownership."

The Board finds the *Lentz* case is distinguishable because it concerned a new public use runway and included road realignment as well as an expansion of the airport boundary. The two cities involved, Eugene and Springfield, as well as Lane County all joined together and adopted amendments to the Eugene Airport Master Plan changing the zoning of the Lentz property from AG (Agricultural) to G (Government and Education). There is no indication that the proposed use, consolidation of the Applicant's helicopter transport business, involves any similar transportation improvements to the airport. In any event, the Board finds that the Applicant has satisfied requirements of exceptions to Goals 3 and 14. Those exceptions are discussed and analyzed below.

29. Applicant proposes a reasons exception to goal 3 and 14. The third type of exception requires the county to show other "reasons" why a goal exception is appropriate. Only the portions of the OARs applicable to this application are discussed below.

30. OAR 660-004-0018(4) provides:

(a) When a local government takes an exception under the "Reasons" section of ORS 197.732(1)(c) and OAR 660-004-0020 through 660-004-0022, plan and zone designations must limit the uses, density, public facilities and services, and activities to only those that are justified in the exception;

(b) When a local government changes the types or intensities of uses or public facilities and services within an area approved as a "Reasons" exception, a new "Reasons" exception is required;

This approval includes the imposition of a limited use overlay zone on Applicant's property. Only the following uses are allowed: helicopter uses, services, maintenance, offices, repair, overhauling, and other uses associated with the helicopter business.

31. ORS 197.732(1)(c) provides that a local government may take exception to a goal if the following standards are met:

(A) Reasons justify why the state policy embodied in the applicable goals should not apply;

(B) Areas which do not require a new exception cannot reasonably accommodate the use;

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(C) The long term environmental, economic, social and energy consequences resulting from the use at the proposed site with measures designed to reduce adverse impacts are not significantly more adverse than would typically result from the same proposal being located in areas requiring a goal exception other than the proposed site; and

(D) The proposed uses are compatible with other adjacent uses or will be so rendered through measures designed to reduce adverse impacts.

32. These standards are further clarified in the relevant Oregon Administrative Rules:

660-004-0020, Reason Exception Requirements:

(1) If a jurisdiction determines there are reasons consistent with OAR 660-004-0022 to use resource lands for uses not allowed by the applicable Goal or to allow public facilities or services not allowed by the applicable Goal, the justification shall be set forth in the comprehensive plan as an exception.

(2) The four factors in Goal 2, Part II(c) required to be addressed when taking an exception to a Goal are:

(a) Reasons justify why the state policy embodied in the applicable goals should not apply: The exception shall set forth the facts and assumptions used as the basis for determining that a state policy embodied in a goal should not apply to specific properties or situations including the amount of land for the use being planned and why the use requires a location on resource land;

(b) Areas which do not require a new exception cannot reasonably accommodate the use:

(A) The exception shall indicate on a map or otherwise describe the location of possible alternative areas considered for the use, which do not require a new exception. The area for which the exception is taken shall be identified;

(B) To show why the particular site is justified, it is necessary to discuss why other areas which do not require a new exception cannot reasonably accommodate the proposed use. Economic factors can be considered along with other relevant factors in determining that the use cannot reasonably be accommodated in other areas. Under the alternative factor the following questions shall be addressed:

(i) Can the proposed use be reasonably accommodated on nonresource land that would not require an exception, including increasing the density of uses on nonresource land? If not, why not?

(ii) Can the proposed use be reasonably accommodated on resource land that is already irrevocably committed to nonresource uses, not allowed by the applicable Goal, including resource land in existing rural centers, or by increasing the density of uses on committed lands? If not, why not?

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(iii) Can the proposed use be reasonably accommodated inside an urban growth boundary? If not, why not?

(iv) Can the proposed use be reasonably accommodated without the provision of a proposed public facility or service? If not, why not?

(C) This alternative areas standard can be met by a broad review of similar types of areas rather than a review of specific alternative sites. Initially, a local government adopting an exception need assess only whether those similar types of areas in the vicinity could not reasonably accommodate the proposed use. Site specific comparisons are not required of a local government taking an exception, unless another party to the local proceeding can describe why there are specific sites that can more reasonably accommodate the proposed use. A detailed evaluation of specific alternative sites is thus not required unless such sites are specifically described with facts to support the assertion that the sites are more reasonable by another party during the local exceptions proceeding.

(c) The long-term environmental, economic, social and energy consequences resulting from the use at the proposed site with measures designed to reduce adverse impacts are not significantly more adverse than would typically result from the same proposal being located in other areas requiring a Goal exception. The exception shall describe the characteristics of each alternative areas considered by the jurisdiction for which an exception might be taken, the typical advantages and disadvantages of using the area for a use not allowed by the Goal, and the typical positive and negative consequences resulting from the use at the proposed site with measures designed to reduce adverse impacts. A detailed evaluation of specific alternative sites is not required unless such sites are specifically described with facts to support the assertion that the sites have significantly fewer adverse impacts during the local exceptions proceeding. The exception shall include the reasons why the consequences of the use at the chosen site are not significantly more adverse than would typically result from the same proposal being located in areas requiring a goal exception other than the proposed site. Such reasons shall include, but are not limited to, the facts used to determine which resource land is least productive; the ability to sustain resource uses near the proposed use; and the long-term economic impact on the general area caused by irreversible removal of the land from the resource base. Other possible impacts include the effects of the proposed use on the water table, on the costs of improving roads and on the costs to special service districts;

(d) The proposed uses are compatible with other adjacent uses or will be so rendered through measures designed to reduce adverse impacts. The exception shall describe how the proposed use will be rendered compatible with adjacent land uses. The exception shall demonstrate that the proposed use is situated in such a manner as to be compatible with surrounding natural resources and resource management or production practices. "Compatible" is not intended as an absolute term meaning no interference or adverse impacts of any type with adjacent uses.

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33. OAR 660-004-0022 sets out what "reasons" are acceptable under OAR 660-004-0020(2)(a). It provides in pertinent part:

> An exception Under Goal 2, Part II(c) can be taken for any use not allowed by the applicable goal(s). The types of reasons that may or may not be used to justify certain types of uses not allowed on resource lands are set forth in the following sections of this rule:
>
> (1) For uses not specifically provided for in subsequent sections of this rule or in OAR 660-012-0070 or chapter 660, division 14, the reasons shall justify why the state policy embodied in the applicable goals should not apply. Such reasons include but are not limited to the following:
>
> (a) There is a demonstrated need for the proposed use or activity, based on one or more of the requirements of Goals 3 to 19; and either
>
> (b) A resource upon which the proposed use or activity is dependent can be reasonably obtained only at the proposed exception site and the use or activity requires a location near the resource. An exception based on this subsection must include an analysis of the market area to be served by the proposed use or activity. That analysis must demonstrate that the proposed exception site is the only one within that market area at which the resource depended upon can reasonably be obtained; or
>
> (c) The proposed use or activity has special features or qualities that necessitate its location on or near the proposed exception site.

As the findings above discuss, the Board finds the use to be an airport related use industrial in nature. Because Applicant's use is industrial in nature, it is specifically provided for in a subsequent section of OAR 660-004-0022. Specifically, OAR 660-004-0022(3) provides that for the siting of industrial development on resource land outside an urban growth boundary, appropriate reasons and facts include, but are not limited to, the following:

> (a) The use is significantly dependent upon a unique resource located on agricultural or forest land. Examples of such resources and resource sites include geothermal wells, mineral or aggregate deposits, water reservoirs, natural features, or river or ocean ports; or
>
> (b) The use cannot be located inside an urban growth boundary due to impacts that are hazardous or incompatible in densely populated areas; or
>
> (c) The use would have a significant comparative advantage due to its location (e.g., *near existing industrial activity*, an energy facility, or products available from other rural activities), which would benefit the county economy and cause only minimal loss of productive resource lands. Reasons for such a decision should include a discussion of the lost resource productivity and values in relation to the county's gain from the industrial use, and the specific transportation and resource advantages which support the decision.

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Goal 3 Exception

34. The purpose of Goal 3 is to preserve and maintain agricultural lands for farm use, consistent with existing and future needs for agricultural and forest products as well as open spaces. The Applicant's proposed development is to establish a helicopter business on EFU zoned land adjacent to the airport. The proposed use is not consistent with the goal and an exception is required.

35. The proposed use is not dependent upon a unique resource located on agricultural land. Accordingly OAR 660-004-0022(3)(a) is not applicable. If subsection (a) is not applicable, then an analysis may be done under subsections (b) or (c).

36. OAR 660-004-0022(3)(c) is applicable to the proposed use. The Board hereby incorporates findings below regarding Goal 3 as to the comparative advantage of this property due to its location, not the least of which is it being immediately adjacent to an existing industrial activity: the Aurora Airport, including one of Applicant's primary competitors at the same airport. That fact alone severely limits the number of locations suitable for Applicant's proposed use. Additional, significant comparative advantages are this property's size, proximity to critical and unique suppliers and service providers, proximity to sufficiently skilled workforce, proximity to Portland International Airport, potential access to through the fence incentives identified for this airport, the access easement serving this property to the airport runway, and the fact that the Applicant owns the property outright, which is a significant factor for its relocation from Corvallis where it has determined that leasing is no longer an option for their operations.

The Applicant is proposing a 126,000 square foot building with accompanying parking and storage space for its helicopters. The helicopters used by the Applicant are older helicopters, built in the 60's and 70's, and are no longer in production. When possible, the Applicant buys the older helicopters for parts and stores the helicopters on site. Testimony at the hearing demonstrated the size of the rotor blades, which are manufactured and repaired at Metal Innovations in the airport near the subject property. Some of the helicopters are quite large, 80 feet, with the rotor blades alone being 40 feet in length. One of the reasons the Applicant is moving from its current location is lack of storage space. Currently some of the helicopters are stored outside where the weather corrodes the helicopters and parts. Because of the limited space at its current location, the Applicant's business is spread out at several locations in the Willamette Valley.

The airport is also home to a major vendor of the Applicant, Metal Innovations, and the vendor is the only vendor of its kind in the world. The airport is one of three rural airports in the state that was identified as a pilot site for the "through the fence" program, which allows access to the airport runway for airport related businesses located within the airport boundary. Concerns were raised by DLCD that the Applicant may be relying too heavily on this program as justification for a goal exception because the program can be applied only after the land use actions have been approved. The Board finds that while Applicant cannot rely solely on the program as justification for this application, the program is still a factor that should be considered.

The subject property is also bordered on two sides by public roads, Keil Road to the south and Airport Road to the east, which buffers it from neighboring agricultural activity. Immediately to the west and further to the north is the airport. Because of its location with respect two of Applicant's competitors (Columbia and Evergreen), the area of the airport has attracted a specialized work force of helicopter mechanics and other specialized workers who provide support for helicopters. The Board finds that

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these attributes of this property and the Aurora State Airport represent significant comparative advantages for Applicant's industrial use.

In addition, the Board finds that the economic gain to the county associated with the proposed use far exceeds the relatively minimal loss of resource land and revenue generated thereby. Marion County contains 156,012 acres of crop land alone (excluding other types of resource land such as forest land and livestock land. On average, that crop land generates $2,954.23 per acre. Accordingly the proposed site could generate approximately $81,200 per year if left in resource use. Such an estimate may be generous in light of testimony received at the hearing indicating that it has not historically been farmed for any extended periods of time. The property also generates minimal property tax revenue due to its special assessment for farm-deferral. The data is from *Gross Farm Sales* and *Estimated Acreage Summary* tables of the Oregon State University Extension Service report, "2008 Oregon County and State Agricultural Estimates, Special Report 790-08, revised February 2009."

Conversely, the Applicant's proposed use will generate sufficient revenue for 85 high-wage jobs (an estimated 160 jobs in 5 years with anticipated expansion), construction jobs for the installation of the $19 million facility, an estimated $5 million annually in outsourcing to local service providers and suppliers (an estimated $8 million annually with anticipated expansion in the next 5 years), and approximately $150,000 annually in property tax revenue to the county. Applicant's payroll is $10 to $12 million annually. In addition, construction of the $19 million facility will generate a substantial number of construction jobs. This 27 acres is far more productive for the county's and Oregon's economy than it would be in continued resource use.

Opponent testimony suggested that Applicant's use does not need access or to be adjacent to the Aurora Airport. The Board disagrees. The Board finds that a significant factor in Applicant's purchase of the subject property was the existence of a taxiway easement from the property to the airport runway. Applicant's site plan manifests this with the taxiway from the new facility to the airport property. Weather conditions, air traffic congestion, and other unique circumstances will necessitate HTS helicopters' occasional use of the airport runway for arrival or departure by use of tugging to and from the proposed facility. The facility also relies on the ability of fixed-wing aircraft, both of HTS and those of vendors, suppliers, and independent contractors, to directly access the Applicant's facility, particularly with heavy parts delivery to and from the facility. Applicant's facility, because Applicant outsources the majority of its service and product needs, also relies upon close proximity to such services, particularly key vendors such as Metal Innovations, Applicant's competitor, and Columbia Helicopters (nondestructive stress testing facility), as well as aviation fueling stations, and charter flights for personnel and parts. In fact, as testified by a former employee of Columbia Helicopters, the Applicant's substantial outsourcing is what allows it to operate without the impacts of substantially higher numbers of employees. The efficiencies gained by close proximity to Metal Innovations, an exclusive vendor for the repair and manufacture of Applicant's specialized rotor blades, is one of the primary purposes for Applicant's relocation to the Aurora Airport. The Board finds that these are compelling reasons for Applicant's facility being adjacent to the Aurora Airport on this property.

In light of the fact that this property is designated as being acceptable for future airport expansion in the airport's Master Plan, and that the proposed use has such relatively low impact on the surrounding uses, the reasons are compelling for the property to be used for Applicant's purpose. For these reasons, the Board finds the application satisfies OAR 660-004-0022(3)(c).

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37. Alternate Analysis Under OAR 660-004-0022(1)

In light of the applicability of OAR 660-004-0022(3), the Board finds that Applicant need not show a "demonstrated need" under OAR 660-004-0022(1) because the use is an industrial use. However, the Applicant also provided information demonstrating compliance with OAR 660-004-0022(1) in the event Applicant's use was deemed not to be an industrial. The Board agrees with Applicant that, in the event the use was deemed to not be industrial, the application satisfies OAR 660-004-0022(1) for the reasons below. OAR 660-004-0022(1) provides:

(1) For uses not specifically provided for in subsequent sections of this rule or in OAR 660-012-0070 or chapter 660, division 14, the reasons shall justify why the state policy embodied in the applicable goals should not apply. Such reasons include but are not limited to the following:

(a) There is a demonstrated need for the proposed use or activity, based on one or more of the requirements of Goals 3 to 19; and either

(b) A resource upon which the proposed use or activity is dependent can be reasonably obtained only at the proposed exception site and the use or activity requires a location near the resource. An exception based on this subsection must include an analysis of the market area to be served by the proposed use or activity. That analysis must demonstrate that the proposed exception site is the only one within that market area at which the resource depended upon can reasonably be obtained; or

(c) The proposed use or activity has special features or qualities that necessitate its location on or near the proposed exception site.

There is a demonstrated need for the proposed use based on Goals 9 and 12. Following is an analysis of both goals in relation to OAR 660-004-0022(1).

1. **Goal 12.** Statewide Planning Goal 12 requires the provision and encouragement of a safe, convenient, and economic transportation system. Goal 12, Airport Planning, is implemented by OAR 660, Division 13, "Airport Planning.". Division 13 also implements ORS 836.600 through 836.630 relating to local government airport regulation.[2]

The purpose statement of Division 13 indicates that "[t]he policy of the State of Oregon is to encourage and support the continued operation and vitality of Oregon's airports. The rules are intended to promote a convenient and economic system of airports in the state and for land use planning to reduce risks to aircraft operations and nearby land uses." OAR 660-013-0010(1).

Division 13 requires that the county "shall adopt land use regulations to carry out the requirements of this division, or applicable requirements of ORS 836.608, *consistent with the applicable elements of the adopted state ASP* and applicable statewide planning requirements. OAR 660-013-0050 (*emphasis added*).

In addition, the county's "land use regulations for areas within the airport boundary of non-towered

2 See Purpose Statement, OAR 660-013-0010(1): "This division implements ORS 836.600 through 836.630 and Statewide planning Goal 12 (Transportation)." Compliance with OAR 660, Division 13 is deemed to satisfy requirements of Statewide Planning Goal 12 and OAR 660, Division 12 related Airport Planning. See OAR 660-013-0160(3).

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airports identified in ORS 836.610(1))" (e.g. Aurora Airport) must authorize, among other uses:

Law Enforcement and *Firefighting Activities, including aircraft and ground based activities, facilities, and accessory structures necessary to support federal, state or local law enforcement and land management agencies engaged in* law enforcement and *firefighting activities. These activities include transport of personnel, aerial observation and transport of equipment, water, fire retardant and supplies.*

OAR 660-013-0100(3) (*emphasis added*). The Applicant's proposed use is for a facility dedicated almost exclusively to firefighting activities as defined above in that its purpose is the provision of firefighting services for a federal agency, the United Stated Forest Service. To the extent this property is not deemed within the airport boundary, the county has failed to provide adequate land on which firefighting activities are authorized.

Lastly, the county's comprehensive plan indicates that "[f]or specifics related to the Aurora State Airport and the Salem Municipal Airport, the respective Master Plans for these airports should be consulted." MCCP, Chapter IIE, Transportation Element, p. 9.

The record includes the county-adopted Aurora State Airport Master Plan (See Exhibit G in application, hereinafter "Master Plan") and the most recent data available and adopted by the Oregon Department of Aviation as part of the Department's Aviation System Plan pursuant to Division 13. Since 1976, expansion of the airport has been designated to occur *east* of the airport in exactly the area in which this property sits (See p. 67 of Master Plan and accompanying "Airport Layout Plan," Figure 23). Numerous documents in the Master Plan relating to zoning and use of the subject property identify this property and the area around it as "ACCEPTABLE FOR AIRPORT RELATED DEVELOPMENT UNDER PRIVATE OWNERSHIP," including the Airport Layout Plan (Figure 23), the Terminal Area Plan (Figure 25), the Land Use Plan (Figure 28), the Recommended Zoning Plan (Figure 29), and the Development Staging Plan (Figure 30).

The forecasted need for this area to become part of the airport has proven accurate. The current demand well exceeds the demand (and capacity) forecasted by the 1976 Master Plan. The demand is detailed with the most-recent data provided in the 2000 Master Plan Update and the Oregon Department of Aviation 2007 Aviation Plan. In short, while the 1976 Master Plan forecasted needs only as far as when 248 based aircraft would use the airport, the airport had 387 based aircraft as of 2005 with a predicted 498 based aircraft by 2025. To this day, the Airport Layout Plan for the Aurora State Airport identifies this property as acceptable for airport development under private ownership. Lastly, the Master Plan recommends that Marion County work with the State "to develop zoning changes on and near the airport as recommended by the Master Plan." Master Plan, p. 11.

In summary, the 1976 Master Plan, based on demands through a 1995 planning horizon, anticipated this property to be developed for airport uses. Now, in the current planning horizon, demand already exceeds the 1995 forecast by 56% (and will double by the end of the period). Only roughly 4.85 acres of vacant land remain for development at the airport (see Supplemental Written Statement). Yet, the subject property remains undeveloped and unzoned for airport purposes.

Whether pursuant to its obligations under its adopted Master Plan under Goal 12, or pursuant to the obligations imposed directly by Goal 12 and its implementing regulations under OAR 660, Division 13 and ORS 836.600 through 836.630, the county's failure to grant the proposed Goal exception would necessarily mean its failure to accomplish its obligations under Goal 12. Therefore, for the reasons set

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forth above, there is a demonstrated need for the proposed use based on one or more of the goals in satisfaction of OAR 660-004-0022(1)(a).

2. **Goal 9.** Closely related to the county's obligations under Goal 12 are its obligations under Goal 9 to "provide adequate opportunities through the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens." In addition, not granting the proposed application would also represent failure to accomplish the county's economic goals under its Comprehensive Plan.

The economic impacts associated with the vitality of state airports are statutorily acknowledged in ORS 836.600, which provides "[i]n recognition of the importance of the network of airports *to the economy of the state* and the safety and recreation of its citizens, the policy of the State of Oregon is to encourage and support the continued operation and vitality of Oregon's airports." (*emphasis added*). The economic benefits of this proposed use to both the County and the State are very substantial. They are described at length in the Applicant's Written Statement (e.g., pp. 13-14, 16-17, 21-22) and Supplemental Written Statement (p. 2 and enclosed flier from Helicopter Transport Services).

As demonstrated above with respect to Goal 12, there is currently *inadequate* opportunity at the Aurora Airport. This airport is the only airport within the county's jurisdiction. Clearly, both as acknowledged by statute and as evidenced with the data provided, airports provide a tremendous benefit to and are essential components to a diverse economy. The county's failure to adequately provide appropriately zoned land for the demand at that airport would constitute failure to provide "adequate opportunities" for a "variety of economic activities." This application provides a vehicle to provide such opportunities maintaining the variety sought by Goal 9. Failure to grant the exception would constitute failure to comply with the county's obligations under Goal 9 and its associated Comprehensive Plan policies.

B. Applicant's use relies on Aurora Airport resources (OAR 660-004-0022(1)(b)) and has special features and qualities necessitating its location at the subject property (OAR 660-004-0022(1)(c)).

These findings address why the proposed use must be located adjacent not only to an airport, but the Aurora airport specifically. The airport contains the airstrip, fueling, and other essential operational, maintenance, and repair services essential to Applicant's use. In addition, it is located in the heart of the human resource pool trained for Applicant's helicopter operations, and it is located strategically close to the Portland International Airport. Lastly, although not a justification in and of itself for the proposed zone change, the Aurora Airport is one of only a few airports in the State that has through-the-fence opportunities, which best accommodate Applicant's use.

The market area served by the Applicant's firefighting helicopter services spans multiple states in conjunction with the United States Forest Service's firefighting operations. The only other airport in the County potentially large enough for Applicant's use is the Salem Airport. However, Applicant's helicopter use is less compatible with the surrounding uses at Salem's urban airport, and Salem's airport and vicinity do not provide the economic, energy, and environmental advantages associated with the Aurora location and its proximity to Portland International Airport. This reliance on the Aurora Airport as a critical resource satisfies OAR 660-004-0022(1)(b).

Applicant's reliance on these fundamental features, including the airport's landing strip, refueling proximity, and unique service providers, also constitute satisfaction, if needed, of OAR 660-004-

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0022(1)(c). In addition to the airport as a resource, the size of the property itself is sufficient to accommodate Applicant's current and future operational requirements, including the space needed to provide adequate surface protections for the approach and departure of the helicopters as well as the vast storage and maintenance space associated with its operations. As stated by Applicant's engineer at the hearing, these large helicopters do not take off and land straight up and down. They require horizontal clearance as well.

For all the reasons and evidence set forth above, Applicant's proposal complies with OAR 660-004-0022(1), if applicable.

38. OAR 660-004-0020 sets forth four factors under Goal 2, Part II(c) that are required to be addressed when taking an exception to a goal. The factors are set out above and below with findings specific to each following.

(a) Reasons justify why the state policy embodied in the goals should not apply.

The reasons justifying inapplicability of Goals 3 and 4 are established above as set forth in the Board's findings under OAR 660-004-0022.

In addition, with respect to the size of the property to be rezoned, after review of Applicant's site plan and current and long-range expansion needs, the Board finds that Applicant requires the full 27.48 acres. The record shows that Applicant requires at least 15 acres for the initial facility just to consolidate its United States operations and will require more for planned expansion.

The Applicant is currently leasing multiple different, separate areas and hangers at the Corvallis airport and in other cities near Corvallis due to insufficient space for its use. Applicant's existing Corvallis operations alone require 63,000 square feet of indoor roofed space. The remaining operations across the United States total an additional 23,000 square feet of indoor hanger and office space. In addition, Applicant leases a four-acre, outdoor truck yard for additional storage of helicopter parts. The need for storage is ever expanding as the company searches for and purchases parts for its older helicopters, for which parts are no longer manufactured. Applicant purchases older helicopters around the country simply for their parts in the event of future need. The outdoor storage causes corrosion of the parts, and the company's future expansion will provide additional, large areas of indoor storage and line maintenance for the additional helicopters. In the months between the hearings officer hearing and the Board's hearing, Applicant purchased two large, heavy-lift Sikorsky helicopters and as of the Board hearing was in the process of purchasing three more.

To provide for Applicant's 126,000 square foot facility, its outdoor apron, parking areas, truck storage areas (the company owns multiple fuel tankers that follow the helicopters while out for the summer on firefighting service; the helicopters burn up to 525 gallons of fuel per hour of flight), septic system and drainfield, the taxi way, the helipad and sufficient approach for the helipad, construction of the initial facility will require approximately 15 acres. After Applicant's consolidation, Applicant's foreseeable growth will require additional covered space for additional storage and maintenance shops.

The site map shows the approximate location and size of Applicant's anticipated future expansion. Construction of the expansion will require Applicant to obtain an additional conditional use permit by submitting a detailed site plan of the expansion facilities. At that time, the county and public will review the expansion and its impacts, and the county may impose conditions to mitigate those impacts.

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The Board finds that Applicant's request for the re-designation of the entire 27 acres is also consistent with similar users at the airport and necessary for safety. Applicant's primary competitor, Columbia Helicopters, operates on a site of 24 acres on the north end of the airport. In addition, the Federal Aviation Administration discourages crop lands on airport property for the safety of flight operations. Mr. Faegre, who has engineered and designed many of the facilities at the Aurora State Airport, recommends against using any of the proposed parcel for agricultural purposes. The Board finds such safety concerns substantiated by the January 13, 2010 *Oregonian* article provided at the hearing recounting the deaths of 8 people in a Sikorsky helicopter like Applicant's when the helicopter struck a hawk. Accordingly, as a practical matter, given the necessary configuration of the site for Applicant's use, no part of the subject property can remain viable for agricultural purposes. The Applicant has indicated that because of the reality of such safety concerns, the Applicant will not allow the property's use for agricultural purposes. Accordingly, the Board finds that regardless of whether buildings are constructed immediately on the area designated for Applicant's eventual expansion that area will nevertheless be for airport use by virtue of safety precautions preventing any agricultural activity to occur on that portion of the property. Furthermore, the record shows, and the Board finds that, Applicant's ability to expand is critical to the success of the company.

For these reasons, the Board finds that re-zoning the entire 27 acres is consistent with applicable criteria for the Goal exceptions.

(b) "Areas which do not require a new exception cannot reasonably accommodate the use":

The property adjacent to the Aurora State Airport was selected for this development by the Applicant because it features a unique combination of attributes not found on any other property in the region. Being situated adjacent to an airport is vital to Applicant's business. This eliminates a majority of the potential property in the applicable vicinity, and the county as a whole. In addition to benefitting from the use of an adjacent airport, Applicant also provides services that are a direct benefit to other businesses already located at airports. This concentration of potential users and customers cannot be found except at an airport facility. It is most efficient from both the aviation supplier and customer's perspective to have these services located nearby each other and adjacent to an airport. More importantly, the Applicant requires proximate access to airport facilities for the dispatch of its fleet of helicopters as well as the helicopters' return for maintenance and repair.

Proximity to the Aurora State Airport specifically is particularly important. This specific site offers several unique amenities that cannot be duplicated by any city, rural community, or airport in the state. The Aurora airport is the location of the supplier, repair service provider, and engineer of the Applicant's specially designed tail rotor blades, Metal Innovations, Inc. Metal Innovations, Inc. is the only company in the world that supplies this product and service for the Applicant. This is not only important for operations efficiency, but also for reducing energy and transportation costs associated with shuttling parts to and from Metal Innovations, Inc.

In addition, there are significant strategic advantages in being located near the Applicant's two competitors. Columbia Helicopters, Inc. is located within the Aurora Airport, and Evergreen Helicopters, Inc. is located at the McMinnville Airport. Included in those advantages is proximity to the human resource pool of specially trained mechanics that has the expertise necessary to perform the service and repairs needed at the Applicant's proposed facility. The center of that pool is in the Aurora area because of the presence of the Applicant's two competitors.

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In addition, there is an airport access road that abuts the subject property's western border. Applicant also owns a 100-foot easement across the south end of the airport specifically granted for purposes of gaining access to taxiways and the runway. Because a "Through the Fence" program has been established at this airport, Applicant will be eligible to use this easement in conjunction with the ability to access the airport facilities. The "Through the Fence" program, in its newly enacted form, is available only at three Oregon airports at this time. Along with the Aurora State Airport, the Scappoose Industrial Airpark and the Baker City Municipal Airport are eligible to participate in this program. However, only the Aurora State Airport can meet the Applicant's needs: It is the only airport in the state with the strategic and efficiency advantages of proximity to its specialty rotor blade vendor and its competitors (i.e. skilled labor force), it is proximately located to the Portland International Airport (key for transportation of parts and employees), and it has the "Through the Fence" capability.

The largest concentration of industrial land is typically found within city limits, in urban environments. This is the land that would be immediately ready to accept Applicant's use, and would not require any exceptions. However, the proposed uses on the property are not compatible with most uses located inside city limits in a traditional urban setting, as there are certain noise and safety concerns that are typical for an airport environment, but which may not be compatible with certain residential, commercial, and even some industrial developments.

The Applicant provided a detailed analysis of the areas at the airport not requiring an exception. It reveals that there is no property in the airport's boundary that can accommodate the Applicant's proposed use. The Applicant is consolidating its United States operations at its Aurora property. Its operations require large operating and storage areas immediately and substantially more in anticipated expansion.

The Applicant is currently leasing multiple different, separate areas and hangers at the Corvallis airport and even in other cities near Corvallis due to insufficient space for its needs. Applicant's existing Corvallis operations alone require 63,000 square feet of indoor roofed space. The remaining operations across the United States total an additional 23,000 square feet of indoor hanger and office space. In addition, Applicant leases a four-acre, outdoor truck yard for additional storage of helicopter parts. The need for storage expands as the company purchases parts for its older helicopters, for which parts are no longer manufactured. Applicant purchases older helicopters around the country simply for their parts in the event of future need. The outdoor storage causes corrosion of the parts, and the company's future expansion will provide additional, large areas of indoor or covered storage.

To provide for Applicant's 126,000 square foot facility, its outdoor apron, parking areas, truck storage areas (the company owns multiple fuel tankers that follow the helicopters while out for the summer on firefighting service; the helicopters burn up to 525 gallons of fuel per hour of flight), septic system and drainfield, the taxi way, the helipad and sufficient approach for the helipad, stage 1 of the new facility will require approximately 15 acres. This facility is intended primarily to house corporate offices and line maintenance facilities for the winter overhaul of the helicopters when returned from firefighting service in the late fall. Additional storage will continue to be maintained offsite until expansion occurs, which will primarily house additional storage and shops.

The site map shows the approximate location and size of shops and storage areas in future expansion. A separate conditional use permit application with a detailed site plan will be required when Applicant's expansion takes place.

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Because there are no properties within the airport large enough for Applicant's proposed use, any properties other than Applicant's would require crossing a state highway or county road and further encroaching on resource land to find properties large enough to accommodate Applicant's use. The facility's taxiway cannot cross public roads. In addition, any resource-land properties would likewise require reasons exceptions, and would be less compatible with resource lands than Applicant's property. Applicant's property is immediately adjacent to the existing airport facilities and buffered from surrounding agricultural uses by Airport Road and Keil Road.

The Board finds that Applicant's necessity of owning the property for its new facility is valid justification for its site selection. The economic realities of Applicant's proposed facility require its ownership of the property. Some testimony at the hearing suggested that properties available for lease should be viably considered for Applicant's use. The Applicant states that leasing is not an option, and the Board finds Applicant's position to be valid. Applicant is investing $20,000,000 into this facility's initial construction alone. The Board agrees that with an investment of this size, no prudent business would move forward without complete control of its property and the knowledge that it will permanently retain its investment (i.e. not risk losing it at the conclusion of a lease). The Board finds that such an investment in ownership of the property is a sign of Applicant's commitment to longevity at this location, as opposed to other companies that have merely leased property and are now abandoning the airport. The Board finds such an economic consideration requiring property ownership as an appropriate factor to be considered in this application. The Board finds the proposed facility to be unique and large, and a significant economic opportunity that requires very specific parameters, including property ownership. OAR 660-004-0020(2)(b)(B) specifically provides that "Economic factors can be considered along with other relevant factors in determining that the use cannot reasonably be accommodated in other areas."

The requirements of this particular use require a location in close proximity to the airport. The subject property, given the reasons noted above, is uniquely suited for this use. The airport is currently surrounded by resource lands and there are no appropriately zoned areas available adjacent to the airport which are not developed or are being developed which can reasonably accommodate aviation-related activity. There are no areas which do not require an exception that could reasonably accommodate the use. For the reasons stated, there is no other airport that can meet Applicant's needs. However, even assuming otherwise, any other lands for purchase adjacent to public-use airports in Marion County, or the State of Oregon for that matter, would likely require the same exception that is required in this application. For these reasons, there are no properties not requiring an exception that can reasonably accommodate Applicant's use. Even those properties that would require an exception cannot accommodate Applicant's use in light of their inability to provide the significant comparative advantages of this location and their incompatibility with surrounding agricultural uses. This criterion is satisfied.

(c) *The long-term environmental, economic, social and energy consequences resulting from the use at the proposed site with measures designed to reduce adverse impacts are not significantly more adverse than would typically result from the same proposal being located in other areas requiring a Goal exception.*

As stated above, the location of this project adjacent to the airport is an essential component of the proposed development. All of the possible alternative sites adjacent to airports, which would be suitable for siting an aviation-related activity, are also zoned EFU in the vicinity. Therefore, there are no adverse impacts that can be said to be significantly more adverse that would typically result from the same proposal being located in other areas requiring a Goal exception. Attempting to site the

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proposed project on any other piece of land would likely have even more significant adverse consequences. The only other tract of land adjacent to the airport that is not already in airport use is the tract of land directly adjacent to the north of the proposed use. This property is not vacant; it is actively used as a religious retreat facility. The retreat property would also require an exception, would actually have no buffer from agricultural land to the south, and is financially infeasible since the Applicant already owns the property subject to this application. In addition, in order to develop the retreat property, besides the costly relocation of the religious retreat and removal of the associated structures, a large amount of the timber that is currently on the land would likely have to be removed. This is a significant environmental consequence that would not be necessary were the development located directly to the south on the subject property.

Even as far back as 1976, Marion County recognized that the subject property was fit to be developed for airport expansion under private ownership. In the 2007 Airport Layout Plan (ALP), this property is the only property acknowledged as "ACCEPTABLE FOR AIRPORT-RELATED DEVELOPMENT UNDER PRIVATE OWNERSHIP." The proposed uses on the subject property will be consistent with those that currently exist at the airport. The existing airport uses have been compatible with the surrounding resource uses for decades. There is no indication that an expansion of these uses would cause an incompatibility. In fact, the new development will have better buffers from resource uses than the current airport development has. The proposed use is well situated away from residential areas, but also buffered by roads from agricultural uses. As described and conditioned, it will not interfere with resource use, as many other uses might. Additionally, there are certain noise and safety concerns associated with this use, which make it more compatible with rural areas than it would otherwise be in more densely populated areas.

The Board finds that the proposed use will not cause a significant increase in the amount of automobile traffic. The impact would be no more adverse than if this use were sited on another property requiring a goal exception. As identified in the Traffic Impact Analysis and as conditioned, the surrounding roads will be adequate to accommodate the increase in vehicle trips caused by the proposed development. As the 2000 Airport Master Plan Update concludes, the existing roads are adequate to handle the increase in the proposed development. Being located adjacent to a major collector and in close proximity to major transportation and shipping routes, such as Interstate 5 and Oregon Highway 51, is a benefit that is not available on other rural land that would be suitable for this use. The property is also benefitted by the existing easement created specifically to provide direct access to the airport from this site without burdening public roads. In addition, the applicable airport overlay zone limits certain development standards applicable to the property. This will help ensure that the potential for larger, heavy traffic producing development on the property remains less than could be achieved from the same proposal being located on other lands requiring a Goal exception.

The proximity to the Aurora Airport, and various urban centers, is another reason why this property was purchased by Applicant. Applicant currently travels from the Corvallis Municipal Airport to the Portland International Airport (PDX) for shipments and personnel dispatches. The move to Aurora will cut this transportation distance and time significantly, by approximately 130 miles and 2.5 hours each round trip to and from PDX. This reduction in distance reduces energy consumption and environmental impacts, as well as the operations costs to the Applicant.

Economically, the expansion of the airport is positive for the City of Aurora, Marion County, and the state of Oregon. In the city of Aurora's comprehensive plan, the City's adopted assumptions forecast an 86% increase in population over the planning period (2000-2020). According to the Portland State University Population Research Center, as of July 1, 2007 Marion County was estimated to contain

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311,070 residents in 2005, up 9.2 percent from the 284,834 residents the census data recorded in 2000. This region is currently growing at nearly the same pace as the state as a whole, which experienced 9.5 percent growth over that same period according to the same data. The City acknowledges that the vicinity around the airport has the potential for significant economic/commercial development. *See* City of Aurora Comprehensive Plan, Pages 22 and 59. Increased development will have a positive economic impact upon the city. *See* City of Aurora Comprehensive Plan, Page 22. Applicant's generation of new jobs will also have a secondary effect of increased patronage of local businesses. The 2007 Oregon Aviation Plan analyzed the economic impact that the airport had on regional economy. In 2005, 2,403 jobs were directly related to both on and off airport related impacts, providing $52,347,000 in local wages. *See* Oregon Aviation Plan 2007, Appendix E, Page 6. The sum of on-airport economic activities, off-airport spending by visitors who arrive by air, and spin-off impacts led to local business sales of $134,827,000. This impact is proportionate to the impact that public-use airports have on the state as a whole. Oregon public-use airports, including airport tenants, directly employ 7,000 people for aviation related activities and expend $259,000,000 in wages. *See* Oregon Aviation Plan 2007, Aurora State- Individual Airport Report, Page 32. These employees and tenants earned an average annual salary of $36,000 per year for aviation activities and $35,000 per worker, when including non-aviation jobs.

OAR 660-013-0010 sets forth the policy of the state of Oregon regarding airport planning. "The State is to encourage and support the continued operation and vitality of Oregon's airports... Ensuring the vitality and continued operation of Oregon's system of airports is linked to the vitality of the local economy where the airports are located." Expansion of the airport to include Applicant's business would be positive for the continued overall growth and vitality of Oregon's aviation system, and a tremendous advantage for the region to secure a productive and viable business. As discussed above, Applicant is a multimillion dollar producer. Applicant will provide both sales and substantial, high-wage jobs to the region. The consolidation of the company in Aurora would mean that there will be an immediate need for 85 additional jobs in the region, with average salaries ranging from $50,000 to $60,000 per year. The Applicant forecasts steady growth, with a projected need of approximately 160 employees by the 5th year.

Applicant's proposed use can only be located at or adjacent to an airport which will allow access to its facilities. This limits the alternative sites which are appropriate to consider for the proposed use. The land adjacent to the Aurora State Airport is ideal for the proposed use given its location adjacent to the airport and its proximity to nearby urban centers. Additionally, the land has adequate resources and capacity to support the septic and water needs of the use, while also being adjacent to roadway infrastructure that can handle the increase in anticipated traffic.

For the reasons listed above, Applicant's proposed use will have significantly positive, long-term environmental, economic, social and energy consequences resulting from the use at the proposed site as compared to other areas which would also require a goal exception, especially given the history of similar uses on adjacent properties. Applicant's relocation will have significant, positive energy and environmental consequences by reducing fuel and traffic use from its Corvallis site, and it will provide tremendous economic benefits to the state and region through relocation of its business to the Aurora Airport. The Board finds this criterion is satisfied.

(d) The proposed uses are compatible with other adjacent uses or will be so rendered through measures designed to reduce adverse impacts.

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The vicinity in which the property is located is dominated by the airport. The airport has been in existence since 1943 and has remained compatible with the adjacent resource uses in the area over this period. Applicant's proposed use, which would effectively expand the airport and include uses already existing adjacent to resource uses, will be bordered to the west by the preexisting airport development, to the south by Keil Road NE, and to the east by Airport Road NE. To the north is a rural religious retreat, which also borders the existing airport operations. The proposed primary operations of the use will be located on the southern portion of the parcel which should minimize any interference between the proposed use and the retreat to the north. Similarly, the farming activity to the south, across Keil Road NE has not been negatively impacted by the current airport development. The Board finds that expansion of currently existing uses will not render the airport uses otherwise incompatible with farming to the south. There has been and there is currently no affect on agricultural activity on the property from the existing airport uses. Applicant's extension of airport uses farther east onto the property will not have a negative effect, especially now with a larger buffer in Airport Road.

Regarding the activity that will take place on the property, all helicopter repairs will be done indoors. The Board finds Applicant's use to be relatively low impact for an industrial proposal, particularly with respect to both air and road traffic. Many of its employees are offsite with the helicopters thereby reducing vehicle trips. The helicopter traffic occurs predominantly for a brief period in the spring and fall between fire season dispatch and returns. This approval further conditions the number of employees regularly onsite as well as site grading and storm drain activities to prevent adverse impacts to surrounding properties. The applicable airport overlay zone provides additional restrictions on development on the property.

Many neighbors of the airport testified in support of the proposed use, including other airport users and numerous neighbors in the residential subdivision to the southwest of the airport, Deer Creek Estates. The airport manager for the Corvallis Airport, where Applicant is currently located, also provided testimony explaining how Applicant has been a compatible neighbor to airport users and local residents. The Applicant's competitor, Columbia Helicopters, has long operated 24 acres at the north end of the airport without conflict with neighbors or airport users. Lastly, the State of Oregon's Airport Land Use Compatibility Guidebook indicates that industrial uses, like the Applicant's, are specifically permitted within 10,000 feet of the airport runway and are compatible with the airport itself.

Concern was raised regarding the flight paths of the helicopters and their landing location. A nearby resident was concerned for safety reasons of a helicopter power failure resulting in a crash. At the Board hearing, testimony was provided indicating that helicopters do have the ability to maneuver and glide in the event of power failure, even to the point of being able to control a landing location. The Board finds that it does not control flight paths of the aircraft at the airport; the FAA controls flight paths. The Board also finds the evidence in the record to demonstrate that Applicant's proposed use will minimize conflicts with neighboring property owners. The highest concentration of helicopter flights to and from the facility occurs in two, relatively brief periods of the year (spring and fall). The pilots are highly trained and experienced as needed for their firefighting purposes. The airport manager of the City of Corvallis airport indicates that the Applicant has a history of controlling its flights in a manner that avoids conflict with neighbors. In addition, Mr. Faegre indicates that the Aurora Airport has one of the strongest noise abatement programs in the country. For these reasons, the Board finds that the proposed use will be highly compatible with neighbors both within and outside the airport, whether the helicopters are landing at the airport runway or at the subject property. The Board finds that the Applicant's helicopters will take off and land predominantly at the subject site except in times of inclement weather, emergencies, or as needed to avoid air traffic congestion. Fixed

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wing aircraft of the company and its suppliers, vendors, and independent contractors that deliver parts and personnel will land on the airport runway and taxi to the Applicant's facility.

For these reasons, the Board finds that the proposal, as conditioned hereby, is compatible with adjacent uses and therefore satisfies this criterion.

39. The Board finds that the Applicant has demonstrated satisfaction of the criteria for taking a Goal 3 exception for the 27 acres of the subject parcel.

Goal 14 Exception

40. The purpose of Goal 14 is to provide an orderly transition from rural to urban land uses. The subject property is rural land by definition, is zoned EFU, and the proposed use is an urban use. The existing airport was deemed to be a type of urban use in *Murray et al. v. Marion County,* 23 OR LUBA 268 (1992). Airports tend to be located away from urban zoned land. An exception to Goal 14 is required for an urban use on EFU zoned land. OAR 660-014 provides the criteria for taking a reasons exception to Goal 14.

41. Below are the criteria and findings of OAR 660-014-0040:

(1) *As used in this rule, "undeveloped rural land" includes all land outside of acknowledged urban growth boundaries except for rural areas committed to urban development. This definition includes all resource and nonresource lands outside of urban growth boundaries. It also includes those lands subject to built and committed exceptions to Goals 3 or 4 but not developed at urban density or committed to urban level development.*

(2) *A county can justify an exception to Goal 14 to allow establishment of new urban development on undeveloped rural land. Reasons that can justify why the policies in Goals 3, 4, 11 and 14 should not apply can include but are not limited to findings that an urban population and urban levels of facilities and services are necessary to support an economic activity that is dependent upon an adjacent or nearby natural resource.*

The subject property is outside the Aurora urban growth boundary and is on undeveloped rural land but is adjacent to the airport which is zoned P and has been developed with urban type uses. Airports are generally located away from urban areas due to safety and noise concerns. According to the Oregon Department of Aviation, the Aurora State Airport has evolved over the years into the busiest state-owned airport and the fifth overall busiest airport in the state. *See* Oregon Department of Aviation 2007 System Master Plan-Aurora State Individual Airport Report, Page 18. Today, the airport continues this growth. The significant economic contribution the airport already makes to the region is discussed below and throughout these findings. The Aurora State Airport does not presently have the capacity to meet the demand that increased usage has caused. This deficiency is caused by the limited amount of land currently at the airport that has the appropriate zoning designation to allow for airport development.

The eventual need to expand the airport has been documented as far back as at least 1976. The 1976 Aurora Airport Master Plan was incorporated into the Marion County Comprehensive Plan, of which it remains a part today. The 1976 version of the Airport Master Plan forecasted a significant increase in general aviation traffic. In order to deal with this increase, which has in fact occurred as predicted, the plan recommended the acquisition of additional surrounding land. Specifically, the master plan noted

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that "Space for airport expansion is impacted on three sides by highways, relatively difficult to relocate, and on the fourth side by privately owned and controlled property... Expansion will be into the space east of present airport property." The Land Use Plan drawing incorporated into the master plan notes on the subject property that "THIS AREA IS ACCEPTABLE FOR AIRPORT-RELATED DEVELOPMENT UNDER PRIVATE OWNERSHIP." This note continues to appear on other site plans and airport layout plans through the years. One recommendation to implement this plan prescribed acquiring 113 acres of land on the east side of the airport. The plan went on to note that "Without this space for airport development it will be impossible to implement a complete and productive airport development program".

The need exists to expand the airport facility to accommodate both historical and anticipated growth. The subject property has been identified, at least as far back as 1976 in the Airport Master Plan, as the most appropriate location for purposes for expansion. Applicant's use will provide additional land and support services that the airport will use to help encourage and facilitate the growth potential at the airport facility. Numerous documents including the MCCP, the Aurora State Airport Master Plan, and the October 2000 update to the Aurora State Airport Master Plan (though not adopted by the county), state the need for additional acquisition of land at the airport. The Aurora State Airport has been selected by the Oregon Legislature as the first pilot site to participate in its "Through the Fence" program (*see* ORS 836.642), which specifically promotes the economic development of rural airports. The stated purpose of ORS 836.642 is to "encourage development of through the fence operations designed to promote economic development by creating family wage jobs, by increasing local tax bases and by increasing financial support for rural airports." The Aurora State Airport has the potential to be an even more significant economic contributor than it is now.

As discussed in the Board's findings with respect to the Goal 3 exception above, the subject property is situated in a perfect location for the Applicant's business. The proximity of the airport to the aerial forest fire fighting portion of the business, along with a close proximity to other urban centers provide additional reasons why the Aurora State Airport provides an ideal location for Applicant's business. Furthermore, the subject property was available for outright ownership. The long-term financial and control advantages of ownership rule out leasing land for Applicant's operations as an option. A significant economic advantage regarding the subject property is that the Applicant already owns the land. Finding lands adjacent to airports to purchase in this state is difficult enough, not to mention lands which are adjacent to airports which have as much to offer Applicant as the Aurora State Airport does. Finally, Applicant would be considered a fixed based operator at the airport. The October 2000 update to the Aurora State Airport Master Plan, describes these operators as needing "easily identified and available public access, visibility from public roads, and good airfield access, and should be easily locatable by itinerant traffic landing at the airport." *See* page 4-15. The subject property meets all of these criteria, as it has frontage and public access off of Airport Road NE, Keil Road NE, and Yellow Gate Lane; as it has good airfield access with an easement which allows direct access to airport facilities; and as it can be easily locatable by itinerant traffic landing at the airport since it is within the horizontal surface district of the airport.

The Board finds that securing Applicant's company at this location would be a benefit for not only the airport, but the city, county, and state as well. The Applicant reached $80 million in sales in 2007, and it is estimated to reach $110 million in sales in 2010. Currently, Applicant subcontracts approximately $5 million to local Oregon companies and estimates that the number should increase to $8 million within the first year after consolidation of the operation is complete at the airport. The consolidation of the company at the airport would mean that there will be an immediate need for approximately 85 additional jobs in the region, with average salaries ranging from $50,000 to $60,000 per year. The

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Applicant projects the need to add approximately 20 additional positions per year, with an anticipated workforce of 160 employees in place by the end of the 5th year.

For the reasons listed above, there exist compelling reasons in this case for taking an exception to Statewide Planning Goal 14 to allow Applicant to locate its use on the subject property, adjacent to the Airport.

(3) To approve an exception under section (2) of this rule, a county must also show:

(a) That Goal 2, Part II (c)(1) and (c)(2) are met by showing that the proposed urban development cannot be reasonably accommodated in or through expansion of existing urban growth boundaries or by intensification of development in existing rural communities;

The Aurora UGB is located approximately 1300 feet from the subject property. The land between the existing UGB and the subject property is resource land, currently in farm production. The City of Aurora originally proposed that the airport be included in the UGB when it was going through acknowledgement; however, this was not approved by LCDC and the UGB was reduced to the present area. It continues to be unreasonable to extend the UGB this distance due to the amount of intervening resource land.

Likewise, attempting to locate this use in a rural center, or rural community would be unreasonable. There are no rural centers or communities in Marion County that lie adjacent to an airport. The proposed use depends on access to adjacent airport facilities. The business cannot be located away from any airport. Furthermore, proximity to the Aurora State Airport specifically is particularly important. This specific site offers several unique amenities that cannot be duplicated by any city, rural community, or airport in the state. The Aurora airport is the location of the supplier, repair service provider, and engineer of the Applicant's specially designed tail rotor blades, Metal Innovations, Inc. Metal Innovations, Inc. is the only company in the world that supplies this product and service for the Applicant. This is not only important for operations efficiency, but also for reducing energy and transportation costs associated with shuttling parts to and from Metal Innovations, Inc.

In addition, there are significant strategic advantages in being located near the Applicant's two competitors: Columbia Helicopters, Inc. is located within the Aurora Airport, and Evergreen Helicopters, Inc. is located at the McMinnville Airport. Included in those advantages is proximity to the human resource pool of specially trained mechanics that has the expertise necessary to perform the service and repairs needed at the Applicant's proposed facility. The center of that pool is in the Aurora area because of the presence of the Applicant's two competitors.

The "Through the Fence" access, in connection with the private airport access easement owned by the Applicant, will allow Applicant the ability to directly access the airport and runway. Accordingly, this location affords the most economic, energy and environmentally efficient operation possible.

There are no rural centers which could encompass the proposed exception area. The closest rural center, Fargo Interchange, is approximately 10,000 feet west of the subject property and airport. The closest rural community is Butteville, which is located approximately 4.7 miles from the airport. Notwithstanding proximity to the airport being an issue, the Applicant is proposing a use that is larger in scale than is typical for most urban development in these areas. For example, Butteville, which

contains approximately 85 dwellings, an art studio, and a church, would be an inappropriate location to intensify development density to allow for larger scale airport related uses. The predominantly residential character of the community is not compatible with the Applicant's proposed uses, especially certain noise and safety issues generally associated with airport related development as already exists at the airport. Intensifying development in existing rural communities, in this case, would have negative consequences for both the rural community and the Applicant.

For the reasons listed above, the Board finds the proposed urban development cannot be reasonably accommodated in or through expansion of existing urban growth boundaries or by intensification of development in existing rural communities. This criterion is satisfied.

(b) That Goal 2, Part II (c)(3) is met by showing that the long-term environmental, economic, social and energy consequences resulting from urban development at the proposed site with measures designed to reduce adverse impacts are not significantly more adverse than would typically result from the same proposal being located on other undeveloped rural lands, considering:

(A) Whether the amount of land included within the boundaries of the proposed urban development is appropriate, and

The Board hereby incorporates its findings as to the necessity of re-zoning Applicant's entire 27 acres from the findings above under OAR 660-004-0020.

The Board finds the size appropriate particularly in light of the predicted needs of the Aurora State Airport and the deficiency to meet those needs. According to the Oregon Department of Aviation, the Aurora State Airport has evolved over the years into the busiest state-owned airport and the fifth overall busiest airport in the state. *See* Oregon Department of Aviation 2007 System Master Plan-Aurora State Individual Airport Report, Page 18. According to the update to the Aurora State Airport Master Plan, dated October 2000, (2000 Plan) a recommendation is made to provide increased space for increased fixed base operators (FBOs), which provide goods and services which complement the airport and its users. The 2000 Plan recommends that, "To provide sufficient land for new FBOs, 8 to 10 acres will be needed." In addition to the land needed to support the anticipated need for new FBOs, the 2000 Plan predicts that there will be an increased need for hangars to accommodate 62 additional based aircraft, which will require an additional 6.1-7.3 acres of land, to adequately serve the 318 total based aircraft anticipated to be located at the airport in the future. In sum, the 2000 Plan update predicts that by 2017, approximately 14.1-17.3 acres of additional land (for both FBOs and hanger space) will be needed to accommodate forecasted growth of the airport aside from Applicant's intended use. The 2000 Plan also reports that the surrounding area has a good supply of available adjacent land for future development, and points out that the development pattern for the airport has always been on adjacent private land.

The 2000 Plan update is now nearly 10 years old and made projections through year 2017.[3] In February 2008, the Oregon Department of Aviation adopted the Oregon Aviation Plan 2007, (OAP 2007). This document is intended to guide the management and growth of all Oregon airports over the

3 This update has never been formally adopted by Marion County. The County has not adopted any revision to the master plan since the 1976 version of the Aurora State Airport master plan was incorporated into the comprehensive plan. Nevertheless, the Board finds the update to provide reliable information relevant to this proposal.

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next 25 years. The aviation activities and future projections in this study were updated. OAP 2007 represents the most current analysis of the activities taking place at the airport today. The report specifically identified that hangered aircraft storage was one area in which the airport was deficient. The data in OAP 2007 reveal that the 2000 update to the Aurora State Master Plan did not fully anticipate the growth that would occur at the airport. OAP 2007 reports that, as of 2005, there were 387 based aircraft at the airport. This is already 69 more aircraft than the 2000 Plan update anticipated would be located at the airport in 2017. By 2025, OAP 2007 forecasts that 498 based aircraft could potentially be located on site at the airport. Using this 2025 estimate, in light of demand already significantly exceeding the 2000 Plan estimates, airport needs easily exceed the 27.5 total acres that are the subject of this application, let alone the acreage to be available for FBOs and hangers after establishment of Applicant's proposed facility.

The Board finds that the subject property provides an appropriate amount of land to meet at least some of the need from current and future growth, including the Applicant's proposal and projected operations. This criterion is satisfied.

(B) Whether urban development is limited by the air, water, energy and land resources at or available to the proposed site, and whether urban development at the proposed site will adversely affect the air, water, energy and land resources of the surrounding area.

The uses on the property will be similar to those uses that currently exist on the adjacent airport property. The Board finds that an onsite well and septic system will be feasible to handle the required demands of the proposed use, with the potential exception of water for fire protection, which may be provided by connection to the adjacent, existing facilities at the airport. As testified at the hearing by Applicant's engineer, that need may be met by either the existing fire protection district or the well onsite. As a condition under this approval, Applicant is required to provide a report demonstrating the capacity of any facility. Stormwater will be detained onsite. Applicant is required, under conditions of this approval, to not adversely impact storm drainage in surrounding areas. Environmental Management Systems, Inc. conducted a preliminary evaluation for onsite water feasibility in May of 2008 concluding that there was capacity for up to 100 workers were expected to work onsite in a facility containing showers (the approval will be conditioned to allow only 70 employees to be regularly scheduled on site). There are no anticipated limitations to the air, water, energy and land resources at or available to the proposed site. There are no adverse impacts on the carrying capacity of the environmental resources, as the area historically has no ground water issues, and no other known issues relating to a lack of capacity for sewer and water for airport users. There are no identified areas for fish or wildlife habitat, and no wetlands or streams are present on the property. There are no conflicts or limitations as to onsite resources which would serve the property.

Likewise, urban development on the subject property will not adversely affect the resources of the surrounding area. Using the subject property for airport related uses is an appropriate use of this land, given it is adjacent to other airport development, buffered from agricultural activity by roads, and long-identified as suitable for airport development. Most of the activity associated with Applicant's business will be conducted onsite, or on the adjacent airport properties. As previously mentioned, the location of the airport is necessary for Applicant, especially since it regularly uses the Portland International Airport (PDX) for equipment deliveries, and to dispatch personnel. A move from the Corvallis facility to the Aurora State Airport would save the Applicant approximately 2.5 hours and 130 miles per round trip to and from PDX. For these reasons, Applicant's proposal should actually have a positive effect on the environment, energy and land resources of the surrounding area.

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The entire western border of the subject property is adjacent to the currently developed airport. The proposed uses on the property are similar in nature to those that have existed at the airport for many years. Those uses have coexisted with the adjacent resource uses in the area, and the Board finds this will continue after development of the subject property. This development will have a more significant buffer to the east of the property than was provided by Yellow Gate Lane to the previous easternmost airport development, as Airport Road NE is improved as a major collector. The property is also buffered from agricultural uses to the south by Keil Road NE.

The impact of establishing this type of business on other undeveloped rural land would be far more dramatic than the impact at the proposed location. The airport has a runway and other amenities necessary for the Applicant's business that would not be available if the use were sited on other undeveloped rural land. Because the location adjacent to an existing airport offers necessary existing infrastructure the economic, environmental, and energy impact will be reduced. In addition, there is no other undeveloped land that is located near a rural airport within the county. Surrounding landowners will be minimally affected and can continue to use their property for farming as they have done in the past.

As conditioned, and in light of the longstanding coexistence of this agricultural area with the Aurora State Airport, the capacity of the subject property to accommodate the proposed use, the lack of anticipated negative affects on the air, water, energy, and land resources onsite or on the surrounding area, the buffers provided by Airport Road NE and Keil Road NE, and the positive affects on the energy and land resources in the area, this criterion is satisfied.

(c) That Goal 2, Part II (c)(4) is met by showing that the proposed urban uses are compatible with adjacent uses or will be so rendered through measures designed to reduce adverse impacts considering:

(A) Whether urban development at the proposed site detracts from the ability of existing cities and service districts to provide services; and

All water and septic requirements of this proposed use will be handled onsite, or by connection into the existing facilities at the airport. The proposed use is anticipated to generate 878 automobile trips per day, 123 of those being PM peak hour trips. The Applicant's traffic engineer and County Engineering staff concluded, based on Applicant's Traffic Impact Analysis (TIA) that the existing and anticipated level of trips will be accommodated by the existing capacity of the road system. The October 2000 update to the Airport Master Plan concurs with this conclusion. The 2000 update provides:

Surface access to all parts of the airport is good. The airport businesses have access from Arndt Road, Airport Road and Keil Road. Access to Interstate 5 is a short drive on the Wilsonville-Hubbard Highway. Interstate 5 can also be accessed via Ehlen Road. Aurora State Airport, like most general aviation airports, does not generate a significant number of auto or truck trips per day. The existing and anticipated level of trips can easily be accommodated by the existing road system.

See page 4-22. In addition, Applicant will contribute toward measures required to mitigate its impact.

Applicant's proposed use will be located adjacent to other uses that have been established at urban densities outside of the Aurora UGB, and that rely very little upon the provision of services from cities

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or service districts. Like the existing users at the airport, the Applicant will rely only on county transportation facilities, the Aurora Rural Fire Protection District and the Marion County Sheriff. Given Applicant's location adjacent to users that already utilize these services, Applicant will be in the best position to receive the benefits of these services, and should in no way detract from the provision of services. This criterion is satisfied.

(B) Whether the potential for continued resource management of land at present levels surrounding and nearby the site proposed for urban development is assured.

The airport has existed surrounded by resource land and uses since 1943. During that time, there has been no evidence that the airport has reduced the potential for continued resource management of the surrounding land. This expansion of the airport will not change the interaction with the surrounding properties and, as discussed above, the proposed use is compatible with nearby agricultural resource lands. The airport overlay zone places additional limits on potential development of the property, thus reducing the possibility that the Applicant could establish a use that would be incompatible with surrounding properties. Lastly, Airport Road NE and Keil Road NE provide a buffer between the agricultural uses and proposed urban uses on this site. Airport Road NE, which is developed as a major collector, will provide a greater buffer between airport development and agricultural uses than Yellow Gate Lane currently provides. This criterion is satisfied.

(d) That an appropriate level of public facilities and services are likely to be provided in a timely and efficient manner; and

The primary services needed for this proposed use are water and sewer, both of which will be provided onsite. The Board finds that an onsite well and septic system will be feasible to handle the required demands of the proposed use, with the potential exception of water for fire protection, which may be provided by connection to the adjacent, existing facilities at the airport. Testimony at the hearing indicated that need may be met by either the existing fire protection district or the well onsite. As a condition of this approval, the Applicant is required to provide a report demonstrating the capacity of the facility. Fire suppression service will likely be provided by the existing Aurora Rural Fire Protection District, and law enforcement, to the extent necessary, will be provided by the Marion County Sheriff. As discussed above, these services are currently available to the properties in the area and can be efficiently provided to the subject property. No public facilities or services are thus required except for roadways. No new roadways are needed. Currently, the intersections of Ehlen Road with OR 551 and Airport Road do not meet operating standards. Both intersections have improvements identified with a traffic signal at Airport Road and dedicated left turn lanes for Ehlen Road. The Applicant's traffic engineer and County Public Works staff determined that any impacts to roadways caused by Applicant's proposal will be minimal so long as 1) no more than 70 employees are regularly scheduled onsite, and 2) proportionate contributions are made by Applicant to mitigate its impact at the studied intersections. This approval is conditioned accordingly. This criterion is satisfied.

(e) That establishment of an urban growth boundary for a newly incorporated city or establishment of new urban development on undeveloped rural land is coordinated with comprehensive plans of affected jurisdictions and consistent with plans that control the area.

As demonstrated above, the proposed uses and development are consistent with the applicable sections of the Marion County Comprehensive Plan. Likewise, development of this property is consistent with the 1976 Aurora State Airport Master Plan, which has been incorporated into the Marion County

Comprehensive Plan. Specifically, this Master Plan designates the subject property as an area suitable for airport expansion under private ownership. This criterion is satisfied.

Some participants provided testimony asserting that approval of this application will represent inadequate planning and threatened encroachment of the airport toward the City of Aurora. These participants advocate for the Board's waiting until new master planning is complete. The Board finds this proposal is consistent with the existing, current Aurora State Airport Master Plan, the Marion County Comprehensive Plan, the zoning regulations of the county, and the Oregon Department of Aviation's Aviation Plan. The Master Plan and subsequent updates by both the county and the Oregon Department of Aviation have long identified the subject property as suitable for airport expansion. The Board finds no benefit or necessity in delaying this decision for additional Master Planning when Master Planning is already in place. The 1976 Aurora State Airport Master Plan was adopted into the county's comprehensive plan. The subsequent updates and aviation plans for the county and state have not been formally adopted by the county, but the Board finds they nevertheless provide valuable, pertinent information regarding the airport and this application. The Board does not find that additional Master Planning will produce better information. Testimony at the Board hearing demonstrated that the new Master Plan will not address zoning or infrastructure at the airport at all. The Board finds that approval of Applicant's proposal reflects good planning consistent with applicable regulations using existing planning documents.

42. OAR 660-014-0040(4) is not applicable.

43. The Board finds that, as conditioned, this application meets the criteria for a Goal 14 exception under OAR 660-014-0040.

STATEWIDE PLANNING GOALS

44. Relief from one goal does not excuse compliance with other Statewide Planning Goals, and, comprehensive plan amendments must be consistent with Statewide Planning Goals.

Goal 1: Citizen Involvement. To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.

The notice and hearings process before the hearings officer and the Board provided opportunity for citizen involvement.

Goal 2: Land Use Planning. To establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual basis for such decisions and actions.

The Board finds that the applicable substantive and procedural requirements governing Applicant's proposal, including examination under the county's acknowledged implementing regulations, have been followed and are satisfied.

Goal 3: Agricultural Lands. To preserve and maintain agricultural lands.

The Applicant requested an exception to Goal 3. The exception is discussed above and the Board approves the exception.

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Goal 4: Forest Lands. To conserve forest lands by maintaining the forest land base and to protect the state's forest economy by making possible economically efficient forest practices that assure the continuous growing and harvesting of forest species as the leading use on forest land consistent with sound management of soil, air, water, fish and wildlife resources and to provide for recreational opportunities and agriculture.

The subject site is not in a forest zone and has no known forestland capability. This goal is not applicable.

Goal 5: Open Spaces, Scenic and Historic Areas, and Natural Resources. To conserve open space and protect natural and scenic resources.

No identified wetlands, riparian ways, aggregate sites, big game habitat, sensitive waterways, or cultural sites are identified on or immediately adjacent to the Exception Area. This goal is not applicable.

Goal 6: Air, Water and Land Resources Quality. To maintain and improve the quality of the air, water and land resources of the state.

The Board hereby incorporates its findings above under OAR 660-014-0040(3)(b) relating to air, water, and land quality. The Exception Area is not within an identified air or watershed area. The subject site is not in an identified sensitive groundwater overlay zone. The proposed use is not one which will result in significant particulate discharge into the air. State law, administered through the county, governs septic disposals. State and county regulations are consistent with this goal. The Applicant will be required to comply with DEQ regulations and as conditioned, groundwater resources will be protected. As addressed above, based on the analysis of Applicant's engineer and consultants and evidence provided by similar uses adjacent to the subject property, development on the property will not exceed the carrying capacity of area resources, degrade area resources, or threaten the availability of such resources. The Board finds the application consistent with Goal 6.

Goal 7: Areas Subject to Natural Disasters and Hazards. To protect life and property from natural disasters and hazards.

The subject site is not in an identified floodplain and is not subject to other natural disasters or hazards. This goal is not applicable.

Goal 8: Recreational Needs. To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.

No goal 8 resources are identified on the subject site or implicated by this application. This goal is not applicable.

Goal 9: Economic Development. To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens.

OAR Chapter 660-09, implementing Goal 9, applies only to comprehensive plans for areas within the urban growth bundary. The proposed exception area is outside of the UGB. Nevertheless, Applicant's proposal has Goal 9 implications based on the direct and incidental economic advantages that this user

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will bring to the region.

The direct economic benefit to the region is significant. The Applicant reached $80 million in sales in 2007. The rate of growth has been steady every year and Applicant estimates it will reach $110 million in sales by 2010. Currently, Applicant subcontracts approximately $5 million to local Oregon companies and estimates that the number should increase to $8 million within the first year after consolidation of the operation is complete at Aurora. The consolidation of the company in Aurora would mean that there will be an immediate need for 85 additional jobs in the region, with average salaries ranging from $50,000 to $60,000 per year. The Applicant projects anticipated growth to require approximately 160 employees by the end of the 5th year. All of these jobs would be related to a use which promotes the health, welfare, and prosperity of Oregon's citizens. A substantial number of jobs will also be generated by construction of the Applicant's new facility, which is estimated to cost approximately $19 to $20 million. Property tax revenues from the property, once improved, will also generate approximately $150,000.

The incidental economic benefits are also important to note as increased development will have a positive economic impact upon the cty of Aurora. Applicant's generation of new jobs will also have the secondary effect of increased patronage of local businesses. For example, the 2007 Oregon Aviation Plan analyzed the economic impact that the airport had on regional economy. In 2005, 2,403 jobs were directly related to both on and off airport related impacts, providing $52,347,000 in local wages. *See* Oregon Aviation Plan 2007, Appendix E, Page 6. The sum of on-airport economic activities, off-airport spending by visitors who arrive by air, and spin-off impacts led to local business sales of $134,827,000. This impact is proportionate to the impact that public-use airports have on the state as a whole. Oregon Department of Aviation public-use airports, including airport tenants, directly employ 7,000 people for aviation related activities and expend $259,000,000 in wages. *See* Oregon Aviation Plan 2007, Aurora State- Individual Airport Report, Page 32. These employees and tenants earned an average annual salary of $36,000 per year for aviation activities and $35,000 per worker, when including non-aviation jobs. The significant economic benefits that Applicant would bring would not only benefit the region by providing above average wage jobs and utilizing regional goods and services, but the state as a whole by helping to promote the airport transportation system.

This economic opportunity comes at a time when another significant employer at the airport, Artex Aircraft Supplies, Inc., is closing its doors and consolidating its operations away from Aurora to Arizona. Artex's closure has resulted in the loss of 154 jobs at the Aurora Airport. Unlike Artex, which leased its space at the airport, Applicant is committing its resources to the Aurora Airport by consolidating its United States operations to the airport on land that it owns. The Board finds that the county and the airport need this economic opportunity to advance its Goal 9 economic needs. The Board finds that the application provides a diversified and substantial economic opportunity to the county and state.

Goal 10: Housing. To provide for the housing needs of citizens of this state.

OAR 660-08-000 is intended to define standards for compliance with Goal 10. OAR 660-08 deals with the provision of adequate numbers of needed housing units, and the efficient use of buildable land within urban growth boundaries. The subject site is not within a UGB. The proposed development is for airport related industrial use. The property is not designated for residential purposes currently. This Goal is not applicable.

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Goal 11: Public Facilities and Services. To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.

Fire and police protection are already provided and additional public services are not required as a result of this application. Traffic is addressed elsewhere in this recommendation. This application is consistent with Goal 11.

Goal 12: Transportation. To provide and encourage a safe, convenient and economic transportation system.

Under OAR 660-012-0060(1), amendments to acknowledged comprehensive plans and land use regulations which significantly affect a transportation facility shall assure that allowed land uses are consistent with the identified function, capacity, and performance standards (e.g. level of service, volume to capacity ratio, etc.) of the facility.

Under OAR 660-012-0060(2), a plan or land use regulation amendment significantly affects a transportation facility if it:

(a) Changes the functional classification of an existing or planned transportation facility; (exclusive of correction of map errors in an adopted plan);

(b) Changes standards implementing a functional classification system; or

(c) As measured at the end of the planning period identified in the adopted transportation system plan:

(A) Allow land uses or levels of development that would result in types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;

(B) Reduce the performance of an existing or planned transportation facility below the minimum acceptable performance standard identified in the TSP or comprehensive plan; or

(C) Worsen the performance of an existing or planned transportation facility that is otherwise projected to perform below the minimum acceptable performance standard identified in the TSP or comprehensive plan.

The proposed Exception Area abuts Keil Road along the property's southern border to the north and Airport Road along the property's eastern border, which are identified as a local and major collector street respectively on the Rural Transportation System Plan (RTSP). As the Applicant's traffic engineer's TPR analysis concludes, this application for comprehensive plan amendment, zone change, and reasons exception will have no significant affect on the transportation facilities. County engineering staff agree with the traffic engineer's conclusions. Oregon Department of Transportation received the traffic impact analysis, but did not submit comments.

Applicant estimates having approximately 85 employees upon opening the new facility. After complete consolidation and expansion, it estimates it could have as many as 160 employees thereafter. This is the number of employees on Applicant's payroll. However, only some of these employees will

be at the proposed airport facility on any given day. During the period from May to November, the majority of Applicant's employees are out in the field as pilot and repair crews that remain with the helicopters in firefighting operations. While the helicopters are returned to the facility for winter overhaul maintenance during the months from November to May, there are more employees on the site, but still only those necessary for repair and maintenance. Based on current employment operations data, Applicant concluded that of the 85 employees on payroll after opening of the new facility, up to 20 employees would be onsite during the summer months, and up to 40 employees would be onsite during the winter months. Of the 160 employees estimated to be on payroll after Applicant's complete consolidation and anticipated growth, Applicant anticipates up to 35 could be onsite in the summer months and up to 70 employees regularly onsite in the winter months.

Applicant's traffic engineer recommended a cap on the number of employees regularly scheduled at the site at one time. The traffic engineer recommended that such cap be 70 employees regularly scheduled at the site at one time. The Board will condition this approval consistent with that recommendation together with an annual reporting requirement. In the event Applicant ever proposes to exceed that number, a new traffic impact study will be required and traffic impacts mitigated. Consistent with model and assumptions used in the TIA, this condition does not prohibit more than 70 employees ever being on site, but that more than 70 employees cannot regularly be on site at one time.

Applicant is required, as conditioned in this approval, to contribute a share proportionate to its impact at impacted intersections. Specifically, Applicant shall contribute its proportionate share toward improvements at the intersections of Ehlen Road and Airport Road, OR 551 and Ehlen Road, OR 551 and Keil Road, and Airport Road and Keil Road. Applicant is also restricted under the conditions of this approval from constructing any new access to Airport Road, other than access for emergency vehicle access only.

Accordingly, as conditioned, the Board finds that the proposed plan amendment, zone change, and reasons exception will not change the functional classification of the roadway, change standards implementing the functional classification system, allow levels of land uses that result in levels of travel or access inconsistent with a major arterial and collector streets, or reduce performance standards of the roadways. Thus the proposal will not have "significantly affect" the surrounding transportation system. The Board finds that this Goal is satisfied.

Goal 13: Energy Conservation. To conserve energy.

The Board finds that the relocation and consolidation of Applicant's operations at the proposed site will decrease the company's overall energy consumption. The move of one of Applicant's facilities from the Corvallis Municipal Airport to the Aurora State Airport reduces the round trip distance to the Portland International Airport, frequently used by Applicant, by 75%. This directly translates to conserved fuel and energy costs as well as reduced impact to state and local transportation systems. By choosing to relocate to the Aurora State Airport, Applicant has chosen to consolidate its operations in one location, which should decrease the energy consumption related to coordinating its operations and transporting materials, equipment, and personnel from one location to another around the country. Applicant's proposal accomplishes this goal.

Goal 14: Urbanization. To provide for an orderly and efficient transition from rural to urban land use.

Applicant requested an exception to Goal 14. That exception is addressed above, and the Board approves the exception.

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Goals 15, Willamette River Greenway, 16, Estuarine Resources, 17, Coastal Shorelands, 18, Beaches and Dunes, and 19, Ocean Resources, are not applicable because the subject site is not within the Willamette River Greenway, or near any ocean or coastal related resources.

Exceptions to Goals 3 and 14 are approved as conditioned, and the Board finds the remaining goals either inapplicable or advanced as discussed above.

OAR 660-004-0018 – LIMITED USE OVERLAY

45. OAR 660-004-0018(4)(a) provides for a limited use overlay when a reasons exception is taken. The text of the OAR is set out above under Exceptions to Statewide Planning Goals. In this case, an overlay zone is required.

The Applicant proposes that the use be limited to the following uses: helicopter uses, services, maintenance, offices, repair, overhauling, and other uses associated with the helicopter business. The Board finds these uses are reasonable and consistent with the reasons exception granted under this approval. This approval is conditioned on imposition of this limited use overlay zone. OAR 660-004-0018(4) is satisfied.

ZONE CHANGE

46. The proposal is to change the zoning on the 27.48 acre parcel from EFU to P.

47. The following are the required criteria under MCZO 123.060 for a zone change as well as the Board's findings demonstrating satisfaction of each criterion:

(a) The proposed zone is appropriate for the Comprehensive Plan land use designation on the property and is consistent with the goals and policies of the Comprehensive Plan and the description and policies for the applicable land use classification on the Comprehensive Plan; and

The "Public" zone is the appropriate implementing zone since it is the only zone that implements the "Public" comprehensive plan designation, which is also requested as part of this application. In addition to the applicable regulations found in MCRZO Chapter 171, which governs development in Public zones, the site will also be subject to the regulations of the Airport Overlay Zone found in MCRZO Chapter 177. On this site, the Airport Overlay Zone is also appropriate for the comprehensive plan land use designation, since it further restricts development that occurs adjacent to airports, which are permitted in areas zoned and designated Public.

The Marion County Comprehensive Plan does not provide detailed policy related to the "Public" land use classification. In the rural development section of the MCCP, the text notes that public uses are necessary. In agricultural areas, these uses shall be reviewed by the conditional use process to ensure compatibility. An application for a conditional use permit was submitted concurrently with this application and is approved with conditions. The MCCP balances the need for public uses, such as airports and airport uses, with the need to preserve resources. To accomplish this, the MCCP encourages a case-by-case analysis of public zoning and uses on publically zoned land. The Board finds that Applicant has demonstrated that this use will be compatible with surrounding agricultural lands. The findings with respect to exceptions to Goals 3 and 4 address that compatibility. This application process ensures that this case can be examined on its individual merits as to the compatibility the proposed location and intended use will have with surrounding properties. The

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Board finds that the Public zone is appropriate for this the Public comprehensive plan designation sought and is consistent with the goals and policies of that designation. The application is consistent with MCZO 123.060(a).

(b) The proposed change is appropriate considering the surrounding land uses and the density and pattern of development in the area; and

The Public zone, together with the limited use overlay zone imposed with this zone change, is appropriate considering the surrounding land uses, density, and development pattern. The findings above relating to exceptions to Goals 3 and 14 are incorporated in this finding to demonstrate compatibility and appropriateness of the proposed zone and use in light of the surrounding area. The Aurora State Airport is the dominant feature in this vicinity. The subject property is located immediately adjacent to the east of existing airport uses located on airport property. The airport is already developed at urban densities. The subject property is bordered on three sides by roadways, both public and private. The northernmost portion of the airport is already bounded on the east side by Airport Road NE, which is a major collector in the RTSP. The proposed change would establish Airport Road as the easternmost boundary of the airport uses, and provide a more adequate buffer from the agricultural uses further to the east of Airport Road NE. Furthermore, Keil Road NE would effectively extend the southern boundary of where some airport related users are situated. Both Airport Road NE and Keil Road NE are effective buffers to ensure compatibility between the higher density uses at the airport and the adjacent agricultural lands. The proposed change would use these same buffers in the same way as the existing developments have done for years at this location. As mentioned above, there is a documented need for expansion at this location to address service deficiencies. The Airport's Master Plan has identified this property as suitable for private airport development since 1976.

Much of the EFU zoned land in this area, including the subject property, is smaller than the typical 80 acre minimum which is mandated by the state for the creation of any new EFU parcels. The development pattern in the area, particularly at the site of the subject property, is not optimal for the traditional agricultural operations that the EFU zone is intended to promote. The proposed change is more appropriate in an area with this characteristic, as opposed to other areas subject to EFU zones, since many of the EFU parcels in the area are already legally substandard sized parcels. Airport Road NE and Keil Road NE will provide additional buffers between the proposed uses and surrounding agricultural uses. This further ensures that compatibility will exist between the airport development and resource uses. The Aurora Airport, an airport use in a P zone, has existed for many years with little significant impact on the surrounding parcels, most of which are zoned EFU. The Board finds that MCZO 123.060(b) is satisfied.

(c) Adequate public facilities, services, and transportation networks are in place, or are planned to be provided concurrently with the development of the property; and

The Board finds that the evidence in the record demonstrates that there are existing public facilities, services, and transportation networks in place. No new public facilities, services, or transportation networks are necessary for this application. The Board hereby incorporates its findings above for exceptions to Goals 3 and 14 regarding public facilities and services. As conditioned, MCZO 123.060(c) is met.

(d) The other lands in the County already designated for the proposed use are either unavailable or not as well suited for the anticipated uses due to location, size or other factors; and

EXHIBIT M

It is essential for this use to be located on lands adjacent to or within an airport. Also, Applicant's use depends on the ability to quickly dispatch its equipment and personnel into the field, either directly from this airport or to/from PDX, which requires relative proximity to I-5 and as short a distance as possible to PDX. This specific site offers several unique amenities that cannot be duplicated by any city, rural community, or airport in the state. The Aurora Airport is the location of the supplier, repair service provider, and engineer of the Applicant's specially designed tail rotor blades: Metal Innovations, Inc. Metal Innovations, Inc. is the only company in the world that supplies this product and service for the Applicant. This is not only important for operations efficiency, but also for reducing energy and transportation costs associated with shuttling parts to and from Metal Innovations, Inc.

In addition, there are significant strategic advantages to Applicant in being located near the Applicant's two competitors: Columbia Helicopters, Inc. is located within the Aurora Airport, and Evergreen Helicopters, Inc. is located at the McMinnville Airport. Included in those advantages is proximity to the human resource pool of specially trained mechanics that has the expertise necessary to perform the service and repairs needed at the Applicant's proposed facility. The center of that pool is in the Aurora area because of the presence of the Applicant's two competitors.

Applicant may also be able to take advantage of the "Through the Fence" program offered at the airport. This would allow Applicant direct access to the airport facilities from the subject property. No other airport in Marion County is currently authorized under the "Through the Fence" legislation to offer this program.

Lastly, the Applicant has the financial advantage that it owns the subject property already. There is no other property in the county, or for that matter the state, that provides all these necessities and benefits. Other airport users will benefit from the repair services that Applicant can offer as well.

Because of the size and weight of the equipment that Applicant uses in its business, it would be a great burden on both the county's and state's road infrastructure, as well as the Applicant's operating costs, to locate any distance away from an airport. Transportation to and from airport property for purposes of dispatching or repairs could cause excessive wear and tear on the roadways. Additionally, transportation of this equipment could cause delays to the users of the road system by impeding the flow of traffic due to slow moving transports. The costs and energy necessary to move the equipment from a remote location to airport property would be a substantial, inefficient, and unnecessary burden. Finally, the storage and uses that are proposed are most compatible when surrounded by other airport uses. Industrial uses are the only other uses that would be somewhat compatible with Applicant's proposed use. Even if another, suitable property were to exist somewhere in the county, to isolate this use from other airport uses, and to instead site it around other industrial users would negate the necessary benefits of allowing this use to be sited adjacent to an airport, and would consume valuable industrial land, which could be more effectively utilized by another, non-airport user. The findings above regarding the alternative sites analysis for the Goal 3 exception are hereby incorporated. MCZO 123.060(d) is satisfied.

(e) If the proposed zone allows uses more intensive than uses in other zones appropriate for the land use designation, the new zone will not allow uses that would significantly adversely affect allowed uses on adjacent properties zoned for less intensive uses.

The "Public" zone is the only zone appropriate to implement the "Public" land use designation. The airport overlay zone, which already applies to the subject property, further restricts the development

standards which apply to the subject property. This proposed use and uses available under the zone will not adversely affect neighboring agricultural uses for the reasons found above justifying the proposed Statewide Goal exceptions and comprehensive plan amendment. Nevertheless, since there is no other zone which is appropriate for this land use designation, the Board finds this criterion inapplicable to this application.

MCRZO CHAPTER 176 – LIMITED USE OVERLAY ZONE

48. To satisfy the requirements for a reasons exception to Goal 3, the Applicant has requested that the use be limited to the following uses: helicopter uses, services, maintenance, offices, repair, overhauling, and other uses associated with the helicopter business. MCRZO 176.010 states the purpose of the limited use overlay zone is:

To reduce the list of permitted or conditional uses in a zone to those that are suitable for a particular location. . . . The zone may be applied to comply with use limitations for a goal exception required by OAR 660.004. It is the intent that the maximum number of acceptable uses be permitted so that the use of the property is not unnecessarily limited.

49. The Board finds that Applicant's proposed limited use overlay zone is consistent with MCZO 176.010.

CONDITIONAL USE

50. *Under MCZO 119.070, before granting a conditional use, the Director, Planning Commission or Hearings Officer shall determine:*

(a) That it has the power to grant the conditional use;

(b) That such conditional use, as described by the applicant, will be in harmony with the purpose and intent of the zone;

(c) That any condition imposed is necessary for the public health, safety or welfare, or to protect the health or safety of persons working or residing in the area; or for the protection of property or improvements in the neighborhood.

51. Under MCZO 119.100 the director has the power to forward a conditional use application directly to the hearings officer or planning commission for the initial decision. In this instance, the conditional use application was made a part of the comprehensive plan amendment and zone change application. The application was heard by the Hearings Officer. The Hearings Officer recommended to the Board that the application be approved with conditions.

52. Applicant is seeking a conditional use for airport related uses in the Public zone, which are industrial in nature. Industrial uses are allowed in the P zone as a conditional use pursuant to MCZO 171.030(A) and subject to meeting specific criteria. Applicant has the burden of proving compliance with all applicable criteria.

53. The purpose and intent of the P zone is to provide regulations governing the development of lands appropriate for specific public and semi-public uses and to ensure their compatibility with adjacent uses. Furthermore, the zone is intended to be applied to individual parcels shown to be an

EXHIBIT M

appropriate location for a certain public or semi-public use. MCZO 171.010.

The Aurora State Airport is the busiest state owned airport in Oregon. All land supporting airport related uses is designated P. The proposed uses are essentially the same as uses that have long-existed in the adjacent airport and accordingly have been deemed consistent with the purpose of the P zone. One of Applicant's major competitors, Columbia Helicopters, is located in the P zone on the north end of the Airport. As discussed above, the airport needs to expand to adequately serve those that currently use the facilities, and those that are anticipated to use the facilities in the future. The Marion County Comprehensive Plan shows that the subject property is acceptable for airport expansion under private ownership. Applicant's proposed airport related uses would be located adjacent to other P zoned property and would provide needed support to and area for expansion of the airport facility. Airport and airport related industrial uses are conditional uses in the Public zone. Developing under the applicable development standards found in both the P zone and the airport overlay zone will ensure that the resulting use and development will be consistent with the purpose and intent of the P zone, and the surrounding area. The Board finds MCZO 119.070(b) is satisfied.

54. The Board has imposed conditions under this approval, and the Board finds that such conditions are necessary for the public health, safety or welfare, or for the protection of health and safety of persons working or residing in the area or to protect the property or improvements in the neighborhood.

PUBLIC ZONE

55. MCZO 171.040 provides:

(A) New commercial uses in conjunction with public uses may be established up to a maximum of 3,500 square feet of floor area.

(B) Lawfully established commercial uses existing as of the date of adoption of this ordinance up to 3,500 square feet of floor area, or an additional 25% of the floor area that existed as of the date of adoption of this ordinance, whichever is greater.

(C) Airport related uses located at the Aurora Airport are not subject to the size limitations in (A) and (B) of this section.

(D) Except as established in (B), for commercial use to exceed the square foot limitations requires taking an exception to Goal 14. Such exception shall be processed as an amendment to the Marion County Comprehensive Plan.

56. The Boards finds Applicant's proposal is for an airport-related industrial use, accordingly the Board finds that MCZO 171.040 does not apply to this application. If Applicant's use were ever deemed commercial in any way, the Board finds that the use is an airport related use located at the Aurora Airport, therefore, pursuant to MCZO 171.040(C), the size limitations of MCZO 171.040 (A) and (B) do not apply. In addition, the Applicant has demonstrated compliance with the requirements for taking an exception to Goal 14.

57. MCZO 171.060 provides the property development standards in the P zone. At the time Applicant submits application for building permit, these standards shall apply:

EXHIBIT M

(A) HEIGHT. No building or structure in a P zone shall exceed 6 stories or 70 feet, provided that buildings or structures shall set back from every street and lot line 1 foot for each foot of height of the building in excess of 35 feet in addition to all other yard and set back requirements herein specified.

(B) FRONT YARD. Front yard shall be a minimum of 20 feet. No parking shall be permitted within the minimum front yard area.

(C) SIDE YARDS. Where the side of a lot in a P zone abuts upon the side of a lot in any "R" zone, there shall be a minimum side yard of 10 feet. Otherwise there shall be no minimum side yard setback. Where the side of a lot abuts upon a street there shall be a minimum side yard of 20 feet wherein on parking shall be permitted.

(D) REAR YARD. In a P zone there shall be a rear yard that shall have a minimum depth of 30 feet.

(E) LOT AREA AND COVERAGE. The minimum requirements in P zones for dwellings shall be 1 acre except 6,000 square feet inside an unincorporated community boundary where public sewer and water service are provided. No main building, including dwellings, shall occupy more than 30% of the lot area.

(F) OPEN STORAGE.

(1) All yard areas, exclusive of those required to be landscaped as provided in Section 171.060(G), may be used for materials and equipment storage areas related to a use permitted in the P zone, provided such area is screened so it cannot be seen from public roads, or from dwellings on property in other zones.

(2) The surface of open storage areas, including automobile and truck parking area shall be paved or graveled and maintained at all times in a dust-free condition.

(G) LANDSCAPING. The area within 20 feet of a street shall be landscaped. As a condition of approval for a conditional use additional landscaping may be required if necessary to make the use compatible with the area.

(H) PERFORMANCE STANDARDS. No land or structure shall be used or occupied unless maintained and operated in continuing compliance with all applicable standards adopted by the Oregon Department of Environmental Quality.

(I) SEWAGE DISPOSAL. Demonstrate that the development will not exceed the existing carrying capacity of the local sewage disposal system or has an on-site sewage disposal site approved by Marion County of the Department of Environmental Quality.

(J) TRAFFIC ANALYSIS. Demonstrate that the development will be consistent with the identified function, capacity, and level of service of transportation facilities serving the site. A transportation impact analysis, approved by the Marion County Department of Public Works, may be required prior to building permit approval.

58. The Board finds that the proposed facility will feasibly meet the requirements of (A) - (E) above. At 27.48 acres the subject parcel is large enough to accommodate the development standards of

EXHIBIT M

height, parking requirements, yard requirements and lot area coverage. The proposed structure is 126,000 square feet, well below the 30% occupancy maximum in the zone. As a condition of approval, the Applicant shall comply with the development standards in MCZO 171.060 (A) - (E). As conditioned, the application will satisfy MCZO 171.060 (A) through (E).

59. Storage is a large component of Applicant's business. The Applicant will be allowed to use outside storage areas but the storage area must be screened so that it cannot be seen from public roads or dwellings on properties in other zones and the open storage area must be paved or graveled and maintained in a dust-free condition. As conditioned, the application will satisfy MCZO 171.060(F).

60. Applicant will be required to landscape any area that is within 20 feet of a street. As conditioned, the application will satisfy MCZO 171.060(G).

61. Applicant will be required to comply with all applicable DEQ standards regarding structures. As conditioned, the application will satisfy MCZO 171.060(H).

62. Applicant will have an on-site sewage disposal system and will be required to comply with Marion County or DEQ regulations regarding such systems. As conditioned, the application will satisfy MCZO 171.060(I).

63. In light of Applicant's proposed site plan, facility, and improvements, the subject property's size and location, and the existing facilities that will serve the property, the Board finds that MCZO 171.060(F) – (G) can feasibly be satisfied by Applicant's proposed facility.

64. Under MCZO 171.060(J) the DPW may require a traffic impact analysis (TIA). A TIA was required as part of this application and was provided by Applicant's traffic engineer, in coordination with DPW.

The TIA is included in the record, and its assumptions and conclusions are incorporated into these findings by this reference. The Board agrees with the conclusions and assumptions reached in the TIA. The TIA assumed a cap of 70 employees regularly scheduled on the site at one time. The Board has conditioned this approval accordingly. The conclusion reached by the TIA was that the intersections of Ehlen Road with OR 551 and with Airport Road currently do not meet operation standards and that proposed use will increase traffic by less than 2% to the intersections. Both intersections have improvements slated, either by ODOT, the county, or the city of Aurora. The Applicant's traffic engineer, county engineering staff, in coordination with ODOT, concluded that the Applicant should be required to contribute a proportionate share to the slated improvements. This approval is conditioned on Applicant making such contributions. In addition, the Applicant's traffic will have a 1.5% impact on the intersection of Keil Road and OR 551. Like the previous two intersections, this intersection is under ODOT jurisdiction. ODOT did not require improvements or proportionate share contributions. Nevertheless, the Applicant coordinated with county engineering staff to determine Applicant's impact on the intersection. The Applicant is required to accordingly make a proportionate share contribution to the impacted left-hand turn lane at that intersection as well.

65. So long as Applicant's building permit application does not generate more than 70 employees being regularly scheduled at one time at the site, the Board concludes that a new traffic impact analysis will not be required for issuance of the building permit.

As conditioned, the application satisfies MCZO 171.060(J).

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AIRPORT OVERLAY ZONE

66. MCZO Chapter 177 provides the airport overlay zone. MCZO 177.010 provides:

> The Airport Overlay Zone is intended to minimize potential dangers from, and conflicts with the use of aircraft at public airports based on the adopted master plans for each airport. It is to be used in conjunction with the underlying zone. If any conflict in regulation or procedure occurs with the underlying zoning districts, the more restrictive provisions shall govern. This section is intended to comply with Federal Aviation Agency Regulation FAR-77 and all other applicable federal and state laws regulating hazards to air navigation.

67. MCZO 177.030(a) discusses use limitations within airport development districts. The Board finds that Applicant's proposed use is consistent with the use limitations contained in MCZO 177.030(a). Those regulations of MCZO 177.030(a), (b), and (c) relating to structures on the subject property shall be enforced at the time of building permit application, and this approval is conditioned on the compliance of Applicant's building permit application with those restrictions. The Board finds such restrictions can be feasibly met by this application.

68. MCZO 177.040 discusses the procedure for obtaining a building permit regarding structures in the Airport Overlay Zone. Applicant will be required to comply with those requirements when seeking a building permit. As conditioned, MCZO 177.040 will be satisfied.

EXHIBIT M

EXHIBIT B

The Marion County Board of Commissioners adopts the following conditions in ZC/CP/CU09-5/US Leaseco Inc..

CONDITIONS OF APPROVAL:

Pursuant to the Marion County Zone Code 17.123.070, the following conditions apply to the P-LU (Public – Limited Use Overlay) zoning granted in this action. These conditions are reasonably related to the specific development proposed, will serve the public interest of reducing land use conflicts, and are based upon standards adopted by the County. The P-LU zoning significantly intensifies the use of the land. The conditions are necessary for the public health, safety and welfare.

1. Prior to issuance of building permits, the applicant shall provide evidence of compliance with Marion County Public Works conditions and requirements.

2. Access permits are required for any new access or change in use of the existing access to the public right-of-way. No new direct access will be permitted to Airport Road other than for the purpose of emergency vehicle access only.

3. Driveways will need to meet fire district standards for emergency access.

4. Site grading shall not impact surrounding properties, roads, or drainage ways in a negative manner. Construction of improvements on the property shall not block historical or naturally occurring runoff from adjacent properties. The applicant will be required to submit a site drainage plan to demonstrate this lack of negative impact.

5. Any work in the public right-of-way will require a permit from Public Works. OR 551 is under the jurisdiction of ODOT. The applicant shall provide proof to DPW that it has met ODOT's requirements. As traffic from the proposed use may impact the City of Aurora, the applicant shall provide proof to DPW that it has complied with the City's requirements.

6. The applicant shall dedicate sufficient right-of-way for a 30-foot property radius corner at the southeast corner of 22265 Airport Road NE. Dedications shall be made to the public and not to Marion County.

7. A limited use (LU) overlay shall apply. Only the following uses are allowed: helicopter uses, services, maintenance, offices, repair, overhauling, and other uses associated with the helicopter business.

8. No more than 70 employees shall be regularly scheduled to be at the site at one time. In the event Applicant proposes more than 70 employees to be regularly scheduled at the site at one time, Applicant shall provide to the County a new Traffic Impact Analysis and the resulting traffic impacts shall be mitigated. On or before January 31 of each year, Applicant shall provide to the Marion County Planning Department a report of the typical number of employees on the subject property during each month of the preceding calendar year.

EXHIBIT M

9. The applicant shall pay a proportional share for the identified mitigation measures at the intersections of Ehlen Road and Airport Road, OR 551 and Ehlen Road, OR 551 and Keil Road, and Airport Road and Keil Road.

10. Applicant shall provide a civil site plan along with a traffic circulation plan prior to the issuance of building permits.

11. The applicant shall improve Airport Road NE and Keil Road NE along their frontages to the satisfaction of DPW. The improvements shall be on engineering plans and the applicant will be required to submit the engineering plans prior to commencement of any work on the project.

12. Prior to building permit approval, the applicant shall provide a Declaration of Covenants for Road Maintenance Agreement for any non-county maintained access easements.

13. Site grading shall not impact surrounding properties in a negative manner. Prior to the issuance of permits the applicant shall provide a site drainage plan demonstrating that there are no negative impacts.

14. The applicant shall preserve and protect all nearby roads and ditches to the satisfaction of DPW. Failure to preserve and protect the road and ditches may result in the applicant being responsible for repairing the damage at applicant's expense.

15. A National Pollutant Discharge Elimination System (NPDES) permit is required for all construction activities that disturb one-acre or more. The NPDES permit is obtained through the Oregon Department of Environmental Quality. The applicant shall provide proof of issuance of the NEPDES permit.

16. Storm water detention facilities are in place but need to be modified. The system shall be sized so that it will detain the difference between a 5-year frequency storm with predevelopment conditions and a 10-year frequency storm with development conditions. Storm drainage improvements shall be to DPW specifications. A storm drainage plan shall be submitted prior to the issuance of any building permits and an acceptable drainage and detention system must be in place be for the final building inspection.

17. Applicant shall provide a water system report showing the proposed system includes pumping capacity or reservoir storage capacity for fire flow quantity and pressure. The water system report shall be approved by Marion County and the applicable fire district, prior to building permit approval.

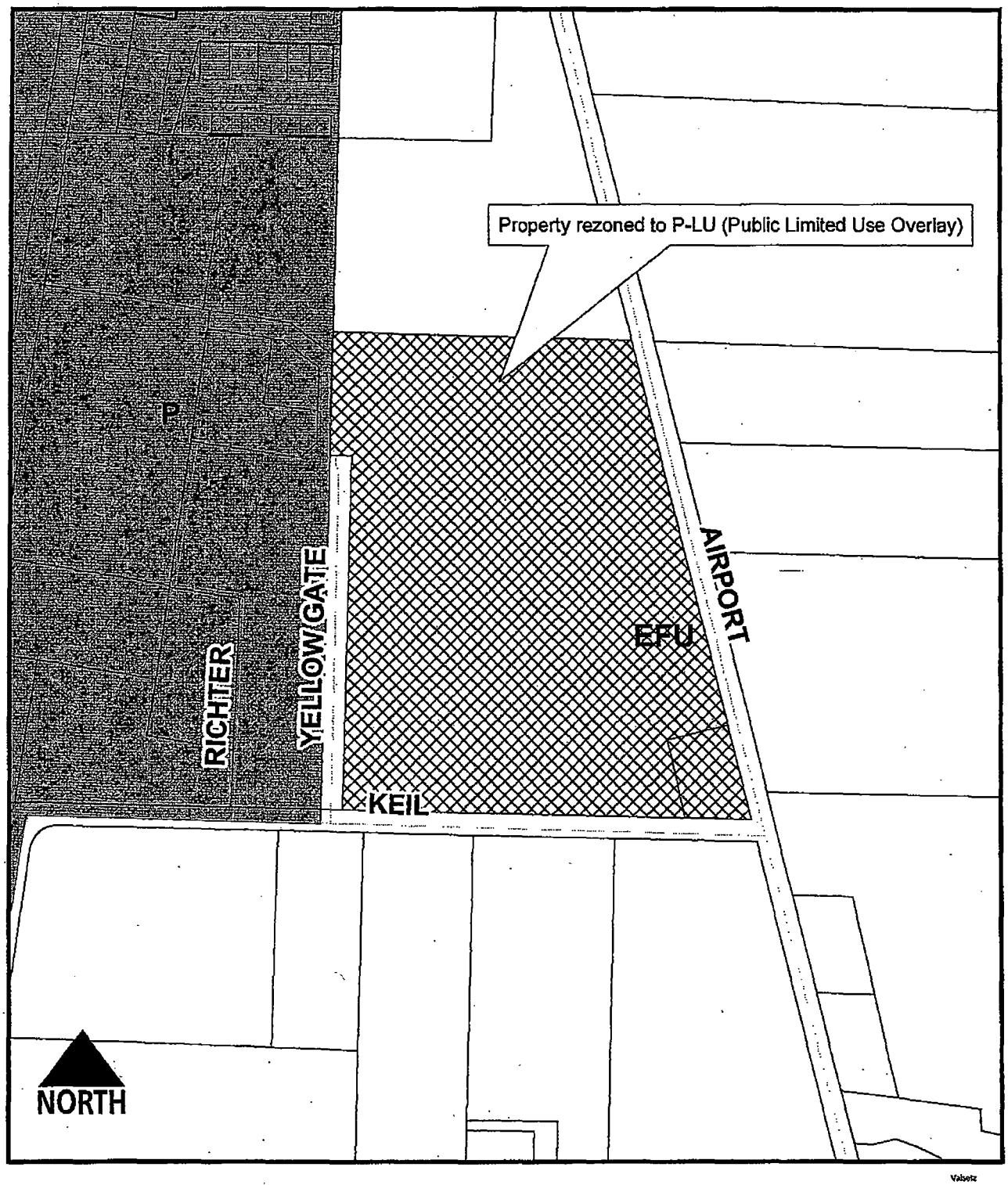
18. The applicant shall comply with the provisions of MCZO171.060 regarding property development standards for the public zone.

19. The applicant shall comply with the provisions of MCZO177.030 and MCZO 177.040 regarding use limitations and procedures for building permits in an airport overlay zone.

EXHIBIT M

EXHIBIT C

The following described property is rezoned from EFU (Exclusive Farm Use) to P-LU (Public - Limited Use Overlay) zone. ZC/CP/CU09-05/US Leaseco Inc.



Outlook

Fw: 12.23 FINAL AAIA TLM LTR Preferred alternative

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 12/26/2024 11:49 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; W. Matt Rogers <WRogers@CenturyWest.com>

2 attachments (1 MB)
12.23 FINAL AAIA TLM LTR Prefered alternative.pdf; EXHIBIT 1 MP- Masterplan Alternative 2024-12-23 final.pdf;

Thanks,

BRANDY STEFFEN | JLA PUBLIC INVOLVEMENT
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in » Email is the best way to reach me; I try to respond within 3 full workdays.

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

From: Wendie Kellington <wk@klgpc.com>
Sent: Monday, December 23, 2024 3:43:40 PM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>; Tony Beach (anthony.beach@aviation.state.or.us) <anthony.beach@aviation.state.or.us>
Cc: Ted Millar <tmillar@wwpmi.com>; Tony Helbling - Wilson Construction Company (helbling@wilsonconst.com) <helbling@wilsonconst.com>; Rachel Bacon <rb@klgpc.com>; Aron Faegre (faegre@earthlink.net) <faegre@earthlink.net>; Senator Betsy Johnson - District 16 (betsy@betsyjohnson.com) <betsy@betsyjohnson.com>; Rachel Bacon <rb@klgpc.com>
Subject: 12.23 FINAL AAIA TLM LTR Preferred alternative

Good afternoon,

Attached please find for the record of the Aurora Airport Master Plan proceedings, the comment letter of AAIA and TLM Holdings, LLC, regarding ODAV's "Preferred Alternative." Please confirm receipt. Regards, Wendie Kellington

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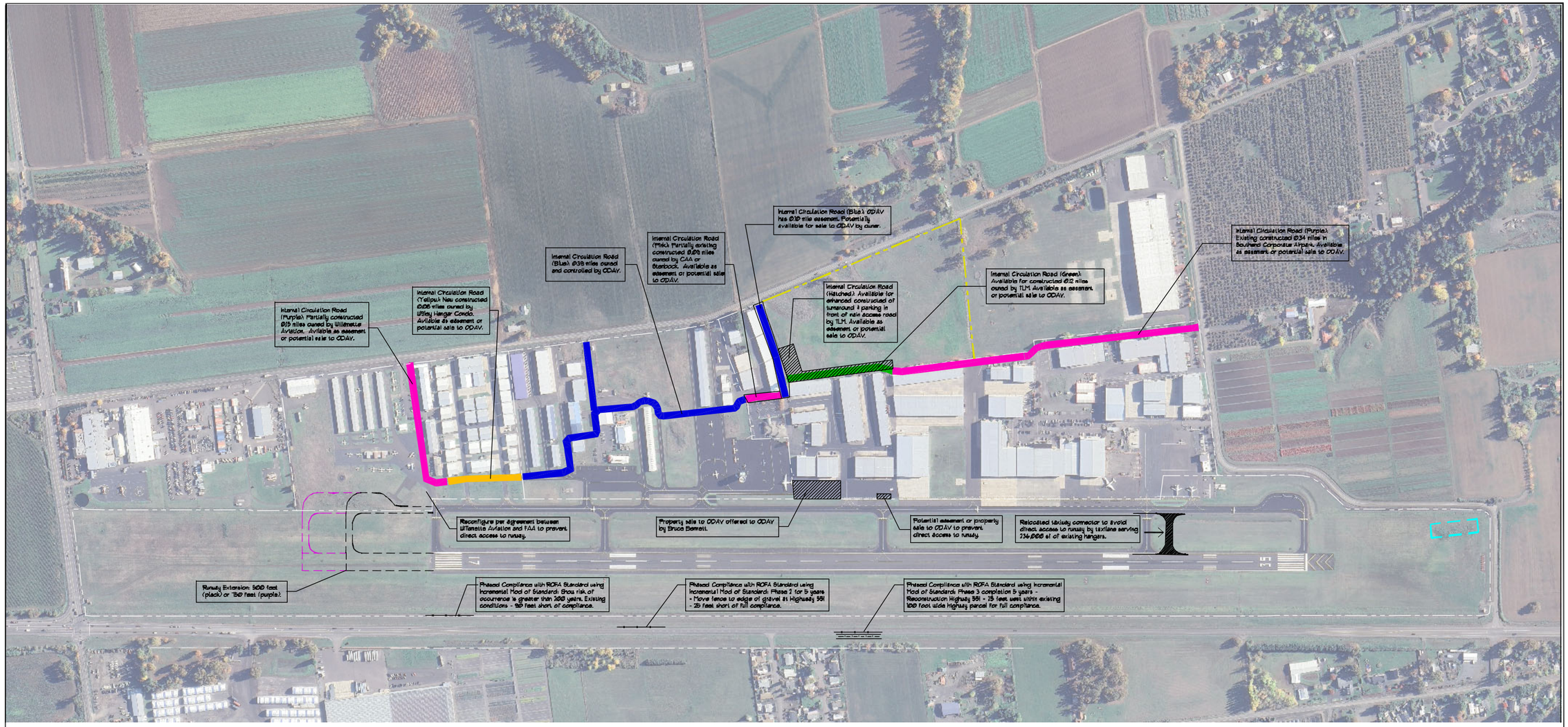
Chambers RANKED IN USA 2024
Wendie Kellington

EXHIBIT 1



SITE PLAN

0 200 400 600

N

KEY

- AIRPORT BOUNDARY
- AIRPORT BOUNDARY ADDITION
- 500 FT RUNWAY EXTENSION
- 750 FT RUNWAY EXTENSION
- DRAINFIELD TO REMAIN WITH GEOTECH CERTIFICATION IN ACCORDANCE WITH WITH FAA SOIL STANDARDS

VERIFY SCALES

BAR IS ONE INCH ON ORIGINAL DRAWING. IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY.

NO.	DATE	BY	APPR.	REVISIONS

AURORA AIRPORT IMPROVEMENT ASSOC.
PROPOSED ALTERNATIVE

DESIGNED BY:	DRAWN BY:	CHECKED BY:	SCALE:
AF	AF/JH	AF	300' = 1"

DATE: DECEMBER 23, 2024
PROJECT: MP - MASTERPLAN ALT AAIA

AURORA STATE AIRPORT (UAO)

AURORA STATE AIRPORT – MASTER PLAN ALTERNATIVE AAIA

DRAWING
MP-AAIA

KELLINGTON LAW GROUP, PC

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December 23, 2024

Alex Thomas
Planning and Programs Manager
Tony Beach
State Airports Manager
Oregon Department of Aviation
Brandy Steffen
JLA

Re: December 23, 2024 Comment Letter on Behalf of Aurora Airport Improvement Association and TLM Holdings, LLC, Regarding the Aurora State Airport Master Plan – ODAV Proposed Preferred Alternative

Mr. Thomas, Mr. Beach and Ms Steffen,

This letter is written on behalf of the Aurora Airport Improvement Association (AAIA), whose members include Aurora Airport aviation private business stakeholders, and one of AAIA's members TLM Holdings, LLC, who is also a PAC Member, together referred to herein as "Aeronautical Stakeholders". Please include this letter in the record for the Oregon Department of Aviation's (ODAV) proposed "Preferred Alternative" for the Aurora State Airport Master Plan. We applaud Director Sugahara's statement that ODAV understands that the "Preferred Alternative" for the Aurora Airport Master Plan is widely opposed and his commitment that ODAV is willing to modify it. It is mission critical that ODAV modify the "Preferred Alternative" if the Aurora Airport is to continue to deliver significant tax benefits, family wage jobs, emergency resiliency and aeronautical innovation to the region and state. The current version of ODAV's proposed Preferred Alternative is inconsistent with these objectives.

EXECUTIVE SUMMARY OF REQUESTS

The Preferred Alternative should be modified to reflect the Aeronautical Stakeholders' Alternative that was previously submitted and that is attached (Exhibit 1) in an updated, annotated form. The attached Aeronautical Stakeholders Alternative is consistent with ODAV's stated wishes to extend the runway by 500 feet to the north and move the airport toward FAA design standard compliance. A significant difference between ODAV's current Preferred Alternative and the Stakeholders' Alternative, however, is that the Stakeholders' Alternative does not

carry ODAV's $150 million (plus) price tag to condemn the Aurora Airport front line aircraft hangars for which the owners have invested more than $200 million and thereby created millions in tax revenue, created more than a 1000 good jobs and millions of dollars in direct and indirect tourist revenue for surrounding communities. ODAV's final Preferred Alternative must:

1. Remove the taking of the frontline hangars and remove the "Aeronautical Reserve" designation across the rest of the privately owned property at the airport.
2. Remove the proposed new taxi lane that isn't required by the FAA and makes no aircraft safety, efficiency or policy sense.
3. Remove the new commercial service road adjacent to the proposed new taxiway that also isn't required by the FAA. Replace it with the internal service road that was approved in the 2012 Master Plan and that as shown on the Stakeholders' Alterative is partially built and would cost ODAV nothing but the cost of some pavement.
4. Leave the drainfields in place because when improved, they are allowed in the RSA and are essential to the continued functioning of the airport. ODAV should simply require HDSE to bring the South Drainfield to meet FAA Design Standards.
5. Be developed in a collaborative in-person meeting that allows real discussion among stakeholders to occur to work out details so that the "Preferred Alternative" that emerges enables the airport to be successful and safe over the next 20 years and avoids needless, years-long litigation continuing the airport's languishment from neglect.

EXPLANATION

ODAV is Bound by ORS 836.640-642

ODAV must understand that it is bound by ORS 836.640-642, which is a statute developed by Business Oregon and adopted by the legislature to strongly encourage private investment at the Aurora Airport and that commanded ODAV to carry out that objective. ODAV's "Preferred Alternative" is in direct contravention of those statutes. The Aeronautical Stakeholder's Alternative (Exhibit 1) is consistent with that statute and reflects good aviation policy and safety.

Contrary to that statute, ODAV's proposed alternative contemplates ODAV taking by eminent domain the frontline hangars at the airport and authorizes for public acquisition all other private property at the Aurora Airport. ODAV's plan to wipe out the front line aircraft hangars has an unnecessary and staggering $150 million plus public price tag. It unwisely seeks to bulldoze these important business aircraft hangars for which the owners have invested more than $200 million,

created millions in tax revenue, more than a 1000 good jobs and millions in directly and indirectly related tourist revenue for surrounding communities, with ORS 836.640-642 as the catalyst. It anomalously designates areas that have been set aside in airport master plans for private airport related development since 1976, as areas for ODAV acquisition instead of planning for them to be developed with private airport related uses by bringing them into the airport boundary as contemplated by ORS 836.640-642.

Both elements of the preferred alternative are misguided. Among other objectives for the Aurora Airport, ORS 836.642 requires ODAV to "Preserve investments [at the Aurora Airport] and the level of service provided by [the Aurora Airport]" and to "promote economic development" at Aurora "by creating family wage jobs, increasing local tax bases" through support of private aviation-related uses so that they may "develop and thrive." The preferred alternative is contrary to ORS 836.640-642 and expressly seeks to trade the private investment that the statute seeks to encourage and grow, for government condemnation and government ownership.

ODAV's Preferred Alternative Gambles with the Aurora Airport's Success, Risking Sending it Backwards and Making it Less Safe

ODAV's preferred alternative gambles with the economic benefits that private investment at the airport has delivered, risking their continuation. The threat of ODAV condemnation, not to mention ODAV actually engaging in such litigation against those owners, presents an unacceptable risk of driving away not only those aircraft hangar owners, but also their businesses, jobs and related tax and tourist revenue. Once they are gone, the stigma of such ODAV action makes the airport and indeed any airport that ODAV manages, a private investment pariah – potentially for decades. Such a risk should not be taken where, as here, a state statute commands ODAV otherwise and there are alternatives. The Stakeholders Alternative demonstrates that viable alternatives are available that carry a fraction of the cost of ODAV's preferred alternative and come with none of the risks.

It is respectfully submitted that the justification for ODAV's "preferred alternative" does not warrant its deleterious effects.

ODAV's Desire for a Vehicle Service Road (VSR) and New Taxiway Cannot Justify ODAV's Preferred Alternative. ODAV has Failed to Consider Better and Less Costly Alternatives for a VSR and new Taxiway

ODAV's desire for a "vehicle service road" (VSR) and a new aircraft taxiway are driving ODAV's desire to condemn the frontline hangars. But neither objective necessitates ODAV's Preferred Alternative, and neither are required by FAA. In

fact, if FAA were doing its job, it would be advising ODAV against both on their astonishing cost alone.

Regarding the VSR, the airport's 2012 master plan approved a VSR that has none of ODAV's Preferred Alternative's deleterious effects and does not carry a $150 million condemnation price tag. At worst, the 2012 VSR costs the state some pavement. The private aeronautical stakeholder owners have offered ODAV the land needed for the 2012 MP VSR free of charge. We are unaware of any reason for ODAV to not pursue that 2012 MP VSR and there are only good reasons to do so. **Let that sink in: ODAV's current "Preferred Alternative" seeks to trade $150 million of the public's money, risk more than 1,000 jobs, millions in tax and tourist revenue just to save some $20,000 on pavement.** The idea is untenable, not to mention unacceptably wasteful and wholly unnecessary.

Similarly, if a new taxiway is required (and ODAV has not shown that it is), ODAV has utterly failed to explore reasonable options for such a new taxiway. ODAV says that it cannot put a new taxiway anywhere but where the ODAV "Preferred Alternative" puts it because ODAV does not own land elsewhere for a taxiway. This is insincere and disingenuous. ODAV **does not own the land where it wants the "Preferred Alternative" taxiway either** – that is why it is showing ODAV condemning the front line hangars. Moreover, many other features of ODAV's proposed alternative are on land ODAV does not own. ODAV simply has made no effort to come up with a less devastating and less expensive alternative. Even if ODAV had to acquire some private land for a new taxiway, ODAV can and must explore alternatives having far less adverse impact on the continuation and growth of private aeronautical investment at the airport, not to mention a price tag well south of the $150 million plus for ODAV's Preferred Alternative.

ODAV Does not "Want" to Expand the Airport Boundary

ODAV asserts that it simply does not "want" to extend the airport boundary to include the land that is now and has long been foreseen for private airport-related development. Instead, ODAV wants to designate that land for ODAV acquisition claiming that only this will "ensure" that land is put to aeronautical use. This claim cannot be insincere and is disingenuous. ODAV acquisition does nothing to put land at the airport to aeronautical use. Further, the private sector has put all of the land that it could into airport related uses and has been trying to put the rest to aeronautical use with no help from ODAV. Per ORS 836.640-642, the way ODAV ensures that land is developed with aeronautical use, is to expand the airport boundary to include such land. ODAV ownership does nothing to further that goal. Instead, as commanded in ORS 836.640-642, ODAV must expand the airport boundary to include the remaining undeveloped land at the airport that has been designated i*n every master plan since 1976 as suitable for airport development*. Not "wanting" to do so is no justification and is contrary to ORS 836.640-642.

ODAV Has Failed to Meaningfully Engage Airport Stakeholders in the Development of Airport Alternatives

Contrary to the federal requirements cited in prior submittals, ODAV has failed to meaningfully engage airport stakeholders in ODAV's process for developing the "Preferred Alternative."

ODAV has improperly insisted upon remote meetings only, where it mutes speakers when ODAV is done hearing from them, but allows ODAV and its consultants to speak without limits, including to break into discussions by stakeholders, undermine stakeholder points, and failing to allow any discussion or iterative response.

ODAV has to date completely failed to consider the Airport Stakeholders' Alternative and has given no rational reason for failing to adjust the airport boundary to support airport related development. ODAV has insisted upon PAC members being locked in stone, despite PAC members designating legal counsel and others to participate as their representative. ODAV has even insisted upon deceased persons holding precious aviation-stakeholder PAC member seats.

The lack of any sincere ODAV effort at engagement is well-illustrated by the fact that 13 minutes before the close of business on Friday December 19, the last business day before the close of the final ODAV "Preferred Alternative" comment period, ODAV's consultant for the first time responded to an important issue raised at the December 10, 2024 "PAC" meeting, proving a link and inviting PAC members to review the materials at the link. That link led to completely unhelpful further links leading to materials dozens of pages in length. Clearly, ODAV had no interest in the Aviation Stakeholders' concerns and even less interest in a meaningful response from the stakeholders on the issue.

The underlying issue was and is an important one. It involves ODAV's "Preferred Alternative" eliminating with no reasonable alternative, the HDSE septic drain field that is critical to the continued viability of the private development (and jobs) at the airport. The airport stakeholders have provided undisputed evidence that the HDSE drainfield can be strengthened to meet FAA standards to remain in the RSA. ODAV responded on December 10, 2024 with vague, unsupported claims that the drainfield must be removed. The links provided by ODAV's consultant at 4:47 pm on December 20, 2024 do not demonstrate what, if any, problem it is that ODAV has with the stakeholders' supporting information for the drainfield to be improved and remain in place. If there is an issue, ODAV should engage with the Stakeholders to discuss it. Clearly, a drainfield is essential to support the airport's good jobs and the businesses that go with them. Ostensibly ODAV would have an interest in preserving those economic attributes and discussing, in a meaningful way, how the drain field can be improved to remain in

place consistent with FAA standards. Assuming ODAV has such an interest – and ORS 836.640-642 compels ODAV to have such an interest, ODAV should meet with the stakeholders to work the issue out. It will not be particularly hard or time consuming to do so.

FAA Admits that the Runway Can be Extended, that an MOS Can be Approved and that the Master Plan need only Show Incremental Movement toward FAA Design Standard Compliance

On December 10, 2024 FAA admitted that (1) it can approve a MOS, (2) that the runway can be extended on a MOS, and (3) that the master plan need only show progress toward meeting FAA design standards. Airport Planner Aron Faegre has submitted comments this date explaining that the MOS for the runway extension can not only be approved but it in fact must be shown on the ALP- as it was shown on the approved 2012 ALP. We join those comments. There is no reason for the Preferred Alternative to continue to hold the runway extension hostage to Hwy 551 moving 30 feet (or however far ODAV wants it to move) west. Moving Hwy 551 can occur later when and if funding for the same is provided. That is what the law says. That is what the master plan should contemplate. Importantly, that is the only truly safe way forward.

Need for a Meaningful Meeting to Discuss a Tenable Preferred Alternative for the Aurora Airport

Given the success of the airport and the commands of ORS 836.640-642, ODAV's approach to the development of the "Preferred Alternative" to date is nothing short of puzzling. The master plan has a 20-year planning horizon and should ensure Aurora Airport's continued growth and success over that horizon. ODAV should meet, in person, with the Aeronautical Stakeholders and explore a more normative and economically reasonable preferred alternative that is consistent with ORS 836.640-642. Exhibit 1, the Stakeholder's Alternative, is a good starting point for that discussion.

Thank you for your consideration.

Very truly yours,

Wendie L. Kellington

WLK:wlk
CC: Clients

Outlook

Fw: Aurora Airport master plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 12/3/2024 2:17 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, November 25, 2024 11:12 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Aurora Airport master plan

Hello Brandy & Samantha,

Good morning. Please include within in the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION
POLICY, PLANNING & PROGRAMS MANAGER

CELL 971-375-2357
EMAIL Alex.R.Thomas@ODAV.Oregon.Gov
3040 25TH STREET SE, SALEM, OR 97302
WWW.OREGON.GOV/AVIATION

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From: Pete Kincart <petekincart@aol.com>
Sent: Monday, November 25, 2024 11:03
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Anthony.Beach@odav.gov
Cc: Bruce Bennett <Bruce@AuroraAviation.com>
Subject: Aurora Airport master plan

You don't often get email from petekincart@aol.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Alex Thomas and Anthony Beach,

Please register and make part of the master plan record my very strong objection to the "taking" of any privately owned hangars on the Aurora Airport.

There is a significant shortage of hangars. Destroying hangars with no replacement does not support aviation in Oregon in a positive way. The hangars sited for destruction are all currently providing significant employment. The two motivations for the proposed destruction can
be solved in a better way: either 1) a vehicle perimeter road would work much better and separate vehicle and aircraft traffic, or 2) ODAV purchasing only 1 acre from a willing seller to build my necessary vehicle lane(s).

I recommend airport safety improvements but only with no destruction of any hangars.

Thank you,
Peter Kincart ATP, CFII

Outlook

Re: Aurora State Airport Master Plan Website Comments - David Knowles

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2024-09-03 8:41 AM
To knowlesd@htshelicopters.com <knowlesd@htshelicopters.com>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Samantha Peterson <SPeterson@CenturyWest.com>

Hi David,

Thanks for your email. We've recorded it and also shared it with the rest of the team.

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting

Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday. Administrative-only hours on Friday.
Check my availability » Schedule a 30 minute check-in
Email is the best way to reach me; I try to respond within 2 workdays.
However, urgent requests should be handled through a phone call or scheduling a meeting using the link above.

Sent: Friday, August 30, 2024 3:42 PM
Subject: Re: Aurora State Airport Master Plan Website Comments - David Knowles

Aurora State Airport Master Plan Website Comments

Name	David Knowles
Organization	Helicopter Transport Services, LLC
Comments or questions?	PAC Input

My name is David Knowles and I am the General Manager of Helicopter Transport Services, LLC located at the Aurora airport at 14497 Keil Rd Ne. Our facility is 210k sq feet on 28 acres and we operate super heavy lift sky crane helicopter (11) and various other large helicopter in the fields of fire fighting, construction and exploration.

Thank you for the professional job and

seeking my input. The closest option i see is number 1B but that support is 100% conditional on the airport not delaying other safety improvements to wait for the highway relocation. It is also conditional on the vehicle access road being on the east side of the property as depicted in the approved 2012 ALP not the West side as depicted on one B.

If you have any questions, or would ever like a tour, although this time of the year everything is out working for USFS, CALFIRE & ODF, feel, free to contact me. We have a very impressive facility and operation at the Aurora airport. 503-776-9300 ext 102

If you would like a response, please tell us the best way to contact you:	Email
Email	knowlesd@htshelicopters.com
Phone Number	(

You can edit this submission and view all your submissions easily.

Outlook

Fw: Concerns Regarding the Proposed Airport Master Plan Alternatives

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 12/18/2024 9:52 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

I will be on vacation starting Monday, 12/23/24 and will return on Monday, 01/06/25.
JLA will be closed December 24 through January 1 to allow our entire team time to rest and recover. Please get in touch early with any anticipated needs during this time. Wishing you a lovely end to 2024!

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Wednesday, December 18, 2024 9:51 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Concerns Regarding the Proposed Airport Master Plan Alternatives

Hello,

Good morning. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:

COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Aric Krause <aric.j.krause@gmail.com>
Date: Wednesday, December 18, 2024 at 09:35
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Concerns Regarding the Proposed Airport Master Plan Alternatives

You don't often get email from aric.j.krause@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear ODAV/ Alex Thomas,
I am writing to express my strong concerns regarding the refined preliminary alternatives outlined in the Aurora State Airport Master Plan update. After reviewing the details, I believe several aspects of the plan should be reconsidered due to their potential negative impacts on the surrounding community and existing infrastructure.

1. **Displacement of Residents and Businesses:**
   Both Alternative 1A and 1B involve significant property acquisitions that would displace numerous residential and commercial properties. Specifically, Alternative 1A impacts 13 residential and 4 commercial properties, while 1B impacts 20 residential and 4 commercial properties. This level of displacement creates unnecessary hardship for community members and disrupts the stability of the area.
2. **Traffic and Infrastructure Strain:**
   Shifting Hubbard Highway, along with realigning roads such as Keil Road, poses risks of increasing traffic congestion and disrupting existing transportation networks. These changes could have long-term repercussions for commuters and freight traffic.
3. **Issues with Alternative 2:**
   While Alternative 2 avoids shifting Hubbard Highway, it requires relocating key airport infrastructure, including air traffic control towers and segmented circles. Additionally, this alternative necessitates the acquisition of 37 acres for runway alignment, with a total of 105 acres being earmarked for future aeronautical use. The removal and replacement of hangars in this plan would also lead to short-term disruptions for airport operations and long-term inefficiencies for existing tenants. The lack of helicopter parking and limited large aircraft accommodations further suggests this alternative does not fully meet the operational needs of the airport.
4. **Community Engagement and Feedback:**
   While the document mentions public review and feedback, the proposed alternatives suggest

that many community concerns remain unaddressed. A more robust and inclusive engagement process is essential to ensure all voices are heard and considered.

5. **FAA Compliance vs. Community Needs:**
   While I understand the FAA's requirement for compliance with design standards, this must be balanced with the needs and well-being of the surrounding community. Placing undue emphasis on expansion at the cost of local harmony is counterproductive and risks eroding public trust.

I strongly urge you to reconsider these alternatives and explore options that align more closely with the values and priorities of the community. Sustainable growth and thoughtful planning can coexist, but only if the concerns of all stakeholders are taken seriously.

Thank you for your attention to this matter. I would be happy to discuss these concerns further or participate in a forum to work towards more balanced solutions.

As a Commercial Pilot, tenant, CAA Club member, and Van's Aircraft employee my life is very much impacted by this proposal and I am not in support of the options on the table today.

Sincerely,

Aric Krause
aric.j.krause@gmail.com

Outlook

RE: aurora airport plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 6/11/2024 2:58 PM
To harmonjan@sterling.net <harmonjan@sterling.net>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>

Hello Harmon and Janette,

Thank you for sending us your thoughts about the runway length and aircraft size at the Aurora Airport. We will make sure that your comments (along with those from local residents, government partners, and businesses) are included in the information that the Oregon Department of Aviation (ODAV) considers as they make a decision on what alternatives to include in the final Aurora Airport Master Plan. You can find more information at the project website and also submit other questions or concerns you might have:
https://publicproject.net/AuroraAirport#

Thank you again for taking time to send us your comments,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting

From: harmonjan@sterling.net <harmonjan@sterling.net>
Sent: Monday, June 10, 2024 3:21 PM
To: Oregon Department of Aviation <mail.aviation@ODAV.oregon.gov>
Subject: aurora airport plan

We are writing to express our strong objection to lengthening runways and increasing size of aircraft at Aurora Airport. Planes from this airport already take off and land over densely populated areas and this proposal will seriously adversely affect communities in and near the flight path both in terms of noise and quality of life, and also in terms of safety. In addition, the Boone Bridge section of I-5 is already a traffic nightmare and adding traffic to and from the airport is not tenable. We have a more than adequate airport in Portland and the studies do not support the need for this expansion any time in the near future
.
Please take citizens and neighbors concerns into consideration and stop any expansion of Aurora Airport.

Harmon and Janette Laurin
Wilsonville, Oregon

Outlook

Aurora Airport Plan

From harmonjan@sterling.net <harmonjan@sterling.net>
Date Mon 2024-06-10 3:28 PM
To BROOKS Kelly S * GOV <Kelly.S.BROOKS@oregon.gov>

You don't often get email from harmonjan@sterling.net. Learn why this is important

We are writing to express our strong objection to lengthening runways and increasing size of aircraft at Aurora Airport. Planes from this airport already take off and land over densely populated areas and this proposal will seriously adversely affect communities in and near the flight path both in terms of noise and quality of life, and also in terms of safety. In addition, the Boone Bridge section of I-5 is already a traffic nightmare and adding traffic to and from the airport will necessitate a new bridge before any expansion is even considered. We have a more than adequate airport in Portland and the studies do not support the need for this expansion at this time.
.
Please take citizens and neighbors concerns into consideration and stop any expansion of Aurora Airport.
Thank you,
Harmon and Janette Laurin
Wilsonville, Oregon

Outlook

Fw: Letter for UAO Proposed Preferred Alternative

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-01-06 8:51 AM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

1 attachment (102 KB)
2024-12-20_ODAV Letter _UAO.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Tuesday, December 24, 2024 8:22 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Letter for UAO Proposed Preferred Alternative

Hello,

Good morning. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:
COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Matt Lawyer <MLawyer@co.marion.or.us>
Date: Monday, December 23, 2024 at 19:00
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Letter for UAO Proposed Preferred Alternative

You don't often get email from mlawyer@co.marion.or.us. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Alex,

Please find the attached letter from Marion County.

Respectfully,
Matt Lawyer
Senior Policy Analyst
Marion County Board of Commissioners
Email: mlawyer@co.marion.or.us
Cell: 503-507-6282 (Primary Contact #: call/text)
Desk: 503-588-5192
Address: 555 Court Street. NE.
Suite 5232
Salem, OR 97301

County Commissioners
Kevin Cameron, Chair
Danielle Bethell
Colm Willis

Chief Administrative Officer
Jan Fritz

MARION COUNTY BOARD OF COMMISSIONERS

December 23, 2024

Alex Thomas
Planning and Programs Manager
Oregon Department of Aviation
3040 25th Ste SE
Salem, OR 97602
Alex.R.Thomas@odav.oregon.gov

Re: Aurora State Airport Master Plan Proposed Preferred Alternative

Mr. Thomas,

Please enter this letter into the record for the Oregon Department of Aviation's (ODAV) proposed "Preferred Alternative" for the Aurora State Airport Master Plan. The Marion County Board of Commissioners support Director Sugahara's statement that ODAV is willing to modify its Preferred Alternative for the Aurora Airport Master Plan. It is important that ODAV explore all options and not just those on the table to ensure the on-going and future success of the Aurora Airport as an economic driver that delivers significant tax benefits, family wage jobs, emergency resiliency and aeronautical innovation to the region and state. The current version of ODAV's Proposed Preferred Alternative is inconsistent with these objectives.

ORS 836.640-642 provides authority for and encourages private investment at the Aurora Airport and provides direction and authority for ODAV to carry out that objective. ODAV's Proposed Preferred Alternatives contemplate significant potential loss of the Aurora Airport front line aircraft hangars for which the owners have invested more than $200 million, created millions in tax revenue, more than a thousand good jobs and millions in directly and indirectly related tourist revenue for surrounding communities.

Against this backdrop, the Proposed Preferred Alternatives anomalously designate areas that have been set aside in airport master plans for airport related development since 1976, as areas for ODAV acquisition instead of bringing them into the airport boundary established by ORS 836.640-642.

ORS 836.642 requires ODAV to "Preserve investments [at the Aurora Airport] and the level of service provided by [the Aurora Airport]" and to "promote economic development" at Aurora "by creating family wage jobs, increasing local tax bases" through support of private aviation-related uses so that they may "develop and thrive." The preferred alternative appears to be in conflict to ORS 836.640-642 and expressly seeks to trade the private investment that the statute seeks to encourage and grow, for government condemnation and ownership.

Concerningly, ODAV's Proposed Preferred Alternatives gambles with the significant economic benefits that private investment at the airport has delivered, risking their continuation. The threat of any future ODAV condemnation presents an unacceptable risk of driving away not only those aircraft hangar owners, but also their businesses, jobs and related tax and tourist revenue.

It is critical to the future of the airport that all alternatives are explored and that all considerations for the existing businesses and the surrounding lands are taken into consideration.

Kevin Cameron | Danielle Bethell | Colm Willis

Outlook

Fw: UAO Forecast Data

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2024-11-11 9:18 AM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Friday, November 8, 2024 2:59 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: UAO Forecast Data

FYI, just wanted to make sure this was included in the record.

Thanks,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Wednesday, July 3, 2024 3:13 PM
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Jeff Lewis <reformfaanow@gmail.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Re: UAO Forecast Data

Hello Jeff,

Good afternoon. Please use the link below for the raw data as received directly from the FAA as used for the forecast during the ongoing UAO masterplan process. Note there are 75 files, some of which are over 100MB each.

If there is an issue with accessing the link, let me know and we can look into alternative options, such as MoveIt.

UAO Raw Forecast Data

Have a great holiday and weekend!

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION
PLANNING & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

3040 25TH STREET SE, SALEM, OR 97302

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From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Date: Wednesday, July 3, 2024 at 13:35
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>, Jeff Lewis <reformfaanow@gmail.com>
Subject: Re: UAO Forecast Data

Hello Jeff,

Good afternoon and thank you for reaching out. ODAV has requested the UAO forecast data document(s) from our engineer consultant partner and will e-mail or provide an access link (if large file size) upon our receipt.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION
PLANNING & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

3040 25TH STREET SE, SALEM, OR 97302

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From: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Date: Tuesday, July 2, 2024 at 17:39
To: Jeff Lewis <reformfaanow@gmail.com>, THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Re:

Hey Jeff,

Cc'ing Alex who can get that info for you. (Either he'll get it to you or he'll be able to get it from the contractor)

TY!

Kenji

Get Outlook for iOS

From: Jeff Lewis <reformfaanow@gmail.com>
Sent: Tuesday, July 2, 2024 12:38:03 PM
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Subject:

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Hi, Mr. Sugahara.

Can you please provide a copy of the dataset used in defining operations levels, aircraft types, etc.? It would appear this is the TFMSC dataset obtained a few years back, and referenced in Table 3-7.

Can you also confirm, is this 'flight plan filings' or ACTUAL 'flown flight plans'? And what way do we have to validate each was actually flown?

Thanks.

Outlook

Fw: KUAO RDC timeline

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 8/29/2024 1:56 PM
To Jen Winslow <Jen.winslow@jla.us.com>

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
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Email is the best way to reach me; I try to respond within 2 workdays.
However, urgent requests should be handled through a phone call or scheduling a meeting using the link above.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, August 28, 2024 3:09 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; W. Matt Rogers <WRogers@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: KUAO RDC timeline

FYI again.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Wednesday, August 28, 2024 3:08 PM
To: Jeff Lewis <reformfaanow@gmail.com>
Subject: RE: KUAO RDC timeline

Hi Jeff, no problem, happy to help.

Yes it does show existing and future conditions as C-II, but that is because the Critical Aircraft was determined to be C-II (existing) earlier in that 2012 master planning process (Chapter 3 – Forecasting).

From the 2012 Chapter 3 – Forecasts:

"According to the 2000 Airport Master Plan, the planned ARC was B-II, exemplified by the King Air turboprop and the Cessna Citation jet. At that time, ODA decided to constrain the forecast by keeping the airfield ARC at B-II. A runway designed for ARC B-II is adequate for about 45% of the business jets manufactured.

The Airport has now passed the 500 operations threshold for Aircraft Approach Category C, so the current ARC should be C-II.

Aircraft Approach Category C accounts for 701 documented operations in FY 2007 and 390 in FY 2009, resulting in an average of 545 operations. The number of Aircraft Approach Category D airplane operations is negligible, as are operations in Airplane Design Group III.

With more than 500 operations in Aircraft Approach Category C and more than 500 operations in Airplane Design Group II, the appropriate ARC for the Airport is C-II."

It also gives a projected growth rate and that it does not expect the ARC to change in that 20-year planning period, so C-II is kept as the "future" condition on the 2012 ALP.

This section of Chapter 3 above determines that C-II is the Critical Aircraft based on recent actual aircraft operations, and sets the existing condition/design standards for the rest of the plan, including the ALP. The change to C-II did not occur prior to the 2012 master plan.

I hope this helps,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Jeff Lewis <reformfaanow@gmail.com>
Sent: Wednesday, August 28, 2024 10:03 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Re: KUAO RDC timeline

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Thanks, Tony. I appreciate the quick and detailed reply.
What confuses is that the actual ALP includes a Table listing both 'existing' and 'future' C-II, right? So, it seems there is an error... either that 2012 signed ALP mis-stated 'existing' as C-II (should have shown B-II?), or there was in fact an upgrade to C-II preceeding Suomi's signature. If such upgrade happened, when was it, and where is the FAA signature copy?
The text you cited appears to come from pg.2 of chapter 4. Contextually, furher down, does that page say the 2007 OAP encouraged an upgrade from B-II to C-II? And, if so, am I correct that the upgrade to C-II therefore happened after 2007?
One more question... what do you have as the FAA approval date for the Master Plan preceding Suomi's 2012 signature, and is a PDF copy available online?
Thanks.

On Tue, Aug 27, 2024, 2:46 PM BEACH Anthony <Anthony.BEACH@odav.oregon.gov> wrote:
Hi Jeff,

From Chapter 4 Facility Requirements of the 2012 Master Plan:

"At this time, ODA has not decided to constrain Aurora State Airport's ability to meet the unconstrained forecasts presented in Chapter Three. Such a decision may occur later. Facility requirements were constrained in the 2000 airport master plan update because ODA made a policy decision to do so. In the 2000 Master Plan update, forecasting determined the Airport Reference Code (ARC) as B-II, which meant that airport design should accommodate light jets and turboprop aircraft, as well as less demanding aircraft types. Unconstrained forecasting projected jet traffic at the Airport would grow so that the future ARC would be C-II, which meant that airport design should accommodate more medium sized jets. ODA made a policy decision to constrain the forecasts by constraining the ARC to B-II. Since then, aircraft activity growth has exceeded both the unconstrained and constrained forecasts in the 2000 master plan update. Current activity has passed the FAA's threshold for the ARC to be C-II. This has been possible because the airfield is adequate for many operators of Aircraft Approach Category C airplanes, even though the Airport does not meet all design standards for ARC C-II. In this current master plan update, ODA will examine the impacts of meeting ARC C-II design standards and of accommodating the unconstrained forecasts from Chapter Three."

The FAA's approval of the 2012 Airport Layout Plan with the ARC as C-II is attached. Since the 2012 ALP was signed, we have examined the impacts and different paths to meeting C-II design standards, including requesting Modification to Standards which were denied. The FAA directed us to evaluate paths to compliance in a new master plan, which we are doing now.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Sent: Tuesday, August 27, 2024 1:12 PM
To: Jeff Lewis <reformfaanow@gmail.com>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Re: KUAO RDC timeline

Hi Jeff-

Cc'ing Tony and Alex. Ty!

From: Jeff Lewis <reformfaanow@gmail.com>
Sent: Tuesday, August 27, 2024 12:20:36 PM
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Subject: KUAO RDC timeline

You don't often get email from reformfaanow@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hi, Kenji.

I am trying to confirm the history of the RDC at KUAO. Specifically, there has to be a document where FAA signed off growing from B-II to either C-I or C-II.

Would you please have an ODAV person check the records and advise the date and name of signatory FAA official? Even better, can you send a PDF copy of the packet with approval and ALP)or link to a copy online?

Thanks.

Outlook

Re: Aurora Airport - Public event this Thursday (6/13)

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 6/10/2024 3:35 PM
To Councilor Joann Linville <linville@ci.wilsonville.or.us>
Cc Anthony.BEACH@aviation.state.or.us <Anthony.BEACH@aviation.state.or.us>; Chris Neamtzu <neamtzu@ci.wilsonville.or.us>; Mayor Julie Fitzgerald <fitzgerald@ci.wilsonville.or.us>; Mark Ottenad <ottenad@ci.wilsonville.or.us>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>

Hello Councilor Linville,

Thanks so much for reaching out. Yes, you're correct that tomorrow night's PAC meeting will be focused on reviewing each of the preliminary alternatives. We've extended the meeting by an hour (5:00-8:00 pm) to give plenty of time for committee members to ask questions and get clarity on the details before providing feedback to ODAV. I'll pass along your idea for a matrix to show the differences between the alternatives.

Regarding the public information, we will have the public open house on Thursday of this week where we'll be able to walk people through those details and answer their questions. We'll also post the materials on the website, along with a comment form, for anyone that can't attend on Thursday.

I hope that helps answer your questions, but please let me know if you have any other questions or concerns.

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
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Check my availability » Schedule a 30 minute check-in

From: Councilor Joann Linville <linville@ci.wilsonville.or.us>
Sent: Monday, June 10, 2024 2:30 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Anthony.BEACH@aviation.state.or.us <Anthony.BEACH@aviation.state.or.us>; Chris Neamtzu <neamtzu@ci.wilsonville.or.us>; Mayor Julie Fitzgerald <fitzgerald@ci.wilsonville.or.us>; Mark Ottenad <ottenad@ci.wilsonville.or.us>
Subject: Re: Aurora Airport - Public event this Thursday (6/13)

Brandy - the supplied "Preliminary Alternatives" document is really insufficient to adequately prepare for the upcoming PAC meeting. There does not appear to be adequate and comprehensive analyses of each alternative including assessments of benefits and constraints of each of the alternatives based on FAA regulations, ODT constraints, land use regulations, ROFA, RSA, RPZ requirements, environmental and community impacts. Will that be provided to the PAC and the general public? Providing a matrix for each alternative including strengths and constraints would be very helpful.

Respectfully,

Joann
Joann Linville, Councilor
City of Wilsonville
Linville@ci.Wilsonville.or.us
(503)746-3495

On Jun 10, 2024, at 8:03 AM, Brandy Steffen <brandy.steffen@jla.us.com> wrote:

Hello PAC members – We hope that you will share this with your community or group that you represent. We've also included a postcard that you can share as well. Please reach out if you have any questions. We'd also greatly appreciate you sharing on any social media platforms that you have. Thank you!

The Aurora State Airport Master Plan will host an open house to show preliminary design alternatives and hear feedback on what the future Aurora State Airport could look like in the future. This Open House will be held in person on Thursday, June 13, 2024, between 4:00-7:00 pm in the Commons of North Marion High School, (20167 Grim Rd NE, Aurora, OR 97002)

Please share this information with your friends and neighbors! We would like to talk with as many people as possible and hear community feedback on the preliminary alternatives.

If you can't make the event, don't worry! We'll post all the information on the website and have an online survey for you to provide your thoughts on the draft alternatives (open from June 13-21): https://publicproject.net/AuroraAirport

---
Thanks,
Brandy

<Outlook-A blue num.png>

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brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
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Meeting + email hours 9 a.m.–5 p.m. Tuesday–Friday. Administrative-only hours on Monday.
Check my availability » Schedule a 30 minute check-in

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Tuesday, June 4, 2024 4:58 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Anthony.BEACH@aviation.state.or.us <Anthony.BEACH@aviation.state.or.us>
Subject: Aurora Airport - PAC meeting next Tuesday (6/11)

Hello PAC members,

Just a reminder that we'll see you next Tuesday for our **sixth PAC meeting (VIRTUAL) on Tuesday, June 11, 2024 from 5:00-8:00 p.m.** *(please note this is an hour longer than our normal meeting time).*

Date/Time: Tuesday, June 11, 2024 from 5:00-8:00 p.m.
Topic: The preliminary alternatives will be presented for the Aurora State Airport Master Plan.
Location: Zoom

- PAC members have been registered via Zoom and will get an email directly from Zoom with the login information (please check your junk folder). Please do not forward this email to anyone.

- Others can register for the meeting under their own names at: Webinar Registration - Zoom

Materials are posted on the website: https://publicproject.net/AuroraAirport#

Additionally, we want to remind you of our next public open house, which will be held in-person. **We hope to see you there; please share with your groups/representatives.**

Thursday, June 13, 2024
Drop by between 4:00-7:00 pm
North Marion High School, Commons
(20167 Grim Rd NE, Aurora, OR 97002)

Light refreshments provided; children welcome
Tendremos interpretación en español en la reunión. We will have Spanish interpretation at the meeting.

This meeting will provide an opportunity for neighbors, PAC members, and other interested community members to learn about the Airport Master Plan project. This meeting will present the preliminary alternatives for the Aurora State Airport Master Plan. All written and verbal comments collected during the open house will be included in the event Summary.

Thanks,
Brandy

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brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
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Check my availability » Schedule a 30 minute check-in

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Tuesday, May 28, 2024 4:17 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Aurora Airport - June 11 PAC meeting

Hello PAC members,

Here are the materials for our **next meeting (VIRTUAL) on Tuesday, June 11, 2024 from 5:00-8:00 p.m.** *(please note this is an hour longer than our normal meeting time).* We will cover new material during this meeting; specifically, we'll be presenting the preliminary alternatives for the Aurora State Airport Master Plan.

Materials for PAC Meeting #6 (also posted on the website: https://publicproject.net/AuroraAirport#)
1. Agenda
2. Preliminary Alternatives Summary - to help you prepare for the discussion during the meeting
3. Postcard for the open house - that we hope you will share electronically with your groups/organizations
4. Meeting #5 Summary

Please let me know if you have any questions, comments, or concerns before our June 11 meeting.

Thanks,
Brandy

<Outlook-A blue num.png>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
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Meeting + email hours 9 a.m.–5 p.m. Tuesday–Friday. Administrative-only hours on Monday.
Check my availability » Schedule a 30 minute check-in

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Thursday, May 9, 2024 3:54 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Aurora Airport - June 11 PAC meeting and June 13 open house

Hello PAC members,

We are looking forward to seeing you at the **next meeting (VIRTUAL) on Tuesday, June 11, 2024 from 5:00-8:00 p.m.** *(please note this is an hour longer than our normal meeting time).*

The recording from our last meeting (April 30) is posted on the project website and **we would like comments back from you for inclusion in the meeting summary by next Tuesday, May 14.**

Date/Time: Tuesday, June 11, 2024 from 5:00-8:00 p.m.
Topic: The preliminary alternatives will be presented for the Aurora State Airport Master Plan.
Location: Zoom

- PAC members have been registered via Zoom and will get an email directly from Zoom with the login information (please check your junk folder). Please do not forward this email to anyone.
- Others can register for the meeting under their own names at: Webinar Registration - Zoom

Materials: Just a reminder that meeting materials will be posted on the website: https://publicproject.net/AuroraAirport#

Additionally, we want to announce and invite you to our next public open house, which will be held in-person. We hope to see you there.

Thursday, June 13, 2024
Drop by between 4:00-7:00 pm
North Marion High School, Commons
(20167 Grim Rd NE, Aurora, OR 97002)

Light refreshments provided; children welcome
Tendremos interpretación en español en la reunión. We will have Spanish interpretation at the meeting.

This meeting provided an opportunity for the neighbors, PAC members, and other interested community members to learn about the Airport Master Plan project. This meeting will present the preliminary alternatives for the Aurora State Airport Master Plan. All written and verbal comments collected during the open house will be included in the event Summary.

Thank you again for your continued interest in, and participation with, the Aurora Airport Master Plan project.
Brandy

<Outlook-A blue num.png>

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brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
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Fw: UAO master plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-01-06 8:57 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (47 KB)
DRAFT Dec 23 2024 Group Ltr re Preferred Alterantive.PDF;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
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JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, December 23, 2024 8:38 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: UAO master plan

Hello,

Good morning. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:

COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Kory MacGregor <korym12@gmail.com>
Date: Friday, December 20, 2024 at 22:01
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Helbling, Tony <helbling@wilsonconst.com>
Subject: UAO master plan

You don't often get email from korym12@gmail.com. Learn why this is important

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Please enter the attached record into record. Thank you.

December 20, 2024

Alex Thomas
Planning and Programs Manager
Oregon Department of Aviation
3040 25th Ste SE
Salem, OR 97602
Alex.R.Thomas@odav.oregon.gov

Re: Aurora State Airport Master Plan Proposed Preferred Alternative

Mr. Thomas,

Please enter this letter into the record for the Oregon Department of Aviation's (ODAV) proposed "Preferred Alternative" for the Aurora State Airport Master Plan. We support Director Sugahara's statement that ODAV is willing to modify its Preferred Alternative for the Aurora Airport Master Plan. We believe that it is important that ODAV do so, to enable the airport to continue to deliver significant tax benefits, family wage jobs, emergency resiliency and aeronautical innovation to the region and state. The current version of ODAV's proposed Preferred Alternative is inconsistent with these objectives.

ODAV is bound by ORS 836.640-642 which was developed by Business Oregon. That statute strongly encourages private investment at the Aurora Airport and commands ODAV to carry out that objective. Contrary to that statute, ODAV's proposed alternative contemplates ODAV taking by eminent domain the Aurora Airport front line aircraft hangars for which the owners have invested more than $200 million, created millions in tax revenue, more than a 1000 good jobs and millions in directly and indirectly related tourist revenue for surrounding communities, with ORS 836.640-642 as the catalyst.

Against this backdrop, the "Preferred Alternative" anomalously designates areas that have been set aside in airport master plans for airport related development since 1976, as areas for ODAV acquisition instead of bringing them into the airport boundary established by ORS 836.640-642 for development for airport related uses and wipes out the front line hangars.

Both elements of the preferred alternative are misguided. Among other objectives for the Aurora Airport, ORS 836.642 requires ODAV to "Preserve investments [at the Aurora Airport] and the level of service provided by [the Aurora Airport]" and to "promote economic development" at Aurora "by creating family wage jobs, increasing local tax bases" through support of private aviation-related uses so that they may "develop and thrive." The preferred alternative is contrary to ORS 836.640-642 and expressly seeks to trade the private investment that the statute seeks to encourage and grow, for government condemnation and ownership.

Concerningly, ODAV's preferred alternative significantly gambles with the significant economic benefits that private investment at the airport has delivered, risking their continuation. The threat of ODAV condemnation, not to mention ODAV actually engaging in such litigation against those owners, presents an unacceptable risk of driving away not only those aircraft hangar owners, but also their businesses, jobs and related tax and tourist revenue. Once they are gone, the stigma of such ODAV action could make the airport and indeed any airport that ODAV manages, a private

investment pariah for decades. Such a risk should not be taken where, as here, a state statute commands ODAV otherwise and there are alternatives.

It is respectfully submitted that the justification for the "preferred alternative" simply does not justify its deleterious effects. ODAV is on record stating that these harmful consequences only flow from ODAV's desire for a "vehicle service road" (VSR) and a new aircraft taxiway. But neither necessitates the preferred alternative.

Regarding the VSR, the 2012 master plan approved a VSR that has none of the Preferred Alternative's deleterious effects and does not carry a $200 million condemnation price tag. At worst, the 2012 VSR costs the state some pavement. Moreover, we are advised that the private aeronautical stakeholder owners have offered ODAV the land needed for the 2012 MP VSR free of charge. We are unaware of any reason for ODAV to not pursue that 2012 MP VSR and we can only see good reasons to do so.

We are further advised that there are alternatives for a new taxiway that ODAV has not explored. We understand that ODAV has not explored any such alternatives because it does not own the land needed for a taxiway to be located elsewhere. However, so far as we know this has never been an impediment previously to the development of the Aurora Airport and should not be an impediment now. Many features of the proposed alternative are now contemplated on land that ODAV does not own – including the taking of the frontline hangars. Even if ODAV had to acquire some private land for a new taxiway, ODAV should explore such alternatives having the least adverse impact on the continuation and growth of private aeronautical investment at the airport, not to mention a price tag well south of the $200 million under the Preferred Alternative. Finally, we are advised that ODAV simply does not "want" to extend the airport boundary to include the land that is now and has long been foreseen for airport-related development in the airport boundary. Such a justification if true, would obviously be contrary to ODAV's mission and responsibility to enable the Aurora Airport to grow with aviation-related uses.

We are frankly perplexed by these problems given the success of the airport and the commands of ORS 836.640-642. ODAV should be eager to develop a master plan that ensures the Aurora Airport's continued growth and success over the master plan's 20-year horizon. If these problems that risk sending the airport backwards by decades arise from a lack of meaningful airport stakeholder engagement in the development of the preferred alternative, then ODAV should meaningfully engage. But whatever the reason, we strongly encourage ODAV to dismiss the Preferred Alternative and to meet with the airport stakeholders and to explore a more normative and economically reasonable preferred alternative that is consistent with ORS 836.640-642.

Sincerely,

Kory MacGregor
Hangar Foxtrot Owner

Outlook

Fw: Aurora Airport Master Plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 11/19/2024 4:13 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, November 12, 2024 12:52 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora Airport Master Plan

Good afternoon, please include in the record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, November 12, 2024 12:52 PM
To: Philip Mandel <phmand@gmail.com>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: RE: Aurora Airport Master Plan

Hi Philip, thank you for your comments, I have forwarded them to the master plan team and they'll be included in the record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Philip Mandel <phmand@gmail.com>
Sent: Tuesday, November 12, 2024 10:58 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Philip Mandel <phmand@gmail.com>
Subject: Aurora Airport Master Plan

Some people who received this message don't often get email from phmand@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Gentlemen,

I am a pilot, flight instructor, and single-engine airplane owner who makes frequent use of Aurora State Airport both for recreation and for training. I am also a member of Columbia Aviation Association which is based at the airport.

I must strongly object to the "taking" or destroying of any privately owned hangars at the airport. There is a significant shortage of aircraft hangars at Aurora airport as well as the rest of the region. Many of the hangars at Aurora airport house businesses that would be significantly impacted or destroyed if said hangars were taken. Even prior to such action, the mere mention of it in any adopted Master Plan would negatively affect their market value and likely lead to loss of employment and related tax revenue.

I urge you to develop a Master Plan that provides needed safety improvements without impacting the above-mentioned hangars or their owners.

Thank you for your time.

Respectfully Submitted,

Philip Mandel
[redacted]
Beaverton OR 97008

Outlook

Re: Charbonneau Replacement on PAC

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 6/10/2024 12:40 PM
To David Mauk <davidemascent@gmail.com>
Cc Anne Shevlin <a.shevlin@charbonneaucountryclub.com>

Wonderful, thank you for confirming! I'll see you virtually tomorrow.

Are you also able to share the Thursday open house with other residents? We want to make sure people know about the event so they can talk to staff from FAA and ODAV.

Thanks,
Brandy

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in » Email is the best way to reach me; I try to respond within 3 full workdays.

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

From: David Mauk <davidemascent@gmail.com>
Sent: Monday, June 10, 2024 12:07:51 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Anne Shevlin <a.shevlin@charbonneaucountryclub.com>
Subject: Re: Charbonneau Replacement on PAC

Greetings Brandy -
Yes, I received your notice & can say that this week's PAC meeting is on my calendar since. I look forward to attending & thank you for your follow-up.

Yours -
Dave
David E. Mauk
Charbonneau Civic Affairs Committee

On Mon, Jun 10, 2024 at 11:40 AM Brandy Steffen <brandy.steffen@jla.us.com> wrote:

> Hello again Anne and Dave,
>
> I just wanted to make sure you saw my previous email in advance of this week's PAC meeting and public open house. **Can you please let me know that you've received this?**

Thanks so much and I look forward to seeing you tomorrow, Dave!

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting
Meeting + email hours 9 a.m.–5 p.m. Tuesday–Friday. Administrative-only hours on Monday.
Check my availability » Schedule a 30 minute check-in

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Tuesday, May 28, 2024 2:36 PM
To: Anne Shevlin <a.shevlin@charbonneaucountryclub.com>
Cc: David Mauk <davidemascent@gmail.com>; Jen Winslow <Jen.winslow@jla.us.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Re: Charbonneau Replacement on PAC

Hello Anne,

Thank you for letting us know about the change. We will update our records. Please note that we have a virtual PAC meeting on Tuesday, June 11 from 5:00-8:00 pm. We hope that Dave can attend.

We are also hosting an in-person open house for anyone interested in the project on Thursday, June 13. We hope that you can help share the public open house with the rest of Charbonneau residents and that you can attend. I've attached a postcard that announces both events; feel free to share! The information is also listed below.

Thursday, June 13, 2024

Drop by between 4:00-7:00 pm

North Marion High School, Commons

(20167 Grim Rd NE, Aurora, OR 97002)

Light refreshments provided; children welcome

Tendremos interpretación en español en la reunión. We will have Spanish interpretation at the meeting.

This meeting provided an opportunity for the neighbors, PAC members, and other interested community members to learn about the Airport Master Plan project. This meeting will present the preliminary alternatives for the Aurora State Airport Master Plan. All written and verbal comments collected during the open house will be included in the event Summary.

Please let me know if you have any questions.

Thanks,

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com

Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday

Check my availability » Schedule a 30 minute check-in » Email is the best way to reach me; I try to respond within 3 full workdays.

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

From: Anne Shevlin <a.shevlin@charbonneaucountryclub.com>
Sent: Tuesday, May 28, 2024 10:53:44 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: David Mauk <davidemascent@gmail.com>
Subject: Charbonneau Replacement on PAC

Brandy,

This message is to notify you that effective immediately, Charbonneau Country Club board director Dave Mauk will replace Jeff Baymor as the representative on the Aurora Airport PAC.

Please include Dave in all correspondence and meeting notices. Dave is copied on this message.

Please respond back that you have received this email and that you are the correct person to make these changes.

Thank you,
Anne Shevlin, President
Charbonneau Country Club

Addendum to PAC Feedback Form:
Problematic Elements of Refined Alternatives in Aurora Airport Master Plan

- all of the refined alternatives are unsuitable for the constrained site & MAP
- refined alternatives are not reasonable when existing constrained site remains a constrained site
- refined alternatives inadequately address future noise exposure & mitigation
- refined alternatives are not compliant with state land use laws & invite costly litigation
- refined alternatives as well as larger & more frequent aircraft are not supported by local community
- insufficient data provided to demonstrate that airport operations are self-sufficient & sustainable without state & federal funding, while funds from the general fund are budgeted for operations
- Aurora State Airport operates at a loss where self-generated revenue is insufficient
- LUBA rulings & ongoing legal issues are costly, time consuming & adversarial
- acquiring private land currently zoned for agriculture is adversarial & litigious
- relocating state highway (551) & other surface roads is unfeasible, adversarial, impractical & costly
- MAP did not follow procedures in its forecasting, where statistics fail to show basis of need
- expansion is unnecessary when over 85% current use is small aircraft that fit the constrained site
- cost, inconvenience, ROI of relocating existing private hangers is adversarial & impractical
- impact of adjusting take-off & landing fees, & fuel pricing as factors is not taken into account
- insufficient data regarding safety, noise & surface traffic impact of higher number of larger aircraft
- insufficient due diligence in not considering unused capacity at existing regional airports with superior facilities & infrastructure already in place as an alternative option
- lack of transparency regarding airport finances calls into question the validity of MAP
- inadequate accounting of local citizens' negative input especially in light of general fund usage
- local municipalities' & other interests' input unaccounted for & not sufficiently documented
- lack of assessment for alternative of runway addition divided on both north & south ends
- inadequate assessment of negative impact on nearby residential neighborhoods & residents
- state of water, sanitation, fire suppression, & emergency services onsite is deficient
- insufficient assessment on local surface transportation based on refined alternatives
- deficient assessment of environmental factors & public health
- MAP documentation with respect to the airport's 10-15 year safety record is inadequate
- failure of applying reasonable standards to high cost/limited benefits of refined alternatives
- imprudent that ODAV's current budget is partially funded from the general fund with $250,000 budgeted for litigation legal fees at Aurora Airport while planning costly refined alternatives
- insufficient due diligence without comparative analysis in use of funds for an alternative project at a different airport that has existing facilities & meets runway specifications for larger aircraft
- deficient documentation identifying specific airport stakeholders & aircraft benefiting from MAP
- reparation for stakeholders who are disadvantaged by refined alternatives is not taken into account
- inadequate explanation why Aurora airport isn't candidate or eligible for modified C-II certification
- insufficient explanation why Aurora airport can't return to B-II certification with current use 85% small aircraft, after shifting higher-rated aircraft to regional airport with C-II or higher certification

Outlook

Aurora State Airport Master Plan Website Comments - David Mauk

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From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 12/17/2024 1:07 PM
To dave@charbonneaucountryclub.com <dave@charbonneaucountryclub.com>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>

Hi Dave,

Thank you for sending your comments to us. I will make sure that the rest of the technical team starts reviewing this and drafting responses to your comments and questions.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

I will be on vacation starting Monday, 12/23/24 and will return on Monday, 01/06/25.
JLA will be closed December 24 through January 1 to allow our entire team time to rest and recover. Please get in touch early with any anticipated needs during this time. Wishing you a lovely end to 2024!

From: David Mauk <noreply@jotform.com>
Sent: Monday, December 16, 2024 11:21 AM
Subject: Re: Aurora State Airport Master Plan Website Comments - David Mauk

Aurora State Airport Master Plan Website Comments

Name	David Mauk
Organization	Charbonneau Country Club
Comments or questions?	There are many ways to assess the proposed Aurora State Airport master plan. Before that, I'd like to put this in context from the participants' points-of-view.

Flight operators see safety, services and ease of operations as priorities. Property owners want utilization and positive return on their assets. Nearby communities view it through the lens of
noise disturbance, potential accidents in their neighborhoods, negative impacts on property values,
and preservation of farmland. FAA's view is through the microscope of compliance to its standards.
And ODAV's point of-view has an eagle eye focused on promoting airport growth, above its safety
and efficiency goals, good neighbor policies, and benefits to a greater number of Oregonians.

What has been witnessed during the decade-plus struggle of devising a master plan for Aurora State Airport demonstrates that ODAV has diverted from its 'mission to provide infrastructure, financial resources, and expertise to ensure a safe and efficient air transportation
system.' The agency presses forward as an advocate for Aurora Airport's growth, bypassing
infrastructure, financial stability and safety aspects.

Somewhere along the way, ODAV's mission morphed into being a 'chamber of commerce' -like agency for the aviation industry. Its dual mandates - aviation safety and aviation growth - are
proving to be incompatible with each other. As a public agency, it has a core duty of providing
safety for that industry and the public who use and are impacted by it. ODAV is failing in this
primary duty at Aurora Airport.

Before final consideration, it seems useful to untangle the web of why the plan for this airport is now in its second decade, all the while universally unpopular with community stakeholders,

and now it seems, operators and property owners, too.

Twenty-eight general aviation airports are owned by ODAV, who is responsible for providing infrastructure and safe usage for those airports. Some of these airports are more important lifelines to their communities than others, connecting recreation, commerce, healthcare, and disaster assistance. Many of those airports have needs that exceed allocated funds. In total, this state agency has a role in nearly 100 public use airports in Oregon.

One airport emerged to receive extra attention, funds and a push to grow it beyond the limits of its constrained site. A tower was built at that one airport. Users of this airport began flying larger aircraft under compliance waivers. To meet standards for these non-compliant larger aircraft, this airport would need to expand its runway and make other costly improvements. This airport would need a master plan enabling it to meet the demands of few, large, mainly transient, non-compliant aircraft, despite its constrained site, over 90% usage by light aircraft, and objections of community stakeholders. This is where Aurora State Airport is now and has been for years. ODAV is flying outside the boundaries of its mission. Excuse the use of mixed metaphors, but the master plan for Aurora Airport has been a runaway train. And there is no light at the end of its tunnel.

ODAV's ambition as an advocate and property developer, is misguided and not compatible with its core duty of aviation safety. ODAV is not held accountable to the citizens of

Oregon in its current structure. ODAV's lack of budgetary restraint and financial accountability is reckless when other state agencies are counting pennies and reevaluating spending priorities. ODAV does not provide adequate benefits for the funds it receives and the communities it serves. And it's safe to say that a development strategy to use this airport for unmanned air commerce will also crash-land.

Without substantial FAA financial backing it would not be feasible for ODAV to fly beyond its core mission. ODAV's empire-building at a general aviation airport in the north edge of Marion County is irresponsible when a 750 acre, full service, modern, underutilized airport sits dead center in this same county. Salem-Willamette Valley Airport, as well as McMinnville Municipal Airport, are well-positioned, and more than capable and ready to accept large aircraft, and subsequent revenue growth that may come from it. This alternative deserves serious due diligence and consideration.

ODAV's preferred alternative is a solution looking for a problem, not a solution that fits Aurora Airport's constrained site, nor the region's aviation budget. Stuffing ten pounds into a five-pound sack doesn't make sense. Finding ways to make the sack fit more makes it undependable. Putting ten pounds into a twenty-pound sack, or better yet, having two twenty-pound sacks, is preferable, with plenty of extra room for safety. Aurora Airport is a flawed location for expansion. Salem and McMinnville are ideal solutions for larger aircraft and space without breaking the bank.

In conclusion, ODAV is misguided, underperforming and wasting resources in it's aviation promotion activities. This jeopardizes its core mandate of 'providing infrastructure, financial resources and expertise to ensure a safe and efficient air transportation system.'

Its preferred plan for Aurora State Airport is no plan at all. Not when it's irresponsibly expensive, opposed by every neighboring community, will invariably lead to costly lawsuits that further delays compliance with FAA standards, and when regional, underutilized airports are readily available at low cost to ODAV.

As history has shown over the past decade, opponents of expanding Aurora State Airport to accommodate larger, mainly transient jet aircraft, while ignoring environmental, noise, safety, and land use directives, as well as community objections, are not going away. ODAV directors, board members and staff have come and gone, but we are, and will still be here, to protect our community from the ambitions of an unaccountable agency, out-of-state parties, and the greedy few who insist their self-interest is more important than thousands of local stakeholder citizens of Oregon.

The Charbonneau District of Wilsonville, my constituency of several thousand citizens, is year-in and year-out, the highest voter turnout in Oregon. We care about what happens in Oregon, and make sure our voices are heard. This letter gives voice to what we're saying, as adamantly as ever.

We don't want to lose value in the thousands of properties we call home. We don't want to

see the quality of our air, water and soil suffer more environmental degradation. We don't want to
lose valuable farmland. We don't want our municipal governments and state regulations to be run
over by big moneyed interests. We don't want the peace and quiet of country living to be ruined.
We don't want another pretext to expand the airport and do this all over again.

It's the duty of the ODAV board of directors and governor to consider airport options in the region as preferred alternatives to this colossally fanciful plan, to clip ODAV's wings in its non-
essential activities, and return it to a safety mandate that can benefit all Oregonians, instead of in this
case, only a few operators who have reasonable alternatives, and affluent, transient out-of-state users.

David E. Mauk
Charbonneau Country Club | Board Member
Chair, Civic Affairs Committee

If you would like a response, please tell us the best way to contact you:	Email
Email	dave@charbonneaucountryclub.com

You can edit this submission and view all your submissions easily.

Outlook

Fw: Aurora Airport Master Plan - Hangars Take

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 11/19/2024 4:04 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, November 18, 2024 2:52 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Aurora Airport Master Plan - Hangars Take

Hello,

Good afternoon, please include in the record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:
COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Date: Monday, November 18, 2024 at 14:52
To: Karina Mayner <karina@karinamayner.com>, BEACH Anthony <Anthony.BEACH@odav.oregon.gov>, governor@oregon.gov <governor@oregon.gov>
Subject: Re: Aurora Airport Master Plan - Hangars Take

Hello Karina,

Good afternoon and thank you for reaching out to the Department of Aviation and providing your comments, we have forwarded them to the master plan team and they'll be included in the record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:
COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
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From: Karina Mayner <karina@karinamayner.com>
Date: Monday, November 18, 2024 at 06:43
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>, BEACH Anthony <Anthony.BEACH@odav.oregon.gov>, governor@oregon.gov <governor@oregon.gov>
Subject: Aurora Airport Master Plan - Hangars Take

[You don't often get email from karina@karinamayner.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear all,

This email is regarding the Aurora airport master plan that is stating to remove hanger in order to accommodate another taxi way.

For your information there is a significant shortage of hangers. I have been trying to find a hanger for the last two years to no avail. The hangers waiting list at each airport to include Aurora airport is miles long. It would be incomprehensible to remove any hangers for the purpose of building another taxiway. There is no need to build an additional taxiway as there is no taxiway traffic issues whatsoever.

But there is definitely an impact to the owners and renters of those hangers which include established businesses.

There is absolutely zero purpose of taking this route.

I am more than positive that FAA would consider any exemptions if they were requested should FAA compliance be a cornerstone of this proposal.

Please feel free to contact me with any questions or clarifications.

Regars,
Karina Mayner

Outlook

Fw: Aurora State Airport Master Plan Comments

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-01-06 8:57 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (81 KB)
Letter to ODA - UAO Master Plan.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Monday, December 23, 2024 8:22 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora State Airport Master Plan Comments

Good morning, please include this in the record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Monday, December 23, 2024 8:21 AM
To: hannahmclaughlin13@yahoo.com
Subject: RE: Aurora State Airport Master Plan Comments

Hi Hannah,

Thank you for your comments, your email has been forwarded to the master plan team and will be included in the public record.

Tony Beach

OREGON DEPARTMENT OF AVIATION

STATE AIRPORTS MANAGER

OFFICE 503-378-2523 **CELL** 503-302-5455

M-F 7:30am – 4pm

From: Hannah Mclaughlin <hannahmclaughlin13@yahoo.com>
Sent: Sunday, December 22, 2024 11:41 AM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Oregon Department of Aviation <mail.aviation@ODAV.oregon.gov>; FOREST Kristen R <Kristen.R.FOREST@odav.oregon.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Subject: Aurora State Airport Master Plan Comments

You don't often get email from hannahmclaughlin13@yahoo.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

To whom it may concern,

Good morning. My name is Hannah McLaughlin. I am a local pilot who regularly flies in and out of Aurora State Airport (UAO). I am also an employee of Aerometal International, Inc. (AMI) located at UAO. I am writing regarding the proposed airport master plan for UAO and some concerns I have about it.

My first concern is the tearing down of private hangars. As you know, hangars and land are both owned by the hangar owner (as opposed to Salem, where owners own the building but lease the land underneath. In plane 1A, it states that "South apron aeronautical properties are acquired, and hangars removed to accommodate parallel taxilane and vehicle service road"

How does the state intend to acquire these properties? To the best of my knowledge, these are all privately owned properties. Does the state have grant money? As an Oregon tax payer and someone employed at the airport, I cannot say that I condone my tax money being used to destroy my place of employment.

Why does there need to be a vehicle service road next to the taxiway? In my opinion, this is dangerous and will lead to more runway and taxiway incursions by unauthorized vehicles and pedestrians. There is already an internal access road that is partially constructed behind these hangars, that has already been approved. Why not simply finish constructing this through-road? Proposal 1B, while not destroying any hangars, still includes this road right in front of the hangars closest to the taxiway. This takes up valuable ramp space for the businesses located

there, and poses a huge safety risk. How does the state propose to provide training to delivery drivers and anyone else who may need to use the access road? Having a road going directly through a very active ramp poses a huge safety issue for anyone not properly trained and who may leave the road, cause taxiway or runway incursions, cut off aircraft that have right of way, or damage aircraft on the ramp with their vehicle(s)

My second concern is the economic impact of this master plan. The hangars that are intended to be torn down under 1A include AMI, Vans Aircraft, and Life Flight. How does the state intend to handle hundreds of employees either temporarily or permanently losing their jobs? Working for AMI, I cannot think of another airport we could move to and still conduct business out of while our current hangar is torn down. We work on large vintage aircraft that are hard to find hangar space for as it is. Where does the state suggest companies like AMI move during this process?

Is the state going to cover my and my coworkers' lost wages for the time that we are unable to work? AMI employs 30+ people. What about Vans? Wilson Construction? Are you going to force businesses to close for an indefinite period when they cannot find other places to operate out of? How does the state propose that Life Flight continue to operate when their base of operations is destroyed? Removing Life Flight's hangar would be a huge disruption to the life saving services they provide, and create a huge burden on a non-profit organization.

I see in 1A that the state claims this will provide hundreds of thousands of square feet of new land for hangars to be developed, however, this space only exists because of the hangars that are being torn down. Will businesses that are forced to sell their hangars to the state be given funds to rebuild? Or will the state force businesses to lease the land back and build new hangars at their own expense? This is not economically feasible for many.

AMI also supports many local businesses in Canby, Aurora, and Wilsonville, whether we are purchasing raw materials, need specialty machining or welding done, or need graphics work. That support disappears if AMI is forced to shut down.

I love working at UAO. I have worked for AMI for almost 7 years, and it is an amazing place to work. I have built my life around working here, and losing not just my job, but the community I have built for myself there would be detrimental to me.

The Oregon Department of Aviation's mission is to provide infrastructure, financial resources, and expertise to ensure a safe and efficient air transportation system. How does using taxpayer money to acquire private property, shut down local businesses, and force people out of work in an already tough economy align with this mission? Your vision to provide an integrated Aviation System benefiting all Oregonians doesn't work when you are forcing Oregonians who work in the aviation industry to lose their jobs.

This is an absolute waste of taxpayer dollars, and I cannot fathom why ODA would choose to take this course of action. Like many employed both in Oregon and at UAO, I cannot afford to lose my job. I strongly encourage the ODA to reconsider this master plan and consider the economic impacts on taxpayers, those employed on the airport, and the local economy surrounding the airport.

Thank you,
Hannah
(971) 599-8896

Oregon Department of Aviation
3040 25th Street SE
Salem, OR 97302

December 22, 2024

To whom it may concern,

Good morning. My name is Hannah McLaughlin. I am a local pilot who regularly flies in and out of Aurora State Airport (UAO). I am also an employee of Aerometal International, Inc. (AMI) located at UAO. I am writing regarding the proposed airport master plan for UAO and some concerns I have about it.

My first concern is the tearing down of private hangars. As you know, hangars and land are both owned by the hangar owner (as opposed to Salem, where owners own the building but lease the land underneath. In plane 1A, it states that "South apron aeronautical properties are acquired, and hangars removed to accommodate parallel taxilane and vehicle service road"

How does the state intend to acquire these properties? To the best of my knowledge, these are all privately owned properties. Does the state have grant money? As an Oregon taxpayer and someone employed at the airport, I cannot say that I condone my tax money being used to destroy my place of employment.

Why does there need to be a vehicle service road next to the taxiway? In my opinion, this is dangerous and will lead to more runway and taxiway incursions by unauthorized vehicles and pedestrians. There is already an internal access road that is partially constructed behind these hangars, that has already been approved. Why not simply finish constructing this through-road? Proposal 1B, while not destroying any hangars, still includes this road right in front of the hangars closest to the taxiway. This takes up valuable ramp space for the businesses located there and poses a huge safety risk. How does the state propose to provide training for delivery drivers and anyone else who may need to use the access road? Having a road going directly through a very active ramp poses a huge safety issue for anyone not properly trained and who may leave the road, cause taxiway or runway incursions, cut off aircraft that have right of way, or damage aircraft on the ramp with their vehicle(s)

My second concern is the economic impact of this master plan. The hangars that are intended to be torn down under 1A include AMI, Vans Aircraft, and Life Flight. How does the state intend to handle hundreds of employees either temporarily or permanently losing their jobs? Working for AMI, I cannot think of another airport we could move to and still conduct business out of while our current hangar is torn down. We work on large vintage aircraft that are hard to find hangar space for as it is. Where does the state suggest companies like AMI move during this process?

Is the state going to cover me and my coworkers' lost wages for the time that we are unable to work? AMI employs 30+ people. What about Vans? Wilson Construction? Are you going to force businesses to close for an indefinite period when they cannot find other places to operate out of? How does the state propose that Life Flight continue to operate when their base of operations is destroyed? Removing Life Flight's hangar would be a huge disruption to the lifesaving services they provide and create a huge burden on a non-profit organization.

I see in 1A that the state claims this will provide hundreds of thousands of square feet of new land for hangars to be developed, however, this space only exists because of the hangars that are being torn down. Will businesses that are forced to sell their hangars to the state be given funds to rebuild? Or will the state force businesses to lease the land back and build new hangars at their own expense? This is not economically feasible for many.

AMI also supports many local businesses in Canby, Aurora, and Wilsonville, whether we are purchasing raw materials, need specialty machining or welding done, or need graphics work. That support disappears if AMI is forced to shut down.

I love working at UAO. I have worked for AMI for almost 7 years, and it is an amazing place to work. I have built my life around working here, and losing not just my job, but the community I have built for myself there would be detrimental to me.

The Oregon Department of Aviation's mission is to provide infrastructure, financial resources, and expertise to ensure a safe and efficient air transportation system. How does using taxpayer money to acquire private property, shut down local businesses, and force people out of work in an already tough economy align with this mission? Your vision to provide an integrated Aviation System benefiting all Oregonians doesn't work when you are forcing Oregonians who work in the aviation industry to lose their jobs.

This is an absolute waste of taxpayer dollars, and I cannot fathom why ODA would choose to take this course of action. Like many employed both in Oregon and at UAO, I cannot afford to lose my job. I strongly encourage the ODA to reconsider this master plan and consider the economic impacts on taxpayers, those employed on the airport, and the local economy surrounding the airport.

Thank you,

Hannah
(971) 599-8896
hannahmclaughlin13@yahoo.com

Outlook

Fw: Aurora State Airport Master Plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 12/19/2024 8:12 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

I will be on vacation starting Monday, 12/23/24 and will return on Monday, 01/06/25.
JLA will be closed December 24 through January 1 to allow our entire team time to rest and recover. Please get in touch early with any anticipated needs during this time. Wishing you a lovely end to 2024!

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Wednesday, December 18, 2024 3:31 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Aurora State Airport Master Plan

Hello,

Good afternoon. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:

COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Tyler Meskers <tyler@oregonflowers.com>
Date: Wednesday, December 18, 2024 at 14:57
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Martin Meskers <martin@oregonflowers.com>
Subject: Aurora State Airport Master Plan

You don't often get email from tyler@oregonflowers.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hello ODAV Alex Thomas,

Thank you for your time and this opportunity to introduce myself. My name is Tyler Meskers, a property owner (https://maps.app.goo.gl/PRi1xfcwGBHGPUSx7) of approximately 30 acres of Farm land near the Aurora State Airport. I understand that there is a lot happening with the airport Master Plan, specifically its impact to property owners at the airport, and surrounding land near the airport. I thought it would be a good to connect.

We understanding the need for safety and improvements but I ask that you keep our family farm in mind when considering development of that area. If I read the proposals correctly, I think the drain field could have an big impact on our farm on the South end of the runway.

We've been farming that area for 20+ years and are open to seeing a safer, more developed airport, however I hope you keep our family business in consideration specifically how it can impact our land, business, and young family.

If ever you have any questions, or would like to connect, please do not hesitate to reach out. We would be happy to assist with efforts to find a win win scenario for all those who will/may be impacted.

Thank you for your time and happy holidays.

Sincerely,
--
Tyler B Meskers

Oregon Flowers, Inc.

P.O. Box 311 Aurora, OR, 97002

[redacted]
P:[redacted]
www.oregonflowers.com
www.instagram.com/oregonflowers/

Outlook

Re: ODAV master plan alternatives submitted - Objection

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 8/29/2024 2:51 PM
To Ken Meuser <ken@managementwest.com>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Samantha Peterson <SPeterson@CenturyWest.com>; Jen Winslow <Jen.winslow@jla.us.com>

Hello Ken,

Thank you for your comments. We've received them and I'll ensure they are recorded and sent to the rest of the team.

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting

Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday. Administrative-only hours on Friday.
Check my availability » Schedule a 30 minute check-in
Email is the best way to reach me; I try to respond within 2 workdays.
However, urgent requests should be handled through a phone call or scheduling a meeting using the link above.

From: Ken Meuser <ken@managementwest.com>
Sent: Thursday, August 29, 2024 2:49 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: FW: ODAV master plan alternatives submitted - Objection

To whom it may concern.

This attached letter is to confirm my Opposition to the July 30, 2024, Aurora Master Plan Alternatives. None of the options presented are feasible or realistic. With at least one option that would destroy our operation/business here at the Airport.
Runway extension at the Aurora State Airport is needed for increased safety but not at the unnecessary expense and destruction of the surrounding communities and businesses/operations at the Airport.

Ken Meuser
503-720-4060

Management West LLC
14312 Stenbock Way NE
Hangar #F
Aurora, Oregon 97002

Management West LLC | 14312 Stenbock Way NE, #F Aurora, OR 97002 | 503.678.1090 | Fax: 503.678.1073

September 3, 2024
Brandy Steffen,
JLA Public Involvement
Tony Beach, ODAV
Alex Thomas, ODAV
Samantha Peterson
Century West

RE: Comments on July 30, 2024 Aurora Master Plan Alternatives

Ladies and Gentlemen,

This letter is written on behalf of the direct airport stakeholders whose aviation related businesses are located at, and rely upon, the Aurora Airport. Please include this letter in the record of the 2023-2024 Aurora Airport Master Plan proceedings.

On July 30, 2024, the Oregon Department of Aviation (ODAV) presented three alternatives for the development of the Aurora Airport for the next 20 years and invited comment on those alternatives. **The direct airport stakeholders strongly OBJECT to all of those proposed alternatives: 1A, 1B and 2.**

Objection to Process

At the July 30, 2024 meeting, PAC members were invited to comment on the proposed alternatives via checking a box on an online form to identify which of ODAV's three alternatives they preferred. Participants had no way to offer meaningful comments or explain why none of the alternatives were acceptable. The undersigned strongly objects to ODAV's process as it is not reasonably calculated to solicit input from stakeholders as required by federal law to determine a preferred alternative. Reserving that objection, the Aurora Airport direct airport stakeholders present the following comments on the July 30, 2024 ODAV proposed master plan alternatives.

General Objection – the Alternatives Present a False Choice: Sacrifice the Safety of the Aurora Airport in the Name of Safety

Under ODAV's "alternatives" the runway extension that is well-documented to be badly needed now for safety, is held hostage to prerequisites that will take a decade or more (if they can even happen at all) and hundreds of millions of dollars that no one has. In other words, ODAV's alternatives ensure that the runway safety improvement will never happen or will happen only if the airport is less safe, all in service of perfect prerequisite compliance with design standards. This is a false choice and one that FAA does not and in fact cannot demand and ODAV should not demand this false choice either. The false choice is not only contrary to the very purposes of aviation master planning and federal law but also ORS 836.600-642 and ODAV's mission.

Alternatives Proceed from False Assumptions

For the alternatives to have legitimacy, they must proceed from accurate assumptions. The proposed alternatives do not proceed from accurate assumptions. To the contrary, each of the three proposed alternatives proceed from false premises.

The first false assumption is that FAA will not allow the airport to "maintai[n] current non-standard conditions" and if the airport has any "non-standard conditions," then FAA will place the runway "in maintenance only mode ***."[1]

The second false ODAV assumption is that it is necessary for ODAV to acquire the privately owned "through the fence" properties adjacent to the airport "to ensure [their] continued long-term aeronautical use."

---

[1] ODAV July 30, 2024 PPT Presentation to Planning Advisory Committee. This erroneous assumption carries forward to the August 1, 2024 "Refined Preliminary Alternatives Analysis" which similarly begins by asserting that ODAV has "recognized that maintaining current non-standard conditions is not acceptable to the Federal Aviation Administration (FAA)." There is no such lawful FAA position that ODAV may "recognize." To the extent that ODAV has adopted such a "recognition" it is contrary to both federal and state law and may not serve as the foundation for the airport's 20-year future.

Starting with the second false assumption, we note that there is nothing to support the assumption that if ODAV owned the undersigned's private aviation related properties they would be bettered assured to remain in aeronautical use. Respectfully, there are a lot of reasons to believe ODAV ownership of our property would have a contrary result. It is we, the private through the fence owners, who have the strong incentive to maintain robust aviation use of our adjacent private property because it is suitable for no economic use other than aeronautical use and we have invested and continue to invest ***millions of dollars*** to assure the success of our aviation related uses there.

Conversely, we have not seen evidence that ODAV is committed to growing and supporting aeronautical use of our properties at the Aurora Airport. We have pushed for more than a decade for ODAV to remove trees that are a hazard to aviation. ODAV hasn't gotten around to doing that. We have pushed for decades for ODAV to extend the airport's runway for safety, but ODAV hasn't gotten around to doing that, despite the runway extension being approved on the 2012 airport ALP. ODAV told the airport's opponent's that the 2012 airport master plan had not been finally adopted when ODAV had clearly adopted it (otherwise there would have been no 2012 ALP), inviting years of litigation that resulted in a remand of the 2012 master plan on land use grounds. ODAV did not bother to respond to that remand of the 2012 master plan, as it should have.

In all respectfully, the only evidence is that the private through the fence owners have the great documented interest in the continued aeronautical use of their property – they (we) have invested millions of dollars to support aviation use at the Aurora Airport and we continue to do so, our properties are useful for nothing but aviation related use in fact. There is simply nothing to support ODAV's "assumption" that ODAV needs to buy our property to ensure its continued aeronautical use. We note that this second premise is also contrary to the legislative command in ORS 836.640-642 that ODAV **support** the private through the fence ownerships and their economic development, not buy them

out. ODAV is constrained by this legislative command. The second "assumption" is simply a nonstarter.

With respect to the first erroneous assumption, the assumption's referenced "non-standard conditions" are primarily the Runway Object Free Area (ROFA) required separation for C-II design aircraft between the runway and Highway 551. [2] The law does not support ODAV's first erroneous premise that FAA always requires that airports meet all design standards. The law and FAA's decades of practice is exactly the opposite.

In this regard, federal law expressly provides FAA with authority to issue modifications to standards "when necessary to meet local conditions" so long as the "modification will provide an acceptable level of safety, economy, durability and workmanship." 14 CFR 152.11(b). FAA staff lacks authority to override that federal law that recognizes that "non-standard conditions" happen and can be allowed to continue in the right circumstances, as presented here.

The truth is that FAA routinely approves modifications to standards where the modification provides the requisite "acceptable level of safety." FAA has approved modifications at airports from Renton where 737's takeoff and land daily at a B-II airport, to SJC which has modifications to standards for many FAA requirements. This happens frequently enough that, as required by Congress, FAA in conjunction with the National Transportation Research Board and National Academies of Sciences, published a technical handbook entitled "**Risk Assessment Method to Support Modification of Airfield Separation Standards"** that goes to a lot of trouble to

---

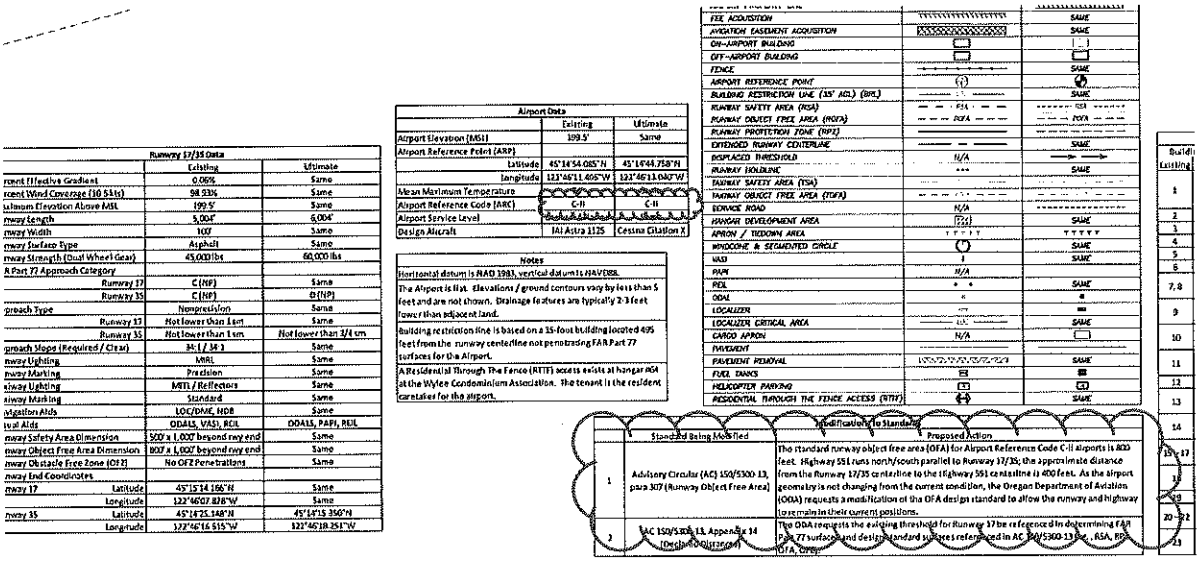
[2] ODAV's "alternatives" assume another "non-standard" condition regarding the location of the airport's septic drainfields in the north and south. The septic drainfield in the south was expressly approved by ODAV, FAA and Marion County in a land use process. It is not "non-standard" or if it is, it is already approved – by ODAV and FAA. Moreover, if necessary, those drainfields can be brought to whatever standard applies. But ODAV may not merely assume they are "non-standard", say they will be "removed" in all alternatives but have no other location for them and no analysis of whether it is feasible to establish any alternative location for them. If ODAV's unstated plan is just to annex the airport to the 900-population City of Auora that has done nothing but oppose the airport for the past decade, and that had a mayor who we understand to be on record saying the city wanted to annex the airport to shut it down, the private airport stakeholders strongly oppose any such -as yet – unarticulated plan.

explain exactly how to assess whether a modification to an airport design standard will provide an acceptable level of safety. Contrary to the July 30 ODAV "assumptions" and August 1 ODAV "recognition", this federal risk assessment publication states that "**FAA does accept requests from airports for modifications to standards**."

Following federal law and the FAA Risk Assessment publication, respected airport planner, Aron Faegre prepared such an analysis under the FAA published risk-assessment methodology that **concludes maintaining the existing ROFA between the runway and Highway 551 provides an acceptable level of safety.** In other words, were ODAV to merely ask (and Mr. Faegre has done the work to support that ask), a modification to the ROFA would be granted. Which means contrary to ODAV's "assumptions" underpinning the three alternatives ODAV revealed on July 30, 2024, FAA would approve maintaining the existing non-standard conditions at the airport. This should not be a surprise because FAA approved the exact ROFA modification for a C-II design aircraft that Mr. Faegre demonstrates meets modification standards, when it approved the 2012 ALP for the airport.

FAA Approved the Modification for the ROFA - Separation of the Runway to Highway 551 – in the 2012 ALP under Airport Design Standards for a C-II Airport

The approved ALP that currently governs the airport shows that FAA approved the runway extension to the south with a ROFA modification to standards for the C-II design aircraft for the separation between the runway and Highway 551.



Runway 17/35 Data	Existing	Ultimate
rcent Effective Gradient	0.06%	Same
rcent Wind Coverage (10.5 kts)	98.93%	Same
simum Elevation Above MSL	199.5'	Same
rway Length	5,004'	6,006'
rway Width	100'	Same
rway Surface Type	Asphalt	Same
rway Strength (Dual Wheel Gear)	45,000 lbs	60,000 lbs
R Part 77 Approach Category		
Runway 17	C (NP)	Same
Runway 35	C (NP)	B (NP)
proach Type	Nonprecision	Same
Runway 17	Not lower than 1 sm	Same
Runway 35	Not lower than 1 sm	Not lower than 3/4 sm
proach Slope (Required / Clear)	34:1 / 34:1	Same
rway Lighting	MIRL	Same
rway Marking	Precision	Same
xiway Lighting	MITL / Reflectors	Same
xiway Marking	Standard	Same
vigation Aids	LOC/DME, NDB	Same
ual Aids	ODALS, VASI, RCIL	ODALS, PAPI, RCIL
rway Safety Area Dimension	500' x 1,000' beyond rwy end	Same
rway Object Free Area Dimension	800' x 1,000' beyond rwy end	Same
rway Obstacle Free Zone (OFZ)	No OFZ Penetrations	Same
rway End Coordinates		
rway 17 Latitude	45°15'14.166"N	Same
Longitude	122°46'07.878"W	Same
rway 35 Latitude	45°14'25.148"N	45°14'15.356"N
Longitude	122°46'16.515"W	122°46'18.251"W

Airport Data	Existing	Ultimate
Airport Elevation (MSL)	199.5'	Same
Airport Reference Point (ARP)		
Latitude	45°14'54.085"N	45°14'44.758"N
Longitude	122°46'11.405"W	122°46'13.040"W
Mean Maximum Temperature	84°F	84°F
Airport Reference Code (ARC)	C-II	C-II
Airport Service Level	Basic/Business	Business
Design Aircraft	IAI Astra 1125	Cessna Citation X

Notes

Horizontal datum is NAD 1983, vertical datum is NAVD88.

The Airport is flat. Elevations / ground contours vary by less than 5 feet and are not shown. Drainage features are typically 2-3 feet lower than adjacent land.

Building restriction line is based on a 35-foot building located 495 feet from the runway centerline not penetrating FAR Part 77 surfaces for the Airport.

A 6' Cleveland Through The Fence (TTF) access exists at hangar #64 at the Wylee Condominium Association. The tenant is the resident caretaker for the airport.

	Existing	Ultimate
FEE ACQUISITION		SAME
AVIATION EASEMENT ACQUISITION		SAME
ON-AIRPORT BUILDING		
OFF-AIRPORT BUILDING		
FENCE		SAME
AIRPORT REFERENCE POINT		
BUILDING RESTRICTION LINE (35' AGL) (BRL)		SAME
RUNWAY SAFETY AREA (RSA)	RSA	RSA
RUNWAY OBJECT FREE AREA (ROFA)	ROFA	ROFA
RUNWAY PROTECTION ZONE (RPZ)		
EXTENDED RUNWAY CENTERLINE		SAME
DISPLACED THRESHOLD	N/A	
RUNWAY HOLDLINE		SAME
TAXIWAY SAFETY AREA (TSA)		
TAXIWAY OBJECT FREE AREA (TOFA)		
SERVICE ROAD	N/A	
HANGAR DEVELOPMENT AREA		SAME
APRON / TIEDOWN AREA		
WINDCONE & SEGMENTED CIRCLE		SAME
VASI		SAME
PAPI	N/A	
REIL		SAME
ODALS		
LOCALIZER		
LOCALIZER CRITICAL AREA		SAME
CARGO APRON	N/A	
PAVEMENT		
PAVEMENT REMOVAL		SAME
FUEL TANKS		
HELICOPTER PARKING		
RESIDENTIAL THROUGH THE FENCE ACCESS (RTTF)		SAME

	Standard Being Modified	Proposed Action
1	Advisory Circular (AC) 150/5300-13, para 307 (Runway Object Free Area)	The standard runway object free area (OFA) for Airport Reference Code C-II airports is 800 feet. Highway 551 runs north/south parallel to Runway 17/35; the approximate distance from the Runway 17/35 centerline to the Highway 551 centerline is 400 feet. As the airport geometry is not changing from the current condition, the Oregon Department of Aviation (ODA) requests a modification of the OFA design standard to allow the runway and highway to remain in their current positions.
2	AC 150/5300-13, Appendix 14 (Declared Distances)	The ODA requests the existing threshold for Runway 17 be referenced in determining FAR Part 77 surfaces and design standard surfaces referenced in AC 150/5300-13 (i.e., RSA, RPZ, OFA, OFZ).

WH Pacific
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OREGON DEPARTMENT OF AVIATION

APPROVAL BLOCK
OREGON DEPARTMENT OF AVIATION
SIGNATURE
TITLE DATE 10/17/2012
FEDERAL AVIATION ADMINISTRATION
SIGNATURE Carol Suomi
TITLE Manager, Seattle ADO DATE 10/18/12
APPROVAL LETTER DATED: see cover dated 10/19/12

SHEET INFO	
DESIGNED	SJR
DRAWN	RAI
CHECKED	REA
APPROVED	---
LAST EDIT	10/17/2012
PLOT DATE	6/28/2012
SUBMITTAL	

REVISIONS			
NO.	BY	DATE	REMARKS

Airport Data	Existing	Ultimate
Airport Elevation (MSL)	199.5'	Same
Airport Reference Point (ARP)		
Latitude	45°14'54.085"N	45°14'44.758"N
Longitude	122°46'11.405"W	122°46'13.040"W
Mean Maximum Temperature	84°F	84°F
Airport Reference Code (ARC)	C-II	C-II
Airport Service Level	Basic/Business	Business
Design Aircraft	IAI Astra 1125	Cessna Citation X

	Standard Being Modified	Proposed Action
1	Advisory Circular (AC) 150/5300-13, para 307 (Runway Object Free Area)	The standard runway object free area (OFA) for Airport Reference Code C-II airports is 800 feet. Highway 551 runs north/south parallel to Runway 17/35; the approximate distance from the Runway 17/35 centerline to the Highway 551 centerline is 400 feet. As the airport geometry is not changing from the current condition, the Oregon Department of Aviation (ODA) requests a modification of the OFA design standard to allow the runway and highway to remain in their current positions.
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APPROVAL BLOCK
OREGON DEPARTMENT OF AVIATION
SIGNATURE
TITLE DATE 10/17/2012
FEDERAL AVIATION ADMINISTRATION
SIGNATURE Carol Suomi
TITLE Manager, Seattle ADO DATE 10/18/12
APPROVAL LETTER DATED: see cover dated 10/19/12

That means there is no reason to think that the same ROFA modification to standards cannot be approved here. ODAV should apply for it and FAA almost certainly will grant it.

Proper Assumptions for this Master Planning Effort

With all due respect, there are proper assumptions for this master planning effort. The direct airport stakeholders urge ODAV to adopt the following assumptions and goals for the Aurora Airport Master Plan:

- ODAV can and should apply for modifications to C-II design standards for existing conditions at the airport that would otherwise require unachievable prerequisites to the runway extension.
- ODAV should grow and support the through the fence aviation operations as it is instructed to do in ORS 836.640-642. Accordingly, ODAV should expand the airport boundary to enable the last undeveloped through the fence areas shown on the draft master plan to grow and flourish.
- ODAV has an obligation to manage the Aurora Airport to safely support the general aviation that has grown to rely upon it and the Oregonians who rely upon that general aviation.
- ODAV should support the Aurora Airport as an economic powerhouse for the region being responsible for thousands of jobs and millions of dollars in payroll and visitor spending.
- ODAV should support the Aurora Airport that is known to be a resiliency center in the event of natural disasters – whether they be wildfire disasters or the Cascadia Subduction Event.
- ODAV should support the Aurora Airport that is home to Life Flight that provides important air ambulance service to needy Oregonians and delivers organs for transplant that saves lives.
- To the extent ODAV is privately planning otherwise, ODAV should strongly resist efforts by opponent municipalities like the city of Aurora to annex the airport.
- The airport should not be casually discarded to the bin of unachievable prerequisites.

Alternative that ODAV Should Consider

A wholly achievable alternative that is consistent with FAA and state law that ODAV should consider is:

a. a 500' runway extension to the north; better yet a 750' runway extension to the north. 750' is well-understood to be better and more appropriate for the long master planning horizon.
b. Reapproval for the necessary existing modification to standards for existing conditions.
c. Adjust the airport boundary to include the undeveloped through the fence areas on the current draft,

Conclusion

The direct airport stakeholders stand ready to work cooperatively with ODAV toward an appropriate 20-year master plan for the Aurora Airport along the lines of the alternative that we outline above. However, respectfully, we cannot abide any of the July 30, 2024 proposed alternatives and strongly oppose all of them. We hope that ODAV will agree that the assumptions and alternative proposed by the direct airport stakeholders are appropriate ones that ODAV should adopt in support of general aviation at the airport, regional disaster resilience and economic vitality for the decades to come. The future of aviation at the Aurora Airport depends upon it.

Thank you for your consideration.

Sincerely,

Ken Meuser

Flight Dept. Manager/ Chief Pilot
Management West LLC
14312 Stenbock Way NE Hangar #F
Aurora, Oregon 97002

Outlook

Fw: Aurora Airport Master Plan 2024

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 11/19/2024 4:12 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, November 12, 2024 3:44 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora Airport Master Plan 2024

Good afternoon, please include in the record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, November 12, 2024 3:44 PM
To: 'Ken Meuser' <ken@managementwest.com>
Subject: RE: Aurora Airport Master Plan 2024

Hi Ken, thank you for your comments, I have forwarded them to the master plan team and they'll be included in the record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Ken Meuser <ken@managementwest.com>
Sent: Tuesday, November 12, 2024 2:12 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Aurora Airport Master Plan 2024

You don't often get email from ken@managementwest.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hello Mr. Beach
I just wanted to be another voice expressing my objection to the new Master Plan at Aurora Airport.
The State of Oregon taking (forcibly procuring) private property for the purpose of bringing the airport into "FAA Standard" is unacceptable. Another realistic option must be obtained and presented. No one on either the East or West side of the Aurora runway wants their property taken away by the state. It would be a great detriment to the overall health of the Airport, its surrounding communities, cities, and businesses.

Ken Meuser
[redacted]

Management West LLC
14312 Stenbock Way NE
Hangar #F
Aurora, Oregon 97002

Outlook

FW: Aurora Airport Master Plan -- Taking of Hangars

From Samantha Peterson <SPeterson@CenturyWest.com>
Date Thu 12/5/2024 6:51 AM
To W. Matt Rogers <WRogers@CenturyWest.com>; David Miller <dmiller@CenturyWest.com>; Mark Steele <MSteele@CenturyWest.com>; Jen Winslow <Jen.winslow@jla.us.com>

-----Original Message-----
From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, December 4, 2024 2:48 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora Airport Master Plan -- Taking of Hangars

Good afternoon, please include in the record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 CELL 503-302-5455
M-F 7:30am - 4pm

-----Original Message-----
From: BEACH Anthony
Sent: Wednesday, December 4, 2024 2:47 PM
To: Phil Miller <plmkmm@comcast.net>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: RE: Aurora Airport Master Plan -- Taking of Hangars

Good afternoon Philip, thank you for your comments, I have forwarded them to the master plan team and they'll be included in the record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 CELL 503-302-5455
M-F 7:30am - 4pm

-----Original Message-----
From: Phil Miller <plmkmm@comcast.net>
Sent: Tuesday, December 3, 2024 8:19 PM

To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Aurora Airport Master Plan -- Taking of Hangars

[You don't often get email from plmkmm@comcast.net. Learn why this is important at https://linklock.titanhq.com/analyse?url=https%3A%2F%2Faka.ms%2FLearnAboutSenderIdentification&data=eJxUzEFrszAYAOBfEw8fGGKiNYEvY7GtbGODMg87p-a1lc68krwW-u_Hjrs_PKM9T7pRQY-l9roqa9CiNGPTlqqZJlCVqZTwRbD_isX-H97E6VOYj840eqdEJ_rDQbuqcTsjq7Zz0h1VK5__MB79sqYgDF8TBo4bfSPe-IjLU5Gti3TF-ODd0e1fWC0w-DvHBBeM_IL3ItnhBAQpY2S12EOkLT2-INNvUGz2SrRmphyTPZO9v3m-ZCb7d_ApujNuNEAMkF4DRJqnefQ0Y_wJAAD__7ysTIA%]

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Alex R. Thomas, Planning, Policy and Program Manager Anthony Beach, State Airport Manager

Sirs,

I am submit to you my personal comments opposing that portion of State of Oregon's, Oregon Department of Aviation's (ODAV) Aurora Airport Masters Plan under current review giving serious consideration to the taking of privately owned hangars. This idea seems extremely counterproductive to the overall needs of general aviation. Specifically the needs of both business and private aircraft owners. A shortage of hangars exists now.

Owners of privately owned aircraft provide significant employment and revenue to the County and State. This taking/destruction of hangars reportedly is a land use/taxiway/road issue. ODAV is supposed to be an advocate for the users of airports under their purview. Would not these users be better served by purchasing 1 acre from a willing seller to resolve your issues.

Does ODAV really want to, or be known as, the cause of undue hardship on businesses and individual hangar owners which it is tasked to serve, by increasing the unavailability of hangar space.

Airport safety can be improved without destruction of any hangars.

Sincerely,

Philip L. Miller
[redacted]
Portland, Oregon 97225

Outlook

Re: Notice - Aurora State Airport Master Plan PAC Meeting

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 2/8/2024 10:00 AM
To Ted Millar <tmillar@wwpmi.com>; OregonAviation@public.govdelivery.com <OregonAviation@public.govdelivery.com>; Alex.R.Thomas@odav.oregon.gov <Alex.R.Thomas@odav.oregon.gov>
Cc Aron Faegre (aron@faegre.org) <aron@faegre.org>; Michele Millar <mmillar@tlmholdingsllc.com>; Jen Winslow <Jen.winslow@jla.us.com>; Wendie Kellington (wk@klgpc.com) <wk@klgpc.com>; helbling@wilsonconst.com <helbling@wilsonconst.com>

Thanks for letting us know Ted.

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting

Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday. Administrative-only hours on Friday

---

From: Ted Millar <tmillar@wwpmi.com>
Sent: Thursday, February 8, 2024 9:43 AM
To: OregonAviation@public.govdelivery.com <OregonAviation@public.govdelivery.com>; Alex.R.Thomas@odav.oregon.gov <Alex.R.Thomas@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Aron Faegre (aron@faegre.org) <aron@faegre.org>; Michele Millar <mmillar@tlmholdingsllc.com>; Wendie Kellington (wk@klgpc.com) <wk@klgpc.com>; Ted Millar <tmillar@wwpmi.com>; helbling@wilsonconst.com <helbling@wilsonconst.com>
Subject: RE: Notice - Aurora State Airport Master Plan PAC Meeting

Good Morning Alex, Brandy and All,

I will be out of the country the entire week of march 11, 2024

Please substitute my Architect/Engineer, Aron Faegre as my alternate for this meeting :
His contact information is :
Aron Faegre
aron@faegre.org
(M) 503-880-1469

Thanks, Ted Millar

Ted L. Millar
14379 Keil Rd. NE
Aurora, OR 97002
Tmillar@WWPMI.com
(M) 503-709-7711

From: Oregon Department of Aviation <OregonAviation@public.govdelivery.com>
Sent: Thursday, February 8, 2024 9:16 AM
To: Ted Millar <tmillar@wwpmi.com>
Subject: Notice - Aurora State Airport Master Plan PAC Meeting

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SHARE

NOTICE OF A MEETING

FOR THE AURORA STATE AIRPORT
Airport Master Plan Project

Notice is hereby given that the Oregon Department of Aviation (ODAV) will hold an online (via Zoom) Public Planning Advisory Committee (PAC) meeting.

When: Tuesday, March 12, 2024, from 5:00 p.m. - 7:00 p.m.

Where: Join by phone or virtually (via Zoom)

Please register and join the virtual **PAC meeting** by visiting: https://publicproject.net/AuroraAirport

This meeting will provide an opportunity for the PAC and project stakeholders to review Working Paper 1, approved forecast, and learn about the Airport Master Plan project. For copies of the airport planning work products, please visit: https://publicproject.net/AuroraAirport

Accessible Meeting Information

Special accommodations are available upon advanced request. Please contact Alex Thomas at least 48 hours prior to the event to discuss specific needs.

For airport questions or project information, please contact Alex Thomas, ODAV Planning & Programs Manager, through the following means: Alex.R.Thomas@odav.oregon.gov

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This email was sent to tmillar@tlmholdingsllc.com using GovDelivery Communications Cloud, on behalf of: Oregon Department of Aviation · 3040 25th St. SE ·Salem, OR 97302-1125

GOVDELIVERY

Outlook

Fw: Aurora meeting please

From Jen Winslow <Jen.winslow@jla.us.com>
Date Mon 2024-09-16 1:06 PM
To Ashley Balsom <ashley.balsom@jla.us.com>

JEN WINSLOW | **JLA PUBLIC INVOLVEMENT**
She/Her » Why pronouns matter
jen.winslow@jla.us.com » Cell 503-367-6447 » jla.us.com
Woman-led, community-centered, for 35 years and counting
I typically work Mon - Fri | 9 am - 5 pm

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Friday, September 13, 2024 3:51 PM
To: W. Matt Rogers <WRogers@CenturyWest.com>; Jen Winslow <Jen.winslow@jla.us.com>
Cc: Samantha Peterson <SPeterson@CenturyWest.com>
Subject: Re: Aurora meeting please

Thanks Matt. We'll add it in.

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday. Administrative-only hours on Friday.
Check my availability » Schedule a 30 minute check-in

I will be on vacation starting Wednesday, September 18 and will return on Monday, September 23.

From: W. Matt Rogers <WRogers@CenturyWest.com>
Sent: Friday, September 13, 2024 1:55 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>
Cc: Samantha Peterson <SPeterson@CenturyWest.com>
Subject: FW: Aurora meeting please

Hi Brandy and Jen,

ODAV asked us to add this to the official PAC record for the UAO AMP. Can you add it to the communication received?

Thanks,
Matt

From: Samantha Peterson <SPeterson@CenturyWest.com>
Sent: Friday, September 13, 2024 1:02 PM
To: W. Matt Rogers <WRogers@CenturyWest.com>
Subject: Fwd: Aurora meeting please

Begin forwarded message:

From: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Date: September 13, 2024 at 12:59:39 PM EDT
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>, THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>, Samantha Peterson <SPeterson@centurywest.com>
Cc: Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>
Subject: FW: Aurora meeting please

Hi Samantha-

Could you make this part of the official record for the PAC?

KENJI SUGAHARA
OREGON DEPARTMENT OF AVIATION
DIRECTOR

OFFICE 503-378-2340

EMAIL kenji.sugahara@odav.oregon.gov

3040 25TH STREET SE, SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

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From: SUGAHARA Kenji
Sent: Friday, September 13, 2024 9:54 AM
To: Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>
Subject: FW: Aurora meeting please

KENJI SUGAHARA
OREGON DEPARTMENT OF AVIATION
DIRECTOR

<image002.png>

<image003.png>

<image004.png>

OFFICE 503-378-2340

EMAIL kenji.sugahara@odav.oregon.gov

3040 25TH STREET SE, SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

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From: Wendie Kellington <wk@klgpc.com>
Sent: Tuesday, September 3, 2024 3:40 PM
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Cc: Schuster, Brad <brad.schuster@aopa.org>; Tony Helbling - Wilson Construction Company (helbling@wilsonconst.com) <helbling@wilsonconst.com>; Ted Millar <tmillar@wwpmi.com>; Aron Faegre (faegre@earthlink.net) <faegre@earthlink.net>
Subject: RE: Aurora meeting please

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Kenji,

Can we please schedule a brief meeting? Please let me know. Thank you. Best, Wendie

From: Wendie Kellington
Sent: Friday, August 30, 2024 4:20 PM
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Cc: Schuster, Brad <brad.schuster@aopa.org>; Tony Helbling - Wilson Construction Company (helbling@wilsonconst.com) <helbling@wilsonconst.com>; Ted Millar <tmillar@wwpmi.com>; Aron Faegre (faegre@earthlink.net) <faegre@earthlink.net>
Subject: Aurora meeting please

Kenji,

We'd like to schedule a 20-minute zoom meeting with you this coming Tuesday or Wednesday to discuss KUAO. As you know, the aeronautical interests at the airport are justifiably quite concerned about the master plan alternatives and it has gotten the attention of national interests as well. We want to be sure that you understand the concerns and we would like to understand your thinking for advancing them. Please let me know what works. Thank you. All the best, Wendie

Wendie L. Kellington | Attorney at Law.
MAILING ADDRESS:
P.O. Box 2209
Lake Oswego, OR 97035
PHYSICAL ADDRESS
4500 Kruse Way, #340
Lake Oswego Or 97035
(503) 636-0069 office
(503) 636-0102 fax
wk@klgpc.com
www.wkellington.com

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From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent on: Monday, September 23, 2024 11:08:25 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Subject: FW: Meeting last week
Attachments: FW Scope request - Runway Justification Constrained Operations Report.eml (1.35 MB), Potential for MOS related to runway extensions at UAO.eml (99.57 KB), Mod to Stnd Form (ROFA).doc (60 KB), UAO Mod to Standards.pdf (1.82 MB), UAO 2-13-2023 - LOI Closeout Letter.pdf (249.4 KB)

FYI, please include this response in our record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Monday, September 23, 2024 4:08 PM
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Wendie Kellington <wk@klgpc.com>; Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>; Samantha Peterson <speterson@centurywest.com>
Subject: RE: Meeting last week

Hi Wendie,

Following up on this discussion, please see the attached documents pertaining to Modification of Standards. The Word document is dated 2012 in our system, the PDF Mod form is from 2018. I don't have any email records for these forms specifically, but the 2023 LOI closeout letter confirms the FAA has not granted a MOD for the ROFA at UAO.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Sent: Monday, September 23, 2024 7:45 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Wendie Kellington <wk@klgpc.com>; Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>; Samantha Peterson <speterson@centurywest.com>
Subject: Meeting last week

Wendie!

Thanks for reaching out to ODAV to talk about the comments that you provided on behalf Ted Millar, TLM and AABC concerning the refined alternatives presented to the PAC on July 30, 2024. I also appreciated the opportunity to speak directly with the communities that are and will be affected by ODAV's planning efforts for UAO. It's always important to listen to stakeholders about their concerns and their wishes. I hope our conversation was helpful in understanding ODAV's role in this planning phase and in particular our hope to select an alternative that FAA will support and ultimately agree to extend federal funds to help implement. Like I mentioned in my response to your request for a meeting, I'll be ensuring that all ODAV's communications with its stakeholders are made part of the record. This this email is intended to provide a high-level summary of our discussion today in which you, Anthony Beach, Alex Thomas , Stacy Posegate of DOJ and I attended by teams.

As I explained in our meeting, Chuck Garrison, Director of the Northwest Mountain Region for FAA, has made clear to ODAV that FAA will not fund future projects if the Aurora Airport master plan does not include an ALP that will bring components of the airport up to FAA's standards of compliance. The primary areas of concern, as we have discussed, are the ROFA which extends over and above the Hubbard Highway, OR 551, and the drainfield within the Runway Safety Area supporting your clients' businesses.

I understand that you are asking ODAV to consider another alternative airport layout plan, which you describe in more detail in your letter. You have explained that this alternative should be preferable because it would not require additional real property or moving OR 551. You have also stated that the current alternatives are unrealistic or unnecessary because they seek to obtain "perfect compliance" with FAA standards. But that, in your opinion, perfect compliance is not required. Rather, FAA has an obligation to consider any modifications requested by the ODAV. You also explained that your clients are extremely concerned with the investment that they have put into this airport and their relationship with ODAV. We take all input and comments seriously.

From: Samantha Peterson <SPeterson@CenturyWest.com>
Sent on: Tuesday, September 3, 2024 6:23:44 PM
To: W. Matt Rogers <WRogers@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; David Miller <dmiller@CenturyWest.com>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Scope request - Runway Justification / Constrained Operations Report
Attachments: interimLandUseRPZGuidance.pdf (969.64 KB)

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From: PECK Heather [mailto:heather.peck@aviation.state.or.us]
Sent: Wednesday, December 18, 2019 09:37
To: Matt Rogers <wrogers@centurywest.com.com>; Mike Dane <MDane@CenturyWest.com>; James Kirby <JKirby@CenturyWest.com>
Subject: Fwd: Scope request - Runway Justification / Constrained Operations Report

---

From: "Tykoski, Robert (FAA)" <Robert.Tykoski@faa.gov>
Subject: RE: Scope request - Runway Justification / Constrained Operations Report
Date: 17 December 2019 15:45
To: "PECK Heather" <heather.peck@aviation.state.or.us>
Cc: "STANSBURY Betty" <Betty.STANSBURY@aviation.state.or.us>, "CLARK Cathy RB" <Cathy.RB.CLARK@aviation.state.or.us>, "MAASS Matthew D" <Matthew.D.MAASS@aviation.state.or.us>, "Dalke, Joseph (FAA)" <joseph.dalke@faa.gov>, "Callahan, Sean (FAA)" <Sean.Callahan@faa.gov>

Heather,

On page 3-6 it calls out two items that need additional coordination with FAA:

RPZ - Extension of the runway will place non-compatible land uses in the RPZ. – To run this to ground and make sure that this is something the FAA can support, a RPZ memo needs to go to FAA HQ. Please see the attached document for additional direction.

ROFA - Wilsonville Hubbard Highway runs parallel to the RWY and the north-bound lane falls within the runway OFA. – A similar analysis to the RPZ needs to be done that includes looking at alternatives to resolve the non-standard conditions, costs, etc. Could the road move west? Could the runway/taxiway move east? The FAA does not provide any permanent modifications to standards; therefore, it is not appropriate to assume further development of a non-standard condition without first exploring options to eliminate the condition.

The document also calls out runway connectors which depending on if a solution to the ROFA can be identified may become part of a RWY extension scope and may also need to be considered (If we are touching the runway/taxiway then we would need to identify solutions for the direct access)

As stated during the call, these questions need to be answered prior to an EA because if physical solutions are identified to resolve any or all of the above mentioned issues, they would have a connected action to the RWY extension and need to be considered in the EA. Proceeding without a full understanding of the scope of a project risks segmentation under NEPA.

Please let me know if you have additional questions.

Regards,

Robert Tykoski

(206)231-4139

From: PECK Heather <heather.peck@aviation.state.or.us>
Sent: Tuesday, December 17, 2019 3:05 PM
To: Tykoski, Robert (FAA) <Robert.Tykoski@faa.gov>

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
NORTHWEST MOUNTAIN REGION
AIRPORT IMPROVEMENT PROGRAM

MODIFICATION OF AIRPORT DESIGN STANDARDS

BACKGROUND

1. AIRPORT:	2. LOCATION(CITY,STATE):	3. LOC ID:
Aurora State Airport	**Aurora, Oregon**	**KUAO**

4. EFFECTED RUNWAY/TAXIWAY:	5. APPROACH (EACH RUNWAY):	6. AIRPORT REF. CODE (ARC):
Runway 17/35	☐ PIR ☒ NPI ☐ VISUAL	**C-II**

7. DESIGN AIRCRAFT (EACH RUNWAY/TAXIWAY):

MODIFICATION OF STANDARDS

8. TITLE OF STANDARD BEING MODIFIED (CITE REFERENCE DOCUMENT):
Advisory Circular (AC) 150/5300-13, para 307

9. STANDARD/REQUIREMENT:
The runway object free area (OFA) requires that no above ground objects protrude above the runway safety area edge elevation. For Aurora State (ARC C-II) the standard OFA width is 800 feet.

10. PROPOSED:
Highway 551 runs north/south parallel to Runway 17/35. Current operations at the Airport justify increasing the Airport's ARC to C-II. The distance from the Runway 17/35 centerline to the Highway 551 centerline is approximately 400 feet. Considering the highway's width, the Airport is approximately 20 feet short of meeting the OFA design standard.

As the airport geometry is not changing from the current condition, the Oregon Department of Aviation requests a modification of the OFA design standard as defined in AC 150/5300-13, para 307.

11. EXPLAIN WHY STANDARD CANNOT BE MET (FAA ORDER 5300.1E):
Highway 551 and the vehicles travelling along the highway penetrate the Airport's runway OFA by approximately 20 feet.

12. DISCUSS VIABLE ALTERNATIVES (FAA ORDER 5300.1E):
Runway 17/35 could be located 20 feet eastward to meet the OFA design standard. Alternatively, Highway 551 could be located 20 feet westward to achieve the 400-foot separation standard. However, neither alternative is financially feasible due to the existance of airport buildings to the east and residential properties to the west.

13. STATE WHY MODIFICATION WOULD PROVIDE ACCEPTABLE LEVEL OF SAFETY, ECONOMY, DURABILITY, AND WORKMANSHIP (FAA ORDER 5300.1E):

No changes to the existing airport geometry are proposed. Additionally, the Department of Aviation has recently removed obstructions (shrubs) along the edge of Highway 551 to increase safety margins. The safety of people on the ground or in aircraft will not be reduced as a result of the proposed design standard modification.

ATTACH ADDITIONAL SHEETS AS NECESSARY – INCLUDE SKETCH/PLAN

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
NORTHWEST MOUNTAIN REGION
AIRPORT IMPROVEMENT PROGRAM

MODIFICATION OF AIRPORT DESIGN STANDARDS

MODIFICATION: **AC 150/5300-13, para 307**	LOCATION: **Aurora State Airport**	PAGE 2 OF 2
14. SIGNATURE OF ORIGINATOR:	15. ORIGINATOR'S ORGANIZATION: **Oregon Department of Aviation**	16. TELEPHONE: **503-378-4880**
17. DATE OF LATEST FAA SIGNED ALP:		
18. ADO RECOMMENDATION:	19. SIGNATURE:	20. DATE:
21. FAA DIVISIONAL REVIEW (AT, AF, FS):		

ROUTING SYMBOL	SIGNATURE	DATE	CONCUR	NON-CONCUR

COMMENTS:

22. AIRPORTS' DIVISION FINAL ACTION:

☐ UNCONDITIONAL APPROVAL	☐ CONDITIONAL APPROVAL	☐ DISAPPROVAL

DATE:	SIGNATURE:	TITLE:

CONDITIONS OF APPROVAL:

USER'S GUIDE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
NORTHWEST MOUNTAIN REGION
AIRPORT IMPROVEMENT PROGRAM

MODIFICATION OF AIRPORT DESIGN STANDARDS FORM

ITEMS 1-17 ARE TO BE COMPLETED BY THE AIRPORT SPONSOR(ORIGINATOR). ALL OTHER ITEMS WILL BE COMPLETED BY THE FAA.

THE COMPLETED FORM WILL BE TRANSMITTED BY THE ORIGINATOR TO THE APPLICABLE ADO/AFO. THE ADO/AFO WILL TRANSMIT THE FINAL FAA DETERMINATION TO THE ORIGINATOR.

MODIFICATION TO AIRPORT DESIGN STANDARDS REQUESTS SHOULD INCLUDE SKETCHES OR DRAWINGS WHICH CLEARLY ILLUSTRATE THE NONSTANDARD CONDITION.

ITEMS

1. LEGAL NAME OF AIRPORT.

2. ASSOCIATED CITY.

3. AIRPORT LOCATION IDENTIFIER (SEE APPROACH PLATES/AIRPORT FACILITY DIRECTORY).

4. IDENTIFY THE RUNWAY(S), TAXIWAY(S) OR OTHER FACILITIES EFFECTED BY THE PROPOSED MODIFICATION TO STANDARDS REQUEST.

5. IDENTIFY THE MOST CRITICAL APPROACH FOR EACH RUNWAY IDENTIFIED IN #4.

6. AIRPORT REFERENCE CODE - SEE PARAGRAPH 2, PAGE 1 AC 150/5300-13(CHANGE 4) - I.E. C-II, B-II, A-I (SMALL).

7. NOTE THE DESIGN AIRCRAFT (ARC OR SPECIFIC AIRCRAFT) FOR EACH FACILITY IDENTIFIED IN #4. A DESIGN AIRCRAFT MUST MAKE REGULAR USE OF THE FACILITY. NORMALLY, FAA CONSIDERS REGULAR USE TO BE 500 OR MORE ANNUAL INTINERANT OPERATIONS.

IF THE AIRPORT SERVES A WHOLE FAMILY OF AIRCRAFT IN A PARTICULAR GROUP, THE ARC (I.E. B-II) SHOULD BE SPECIFIED. IF,HOWEVER, THE AIRPORT IS USED BY ONLY 1 OR 2 OF A FAMILY OF AIRCRAFT (IX- BEECH KING AIR C90), THE MOST DEMANDING (APPROACH SPEED, WINGSPAN) AIRCRAFT SHOULD BE SPECIFIED.

8. IDENTIFY THE SPECIFIC NAME OF THE STANDARD THAT IS PROPOSED TO BE MODIFIED FOR THE SUBJECT LOCAL CONDITION.

9. DESCRIBE (WORDS AND NUMBERS) THE DIMENSIONS AND REQUIREMENTS OF THE STANDARD AS PROVIDED IN AC 150/5300-13.

10. STATE THE PROPOSED MODIFICATION TO THE STANDARD.

11. DISCUSS THE LOCAL CONDITIONS THAT MAKE IT IMPRACTICAL OR IMPOSSIBLE TO MEET THE STANDARD.

12. IDENTIFY ALTERNATIVES TO THE SUBJECT PROPOSED MODIFICATION, AND SHOW WHY THESE ALTERNATIVES ARE NOT VIABLE.

13. DISCUSS HOW THE PROPOSED MODIFICATION WOULD IMPACT AIRPORT SAFETY AND EXPLAIN WHY AN ACCEPTABLE LEVEL OF SAFETY, ECONOMY, DURABILITY, AND WORKMANSHIP WOULD STILL EXIST.

14. TYPED NAME AND SIGINATURE OF AIRPORT AUTHORITY REPRESELNTATIVE.

15. SELF-EXPLANATORY.

16. SELF-EXPLANATORY.

17. SELF-EXPLANATORY.

18. TO BE COMPLETED BY FAA.

From: House Timothy <Timothy.A.House@faa.gov>
Sent on: Tuesday, March 26, 2024 10:56:36 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
CC: Samantha Peterson <SPeterson@CenturyWest.com>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; David Miller <dmiller@CenturyWest.com>
Subject: Potential for MOS related to runway extensions at UAO

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Facility requirements chapter comments were provided earlier today. A question was asked of me when the Facility Requirements chapter was provided for review and I wanted to make sure it was answered concurrently with my review comments of the chapter.

The question was related to the likelihood of the FAA issuing a MOS for existing non standard conditions or allowing future projects to be constructed with MOS.

The question was asked to both Regional level management and ADO level management. The answer provided was consistent. The Region and ADO would not be in support of issuing MOS related to the extension of the runway. Standards would have to be met for ROFA and RSA requirements.

Please let me know if you need any additional information on this topic. We are aware this will have a significant impact on your next chapter, alternatives.

Tim A. House

Lead Planner, SEA Airports District Office

FAA Northwest Mountain Region

206-231-4248

405-607-9949 (mobile)

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2024 ANM/NWAAAE Airports Conference. April 2-4. Bellevue, WA

U.S. Department
of Transportation
**Federal Aviation
Administration**

Airports Division,ANM-620
2200 S. 216th Street
Des Moines, WA 98198
Email: Andrew.Edstrom@faa.gov
Phone: 206-231-9038

February 13, 2023

Mr. Tony Beach
Aurora State Airport
Airport Manager
3040 25th Street SE
Salem, OR 97302

RE: Investigation Closeout of Vehicle/Pedestrian Deviation

Dear Mr. Beach:

On December 30, 2022, we advised you that the Federal Aviation Administration was investigating an incident that reportedly involved:

A DARK BLUE CHEVY PICKUP TRUCK ENTERED TAXIWAY A FROM THE NORTHERN MOST EAST RAMP AREA AND PROCEEDED SOUTHBOUND 50FT BEFORE RE-EXITING TO THE EASTERN NON-MOVEMENT AREA. THERE WERE NO COMMUNICATIONS WITH THE VEHICLE. NO AC WERE INVOLVED.

This letter is to inform you that the investigation of this incident has resulted in the following recommendations.

1. Develop and implement training for access and procedures for the following:
   - Non-movement driving access
   - Movement area driving
   - Escort procedures

2. Develop and implement rules and regulations for Aurora State Airport. Consequences of non-compliance should be a component of the rules and include penalties for violations. Advisory Circular (AC) *150/5210-20A Ground Vehicle Operations to include Taxing or Towing an Aircraft on Airports* contains guidance for establishing programs that will improve access to movement areas, safety areas and the airport operations area.

3. Develop a plan to implement and educate tenants about rules and regulations and training requirements to include outreach, education and training opportunities.

4. Ensure enforcement for violations are adhered to when violations do occur.

5. Keep all gates closed to prevent inadvertent entry to the movement area by unauthorized persons and vehicles.

6. Evaluate installation of a vehicle service road (VSR) in the non-movement area.

7. Markings

- Install the markings in accordance with AC *150/5340-1M, Standards for Airport markings.*
- Non-movement area boundary marking - Upgrade the non-movement boundary marking from 6 inch width to 12 inch width (Paragraph 5.4.5.2).
- Upgrade standard taxiway centerline markings to enhanced centerline markings (Paragraph 4.3).
- Install Surface Painted Hold Position Signs (SPHPS) (Paragraph 4.5) and Enhanced Taxiway Centerlines.
- Develop and implement an airfield marking maintenance program including cleaning, replacing, and repairing faded, missing, or a nonfunctional markings; keeping each item unobscured and clearly visible; and ensuring that each item provides an accurate reference to the user.

8. Lighting

- Install standard taxiway edge reflectors to differentiate specific areas of airfield. South ramp area has a sea of pavement with markings not maintained and DOT reflectors installed. This makes it very difficult to differentiate between usable and unusable pavement.
- Long term solution would be to install taxiway edge lighting to all appropriate taxiways on movement side of airfield.

9. Signs

- Add taxiway direction and location signs to the airfield. Only runway exit signs and hold signs exist (with the exception of one destination sign). The airfield is controlled and when Air Traffic is conversing with pilots the pilots don't have an easy way to identify where they are at on the airfield.
- Install VSR stop sign at access points where through the fence operations areas exist that conform with AC *150/534-18G Standards for Airport Sign Systems.* Example of a location would be the movement area at Taxiway A1.
- Review current signs on airfield and ensure they meet current standards and remove incorrect and outdated signs.
- Provide signs at gates to reference gates are to be closed and to reinforce the rules and regulations. Such as an operator be responsible for an unauthorized entry if say there was someone to follow through the gate.
- Work with local Air Traffic Control to provide outreach and education.

<u>Identified non-standard Airport Design Standards</u>

1. Aurora State Airport Sponsor does not control the property for all runway object free areas (ROFA) for C-II standards. The C-II standard ROFA from runway centerline is 400 feet. This exceeds the current location of the non-movement boundary marking (365.5 feet from runway centerline). Due to this it was found Life Flight and other aircraft were seen parked within the ROFA which is contrary to airport design standards (reference AC *150/5300-13B Airport Design* paragraph 3.12.1)

2. The Airport Layout Plan (ALP) has listed the planned modification to standard for Highway 551 but the Office of Airports does not have an approved final modification to standard approved on file.

3. It was found that the Willamette sign on the north end of the airfield around Taxiway A1 was located in the ROFA.

At non-certificated airports that have received Federal grants, the owner is obligated to comply with Federal Grant Assurance #19, Operations and Maintenance, which includes implementing corrective actions to eliminate V/PD's. FAA Order 5200.10, Procedures for conducting investigations of Vehicle/Pedestrian Deviations, states that if V/PDs continue to occur on the airport, and the airport certificate holder/operator has not taken any actions to alleviate or reduce the runway incursion problem, it will be necessary for the FAA to initiate enforcement proceedings. An airport owner's failure to comply with its grant obligations may result in the FAA withholding discretionary funds during the course of its investigation, or as a result of the FAA's investigation (i.e., a finding that the airport is ineligible to receive Federal grants) until the matter is resolved. The FAA is not considering funding disruptions at this time, with the understanding that the airport is taking action to address V/PD's. By implementing these measures, and taking appropriate action to alleviate future taxiway incursions, will ensure the airport remains in compliance with Federal Grant Assurances.

Sincerely,

Andrew Edstrom
Airport Certification Safety Inspector
FAA Northwest Mountain Region, Airports Division

cc: Jason Ritchie, ANM-620
Rick Schoder, ANM-620
Kate Glassey, SEA ADO
Tim House, SEA ADO

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
NORTHWEST MOUNTAIN REGION
AIRPORT IMPROVEMENT PROGRAM

MODIFICATION OF AIRPORT DESIGN STANDARDS

BACKGROUND

1. AIRPORT:	2. LOCATION(CITY,STATE):	3. LOC ID:
Aurora State Airport	**Aurora, Oregon**	**KUAO**

4. EFFECTED RUNWAY/TAXIWAY:	5. APPROACH (EACH RUNWAY):	6. AIRPORT REF. CODE (ARC):
Runway 17/35	☐ PIR ☒ NPI ☐ VISUAL	**C-II**

7. DESIGN AIRCRAFT (EACH RUNWAY/TAXIWAY):

MODIFICATION OF STANDARDS

8. TITLE OF STANDARD BEING MODIFIED (CITE REFERENCE DOCUMENT):
Advisory Circular (AC) 150/5300-13, para 307

9. STANDARD/REQUIREMENT:
The runway object free area (OFA) requires that no above ground objects protrude above the runway safety area edge elevation. For Aurora State (ARC C-II) the standard OFA width is 800 feet.

10. PROPOSED:
Highway 551 runs north/south parallel to Runway 17/35. Current operations at the Airport justify increasing the Airport's ARC to C-II. The distance from the Runway 17/35 centerline to the Highway 551 centerline is approximately 400 feet. Considering the highway's width, the Airport is approximately 20 feet short of meeting the OFA design standard.

As the airport geometry is not changing from the current condition, the Oregon Department of Aviation requests a modification of the OFA design standard as defined in AC 150/5300-13, para 307.

11. EXPLAIN WHY STANDARD CANNOT BE MET (FAA ORDER 5300.1E):
Highway 551 and the vehicles travelling along the highway penetrate the Airport's runway OFA by approximately 20 feet.

12. DISCUSS VIABLE ALTERNATIVES (FAA ORDER 5300.1E):
Runway 17/35 could be located 20 feet eastward to meet the OFA design standard. Alternatively, Highway 551 could be located 20 feet westward to achieve the 400-foot separation standard. However, neither alternative is financially feasible due to the existance of airport buildings to the east and residential properties to the west.

13. STATE WHY MODIFICATION WOULD PROVIDE ACCEPTABLE LEVEL OF SAFETY, ECONOMY, DURABILITY, AND WORKMANSHIP (FAA ORDER 5300.1E):

No changes to the existing airport geometry are proposed. Additionally, the Department of Aviation has recently removed obstructions (shrubs) along the edge of Highway 551 to increase safety margins. The safety of people on the ground or in aircraft will not be reduced as a result of the proposed design standard modification.

ATTACH ADDITIONAL SHEETS AS NECESSARY – INCLUDE SKETCH/PLAN

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
NORTHWEST MOUNTAIN REGION
AIRPORT IMPROVEMENT PROGRAM

MODIFICATION OF AIRPORT DESIGN STANDARDS

MODIFICATION: **AC 150/5300-13, para 307**	LOCATION: **Aurora State Airport**	PAGE 2 OF 2
14. SIGNATURE OF ORIGINATOR:	15. ORIGINATOR'S ORGANIZATION: **Oregon Department of Aviation**	16. TELEPHONE: **503-378-4880**
17. DATE OF LATEST FAA SIGNED ALP:		
18. ADO RECOMMENDATION:	19. SIGNATURE:	20. DATE:
21. FAA DIVISIONAL REVIEW (AT, AF, FS):		

ROUTING SYMBOL	SIGNATURE	DATE	CONCUR	NON-CONCUR

COMMENTS:

22. AIRPORTS' DIVISION FINAL ACTION:

☐ UNCONDITIONAL APPROVAL	☐ CONDITIONAL APPROVAL	☐ DISAPPROVAL

DATE:	SIGNATURE:	TITLE:

CONDITIONS OF APPROVAL:

USER'S GUIDE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
NORTHWEST MOUNTAIN REGION
AIRPORT IMPROVEMENT PROGRAM

MODIFICATION OF AIRPORT DESIGN STANDARDS FORM

ITEMS 1-17 ARE TO BE COMPLETED BY THE AIRPORT SPONSOR(ORIGINATOR). ALL OTHER ITEMS WILL BE COMPLETED BY THE FAA.

THE COMPLETED FORM WILL BE TRANSMITTED BY THE ORIGINATOR TO THE APPLICABLE ADO/AFO. THE ADO/AFO WILL TRANSMIT THE FINAL FAA DETERMINATION TO THE ORIGINATOR.

MODIFICATION TO AIRPORT DESIGN STANDARDS REQUESTS SHOULD INCLUDE SKETCHES OR DRAWINGS WHICH CLEARLY ILLUSTRATE THE NONSTANDARD CONDITION.

ITEMS

1. LEGAL NAME OF AIRPORT.

2. ASSOCIATED CITY.

3. AIRPORT LOCATION IDENTIFIER (SEE APPROACH PLATES/AIRPORT FACILITY DIRECTORY).

4. IDENTIFY THE RUNWAY(S), TAXIWAY(S) OR OTHER FACILITIES EFFECTED BY THE PROPOSED MODIFICATION TO STANDARDS REQUEST.

5. IDENTIFY THE MOST CRITICAL APPROACH FOR EACH RUNWAY IDENTIFIED IN #4.

6. AIRPORT REFERENCE CODE - SEE PARAGRAPH 2, PAGE 1 AC 150/5300-13(CHANGE 4) - I.E. C-II, B-II, A-I (SMALL).

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15. SELF-EXPLANATORY.

16. SELF-EXPLANATORY.

17. SELF-EXPLANATORY.

18. TO BE COMPLETED BY FAA.

Outlook

Wendie Kellington Email to Kenji Sugahara (9.25.24)

From Samantha Peterson <SPeterson@CenturyWest.com>
Date Wed 9/25/2024 8:21 AM
To Brandy Steffen <brandy.steffen@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>
Cc W. Matt Rogers <WRogers@CenturyWest.com>

Can you also include this email in the public record with the others from Kellington.

Thank you,

Samantha Peterson, C.M., ACE | Sr.Aviation Planner/Project Manager
Century West Engineering
509.833.4526 | speterson@centurywest.com

From: Wendie Kellington <wk@klgpc.com>
Sent: Wednesday, September 25, 2024 7:17 AM
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Cc: Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Samantha Peterson <SPeterson@CenturyWest.com>; Ted Millar <tmillar@wwpmi.com>; Tony Helbling - Wilson Construction Company (helbling@wilsonconst.com) <helbling@wilsonconst.com>; Aron Faegre (faegre@earthlink.net) <faegre@earthlink.net>; Rachel Bacon <rb@klgpc.com>
Subject: RE: Meeting last week

Hi Kenji,

Thank you for the note and meeting last week. The effort is appreciated. A few things.

The airport stakeholders sincerely hope that ODAV will take a serious look at the alternative they proposed. Nothing about it is inconsistent with ODAVs objectives and it is consistent with the note below **as well as** FAA requirements. Furthermore, the stakeholders' proposal came with a fully supported MOS! On the latter, the papers that Tony sent confirm that despite FAA's requests otherwise, ODAV has **never submitted** a proper MOS to the FAA. A mere glance at the single MOS ODAV apparently submitted in comparison to the one Mr. Faegre submitted (Faegre's meets the requirements of the FAA/NTSB manual, ODAV's does not) demonstrates why it is unsurprising that FAA did not approve the 'back of napkin' MOS previously submitted by ODAV's prior administration. It is simply impossible to credibly claim that FAA would reject a properly supported MOS – especially one presented for a phased in airport development program. The claim otherwise is fundamentally misguided.

As explained in the alternative that the stakeholders presented, the stakeholders' proposed alternative is far less intrusive, less expensive, less onerous, and more functional than **any alternative** presented in the ODAV process to date. We explained in the stakeholders' submittal that it would be easy to add moving the perimeter fence as a phase 1 item and it would be easy to add to the stakeholder's alternative a phase 2 of moving Highway 551 at the end of the 20-year term if FAA funds that move. We also explained that the idea of ODAV condemning the $300 mm in private investment to move the runway east including destroying business jet hangars and Atlantic is a nonstarter – that alternative effectively destroys the airport for C-II aircraft and is completely contrary to ODAV's legislative mandate in ORS 836.640-642 to support TTF operations, as ODAV must understand. The private aeronautics interests have invested in the airport's

development as the legislature intended creating significant economic development for the area. Destroying their work under any alternative is untenable, inconsistent with all known airport development premises and respectfully, unlawful.

Please understand that it was **impossible for anyone to provide meaningful comments** on the alternatives that ODAV presented. The facts from which all ODAV proposed alternatives flowed were, with respect, faulty and their outcome was untenable - no certain runway extension. ODAV staff mistakenly claimed that FAA required perfect compliance with design standards, and that FAA had refused any MOS in exchange for any runway extension and staff asserted that moving Highway 551 to the west would result in condemnation of many homes and businesses. **Neither are true**. Staff were unable to back up the claim about FAA demands when asked - it was clear something was being missed because the position attributed to FAA is contrary to the CFRs that govern FAA's authority as well as the govern master planning. It turned out that ODAV **never even attempted to submit a properly documented MOS**, making it unsurprising that in the absence of a proper MOS, that FAA expected compliance. And it turns out that the Highway 551 ROW is wide enough for the 20 feet necessary for perfect ROFA compliance **without any apparent need for condemnation of any homes or businesses.** Or at least with a lot less land being needed than the alternatives presented claimed. How much land is needed in truth has never been disclosed.

Further, from our meeting we learned that a 4th ODAV alternative is actually being considered by ODAV– which is an alternative never presented to the PAC. That being one in which airport development is phased in and for which the desperately needed runway extension is not held hostage to infeasible conditions. Given this revelation and the mistaken or at least incomplete factual premises that supported the ODAV alternatives presented on July 30, the stakeholders suggest (and respectfully the rules governing master planning require), that another round of alternatives be presented to the PAC for their input with the following revised elements:

1. Full disclosure about ODAV's phasing proposal – that the runway extension need not be and is not intended to be held hostage to either condemning the private airport development in the east or moving Highway 551 and condemning homes and businesses.
2. Full disclosure that ODAV has never presented a properly documented MOS to FAA and that under a phased approach that FAA will in fact approve a proper MOS so that the runway can be extended in the near term as is desperately needed.
    a. Here the fully documented Faegre MOS is "temporary" in that it supports phase 1 runway extension and phase 2 results in perfect design standard compliance toward the end of the master planning term.
3. Full disclosure about the amount of space within the existing ROW to move Highway 551 west and concerning the extent to which condemning homes or businesses is actually required because it appears such condemnation is not required. What is required in truth?
4. The stakeholders' proposed alternative is presented as an alternative, with
    a. the Faegre properly documented MOS to support phase 1 which would include the runway extension
    b. moving highway 551 to the west within the existing right of way (without condemnation of homes and businesses if that is possible as it appears) as a phase 2 plan
    c. the drainfield in the south remains but is improved per the geotechnical report submitted demonstrating it can be improved to meet FAA standards.
    d. adding the TLM TTF property to the airport boundary as apparently now properly proposed – because it is the last undeveloped property that all KUAO master plans have envisioned be developed with aeronautical uses and TLM has done the work to enable it to support eVTOLs – something that does not exist anywhere else.

We look forward to your thoughts. Thank you. Best, Wendie Kellington

Wendie L. Kellington | Attorney at Law.
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From: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Sent: Monday, September 23, 2024 7:45 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Wendie Kellington <wk@klgpc.com>; Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>; Samantha Peterson <speterson@centurywest.com>
Subject: Meeting last week

Wendie!

Thanks for reaching out to ODAV to talk about the comments that you provided on behalf Ted Millar, TLM and AABC concerning the refined alternatives presented to the PAC on July 30, 2024. I also appreciated the opportunity to speak directly with the communities that are and will be affected by ODAV's planning efforts for UAO. It's always important to listen to stakeholders about their concerns and their wishes. I hope our conversation was helpful in understanding ODAV's role in this planning phase and in particular our hope to select an alternative that FAA will support and ultimately agree to extend federal funds to help implement. Like I mentioned in my response to your request for a meeting, I'll be ensuring that all ODAV's communications with its stakeholders are made part of the record. This this email is intended to provide a high-level summary of our discussion today in which you, Anthony Beach, Alex Thomas , Stacy Posegate of DOJ and I attended by teams.

As I explained in our meeting, Chuck Garrison, Director of the Northwest Mountain Region for FAA, has made clear to ODAV that FAA will not fund future projects if the Aurora Airport master plan does not include an ALP that will bring components of the airport up to FAA's standards of compliance. The primary areas of concern, as we have discussed, are the ROFA which extends over and above the Hubbard Highway, OR 551, and the drainfield within the Runway Safety Area supporting your clients' businesses.

I understand that you are asking ODAV to consider another alternative airport layout plan, which you describe in more detail in your letter. You have explained that this alternative should be preferable

because it would not require additional real property or moving OR 551. You have also stated that the current alternatives are unrealistic or unnecessary because they seek to obtain “perfect compliance” with FAA standards. But that, in your opinion, perfect compliance is not required. Rather, FAA has an obligation to consider any modifications requested by the ODAV. You also explained that your clients are extremely concerned with the investment that they have put into this airport and their relationship with ODAV. We take all input and comments seriously.

Please know that the agency’s consultant does intend to prepare a response to your letter which will be added to the record for the next PAC meeting. But, also, as we discussed, we hope that some of your concerns are alleviated as we explained that any project would be phased, meaning that some of the proposed improvements in the selected alternatives could be built as funding is secured for that phase. We also attempted to clarify that ODAV has no present intention of acquiring by condemnation the areas that are marked “reserve” in any of the alternatives. Rather, these are designated as reserve so that ODAV may apply to FAA for federal funds to acquire these properties, should they become available to be used for a future aviation use. Finally, we attempted to explain that FAA has worked with ODAV to identify the standards that ODAV must comply with and it is apparent that FAA will not approve a modification. As Tony explained, FAA has denied ODAV’s attempts to seek modifications in the past. Furthermore, any modification would be temporary and would not present a permanent solution to the need for new development at the airport. As promised, we will locate the documents pertaining to ODAV’s application to FAA and its response and provide you with copies!

Thank you again for meeting with us today. I look forward to seeing you in a few weeks and to working together on this and other important projects.

Thanks again Wendie!

Kenji

KENJI SUGAHARA
OREGON DEPARTMENT OF AVIATION
DIRECTOR

OFFICE 503-378-2340

EMAIL kenji.sugahara@odav.oregon.gov

3040 25TH STREET SE, SALEM, OR 97302

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*****CONFIDENTIALITY NOTICE*****
This e-mail may contain information that is privileged, confidential, or otherwise exempt from disclosure under applicable law. If you are not the addressee or it appears from the context or otherwise that you have received this e-mail in error, please advise me immediately by reply e-mail, keep the contents confidential, and immediately delete the message and any attachments from your system.

Outlook

Re: Aurora State Airport Master Plan Website Comments - Wendie Kellington

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2024-10-15 5:15 PM
To Wendie Kellington <wk@klgpc.com>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>

Hi Wendie,

Thanks for your email. We only allow the main PAC representative to be on the panelist side, the alternates are on the attendee side, since we have such a large group. Since Ted is the main member, he is in the panelist area. Feel free to send in comments via the QA section throughout the meeting or through email.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Wendie Kellington <wk@klgpc.com>
Sent: Tuesday, October 15, 2024 4:59 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: RE: Aurora State Airport Master Plan Website Comments - Wendie Kellington

I represent a PAC member and cannot get into the panel. Will you please admit me to the panel. Thank you. Wendie Kellington

---

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Tuesday, October 15, 2024 1:39 PM
To: Wendie Kellington <wk@klgpc.com>
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Aurora State Airport Master Plan Website Comments - Wendie Kellington

Hello Wendie,

We have received your comments and questions. We will get back to you as soon as possible.

Thank you,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Wendie Kellington <noreply@jotform.com>
Sent: Tuesday, October 15, 2024 9:03 AM
Subject: Re: Aurora State Airport Master Plan Website Comments - Wendie Kellington

Aurora State Airport Master Plan Website Comments

Name	Wendie Kellington
Organization	Kellington Law Group
Comments or questions?	We represent TLM holdings. (1) ODAV's alternatives first presented 7/31/24 stated they were all premised on the claim that FAA said no runway extension could occur unless the Highway 551 ROFA design standard was first met. That is incorrect and that incorrect premise drove all of ODAV's binary 7/31 alternatives. Further, the highway is just 32 feet off of perfect ROFA compliance and ODAV appears to have been unaware that there is plenty of room in the ROW to move the highway to meet the ROFA without taking homes or businesses, because the binary choice ODAV presented was either taking a bunch of homes/businesses to move Hwy 551 west or wiping out significant aeronautical uses at the airport by moving the RW east. Both of those draconian alternatives ODAV presented are wholly unnecessary. (2) FAA never said that no r/w extension can occur without the ROFA first being met. They will absolutely allow the RW to be extended without perfect ROFA concurrent compliance. They just want the master plan to show the ROFA being met by the end of the planning period if funding becomes available. (3) The airport's aeronautical stakeholders presented an airport MP alternative that extended the RW north in the short term to serve the decade-plus long need for safe existing aircraft operations, provided a fully documented MOS demonstrating unequivocally that MOS standards were met, contemplated HWY 551 be moved the 32 ft west after the RW extension happens, and later in the MP planning period and within the existing ROW (taking no homes/businesses), if funding is available. (4) FAA will in fact allow the r/w to be extended without perfect prerequisite ROFA compliance, and ODAV mistakenly presented alternatives premised on the opposite conclusion it attributed to

	FAA. ODAV must present alternatives to the PAC that are in fact consistent with FAA directives. Otherwise, ODAV fails to comply with its citizen involvement/stakeholder involvement obligations. The aeronautical stakeholders alternative with fully justified MOS must be included as an option in a suite of real properly premised alternatives returned to the PAC for comment. (4) Respectfully, there is no justification for any alternative that wipes out any aeronautical uses. Hwy 551 can be moved west within the existing ROW at the end of the MP planning period with minimal private property impacts. Wiping out any aeronautical uses is simply unacceptable and is contrary to ORS 836.640-642 governing ODAV and the entire point of this master planning effort to serve aeronautical uses. Relatedly, there is no justification for each alternative demanding that the septic drainfield to the south be moved to some unknown location that may not even feasibly exist. As the geotechnical report in the record demonstrates, modest improvements to that drainfield make it comply with FAA standards. Nothing justifies moving it. Thank you. I would like to receive email updates.
If you would like a response, please tell us the best way to contact you:	Email Phone
Email	wk@klgpc.com
Phone Number	(503) 804-0535

You can edit this submission and view all your submissions easily.

Outlook

Fw: Chat and Q & A

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2024-10-16 8:46 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

Thanks,

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in » Email is the best way to reach me; I try to respond within 3 full workdays.

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

From: Wendie Kellington <wk@klgpc.com>
Sent: Tuesday, October 15, 2024 6:45:55 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Chat and Q & A

Brandy, this is not a very good public process because the public is foreclosed from seeing the chat. This is all I can see (below), yet there is a lot of discussion based on comments I am not allowed to see for some reason. :

Brandy Steffen, facilitator | JLA to Everyone
BS If you are a PAC member and are in the attendee section, please let me know.

Brandy Steffen, facilitator | JLA to Everyone
BS Just a reminder that we'll be recording the meeting. The recording will be posted to the website in the next 48 hours; the meeting summary will be posted v

Brandy Steffen, facilitator | JLA to Everyone
BS The presentation slides will be posted to the project website following this meeting.

Brandy Steffen, facilitator | JLA to Everyone
BS Here is Ben William's comment which was sent just to me: To Tim's last comment, who is THEY are following advisory circulars? Tim House is the person wh
So no one above Tim House in the FAA Regional Office or Washington office is making these decisions? They are being made locally at the Regional level

Brandy Steffen, facilitator | JLA to Everyone
BS Here is the FAQ: https://publicproject.net/files/2024-01/Aurora-Airport/updated/uao-amp-faq-022024.pdf?6218398d13

Brandy Steffen, facilitator | JLA to Everyone
BS We will come back in 10 minutes. I'll give you a few minute warning.

Brandy Steffen, facilitator | JLA to Everyone
BS We'll get started in a few minutes

Brandy Steffen, facilitator | JLA to Everyone
BS Just a reminder that we'll post these slides on the project website following this meeting tonight.

Jen Winslow | JLA to Everyone
JW If anyone watching the meeting would like to provide comments, please do so on our "contact us" page at https://publicproject.net/AuroraAirport The mee

Outlook

Re: Public records request

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2024-10-16 4:36 PM
To Wendie Kellington <wk@klgpc.com>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>

Hello Wendie,

Thanks for your request. The website has been updated with the video, as well as the transcript which includes the full chat and Q&A record. You can find everything at https://publicproject.net/AuroraAirport# on the "meetings" page.

Please let us know if you have any other questions.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Wendie Kellington <wk@klgpc.com>
Sent: Tuesday, October 15, 2024 8:08 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Public records request

Brandy,

I request a copy of all comments and Q & A submitted into the zoom meeting tonight that I was foreclosed from seeing. Thank you. Wendie Kellington

Outlook

Fw: Feedback to Preferred Alternative Rev 0.docx

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Fri 11/1/2024 4:49 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, October 30, 2024 4:14 PM
To: Helbling, Tony <helbling@wilsonconst.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Ted Millar <tmillar@wwpmi.com> <tmillar@wwpmi.com>; wk@klgpc.com <wk@klgpc.com>; Bruce Bennett <bruce@auroraaviation.com>
Subject: RE: Feedback to Preferred Alternative Rev 0.docx

Hi Tony, confirming receipt, and we'll have our comments and PAC meeting summary posted on the project website shortly.

Thank you!

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Helbling, Tony <helbling@wilsonconst.com>
Sent: Tuesday, October 29, 2024 2:55 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Ted Millar <tmillar@wwpmi.com> <tmillar@wwpmi.com>; wk@klgpc.com; Bruce Bennett <bruce@auroraaviation.com>
Subject: Feedback to Preferred Alternative Rev 0.docx

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Please see attached.

Tony Helbling

October 29, 2024

To: Oregon Department of Aviation (ODAV)

FROM: Tony Helbling - PAC Member
Ted Millar - PAC Member
Aurora Airport Improvement Association

RE: Feedback to Preferred Alternative - Aurora Airport Master Plan

Per the invitation at the October 15, 2024, PAC meeting, this comment is submitted by Airport Stakeholders who are PAC members as well as is submitted by the entirety of the Aurora Airport Improvement Association (AAIA). AAIA is the organization of the private airport stakeholders including but not limited to:

- Atlantic Aviation
- TLM Holdings
- Wilson Construction Company
- Kory McGregor
- Blue Skies Aviation
- Tim Warren
- George VanHoomison
- Helicopter Transport Services

This is the Airport Stakeholders feedback to ODAV/Century West on "Preferred Alternative" presented during the October 15, 2024, PAC Meeting.

1. ODAV's preferred alternative needlessly punts indefinitely the desperately needed runway extension, inexplicably relocates the internal access road from where it is already partly constructed (wasting the investment in the existing internal road infrastructure) and where it was approved in the 2012 master plan to a location that dangerously parallels an active taxiway, destroys the septic drainfields necessary for the $300 million in private investment at the airport to continue to support the airport's 1,500 jobs, unnecessarily takes critically needed airplane parking, unnecessarily takes property from people on both sides of the airport, while wholly neglecting ODAVs duty as steward of the airport to keep it safe and nurture the economic engine that the legislature directed ODAV support. ODAV's preferred alternative is contrary to law and ODAV's responsibilities. ODAV's claim "the airport MUST be brought into standards as per the FAA" is simply wrong. We have explained in detail that FAA must and will consider a MOS to enable the runway extension (which will be temporary until ODAV moves Highway 551 thirty feet west in the existing ODOT right-of-way). During the last PAC meeting FAA did not claim otherwise. Rather,

the FAA representative specifically stated the FAA is not directing ODAV what to write and that the agency simply wanted a pathway to design standard compliance. Those words mean FAA will (as it must) allow the runway to be extended so long as the master plan contemplates moving Highway 551 when funding becomes available to do so.

2. The preferred alternative is a nonstarter for the following reasons.

    a. The acquisition of the properties is unfair in that

        i. Acquisition is apparently planned to violate the law. Instead of paying fair market value as the law requires, David Miller, the lead consultant during the PAC meeting – explained rates to be paid for the properties will not be the fair market values, the paid rates will be the tax roll valuations. (Which is a significantly lower price.) Even though this is unlawful, the statement of intention to acquire private property at unlawful law ball prices sets up the area for precondemnation blight.
        ii. ODAV (Tony Beach) stated in a direct conversation that it will not pay for relocation costs for affected properties.
        iii. ODAV will also not pay for business disruption costs. If the alternative proceeds the airport and affected privately owned areas will be blighted.

    b. ODAV is completely failing

        i. To defend investment as called for in ORS 836.642, (3), (e), "Preserve investments in pilot sites…"
        ii. To recognize that more than half of the entire airport is made up of privately owned property, upon which private investment provides nearly 1500 family wage paying jobs. A significant portion of which could be lost if the preferred alternative is adopted.

    c. The "Vehicle Service Road" (VSR) is poorly thought out, damaging and unnecessary.

        i. Previous Master Plan updates to include the 2012 ALP approved by the FAA, showed and Internal Circulation Road (ICR) the underlying land for which is largely currently available at no cost to ODAV now and is partially constructed per the 2012 master plan. The ICR was designed for fuel trucks, tugs, official agency vehicles, private vehicles, and 3rd party vendor delivery vehicles. Most of the ICR was set back from the ramp and the taxiway, reducing the probability of a Vehicle Pedestrian Deviation (VPD) or a collision event.

ii. The VSR anomalously parallels the active taxiway, and the preferred alternative omits the ICR that works and that had previously been planned to be improved to work even better to serve the private investment at the airport. Without an answer to the question put to ODAV, "Who will be allowed to operate a vehicle on the VSR?", it appears that ODAV will only allow fuel trucks, tugs, ODAV and FAA vehicles on the VSR, again seeming to turn a blind eye to the needs of the private aeronautics' investors at the airport and the 1500 family wage jobs they created and, until now at least, have maintained. And its responsibilities assigned by the legislature under ORS 836.640-642,

d. Neither ODAV (nor the FAA) have identified any funding source to pay for anything in the preferred alternative, essentially making this Masterplan and its subsequent Airport Layout Plan completely unachievable, ultimately useless and a colossal waste of taxpayer money. ODAV has failed to discharge its responsibility to establish a meaningful and achievable master plan outlined in a of number federal rules to include:

i. AC 150/5070-6B, Part I, Chapter 1, 101. - "The technical steps described in this AC are generally applicable, although each step should be undertaken only to the extent necessary to produce a **MEANINGFUL** (emphasis added) product for a specific airport."
ii. AC 150/5070-6B, Part I, Chapter 1, 104., b. – "The FAA strongly encourages that planners consider the possible environmental and **SOCIOECONOMIC** costs associated with alternative development concepts, and the possible means of **AVOIDING, MINIMIZING OR MITIGATING IMPACTS** to sensitive resources at the appropriate level of detail for facilities planning."
iii. AC 150/5070-6B, Part I, Chapter 1, 104., c. 5) – "Propose an **ACHIEVABLE** financial plan to support the implementation schedule."

3. It is also frustrating that a group of airport stakeholders asked to have a meeting with ODAV and its consultants to discuss an alternative the stakeholders presented on the record that is wholly consistent with the 2012 master plan, constructs in the short term the runway extended on an approvable MOS, and includes a plan to move Highway 551 west the magic 30 feet in the existing right-of-way, when funding is available to do so. It also maintains the existing drainfields merely requiring that they be brought to compliance with FAA standards as demonstrated is wholly achievable by an uncontroverted geotechnical report in the record.[1] ODAV has made it clear that it has no

[1] ODAV asserted with no evidence, that is zero support that compliance was infeasible. Reliance upon that and other unsupported assertions are disappointingly ODAV's theme in this master plan effort.

interest in the airport stakeholders' meaningful, achievable and much less expensive master plan alternative. Rather:

a. The Airport Stakeholders were told by the Director of ODAV that ODAV would not meet to discuss it outside of a PAC meeting and explained that any discussions of ideas would only happen during, and in full view of the public, a live PAC meeting.
b. As directed by ODAV's director, the Airport Stakeholders waited for the October 15, 2024, meeting to discuss the stakeholders master plan alternative (presented on September 3, 2024, and ignored to date).
c. We asked during that PAC meeting to discuss our proposal and were then told by ODAV's Tony Beach that the proposal had been dismissed by ODAV and the consultant for no reason other than the unsupported conclusion that it was "not possible". And any consideration or discussion of the Stakeholders' alternative was completely foreclosed in the PAC meeting forum.
d. ODAV and the consultants presented the ODAV preferred alternative and next steps to the PAC with no PAC discussion of the stakeholders' alternative. This appears to the PAC, that its input is unwelcome and the entire process pro forma. The only conclusion is that ODAV's decision was already made, and that stakeholder input has been and was always intended to be window-dressing, nothing more.
e. After the PAC Meeting, the airport stakeholders expressed frustration with not being allowed to discuss the proposed stakeholder alternative during the PAC meeting. ODAV merely gave a giant bureaucratic shrug.

4. Anyone can see this Master Plan effort is a sham, has a pre-determined outcome, and public or PAC member input is viewed as a nuisance level necessity

a. It is apparent ODAV, the consultants have decided how the final master plan shall be completed – the preferred alternative is not about airport safety, airport efficiency, aeronautical advancement for the future, economic development, family wage jobs, but about destroying the through the fence operations at the airport. But ODAV must understand, they are in that single minded focus destroying the Goose that laid the golden economic development egg that until now has been the Aurora Airport and importantly they are violating the legislative command of ORS 836.640-642.
b. ODAV's tone deafness to input and the law rests on false assumptions that the FAA can and does demand perfect airport design standard compliance before the runway may be extended, even though it is clearly a real safety issue to ignore the needed runway extension, and the safety risk of imperfect design compliance is almost infinitely minute:

i. The landing risk is “one incident in every 16.7 trillion landings, the time between occurrences is calculated as 16 trillion landings divided by 45,115 landing operations per year which equates to one incident every 369,000 years.”
ii. The landing roll risk is “one incident in every 12.5 million landings, the rate of occurrence is calculated as 12.5 million landings divided by 45,115 landings per year which equates to one incident every 277 years” at worst or more likely “one incident in every 16.7 million landings, the rate of occurrence is calculated as 16.7 million landings divided by 45,115 landings per year which equates to one incident every 369 years.”
iii. The takeoff roll phase, the risk is “one incident in every 45.5 million takeoffs, the rate of occurrence is calculated as 45.5 million takeoffs divided by 45,115 takeoffs per year which equates to one incident every 1,008 years.”
iv. The landing roll phase risk to taxiway is “one incident in every 11.1 million landings, the rate of occurrence is calculated as 11.1 million landings divided by 45,115 landings per year which equates to one incident every 246 years.”

5. You are no doubt aware that FAA is required to consider and approve a MOS “when necessary to meet local conditions” so long as the “modification will provide an acceptable level of safety, economy, durability and workmanship.” (*See,* 14 CFR § 152.11(b)).

    a. That has been proven by the Airport Stakeholders alternative that ODAV is ignoring.
    b. The design standards for which ODAV claims FAA demands perfect prerequisite compliance for any runway extension applies to all airports in the US. The FAA routinely approves MOS for large airports nationwide some with genuine safety concerns. Nothing suggests Aurora has some super anomaly warranting the disparate treatment ODAV claims FAA demands. Rather, as shown above, the risk of 30 feet of imperfection until funding is available to move Highway 551 is ridiculously small.

6. ODAV’s decisions were made before presenting information to the PAC, specifically evident in the facts surrounding the previous two PAC meetings.
    a. Refined Alterantives 1A, 1B and 2 were NOT allowed to be seen by PAC members or the public for meaningful review BEFORE the July 31, 2024, PAC meeting.
    b. The Preferred Alternative was not allowed to be seen by the PAC members or the public for meaningful review BEFORE the October 15, 2024, PAC meeting.

7. ODAV has lost its way. ODAV should pause the process and park the preferred alternative until such time that:

    a. ODAV and consultants set up an in-person work session for the ENTIRE PAC where proposals that bring a win-win situation for everyone could be JOINTLY developed.
    b. ODAV works collaboratively with the FAA, and the PAC to define a path forward that provides as safe airport, respectful of surrounding communities, protects the investment in private property both on and off the airport, and follows the law to include ORS 836.640-642.

Sincerely,

Tony Helbling - PAC Member
Ted Millar - PAC Member
Aurora Airport Improvement Association

Outlook

Fw: public comments

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2024-11-04 2:34 PM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Monday, November 4, 2024 7:30 AM
To: Wendie Kellington <wk@klgpc.com>; Brandy Steffen <brandy.steffen@jla.us.com>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Ted Millar <tmillar@wwpmi.com>; Tony Helbling - Wilson Construction Company (helbling@wilsonconst.com) <helbling@wilsonconst.com>; Aron Faegre (faegre@earthlink.net) <faegre@earthlink.net>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Rachel Bacon <rb@klgpc.com>; Bruce Bennett - Aurora Aviation (bruce@auroraaviation.com) <bruce@auroraaviation.com>
Subject: RE: public comments

Hi Wendie, we are working on uploading all of the public records to this section, it is still in progress.

We'll make a few changes to reflect that and you should see all of the public records there shortly. We'll send out a notice when it is updated.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Wendie Kellington <wk@klgpc.com>
Sent: Sunday, November 3, 2024 3:17 PM
To: brandy.steffen@jla.us.com; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Ted Millar <tmillar@wwpmi.com>; Tony Helbling - Wilson Construction Company (helbling@wilsonconst.com) <helbling@wilsonconst.com>; Aron Faegre (faegre@earthlink.net) <faegre@earthlink.net>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Rachel Bacon <rb@klgpc.com>; Bruce Bennett - Aurora Aviation (bruce@auroraaviation.com) <bruce@auroraaviation.com>
Subject: public comments

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Brandy and Thomas,

Will you please direct me to where I may go to view the various public comments that have been submitted for the KUAO Master Planning effort? The below screenshot is from today and says there have only been two comments received for the entire effort. We all know that is wrong. I have submitted more documents than is listed below, as have others I work with; and we are aware that others beyond that have commented as well. Moreover, at the last PAC meeting, Tony Beach said that some people (including the Wilsonville Mayor) had contacted him outside of the MP process and that he was going to post those comments. But none of that has happened. Kenji assured me that public comments would be made available two months ago. If they are available, please direct me to where they are. If they are not, please post them or let me know where I can go to view them. It is really important to meaningful participation that all comments are available somewhere. This is time sensitive. Thank you. Wendie Kellington

PUBLIC RECORDS

Below are the public records, including public comment received, throughout the project.

Public Comments Received

Below are the comments that the project team received throughout the project.

Aron Faegre (09/03/24) - Email

Ted Millar c/o Wendie Kellington (09/03/24) - Email 1 of 9, Email 2 of 9, Email 3 of 9, Email 4 of 9, 9, Email 9 of 9, Exhibit A, Exhibit B, Exhibit C, Exhibit D, Exhibit E, Exhibit F, Exhibit G, Exhibit H, Ex

Outlook

Fw: 12.23 FINAL AAIA TLM LTR Preferred alternative

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 12/26/2024 11:49 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; W. Matt Rogers <WRogers@CenturyWest.com>

2 attachments (1 MB)
12.23 FINAL AAIA TLM LTR Prefered alternative.pdf; EXHIBIT 1 MP- Masterplan Alternative 2024-12-23 final.pdf;

Thanks,

BRANDY STEFFEN | JLA PUBLIC INVOLVEMENT
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in » Email is the best way to reach me; I try to respond within 3 full workdays.

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

From: Wendie Kellington <wk@klgpc.com>
Sent: Monday, December 23, 2024 3:43:40 PM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>; Tony Beach (anthony.beach@aviation.state.or.us) <anthony.beach@aviation.state.or.us>
Cc: Ted Millar <tmillar@wwpmi.com>; Tony Helbling - Wilson Construction Company (helbling@wilsonconst.com) <helbling@wilsonconst.com>; Rachel Bacon <rb@klgpc.com>; Aron Faegre (faegre@earthlink.net) <faegre@earthlink.net>; Senator Betsy Johnson - District 16 (betsy@betsyjohnson.com) <betsy@betsyjohnson.com>; Rachel Bacon <rb@klgpc.com>
Subject: 12.23 FINAL AAIA TLM LTR Preferred alternative

Good afternoon,

Attached please find for the record of the Aurora Airport Master Plan proceedings, the comment letter of AAIA and TLM Holdings, LLC, regarding ODAV's "Preferred Alternative." Please confirm receipt. Regards, Wendie Kellington

Wendie L. Kellington | Attorney at Law.
MAILING ADDRESS:
P.O. Box 2209
Lake Oswego, OR 97035
PHYSICAL ADDRESS
4500 Kruse Way, #340
Lake Oswego Or 97035
(503) 636-0069 office
(503) 636-0102 fax
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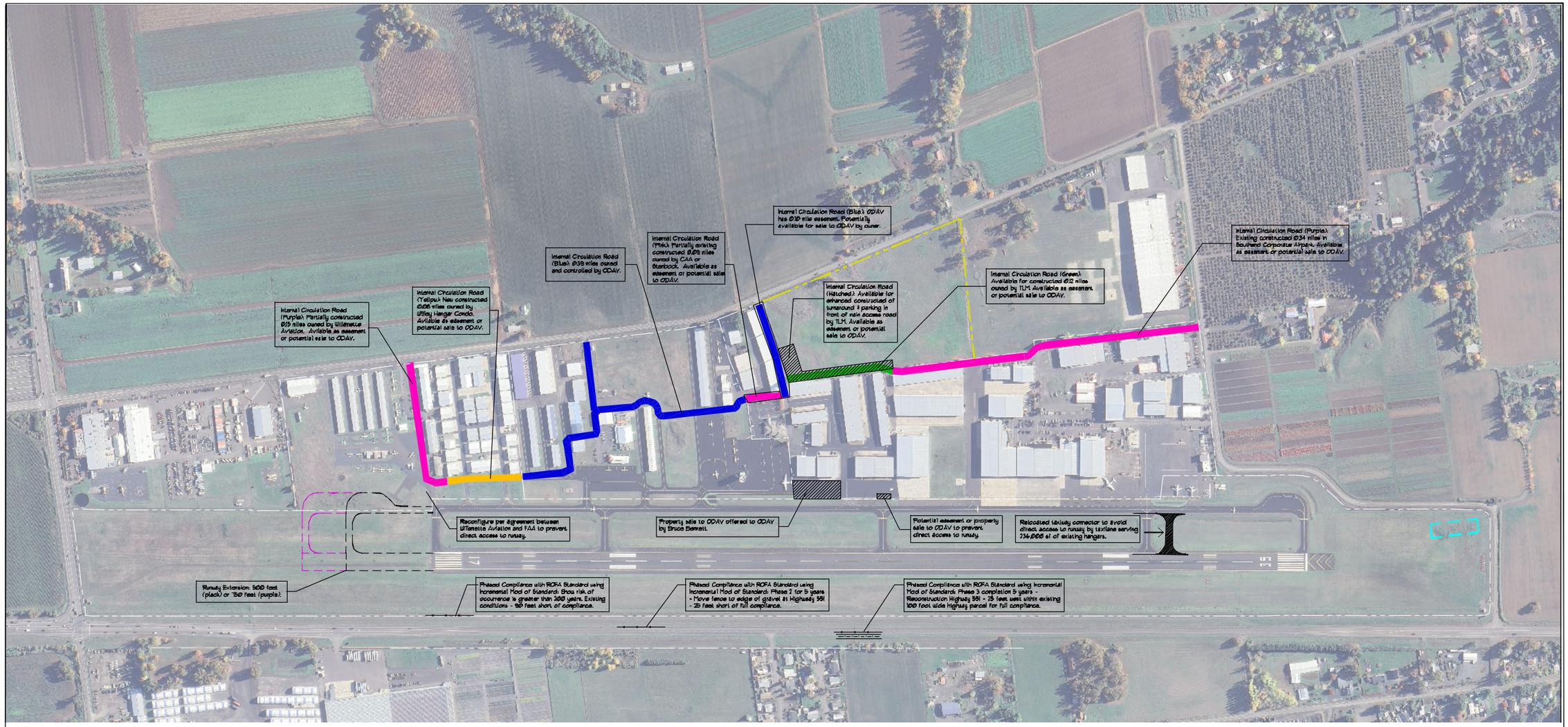
Chambers RANKED IN USA 2024
Wendie Kellington

EXHIBIT 1



SITE PLAN

0 200 400 600

N

KEY

- AIRPORT BOUNDARY
- AIRPORT BOUNDARY ADDITION
- 500 FT RUNWAY EXTENSION
- 750 FT RUNWAY EXTENSION
- DRAINFIELD TO REMAIN WITH GEOTECH CERTIFICATION IN ACCORDANCE WITH WITH FAA SOIL STANDARDS

VERIFY SCALES

BAR IS ONE INCH ON ORIGINAL DRAWING. IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY.

NO.	DATE	BY	APPR.	REVISIONS

AURORA AIRPORT IMPROVEMENT ASSOC.
PROPOSED ALTERNATIVE

DESIGNED BY:	DRAWN BY:	CHECKED BY:	SCALE:
AF	AF/JH	AF	300' = 1"

DATE: DECEMBER 23, 2024
PROJECT: MP - MASTERPLAN ALT AAIA

AURORA STATE AIRPORT (UAO)

AURORA STATE AIRPORT – MASTER PLAN ALTERNATIVE AAIA

DRAWING
MP-AAIA

KELLINGTON LAW GROUP, PC

Wendie L. Kellington
P.O. Box 2209
Lake Oswego Or
97035

Phone (503) 636-0069
Mobile (503) 804-0535
Email: wk@klgpc.com

December 23, 2024

Alex Thomas
Planning and Programs Manager
Tony Beach
State Airports Manager
Oregon Department of Aviation
Brandy Steffen
JLA

Re: December 23, 2024 Comment Letter on Behalf of Aurora Airport Improvement Association and TLM Holdings, LLC, Regarding the Aurora State Airport Master Plan – ODAV Proposed Preferred Alternative

Mr. Thomas, Mr. Beach and Ms Steffen,

This letter is written on behalf of the Aurora Airport Improvement Association (AAIA), whose members include Aurora Airport aviation private business stakeholders, and one of AAIA's members TLM Holdings, LLC, who is also a PAC Member, together referred to herein as "Aeronautical Stakeholders". Please include this letter in the record for the Oregon Department of Aviation's (ODAV) proposed "Preferred Alternative" for the Aurora State Airport Master Plan. We applaud Director Sugahara's statement that ODAV understands that the "Preferred Alternative" for the Aurora Airport Master Plan is widely opposed and his commitment that ODAV is willing to modify it. It is mission critical that ODAV modify the "Preferred Alternative" if the Aurora Airport is to continue to deliver significant tax benefits, family wage jobs, emergency resiliency and aeronautical innovation to the region and state. The current version of ODAV's proposed Preferred Alternative is inconsistent with these objectives.

EXECUTIVE SUMMARY OF REQUESTS

The Preferred Alternative should be modified to reflect the Aeronautical Stakeholders' Alternative that was previously submitted and that is attached (Exhibit 1) in an updated, annotated form. The attached Aeronautical Stakeholders Alternative is consistent with ODAV's stated wishes to extend the runway by 500 feet to the north and move the airport toward FAA design standard compliance. A significant difference between ODAV's current Preferred Alternative and the Stakeholders' Alternative, however, is that the Stakeholders' Alternative does not

carry ODAV's $150 million (plus) price tag to condemn the Aurora Airport front line aircraft hangars for which the owners have invested more than $200 million and thereby created millions in tax revenue, created more than a 1000 good jobs and millions of dollars in direct and indirect tourist revenue for surrounding communities. ODAV's final Preferred Alternative must:

1. Remove the taking of the frontline hangars and remove the "Aeronautical Reserve" designation across the rest of the privately owned property at the airport.
2. Remove the proposed new taxi lane that isn't required by the FAA and makes no aircraft safety, efficiency or policy sense.
3. Remove the new commercial service road adjacent to the proposed new taxiway that also isn't required by the FAA. Replace it with the internal service road that was approved in the 2012 Master Plan and that as shown on the Stakeholders' Alterative is partially built and would cost ODAV nothing but the cost of some pavement.
4. Leave the drainfields in place because when improved, they are allowed in the RSA and are essential to the continued functioning of the airport. ODAV should simply require HDSE to bring the South Drainfield to meet FAA Design Standards.
5. Be developed in a collaborative in-person meeting that allows real discussion among stakeholders to occur to work out details so that the "Preferred Alternative" that emerges enables the airport to be successful and safe over the next 20 years and avoids needless, years-long litigation continuing the airport's languishment from neglect.

EXPLANATION

ODAV is Bound by ORS 836.640-642

ODAV must understand that it is bound by ORS 836.640-642, which is a statute developed by Business Oregon and adopted by the legislature to strongly encourage private investment at the Aurora Airport and that commanded ODAV to carry out that objective. ODAV's "Preferred Alternative" is in direct contravention of those statutes. The Aeronautical Stakeholder's Alternative (Exhibit 1) is consistent with that statute and reflects good aviation policy and safety.

Contrary to that statute, ODAV's proposed alternative contemplates ODAV taking by eminent domain the frontline hangars at the airport and authorizes for public acquisition all other private property at the Aurora Airport. ODAV's plan to wipe out the front line aircraft hangars has an unnecessary and staggering $150 million plus public price tag. It unwisely seeks to bulldoze these important business aircraft hangars for which the owners have invested more than $200 million,

created millions in tax revenue, more than a 1000 good jobs and millions in directly and indirectly related tourist revenue for surrounding communities, with ORS 836.640-642 as the catalyst. It anomalously designates areas that have been set aside in airport master plans for private airport related development since 1976, as areas for ODAV acquisition instead of planning for them to be developed with private airport related uses by bringing them into the airport boundary as contemplated by ORS 836.640-642.

Both elements of the preferred alternative are misguided. Among other objectives for the Aurora Airport, ORS 836.642 requires ODAV to "Preserve investments [at the Aurora Airport] and the level of service provided by [the Aurora Airport]" and to "promote economic development" at Aurora "by creating family wage jobs, increasing local tax bases" through support of private aviation-related uses so that they may "develop and thrive." The preferred alternative is contrary to ORS 836.640-642 and expressly seeks to trade the private investment that the statute seeks to encourage and grow, for government condemnation and government ownership.

ODAV's Preferred Alternative Gambles with the Aurora Airport's Success, Risking Sending it Backwards and Making it Less Safe

ODAV's preferred alternative gambles with the economic benefits that private investment at the airport has delivered, risking their continuation. The threat of ODAV condemnation, not to mention ODAV actually engaging in such litigation against those owners, presents an unacceptable risk of driving away not only those aircraft hangar owners, but also their businesses, jobs and related tax and tourist revenue. Once they are gone, the stigma of such ODAV action makes the airport and indeed any airport that ODAV manages, a private investment pariah – potentially for decades. Such a risk should not be taken where, as here, a state statute commands ODAV otherwise and there are alternatives. The Stakeholders Alternative demonstrates that viable alternatives are available that carry a fraction of the cost of ODAV's preferred alternative and come with none of the risks.

It is respectfully submitted that the justification for ODAV's "preferred alternative" does not warrant its deleterious effects.

ODAV's Desire for a Vehicle Service Road (VSR) and New Taxiway Cannot Justify ODAV's Preferred Alternative. ODAV has Failed to Consider Better and Less Costly Alternatives for a VSR and new Taxiway

ODAV's desire for a "vehicle service road" (VSR) and a new aircraft taxiway are driving ODAV's desire to condemn the frontline hangars. But neither objective necessitates ODAV's Preferred Alternative, and neither are required by FAA. In

fact, if FAA were doing its job, it would be advising ODAV against both on their astonishing cost alone.

Regarding the VSR, the airport's 2012 master plan approved a VSR that has none of ODAV's Preferred Alternative's deleterious effects and does not carry a $150 million condemnation price tag. At worst, the 2012 VSR costs the state some pavement. The private aeronautical stakeholder owners have offered ODAV the land needed for the 2012 MP VSR free of charge. We are unaware of any reason for ODAV to not pursue that 2012 MP VSR and there are only good reasons to do so. **Let that sink in: ODAV's current "Preferred Alternative" seeks to trade $150 million of the public's money, risk more than 1,000 jobs, millions in tax and tourist revenue just to save some $20,000 on pavement.** The idea is untenable, not to mention unacceptably wasteful and wholly unnecessary.

Similarly, if a new taxiway is required (and ODAV has not shown that it is), ODAV has utterly failed to explore reasonable options for such a new taxiway. ODAV says that it cannot put a new taxiway anywhere but where the ODAV "Preferred Alternative" puts it because ODAV does not own land elsewhere for a taxiway. This is insincere and disingenuous. ODAV **does not own the land where it wants the "Preferred Alternative" taxiway either** – that is why it is showing ODAV condemning the front line hangars. Moreover, many other features of ODAV's proposed alternative are on land ODAV does not own. ODAV simply has made no effort to come up with a less devastating and less expensive alternative. Even if ODAV had to acquire some private land for a new taxiway, ODAV can and must explore alternatives having far less adverse impact on the continuation and growth of private aeronautical investment at the airport, not to mention a price tag well south of the $150 million plus for ODAV's Preferred Alternative.

ODAV Does not "Want" to Expand the Airport Boundary

ODAV asserts that it simply does not "want" to extend the airport boundary to include the land that is now and has long been foreseen for private airport-related development. Instead, ODAV wants to designate that land for ODAV acquisition claiming that only this will "ensure" that land is put to aeronautical use. This claim cannot be insincere and is disingenuous. ODAV acquisition does nothing to put land at the airport to aeronautical use. Further, the private sector has put all of the land that it could into airport related uses and has been trying to put the rest to aeronautical use with no help from ODAV. Per ORS 836.640-642, the way ODAV ensures that land is developed with aeronautical use, is to expand the airport boundary to include such land. ODAV ownership does nothing to further that goal. Instead, as commanded in ORS 836.640-642, ODAV must expand the airport boundary to include the remaining undeveloped land at the airport that has been designated i*n every master plan since 1976 as suitable for airport development*. Not "wanting" to do so is no justification and is contrary to ORS 836.640-642.

ODAV Has Failed to Meaningfully Engage Airport Stakeholders in the Development of Airport Alternatives

Contrary to the federal requirements cited in prior submittals, ODAV has failed to meaningfully engage airport stakeholders in ODAV's process for developing the "Preferred Alternative."

ODAV has improperly insisted upon remote meetings only, where it mutes speakers when ODAV is done hearing from them, but allows ODAV and its consultants to speak without limits, including to break into discussions by stakeholders, undermine stakeholder points, and failing to allow any discussion or iterative response.

ODAV has to date completely failed to consider the Airport Stakeholders' Alternative and has given no rational reason for failing to adjust the airport boundary to support airport related development. ODAV has insisted upon PAC members being locked in stone, despite PAC members designating legal counsel and others to participate as their representative. ODAV has even insisted upon deceased persons holding precious aviation-stakeholder PAC member seats.

The lack of any sincere ODAV effort at engagement is well-illustrated by the fact that 13 minutes before the close of business on Friday December 19, the last business day before the close of the final ODAV "Preferred Alternative" comment period, ODAV's consultant for the first time responded to an important issue raised at the December 10, 2024 "PAC" meeting, proving a link and inviting PAC members to review the materials at the link. That link led to completely unhelpful further links leading to materials dozens of pages in length. Clearly, ODAV had no interest in the Aviation Stakeholders' concerns and even less interest in a meaningful response from the stakeholders on the issue.

The underlying issue was and is an important one. It involves ODAV's "Preferred Alternative" eliminating with no reasonable alternative, the HDSE septic drain field that is critical to the continued viability of the private development (and jobs) at the airport. The airport stakeholders have provided undisputed evidence that the HDSE drainfield can be strengthened to meet FAA standards to remain in the RSA. ODAV responded on December 10, 2024 with vague, unsupported claims that the drainfield must be removed. The links provided by ODAV's consultant at 4:47 pm on December 20, 2024 do not demonstrate what, if any, problem it is that ODAV has with the stakeholders' supporting information for the drainfield to be improved and remain in place. If there is an issue, ODAV should engage with the Stakeholders to discuss it. Clearly, a drainfield is essential to support the airport's good jobs and the businesses that go with them. Ostensibly ODAV would have an interest in preserving those economic attributes and discussing, in a meaningful way, how the drain field can be improved to remain in

place consistent with FAA standards. Assuming ODAV has such an interest – and ORS 836.640-642 compels ODAV to have such an interest, ODAV should meet with the stakeholders to work the issue out. It will not be particularly hard or time consuming to do so.

FAA Admits that the Runway Can be Extended, that an MOS Can be Approved and that the Master Plan need only Show Incremental Movement toward FAA Design Standard Compliance

On December 10, 2024 FAA admitted that (1) it can approve a MOS, (2) that the runway can be extended on a MOS, and (3) that the master plan need only show progress toward meeting FAA design standards. Airport Planner Aron Faegre has submitted comments this date explaining that the MOS for the runway extension can not only be approved but it in fact must be shown on the ALP- as it was shown on the approved 2012 ALP. We join those comments. There is no reason for the Preferred Alternative to continue to hold the runway extension hostage to Hwy 551 moving 30 feet (or however far ODAV wants it to move) west. Moving Hwy 551 can occur later when and if funding for the same is provided. That is what the law says. That is what the master plan should contemplate. Importantly, that is the only truly safe way forward.

Need for a Meaningful Meeting to Discuss a Tenable Preferred Alternative for the Aurora Airport

Given the success of the airport and the commands of ORS 836.640-642, ODAV's approach to the development of the "Preferred Alternative" to date is nothing short of puzzling. The master plan has a 20-year planning horizon and should ensure Aurora Airport's continued growth and success over that horizon. ODAV should meet, in person, with the Aeronautical Stakeholders and explore a more normative and economically reasonable preferred alternative that is consistent with ORS 836.640-642. Exhibit 1, the Stakeholder's Alternative, is a good starting point for that discussion.

Thank you for your consideration.

Very truly yours,

Wendie L. Kellington

WLK:wlk
CC: Clients

Outlook

Fw: Regarding the Aurora Airport Master Plan that is Currently Underway

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 11/19/2024 4:16 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, November 12, 2024 6:09 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Regarding the Aurora Airport Master Plan that is Currently Underway

Good morning, please include in the record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, November 12, 2024 6:08 AM
To: janmoon777@gmail.com; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: RE: Regarding the Aurora Airport Master Plan that is Currently Underway

Hi Jan, thank you for your comments, I have forwarded them to the master plan team and they'll be included in the record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: janmoon777@gmail.com <janmoon777@gmail.com>
Sent: Sunday, November 10, 2024 10:26 AM

To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Regarding the Aurora Airport Master Plan that is Currently Underway

Some people who received this message don't often get email from janmoon777@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Please register and make part of the master plan record, my **very strong objection** to the "taking" of any privately owned hangars on the Aurora Airport.

There is a significant shortage of hangars. We don't need less hangars – we need more! The hangars sited for destruction are all currently providing significant employment.

The two motivations for the proposed destruction are:

- A vehicle lane would work MUCH better as far as possible away from the taxiway
- The parallel taxi-lane is unnecessary, and very similar results could be achieved with ODAV purchasing only 1 acre from a willing seller.

I recommend airport safety improvements, but only with **NO DESTRUCTION** of any hangars.

Thank you,
Jan Moon
janmoon777@gmail.com

Outlook

Aurora State Airport Master Plan

From Janet Moss <cascadejanet@gmail.com>
Date Sat 2024-06-15 4:22 PM
To MCCOLAUGH Annie * GOV <Annie.MCCOLAUGH@oregon.gov>; BROOKS Kelly S * GOV <Kelly.S.BROOKS@oregon.gov>

Some people who received this message don't often get email from cascadejanet@gmail.com. Learn why this is important

Please record that we strongly oppose this expansion. There are multiple alternative airports in the greater Portland/Salem area to use for larger, heavier aircraft.

Thank you,
Janet Moss & family
Wilsonville residents

Sent from my iPhone

Outlook

Fw: Aurora Airport Master Plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-01-06 8:57 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, December 23, 2024 8:39 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Aurora Airport Master Plan

Hello,

Good morning. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:

COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Andy Nager <anager1@msn.com>
Date: Saturday, December 21, 2024 at 06:40
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Aurora Airport Master Plan

You don't often get email from anager1@msn.com. Learn why this is important

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Dear ODAV c/o Alex Thomas,
As a pilot that flies off KUAO, please register and record my urgent input for the Aurora Airport Master Plan that is underway not to consider the condemnation and destruction of any aircraft hangars.
Thank you

Andy Nager

Outlook

Re: Aurora State Airport Master Plan Website Comments - Kirsten Newbury

From Kirsten Newbury <noreply@jotform.com>
Date Tue 6/11/2024 6:25 PM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	Kirsten Newbury
Organization	Eagle Simulator
Comments or questions?	Just want to stay informed.
	I would like to receive email updates.
If you would like a response, please tell us the best way to contact you:	Email
Email	krnewbury@comcast.net
Phone Number	[redacted]

You can edit this submission and view all your submissions easily.

Outlook

Re: Aurora State Airport Master Plan Website Comments - Kirsten Newbury

From Kirsten Newbury <noreply@jotform.com>
Date Tue 2024-09-03 11:13 AM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	Kirsten Newbury
Organization	Eagle Simulator LLC in Meridian A2
Comments or questions?	1. Why is Lower Boones Ferry Road not included in alternatives? 2. I'm very concerned for small business owners like us. An extended unavailability of the airport will have dire consequences to our business. We can't all go to neighboring airports. 3. We're obviously pro airport. We'd like to see additional or expanded alternatives, more out-of-box brainstorming. I would like to receive email updates.
If you would like a response, please tell us the best way to contact you:	Email
Email	krnewbury@comcast.net
Phone Number	(503) 688-8012

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Re: Aurora State Airport Master Plan Website Comments - Kirsten Newbury

From Kirsten Newbury <noreply@jotform.com>
Date Fri 12/13/2024 6:24 PM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	Kirsten Newbury
Organization	Eagle Simulator, LLC
Comments or questions?	I logged into the Master Plan presentation last Tuesday evening. I was dismayed by the obvious lack of collaboration between the Planners and the airport tenants. The meeting grew somewhat contentious, primarily due to airport tenants not believing their objections or ideas were listened to. And, it seemed to me the tenants didn't believe ODAV had served as an advocate for them. Several airport advocates provided examples of airports in the PNW that do not conform to FAA requirements but do have authorized variances. Several tenants cited areas where they disagree with the preferred plan but offered alternative ideas instead. Tenants again cited the historical public-private cooperative partnership enjoyed by the airport that sadly does not appear to be recognized in the Plan. And what happened to apparently reasonable ideas like moving the airport fencing west rather than the much more expensive option of building more road surface, much less invoking eminent domain and actually moving the road west. On a good note, I see this as a leadership opportunity for Kenji Sugahara to step in and

	bring the two sides together with a goal of tweaking the current plan through in-person discussion, brain storming, and consensus building to achieve a workable Master Plan. Hurray for the Mayor of Canby who submitted a statement attesting to the economic value of the airport to his community. Hurray for the on airport business owners willing to partner with ODAV for workable solutions. Hurray for the government-business partnerships that already exist, like with providing the Civil Air Patrol with permanent headquarters. Or for providing hangar and hub operations for ODART. Please, I urge ODAV not to turn away from the voiced dissatisfaction we heard Tuesday night but to embrace it as an impetus to move forward, together. The Aurora Airport is too important a resource to allow these dissents to fester. I would like to receive email updates.
If you would like a response, please tell us the best way to contact you:	Email
Email	krnewbury@comcast.net
Phone Number	(503) 688-8012

You can edit this submission and view all your submissions easily.

Outlook

Fw: Pacific Skies Aviation Letter Regarding the Proposed Aurora State Master Plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-01-06 8:54 AM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

1 attachment (217 KB)
PSA Testimony to KUAO.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, December 23, 2024 1:56 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Pacific Skies Aviation Letter Regarding the Proposed Aurora State Master Plan

Hello,

Good afternoon. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:
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Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Luke Nickerson <luke@flyaerometal.com>
Date: Monday, December 23, 2024 at 13:45
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: wk@klgpc.com <wk@klgpc.com>, Brandy.Steffan@jla.us.com <Brandy.Steffan@jla.us.com>, BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Pacific Skies Aviation Letter Regarding the Proposed Aurora State Master Plan

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Good Afternoon Mr. Thomas,

Please see the attached letter.

Kind regards,
Lukas Nickerson

Pacific Skies Aviation Llc

December 23, 2024
Alex Thomas
Planning and Programs Manager
Oregon Department of Aviation
3040 25th Ste SE
Salem, OR 97602
Alex.R.Thomas@odav.oregon.gov

Re: Aurora State Airport Master Plan Proposed Preferred Alternative

Mr. Thomas,

Please enter this letter into the record for the Oregon Department of Aviation's (ODAV) proposed "Preferred Alternative" for the Aurora State Airport Master Plan. We support Director Sugahara's statement that ODAV is willing to modify its Preferred Alternative for the Aurora Airport Master Plan. We believe that it is important that ODAV do so, to enable the airport to continue to deliver significant tax benefits, family wage jobs, emergency resiliency and aeronautical innovation to the region and state. The current version of ODAV's proposed Preferred Alternative is inconsistent with these objectives.

ODAV is bound by ORS 836.640-642 which was developed by Business Oregon. That statute strongly encourages private investment at the Aurora Airport and commands ODAV to carry out that objective. Contrary to that statute, ODAV's proposed alternative contemplates ODAV taking by eminent domain the Aurora Airport front line aircraft hangars for which the owners have invested more than $200 million, created millions in tax revenue, more than a 1000 good jobs and millions in directly and indirectly related tourist revenue for surrounding communities, with ORS 836.640-642 as the catalyst.

Against this backdrop, the "Preferred Alternative" anomalously designates areas that have been set aside in airport master plans for airport related development since 1976, as areas for ODAV acquisition instead of bringing them into the airport boundary established by ORS 836.640-642 for development for airport related uses and wipes out the front line hangars.

Both elements of the preferred alternative are misguided. Among other objectives for the Aurora Airport, ORS 836.642 requires ODAV to "Preserve investments [at the Aurora Airport] and the level of service provided by [the Aurora Airport]" and to "promote economic development" at Aurora "by creating family wage jobs, increasing local tax bases" through support of private aviation-related uses so that they may "develop and thrive." The preferred alternative is contrary to ORS 836.640-642 and expressly seeks to trade the private investment that the statute seeks to encourage and grow, for government condemnation and ownership.

Concerningly, ODAV's preferred alternative significantly gambles with the significant economic benefits that private investment at the airport has delivered, risking their continuation. The threat of ODAV condemnation, not to mention ODAV actually engaging in such litigation against those owners, presents an unacceptable risk of driving away not only those aircraft hangar owners, but also their businesses, jobs and related tax and tourist revenue. Once they are gone, the stigma of such ODAV action could make the airport and indeed any airport that ODAV manages, a private investment pariah for decades. Such a risk should not be taken where, as here, a state statute commands ODAV otherwise and there are alternatives.

It is respectfully submitted that the justification for the "preferred alternative" simply does not justify its deleterious effects. ODAV is on record stating that these harmful consequences only flow from ODAV's

22253 Yellow Gate Lane Northeast | Aurora, Oregon, U.S.A.

desire for a "vehicle service road" (VSR) and a new aircraft taxiway. But neither necessitates the preferred alternative.

Regarding the VSR, the 2012 master plan approved a VSR that has none of the Preferred Alternative's deleterious effects and does not carry a $200 million condemnation price tag. At worst, the 2012 VSR costs the state some pavement. Moreover, we are advised that the private aeronautical stakeholder owners have offered ODAV the land needed for the 2012 MP VSR free of charge. We are unaware of any reason for ODAV to not pursue that 2012 MP VSR and we can only see good reasons to do so.

We are further advised that there are alternatives for a new taxiway that ODAV has not explored. We understand that ODAV has not explored any such alternatives because it does not own the land needed for a taxiway to be located elsewhere. However, so far as we know this has never been an impediment previously to the development of the Aurora Airport and should not be an impediment now. Many features of the proposed alternative are now contemplated on land that ODAV does not own – including the taking of the frontline hangars. Even if ODAV had to acquire some private land for a new taxiway, ODAV should explore such alternatives having the least adverse impact on the continuation and growth of private aeronautical investment at the airport, not to mention a price tag well south of the $200 million under the Preferred Alternative. Finally, we are advised that ODAV simply does not "want" to extend the airport boundary to include the land that is now and has long been foreseen for airport-related development in the airport boundary. Such a justification if true, would obviously be contrary to ODAV's mission and responsibility to enable the Aurora Airport to grow with aviation-related uses.

We are frankly perplexed by these problems given the success of the airport and the commands of ORS 836.640-642. ODAV should be eager to develop a master plan that ensures the Aurora Airport's continued growth and success over the master plan's 20-year horizon. If these problems that risk sending the airport backwards by decades arise from a lack of meaningful airport stakeholder engagement in the development of the preferred alternative, then ODAV should meaningfully engage. But whatever the reason, we strongly encourage ODAV to dismiss the Preferred Alternative and to meet with the airport stakeholders and to explore a more normative and economically reasonable preferred alternative that is consistent with ORS 836.640-642.

Thank you for your consideration.

Sincerely,

Lukas Nickerson
Chief Operating Officer
Pacific Skies Aviation LLC

22253 Yellow Gate Lane Northeast | Aurora, Oregon, U.S.A.

Outlook

Re: Aurora State Airport Master Plan Website Comments -

From noreply@jotform.com <noreply@jotform.com>
Date Sun 6/23/2024 3:16 PM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

Aurora State Airport Master Plan Website Comments

Comments or questions?	As a local resident, I am highly concern on this project. My daily work and personal life depend on traveling through the Arndt Rd into Canby and to access the Freeway through Portlan-Hubbard Hwy, just like many others that live in my community at Century Meadows. This project would impact greatly our commute, specially when taking kids into school. Making the airport accessible to larger aircraft would raise hazard concerns driving near by any of those aircraft. Which also includes the higher levels of pollution. Specially for the existing area, since there are many water bodies in the area, the increase of jet fuel could affect the environment as well as the health of people and animals that live in the surrounding areas. Increased of noise of large aircraft can also impact people's health affecting sleep patterns and kids' ability to study.

You can edit this submission and view all your submissions easily.

Outlook

FW: Aurora Aviation Master Plan - Hangar Removal Objection

From Samantha Peterson <SPeterson@CenturyWest.com>
Date Mon 12/2/2024 8:54 AM
To Mark Steele <MSteele@CenturyWest.com>; David Miller <dmiller@CenturyWest.com>; W. Matt Rogers <WRogers@CenturyWest.com>
Cc Jen Winslow <Jen.winslow@jla.us.com>

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Monday, December 2, 2024 4:13 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora Aviation Master Plan - Hangar Removal Objection

Good morning, please include in the record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Monday, December 2, 2024 4:12 AM
To: James.North@morganstanley.com; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: RE: Aurora Aviation Master Plan - Hangar Removal Objection

Good morning James, thank you for your comments, I have forwarded them to the master plan team and they'll be included in the record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: James.North@morganstanley.com <James.North@morganstanley.com>
Sent: Friday, November 29, 2024 1:16 PM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Aurora Aviation Master Plan - Hangar Removal Objection

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

There is already a severe shortage of hangars at Aurora State airport. With the currently proposed Master Plan many additional hangars will be destroyed. This will devastate the owners as well as the people that are employed at these facilities. This will decimate the current thriving economy of the airport.

Instead of the current plan we urge you to:

1. Move the vehicle lane farther east from the runway or use the current Airport Road NE

2. The parallel taxi lane on the west side of the runway is not needed

As a pilot and hangar owner at Aurora I recommend airport safety improvements but only with no destruction of any hangars. Thank you for your consideration.

James W. North
Financial Advisor
Vice President
Morgan Stanley Wealth Management
760 SW 9th Avenue
Suite 2100
Portland, OR 97205
Direct: [redacted]
Email: james.north@morganstanley.com
Website: www.morganstanley.com/fa/james.north
NMLS# 1380670

Cindy Iseli
Senior Registered Associate
Morgan Stanley Wealth Management
760 SW 9th Ave, Suite 2100 | Portland, OR 97205
Direct: [redacted]
Main: [redacted]
Toll Free: [redacted]
eFax: [redacted]
Email: Cindy.Iseli@morganstanley.com

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_____
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Outlook

Fw: Aurora State Airport Master Plan Proposed Preferred Alternative

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-01-06 8:52 AM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

1 attachment (537 KB)
Wilsonville Chamber Aurora Airport proposed preferred alternative.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, December 23, 2024 3:20 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Aurora State Airport Master Plan Proposed Preferred Alternative

Hello,

Good afternoon. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357
EMAIL Alex.R.Thomas@ODAV.Oregon.Gov
SALEM, OR 97302
WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:

COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Kevin Ferrasci O'Malley <kevin@wilsonvillechamber.com>
Date: Monday, December 23, 2024 at 14:17
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Aurora State Airport Master Plan Proposed Preferred Alternative

You don't often get email from kevin@wilsonvillechamber.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear Mr. Thomas

Please enter the attached letter into the record for the Oregon Department of Aviation's (ODAV) proposed "Preferred Alternative" for
the Aurora State Airport Master Plan.

Sincerely,
Kevin

Kevin Ferrasci O'Malley
CEO
Wilsonville Area Chamber of Commerce

http://wilsonvillechamber.com
https://www.oregonbrc.org/
http://www.facebook.com/wilsonvillechamber
https://www.facebook.com/oregonbrc
https://linkedin.com/in/kevinferrasciomalley

If you would like to schedule a phone meeting with me the fastest way is to please go to:
http://www.15withkevin.com
(You're of course always welcome to make a request via email

it will just take a bit more time with back and forth emails for us to match up our calendars. At the 15withKevin.com website you will have immediate access to my calendar availability)

W: 503-682-0411 X: 2
8565 SW Salish Lane, Suite 150 (*)
Wilsonville, Oregon 97070

(*) Our offices are located in the Oregon Restaurant and Lodging Assoc. building. It's best to park in the west side parking lot and to enter thru the side door.

Don't forget to subscribe to the Chamber e-Newsletter at this link: www.bit.ly/WACCnewsletter

WILSONVILLE
AREA CHAMBER OF COMMERCE

December 23, 2024

Alex Thomas
Planning and Programs Manager
Oregon Department of Aviation
3040 25th Ste SE
Salem, OR 97602
Emailed to: Alex.R.Thomas@odav.oregon.gov

Re: Aurora State Airport Master Plan Proposed Preferred Alternative

Mr. Thomas,

Please enter this letter into the record for the Oregon Department of Aviation's (ODAV) proposed "Preferred Alternative" for the Aurora State Airport Master Plan. We support Director Sugahara's statement that ODAV is willing to modify its Preferred Alternative for the Aurora Airport Master Plan. We believe that it is important that ODAV do so, to enable the airport to continue to deliver significant tax benefits, family wage jobs, emergency resiliency and aeronautical innovation to the region and state. The current version of ODAV's proposed Preferred Alternative is inconsistent with these objectives.

ODAV is bound by ORS 836.640-642 which was developed by Business Oregon. That statute strongly encourages private investment at the Aurora Airport and commands ODAV to carry out that objective. Contrary to that statute, ODAV's proposed alternative contemplates ODAV taking by eminent domain the Aurora Airport front line aircraft hangars for which the owners have invested more than $200 million, created millions in tax revenue, more than a 1000 good jobs and millions in directly and indirectly related tourist revenue for surrounding communities, with ORS 836.640-642 as the catalyst.

Against this backdrop, the "Preferred Alternative" anomalously designates areas that have been set aside in airport master plans for airport related development since 1976, as areas for ODAV acquisition instead of bringing them into the airport boundary established by ORS 836.640-642 for development for airport related uses and wipes out the front line hangars.

Both elements of the preferred alternative are misguided. Among other objectives for the Aurora Airport, ORS 836.642 requires ODAV to "Preserve investments [at the Aurora Airport] and the

level of service provided by [the Aurora Airport]" and to "promote economic development" at

Aurora "by creating family wage jobs, increasing local tax bases" through support of private aviation-related uses so that they may "develop and thrive." The preferred alternative is contrary to ORS 836.640-642 and expressly seeks to trade the private investment that the statute seeks to encourage and grow, for government condemnation and ownership.

Concerningly, ODAV's preferred alternative significantly gambles with the significant economic benefits that private investment at the airport has delivered, risking their continuation. The threat of ODAV condemnation, not to mention ODAV actually engaging in such litigation against those owners, presents an unacceptable risk of driving away not only those aircraft hangar owners, but also their businesses, jobs and related tax and tourist revenue. Once they are gone, the stigma of such ODAV action could make the airport and indeed any airport that ODAV manages, a private investment pariah for decades. Such a risk should not be taken where, as here, a state statute commands ODAV otherwise and there are alternatives.

It is respectfully submitted that the justification for the "preferred alternative" simply does not justify its deleterious effects. ODAV is on record stating that these harmful consequences only flow from ODAV's desire for a "vehicle service road" (VSR) and a new aircraft taxiway. But neither necessitates the preferred alternative.

Regarding the VSR, the 2012 master plan approved a VSR that has none of the Preferred Alternative's deleterious effects and does not carry a $200 million condemnation price tag. At worst, the 2012 VSR costs the state some pavement. Moreover, we are advised that the private aeronautical stakeholder owners have offered ODAV the land needed for the 2012 MP VSR free of charge. We are unaware of any reason for ODAV to not pursue that 2012 MP VSR and we can only see good reasons to do so.

We are further advised that there are alternatives for a new taxiway that ODAV has not explored. We understand that ODAV has not explored any such alternatives because it does not own the land needed for a taxiway to be located elsewhere. However, so far as we know this has never been an impediment previously to the development of the Aurora Airport and should not be an impediment now. Many features of the proposed alternative are now contemplated on land that ODAV does not own – including the taking of the frontline hangars. Even if ODAV had to acquire some private land for a new taxiway, ODAV should explore such alternatives having the least adverse impact on the continuation and growth of private aeronautical investment at the airport, not to mention a price tag well south of the $200 million under the Preferred Alternative. Finally, we are advised that ODAV simply does not "want" to extend the airport boundary to include the land that is now and has long been foreseen for airport-related development in the airport boundary. Such a justification if true, would obviously be contrary to ODAV's mission and responsibility to enable the Aurora Airport to grow with aviation-related uses.

We are frankly perplexed by these problems given the success of the airport and the commands of ORS 836.640-642. ODAV should be eager to develop a master plan that ensures the Aurora Airport's continued growth and success over the master plan's 20-year horizon. If these problems that risk sending the airport backwards by decades arise from a lack of meaningful airport stakeholder engagement in the development of the preferred alternative, then ODAV should meaningfully engage. But whatever the reason, we strongly encourage ODAV to dismiss the Preferred Alternative and to meet with the airport stakeholders and to explore a more normative and economically reasonable preferred alternative that is consistent with ORS 836.640-642.

Sincerely,

Kevin Ferrasci O'Malley, CEO
Wilsonville Chamber of Commerce

Outlook

Fw: comments, Aurora Airport Master Plan - East Side Property Acquisition strategy

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 12/3/2024 2:17 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, November 25, 2024 10:39 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: comments, Aurora Airport Master Plan - East Side Property Acquisition strategy

Hello Brandy & Samantha,

Good morning. Please include in the UAO master plan record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION
POLICY, PLANNING & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

3040 25TH STREET SE, SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

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From: Jeff Oerding <jo-nasa1@att.net>
Sent: Sunday, November 24, 2024 16:26
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: comments, Aurora Airport Master Plan - East Side Property Acquisition strategy

You don't often get email from jo-nasa1@att.net. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Greetings,

I am writing to express my strong objection to the provisions of the East Side Property Acquisition outlined in the new Aurora Airport Master Plan.

This “strategy” is ill-advised, burdensome, over-reaching and totally unnecessary, not to mention a HUGE waste of taxpayers’ money. The condemnation of private property in this plan is unconscionable. Aviation safety is paramount, but this plan goes WAY TOO FAR.

ODA continually states it has a low budget, and now it wants to “dig deep” into taxpayers’ pockets to fund a project for which there is no present need.

I ask you to reconsider ODA’s position on this financially debilitating project.

Sincerely,
Jeff Oerding
Columbia Aviation Association Historian
Aurora Airport stakeholder since 1979

.

Outlook

Aurora FW: agenda

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 1/30/2024 8:56 AM
To Ottenad, Mark <ottenad@ci.wilsonville.or.us>
Cc Jen Winslow <Jen.winslow@jla.us.com>; neamtzu@ci.wilsonville.or.us <neamtzu@ci.wilsonville.or.us>

Hi Mark and Chris,

The meeting for 1/30 has been cancelled and will be rescheduled. As soon as we finalize the agenda we will post it on the website.

Please reach out if you have any other questions.

Thanks,
Brandy

From: Mark Ottenad <ottenad@ci.wilsonville.or.us>
Sent: Thursday, January 25, 2024 10:41 AM
To: JLA Public Involvement <info@jla.us.com>
Cc: Chris Neamtzu <neamtzu@ci.wilsonville.or.us>
Subject: agenda

Can I obtain a copy of the meeting agenda?

Thank you.

- Mark

Mark C. Ottenad
Public/Government Affairs Director
City of Wilsonville / South Metro Area Regional Transit (SMART) / Explore Wilsonville
29799 SW Town Center Loop East
Wilsonville, OR 97070
General: 503-682-1011
Direct: 503-570-1505
ottenad@ci.wilsonville.or.us
www.ci.wilsonville.or.us
www.ridesmart.com
www.ExploreWilsonville.com

Wilsonville City Hall is now open, with physical distancing controls in place. During COVID-19, we wish to remain responsive while prioritizing the health and safety of the Wilsonville community. We are happy to meet by call or teleconference as an alternative to face-to-face meetings.

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Outlook

Fw: Aurora Historical ATCT Ops Forecast; Wed 5/29 Aurora-Wilsonville-ODAV meeting

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2024-11-11 9:18 AM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Friday, November 8, 2024 2:58 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora Historical ATCT Ops Forecast; Wed 5/29 Aurora-Wilsonville-ODAV meeting

FYI, just wanted to make sure this was included in the record.

Thanks,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Mark Ottenad <ottenad@ci.wilsonville.or.us>
Sent: Wednesday, July 3, 2024 10:02 AM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Mayor Julie Fitzgerald <fitzgerald@ci.wilsonville.or.us>; Councilor Joann Linville <linville@ci.wilsonville.or.us>; Chris Neamtzu <neamtzu@ci.wilsonville.or.us>; Mayor Brian Asher (mayor@ci.aurora.or.us) <mayor@ci.aurora.or.us>; brian.asher@gmail.com; Mercedes Rhoden-Feely <Mercedes.Rhoden@thede-culpepper.com>; Joseph Schaefer (jschaefer@ci.aurora.or.us) <jschaefer@ci.aurora.or.us>; Greg Leo (Greg@theleocompany.com) <Greg@theleocompany.com>; Amanda Guile-Hinman <guile@ci.wilsonville.or.us>; Stephanie Davidson <sdavidson@ci.wilsonville.or.us>
Subject: RE: Aurora Historical ATCT Ops Forecast; Wed 5/29 Aurora-Wilsonville-ODAV meeting

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hello Alex and Tony,

I am writing to follow-up again on your promise from our May 29 meeting to provide timely the City with the requested air traffic data prior to the July 30 PAC work session.

I have now filed a formal Public records request via the ODAV website requesting the operations data being used by the Master Plan process.

Please advise on what is going on. Thank you.

- Mark

Mark Ottenad, Public/Government Affairs Director
City of Wilsonville / SMART / Explore Wilsonville
503-570-1505
ottenad@ci.wilsonville.or.us

From: Mark Ottenad
Sent: Wednesday, June 12, 2024 8:27 AM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Mayor Julie Fitzgerald <fitzgerald@ci.wilsonville.or.us>; Councilor Joann Linville <linville@ci.wilsonville.or.us>; Chris Neamtzu <neamtzu@ci.wilsonville.or.us>; Mayor Brian Asher (mayor@ci.aurora.or.us) <mayor@ci.aurora.or.us>; brian.asher@gmail.com; Mercedes Rhoden-Feely <Mercedes.Rhoden@thede-culpepper.com>; Joseph Schaefer (jschaefer@ci.aurora.or.us) <jschaefer@ci.aurora.or.us>; Greg Leo (Greg@theleocompany.com) <Greg@theleocompany.com>; Amanda Guile-Hinman <guile@ci.wilsonville.or.us>; Stephanie Davidson <sdavidson@ci.wilsonville.or.us>
Subject: RE: Aurora Historical ATCT Ops Forecast; Wed 5/29 Aurora-Wilsonville-ODAV meeting

Hello Thomas,

Thanks for your note, and we would be interested in pursuing both options that you suggest:

1. We prefer to have the data prior to the July work session in order to conduct analysis so that we can be better informed for the July PAC work session. Please advise on how we may timely acquire such operations data.

2. We would appreciate the opportunity to continue our group check-in following the July work session. Please provide a few good dates and timeframe that work for ODAV leadership; given the August 'vacation season' we may need to look at a range of potential dates in August and September.

Thank you.

- Mark

Mark Ottenad, Public/Government Affairs Director
City of Wilsonville / SMART / Explore Wilsonville
503-570-1505
ottenad@ci.wilsonville.or.us

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Tuesday, June 11, 2024 4:37 PM
To: Mark Ottenad <ottenad@ci.wilsonville.or.us>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Mayor Julie Fitzgerald <fitzgerald@ci.wilsonville.or.us>; Councilor Joann Linville <linville@ci.wilsonville.or.us>; Chris Neamtzu <neamtzu@ci.wilsonville.or.us>; Mayor Brian Asher (mayor@ci.aurora.or.us) <mayor@ci.aurora.or.us>;

brian.asher@gmail.com; Mercedes Rhoden-Feely <Mercedes.Rhoden@thede-culpepper.com>; Joseph Schaefer (jschaefer@ci.aurora.or.us) <jschaefer@ci.aurora.or.us>; Greg Leo (Greg@theleocompany.com) <Greg@theleocompany.com>; Amanda Guile-Hinman <guile@ci.wilsonville.or.us>; Stephanie Davidson <sdavidson@ci.wilsonville.or.us>
Subject: Re: Aurora Historical ATCT Ops Forecast; Wed 5/29 Aurora-Wilsonville-ODAV meeting

Hello Mark,

Good afternoon and thank you for bringing this forward. For the benefit of interested parties, the topic of forecast data for the Aurora state airport will be discussed in detail and addressed during our July PAC work session. ODAV can share data that is currently available as requested but anticipate ODAV and the FAA will be able to provide clarification on the data used during the July meeting. Please let Tony and/or I know if you would prefer to have the data prior, or if we can continue our group check-in following the July session.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION
PLANNING & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

3040 25TH STREET SE, SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

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From: Mark Ottenad <ottenad@ci.wilsonville.or.us>
Date: Wednesday, June 5, 2024 at 18:48
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>, BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>, Mayor Julie Fitzgerald <fitzgerald@ci.wilsonville.or.us>, Councilor Joann Linville <linville@ci.wilsonville.or.us>, Chris Neamtzu <neamtzu@ci.wilsonville.or.us>, Mayor Brian Asher (mayor@ci.aurora.or.us) <mayor@ci.aurora.or.us>, brian.asher@gmail.com <brian.asher@gmail.com>, Mercedes Rhoden-Feely <Mercedes.Rhoden@thede-culpepper.com>, Joseph Schaefer (jschaefer@ci.aurora.or.us) <jschaefer@ci.aurora.or.us>, Greg Leo (Greg@theleocompany.com) <Greg@theleocompany.com>, Amanda Guile-Hinman <guile@ci.wilsonville.or.us>, Stephanie Davidson <sdavidson@ci.wilsonville.or.us>
Subject: RE: Aurora Historical ATCT Ops Forecast; Wed 5/29 Aurora-Wilsonville-ODAV meeting

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Good day Alex and Tony,

I am writing to follow-up on the operations forecast data item that you note in your email and that was raised during our meeting last week.

The Draft MP states, p 3-24:

> During several rounds of coordinated review of Working Paper No. 1 with FAA, the Consultant revised the aircraft operations forecast models to respond to specific FAA comments. The extended FAA review process resulted in four aircraft operations models for final consideration. Two of the models (National Aerospace Forecast and FAA TAF Federal Contract Tower - Oregon) are maintained unchanged from the original preliminary forecasts; two models (TFMSC and Marion County Population) were significantly revised; and one model (Aurora Historical ATCT Trend) was discarded.

The Draft MP acknowledges on p 3-24 that "Normally at a towered airport such as Aurora State Airport, a trend analysis of historical ATCT local operations would provide a reasonable indication of future growth potential." The Draft MP then provides debatable reasons why the Aurora Historical ATCT Trend was discarded (pp 3-24-25):

> 1. Limited Data Range. The limited number of years of ATCT operations (2016-forward) provides a reliable indication of individual year historical activity but does not provide a sufficient span of time needed to define reliable trends to build future activity projections. This is highlighted within the overall ATCT data, where local operations have experienced several significant upward and downward fluctuations during this period.
>
> 2. COVID-19. The FAA recognizes that the COVID-19 pandemic and the ongoing post-COVID recovery have created significant forecast uncertainty throughout the U.S. civil aviation system that reduces the level of confidence normally associated with airport master plan forecasting. The impacts of COVID-19 on activity at Aurora State Airport are reflected in the ATCT historical operations counts noted above, and they contribute to annual data that fails to define a reliable trend that can be used to project future aircraft flight activity.

The City respectfully disagrees with both of these reasons as valid reasons to reject the Aurora Historical ATCT Trend. As noted in the Draft MP, the "ATCT at Aurora State Airport has been in service daily since October 2015." P 2-10. This means that nearly 9 years of actual operations data is available.

The City seeks to analyze the operations data to better understand how ODAV's preferred Operations Forecast—the "Marion and Clackamas County Combined Population Growth Model is the recommended aircraft operations forecast for the 2021-2041 Aurora State Master Plan." (p 3-26)

The City understands that ODAV has access to FAA Traffic Flow Management System (TFMS) data for the Airport, p 2-11:

> Instrument Aircraft Flight Activity
> FAA Traffic Flow Management System (TFMS) records were obtained through a Freedom of Information Act (FOIA) request. These records provide Instrument Flight Rules (IFR) flight plan arrivals and departures for all airports nationwide and include information on each aircraft, departure and arrival airports, and departure and arrival dates and times, among other data. Nearly 10 years of Aurora State Airport records were available for analysis—January 1, 2012 through August 16, 2021. Consultants have requested the remaining 2021 data through the FOIA process and will incorporate the data when available to complete the 2021 counts.

The City is not aware of this flight data being published for public inspection. The City seeks to advance the public interest by reviewing public data that supports ODAV's Operations Forecast. Additionally, it is now 2024, and several years of additional ACTC flight data are now available; however, ODAV appears to only be examining a shorter time period when the ACTC was operational, from October 2015 to August 2021.

Please advise how the City may obtain the digital flight data for VRF and IFR operations that ODAV is using upon which to base a decision rejecting the Aurora Historical ATCT Trend model. I understand that the technical request may be for a digital file or files providing National Offload Program (NOP) recorded traffic data representing all flights within 10 nautical miles of KUAO (LAT N45.25 degrees, LONG W122.77 degrees) at or below 4,000 feet MSL, occurring between October 1, 2015, and September 30, 2021.

Thank you for your time and consideration.

- Mark

Mark Ottenad, Public/Government Affairs Director
City of Wilsonville / SMART / Explore Wilsonville
503-570-1505
ottenad@ci.wilsonville.or.us

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Tuesday, June 4, 2024 9:52 AM
To: Mark Ottenad <ottenad@ci.wilsonville.or.us>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Subject: Re: Wed 5/29 Aurora-Wilsonville-ODAV meeting

Hello Mark,

Good morning and thank you for reaching out to follow up. We greatly appreciate the opportunity to meet with leaders from Wilsonville and Aurora and all the time and effort you invested to make it happen! As discussed during the meeting, we are looking forward to continuing the conversation and open to scheduling our next discussion. We can schedule around our master plan progress and/or setup a quarterly 'check-in', just let us know what works best for the group.

Tony is on the road this week visiting south/east state airports and our board meeting in Pendleton on Thursday. We will review the operations data e-mail upon receipt. As always, feel free to give me a call at 971-375-2357 as needed.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION
PLANNING & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

3040 25TH STREET SE, SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

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From: Mark Ottenad <ottenad@ci.wilsonville.or.us>
Date: Tuesday, June 4, 2024 at 08:38
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>, SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Subject: RE: Wed 5/29 Aurora-Wilsonville-ODAV meeting

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hello Tony,

Officials of Aurora and Wilsonville greatly appreciate the opportunity to engage in dialogue and discussion over a number of important, substantive issues pertaining to airport master planning, land-use and related matters.

I will follow-up with a second email regarding the matter that we discussed about the City obtaining the raw data of actual Airport operations that ODAV used to determine that actual Airport operations data was of no value in developing the Operations Forecast, and rather embarked on using a novel methodology of general population growth of two counties as being equal to Airport operations growth.

Also, we hope that Director Sugahara gets well sooner!

Thank you.

- Mark

Mark Ottenad, Public/Government Affairs Director
City of Wilsonville / SMART / Explore Wilsonville
503-570-1505
ottenad@ci.wilsonville.or.us

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, May 29, 2024 5:58 PM
To: Mark Ottenad <ottenad@ci.wilsonville.or.us>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Subject: RE: Wed 5/29 Aurora-Wilsonville-ODAV meeting

Hi Mark,

I wanted to follow up on our meeting earlier today and say thank you to everyone from the Cities of Aurora and Wilsonville for the feedback, questions, and discussion.

Please see the attached email which is my latest correspondence regarding the HDSE drainfield. I am happy this could help clarify the status of this lease beyond the current August 2024 expiration. Again, we are evaluating the drainfield in the masterplan as recommended by the FAA. Please forward this to everyone else who was in attendance as well.

I look forward to meeting again soon so we can keep the conversation going on potential improvements for staging firefighting equipment, noise, and other community/airport issues. I have reached out to our team about the raw data used for the forecast, and I'll share when I have more information.

Thanks again,

Tony Beach
OREGON DEPARTMENT OF AVIATION

STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Mark Ottenad <ottenad@ci.wilsonville.or.us>
Sent: Tuesday, May 28, 2024 5:03 PM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Subject: RE: Wed 5/29 Aurora-Wilsonville-ODAV meeting
Importance: High

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hello Thomas, Tony and Kenji,

Sorry to hear about Director Sugahara's accident.

I've heard from a few of our attendees, and all are in favor of going forward with our meeting tomorrow.

I will note that it took quite a while to find a date that could work for all of us, and so cities' officials appear willing to go forward.

So, let's plan to meet at 10 am at Wilsonville City Hall and see about having a productive conversation.

Thank you.

- Mark

Mark Ottenad, Public/Government Affairs Director
City of Wilsonville / SMART / Explore Wilsonville
503-570-1505
ottenad@ci.wilsonville.or.us

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Tuesday, May 28, 2024 3:34 PM
To: Mark Ottenad <ottenad@ci.wilsonville.or.us>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Subject: Re: Wed 5/29 Aurora-Wilsonville-ODAV meeting

Hello Mark,

Good afternoon. I hope you had a great extended weekend relaxing or enjoying some sunshine! Director Kenji unfortunately had an accident/injury over the holiday weekend that has limited physical activity until recovered.

Tony and I are still happy to meet with you and the Wilsonville team tomorrow at 10:00 as scheduled, but we are also open to reschedule into June/July if Director Kenji attendance is preferred.

Please advise on preferences.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION
PLANNING & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

3040 25TH STREET SE, SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

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From: Mark Ottenad <ottenad@ci.wilsonville.or.us>
Date: Friday, May 24, 2024 at 11:07
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>, BEACH Anthony <Anthony.BEACH@odav.oregon.gov>, SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Subject: RE: Wed 5/29 Aurora-Wilsonville-ODAV meeting

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ODAV Team,

In preparation for our meeting regarding comp plan issues, please find attached a memo that City staff developed for you that highlights relevant Wilsonville comp plan issues pertaining to the ODAV and the Aurora State Airport.

Please advise if you have any questions or need additional information. Thank you.

- Mark

Mark Ottenad, Public/Government Affairs Director
City of Wilsonville / SMART / Explore Wilsonville
503-570-1505
ottenad@ci.wilsonville.or.us

From: Mark Ottenad
Sent: Thursday, May 23, 2024 9:40 AM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Subject: RE: Wed 5/29 Aurora-Wilsonville-ODAV meeting
Importance: High

Good day Director Sugahara, Alex and Tony,

Please find attached for an draft agenda for our meeting next week on Wed 5/29 10-11:30 am at Wilsonville City Hall.

Officials from Aurora and Wilsonville look forward to meeting with you to discuss comp plan issues and a couple of airport master plan issues.

Please advise on any agenda modifications that you may suggest.

Thank you.

- Mark

Mark Ottenad, Public/Government Affairs Director
City of Wilsonville / SMART / Explore Wilsonville
503-570-1505
ottenad@ci.wilsonville.or.us

-----Original Appointment-----
From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, April 8, 2024 9:54 AM
To: Mark Ottenad; BEACH Anthony; SUGAHARA Kenji
Subject: City of Wilsonville - ODAV
When: Wednesday, May 29, 2024 10:00 AM-12:00 PM (UTC-08:00) Pacific Time (US & Canada).
Where: 29799 SW Town Center Loop E, Wilsonville, Oregon, United States

[This email originated outside of the City of Wilsonville]

Wilsonville City Hall

_____

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 275 080 214 125

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+1 971-277-1965,,701313232# United States, Portland

Find a local number

Phone conference ID: 701 313 232#

For organizers: Meeting options | Reset dial-in PIN

_____

Outlook

Aurora Airport - PAC #8 question

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 12/9/2024 9:57 AM
To Mark Ottenad <ottenad@ci.wilsonville.or.us>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>

Hi Mark,

Thanks for your comments and questions. I hope the following answers your questions, but please let us know if you need anything else.

The meeting flyer (public invitation), agenda, and ODAV's email to the general public interested in the project included the direct "public" Zoom link to make it easy for the public to participate.

Regarding the PAC member email that included a link to the website, not the direct "public" link:

1. We want PAC members to be able to direct others to the right page on the website, regardless of the meeting. The most current information and meeting link are always at the top of the page, along with any other meeting materials (if applicable); this has been consistent throughout the life of the project.
2. We previously had some confusion by PAC members about which Zoom link to use. Each PAC member receives a unique link directly from Zoom that is associated with their name and affiliation; that is what we want them to use so that all PAC members are appropriately identified for our meeting notes.
3. In the first email to the PAC, I attached the agenda and reminded them that it was posted on the website. I didn't attach the agenda in the follow up emails, since it had already been delivered.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Mark Ottenad <ottenad@ci.wilsonville.or.us>
Sent: Wednesday, December 4, 2024 4:54 PM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: RE: Aurora Airport - PAC meeting next Tuesday

Hello Alex and Brandy,

Can you please explain why the following direction is given to members of the public to attend the Dec 10 PAC meeting?

> "• Others can join using the link on the website: https://publicproject.net/AuroraAirport (on the "meetings" page)"

What is the purpose of sending the public to a website, and then having to find a link called Meetings, and then have to scroll down the page to find the correct meeting link, and then click on that?

Why not just say here's the meeting link: https://us02web.zoom.us/j/85045246628?

The meeting announcement says: "**Materials:** The agenda is posted to the website."

Why not just provide a link to the meeting agenda, which also has the Zoom link: https://publicproject.net/files/UAOAMP/uao-amp-pac8agenda-111924.pdf?e0208a471d?

Thank you.

- Mark

Mark Ottenad, Public/Government Affairs Director
City of Wilsonville / SMART / Explore Wilsonville
503-570-1505
ottenad@ci.wilsonville.or.us

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Wednesday, December 4, 2024 10:27 AM
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Aurora Airport - PAC meeting next Tuesday

Hello PAC Members,

Just a reminder that PAC Meeting 8 will be next Tuesday. We look forward to seeing you. You should receive the Zoom invitations a few days before the meeting, so please watch for that (and check your junk/spam folder).

Date/Time: Tuesday, December 10, 2024 from 5:00-8:00 p.m.
Location: Zoom

- PAC members have been registered via Zoom and will get an email directly from Zoom with the login information (please check your junk folder). Please do not forward this email to anyone.
- Others can join using the link on the website: https://publicproject.net/AuroraAirport (on the "meetings" page)

Materials: The agenda is posted to the website.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Tuesday, November 26, 2024 7:35 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Aurora Airport - December 10 PAC meeting agenda

Hello PAC members,

We are looking forward to seeing you at the **next meeting (VIRTUAL) on Tuesday, December 10, 2024 from 5:00-8:00 p.m.** The Planning Team and ODAV appreciates your feedback on the preferred alternative that was presented at PAC Meeting 7. Based on the feedback and requests to discuss the Preferred Alternative further, ODAV would like to use PAC Meeting 8 to review the noise analysis and have a roundtable discussion with you all regarding comments on the preferred alternative and any additional input or recommendations that you would like to bring to the meeting.

Thanks again for all of the comments from the last PAC meeting, they are posted along with the responses from the technical team on the website: https://publicproject.net/AuroraAirport (on the "public records" and "meeting" pages).

We are moving our discussion of the ALP and CIP to early 2025 to account for this additional roundtable meeting.

Date/Time: Tuesday, December 10, 2024 from 5:00-8:00 p.m.
Location: Zoom

- PAC members have been registered via Zoom and will get an email directly from Zoom with the login information (please check your junk folder). Please do not forward this email to anyone.
- Others can join using the link on the website: https://publicproject.net/AuroraAirport (on the "meetings" page)

Materials: The agenda is attached and posted to the website.

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
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Meeting + email hours 9 a.m.–5 p.m. Tuesday–Friday. Administrative-only hours on Monday.
Check my availability » Schedule a 30 minute check-in

Outlook

Fw: UAO Hangar Destruction!

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-01-06 3:43 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Thursday, December 19, 2024 11:53 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: UAO Hangar Destruction!

Hello,

Good morning. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357
EMAIL Alex.R.Thomas@ODAV.Oregon.Gov
SALEM, OR 97302
WWW.OREGON.GOV/AVIATION

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Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Allen C. Patterson <Allen@capacitycommercial.com>
Date: Thursday, December 19, 2024 at 11:22
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: UAO Hangar Destruction!

You don't often get email from allen@capacitycommercial.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Mr. Thomas:

As a pilot that flies off KUAO, please register and record my urgent input for the Aurora Airport Master Plan that is underway not to consider the condemnation and destruction of any aircraft hangars.

To even consider such a move is an embarrassment to the aviation community. I am a long-time member of CAA and fly commercially on weekends. I am also a commercial realtor selling and leasing land and facilities throughout the Portland Region to industrial users, including to companies in communities surrounding UAO. the City of Canby, adjacent to UAO, now has 15 companies involved in aviation. Some already have aircraft based at UAO.

UAO is truly an economic generator for Marion and Clackamas Counties. Columbia Helicopter Inc. alone is responsible for the use of over 3,000 motel rooms/year in Wilsonville and surrounding areas. We need to continue to build an aviation business-friendly environment at UAO that pays jobs and taxes for the good of all. The condemnation and destruction of existing hangars as proposed above is not the way to do it, especially with the shortage of hangar space throughout the Region.

Sincerely,

Allen Patterson

Pilot Certificate #1566734

Outlook

Re: Aurora State Airport Master Plan Website Comments - Elizabeth Peters

From Elizabeth Peters <noreply@jotform.com>
Date Mon 2024-09-23 2:42 PM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	Elizabeth Peters
	I would like to receive email updates.
Email	epeters@petersco.net
Phone Number	(503) 250-2235

You can edit this submission and view all your submissions easily.

Outlook

Re: FW: Meeting December 10, 2024

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 12/10/2024 11:04 AM
To Denis Pilon <pilond@htshelicopters.com>
Cc Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

Sounds great! Thanks for confirming Denis.

Take care,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Denis Pilon <pilond@htshelicopters.com>
Sent: Tuesday, December 10, 2024 11:02 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Fwd: FW: Meeting December 10, 2024

Hi Brandy,

Yes please add-on Aron as an alternate and he will be attending tonight's meeting. Have a good day.

Regards,

Denis Pilon
Chief Operating Officer
Helicopter Transport Services
14497 Keil Road NE
Aurora, OR 97002
Work: (503) 776-9300 Ext:103

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From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Monday, December 9, 2024 3:39 PM
To: Denis Pilon <pilond@htshelicopters.com>

Cc: Rob Fournier <fournierr@htshelicopters.com>; faegre@earthlink.net
Subject: Re: Meeting December 10, 2024

Hi Denis,

We have Rob listed as the only PAC representative. Would you like us to make Aron the alternate? It sounds like Aron will be attending tomorrow night. Is that correct?

Thanks for clarifying.

BRANDY STEFFEN | JLA PUBLIC INVOLVEMENT

Partner + Senior Program Manager
<mailto:brandy.steffen@jla.us.com> brandy.steffen@jla.us.com »
<https://outlook.office.com/bookwithme/user/b32d141f8b484237af4cff695637d779@jla.us.com/meetingtype/XeCWyKCq9kS7hJVkN_X-SQ2?anonymous&ep=mLinkFromTile>
Schedule a 30 minute meeting

———

From: Denis Pilon <pilond@htshelicopters.com
<mailto:pilond@htshelicopters.com> >
Sent: Monday, December 9, 2024 2:48 PM
To: Brandy Steffen <brandy.steffen@jla.us.com
<mailto:brandy.steffen@jla.us.com> >
Subject: Meeting December 10, 2024

Hi Brandy,

For tomorrow's Aurora Airport Masterplan Meeting I designate HTS's architect Aron Faegre to represent HTS at the PAC meeting. Please send the zoom link
for the meeting to him at <mailto:faegre@earthlink.net>
faegre@earthlink.net

Thank you.

Outlook

Fw: Aurora Airport plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 12/19/2024 8:10 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

I will be on vacation starting Monday, 12/23/24 and will return on Monday, 01/06/25.
JLA will be closed December 24 through January 1 to allow our entire team time to rest and recover. Please get in touch early with any anticipated needs during this time. Wishing you a lovely end to 2024!

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Thursday, December 19, 2024 8:08 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Aurora Airport plan

Hello,

Good morning. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:

COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Bruce Porter <bruceporter5@comcast.net>
Date: Wednesday, December 18, 2024 at 20:06
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Bruce Erik Bennett <bruce@auroraaviation.com>
Subject: Aurora Airport plan

You don't often get email from bruceporter5@comcast.net. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Oregon Department of Aviation, Alex Thomas, ODAV Planning and Programs Manager, 503-378-4880

Dear ODAV c/o Alex Thomas,
As a long-time Columbia Aviation Association member and 50+ year pilot and business owner that flies off KUAO and rented hangar space there, please register and record my urgent input for the Aurora Airport Master Plan that is underway not to consider the condemnation and destruction of any aircraft hangars.

Thanks,
Bruce Porter

Outlook

Re: Aurora State Airport Master Plan Website Comments - Jason Poss

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 2024-10-03 3:00 PM
To Jason Poss <jason.poss@colheli.com>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>

Wonderful! Thanks Jason.

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday. Administrative-only hours on Friday.
Check my availability » Schedule a 30 minute check-in

From: Jason Poss <jason.poss@colheli.com>
Sent: Thursday, October 3, 2024 2:58 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: RE: Aurora State Airport Master Plan Website Comments - Jason Poss

Hi Brandy – much appreciated. Their contact info is below:

Dave Tibbetts
Sr. Director of Maintenance Services
([redacted])
Cell ([redacted])
Davetib@colheli.com

Matthew A. Nash
Director of Maintenance
Phone: [redacted]
Cell: [redacted]
email: mnash@colheli.com

Thanks,

Jason

Jason Poss
Assistant General Counsel
Columbia Helicopters, Inc.
14452 Arndt Road NE, Aurora, OR 97002
O[redacted]

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this message in error, please immediately notify the sender by reply e-mail and permanently delete or destroy all copies of the message.

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Thursday, October 3, 2024 2:51 PM
To: Jason Poss <jason.poss@colheli.com>
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Re: Aurora State Airport Master Plan Website Comments - Jason Poss

Hi Jason,

Yes, we can shift your PAC representatives as follows:

- From Robert Roedts to **Dave Tibbetts**, as your main PAC representative
- From Bob Buchanan to **Matt Nash** as your alternate representative

Can you please send me Dave and Matt's email addresses and phone numbers?

Thanks,
Brandy

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brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
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Check my availability » Schedule a 30 minute check-in

From: Jason Poss <noreply@jotform.com>
Sent: Thursday, October 3, 2024 2:42 PM
Subject: Re: Aurora State Airport Master Plan Website Comments - Jason Poss

Aurora State Airport Master Plan Website Comments

Name	Jason Poss
Organization	Columbia Helicopters, Inc.
Comments or questions?	Hi - Columbia Helicopters, Inc. would like to update our PAC members. We'd like to replace our primary member, Robert Roedts, with another company executive with more availability to be involved, Dave Tibbetts. We'd also like to replace our alternate member, Bob Buchanan, as he recently left our company. We would like to replace Bob with Matt Nash. Would you be able to help us facilitate this? Thanks.
If you would like a response, please tell us the best way to contact you:	Email
Email	jason.poss@colheli.com
Phone Number	[redacted]

You can edit this submission and view all your submissions easily.

This email has been scanned for spam and viruses by Proofpoint Essentials. Click here to report this email as spam.

Outlook

Fw: Potential for MOS related to runway extensions at UAO

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Fri 2024-11-01 12:29 PM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Friday, November 1, 2024 10:27 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; W. Matt Rogers <WRogers@CenturyWest.com>
Subject: FW: Potential for MOS related to runway extensions at UAO

Please include in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Thursday, October 31, 2024 3:59 PM
To: Pricher Jeffrey <Jeffrey.Pricher@odhsoha.oregon.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Fw: Potential for MOS related to runway extensions at UAO

Hi Jeff, thanks again for checking in with us today about concerns with the master plan.

Below is the response we received from the FAA when we asked about the potential for receiving a modification of standard for something like a runway extension, even after showing a path to meeting standards in the current master plan.

Additionally, here is the project website with all of the information related to the master plan, including all of the meetings, meeting summaries, draft chapters, and more. Our first public meeting for this project was in November 2021.

https://publicproject.net/auroraairport#

Please let us know if you have any follow up questions.

Thank you,

Tony Beach
Oregon Department of Aviation
State Airports Manager
(503) 378-2523

From: House, Timothy A (FAA) <Timothy.A.House@faa.gov>
Sent: Tuesday, March 26, 2024 3:56:36 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Samantha Peterson <SPeterson@CenturyWest.com>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; David Miller <dmiller@CenturyWest.com>
Subject: Potential for MOS related to runway extensions at UAO

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Facility requirements chapter comments were provided earlier today. A question was asked of me when the Facility Requirements chapter was provided for review and I wanted to make sure it was answered concurrently with my review comments of the chapter.

The question was related to the likelihood of the FAA issuing a MOS for existing non standard conditions or allowing future projects to be constructed with MOS.

The question was asked to both Regional level management and ADO level management. The answer provided was consistent. The Region and ADO would not be in support of issuing MOS related to the extension of the runway. Standards would have to be met for ROFA and RSA requirements.

Please let me know if you need any additional information on this topic. We are aware this will have a significant impact on your next chapter, alternatives.

Tim A. House
Lead Planner, SEA Airports District Office
FAA Northwest Mountain Region
206-231-4248
405-607-9949 (mobile)

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We value Integrity, Collaboration and Innovation

Join me at the 2024 Annual Conference

2024 ANM/NWAAAE Airports Conference. April 2-4. Bellevue, WA

Outlook

Re: Aurora Airport PAC meeting scheduled for Tuesday, April 30, 2024

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 3/21/2024 11:22 AM
To PULS Sarah * OEM <Sarah.PULS@oem.oregon.gov>
Cc STEWART Whitney R * OEM <whitney.r.stewart@oem.oregon.gov>; Jen Winslow <Jen.winslow@jla.us.com>

Thanks so much for the update Sarah and welcome Whitney. We'll update our records.

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
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Check my availability » Schedule a 30 minute check-in

I WILL BE ON VACATION, WITHOUT ACCESS TO PHONE OR EMAIL, STARTING FRIDAY, 03/22 AND RETURNING MONDAY, 04/01. PLEASE CONTACT ANOTHER TEAM MEMBER FOR HELP WHILE I'M AWAY. I WILL RETURN YOUR MESSAGE WHEN I'M BACK AT MY DESK.

From: PULS Sarah * OEM <Sarah.PULS@oem.oregon.gov>
Sent: Thursday, March 21, 2024 10:47 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: STEWART Whitney R * OEM <whitney.r.stewart@oem.oregon.gov>
Subject: RE: Aurora Airport PAC meeting scheduled for Tuesday, April 30, 2024

Hi Brandy, our ODEM PAC member person is changing to Whitney Stewart. I have cc'd Whitney Stewart on this e-mail. She will be representing ODEM at the future PAC meetings. I did provider her with a briefing and the link to the website information.

Also, since this project has started, we have become our own department. Please update our name to Oregon Department of Emergency Management.

Let me know if there is anything else you need from me.

Thank you,

Sarah

Sarah Puls, Emergency Preparedness Planner
Preparedness Section
Oregon Department of Emergency Management
Office 503-934-3282
Cell 971-345-7255
sarah.puls@oem.oregon.gov

How was the service you received from OEM?

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Thursday, March 21, 2024 9:52 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Aurora Airport PAC meeting scheduled for Tuesday, April 30, 2024

You don't often get email from brandy.steffen@jla.us.com. Learn why this is important

Hello PAC members,

We are looking forward to our **next meeting (VIRTUAL) on Tuesday, April 30, 2024 from 5:00-7:00 p.m.**

- **Date/Time:** Tuesday, April 30, 2024 from 5:00-7:00 p.m.
- **Location:** Zoom
  - PAC members have been registered via Zoom and you'll get an email directly from Zoom with the login information (please check your junk folder). Please do not forward this email to anyone.
  - Others can register for the meeting under their own names at: https://us02web.zoom.us/webinar/register/WN_GUSqEmpgQam1V7pjA7vmUg
- **Materials:** Just a reminder that meeting materials will be posted on the website two weeks before the meeting at https://publicproject.net/AuroraAirport#

Also, we wanted to let you know that the recording from our last meeting (March 12) is posted on the project website.

Thank you,
Brandy

BRANDY STEFFEN | JLA PUBLIC INVOLVEMENT
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
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Check my availability » Schedule a 30 minute check-in

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Tuesday, February 27, 2024 1:21 PM
Subject: Aurora Airport PAC meeting in two weeks (3/12/24)

Hello PAC members,

We are looking forward to our **next meeting (VIRTUAL) on Tuesday, March 12, 2024 from 5:00-7:00 p.m.**

Date/Time: Tuesday, March 12, 2024 from 5:00-7:00 p.m.
Location: Zoom

- PAC members have been registered via Zoom and you'll get an email directly from Zoom with the login information (please check your junk folder). Please do not forward this email to anyone.

- Others can register for the meeting under their own names at: https://us02web.zoom.us/webinar/register/WN_USqgITSLT5SrqW7lDvyFUg

Materials: Just a reminder that meeting materials are also posted on the website: https://publicproject.net/AuroraAirport#

- Agenda (attached)
- Approved Forecast (posted on the website on the meetings page)

Thank you,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
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Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday. Administrative-only hours on Friday

Outlook

Fw: Aurora Master Plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-01-06 8:57 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, December 23, 2024 8:45 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Aurora Master Plan

Hello,

Good morning. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357
EMAIL Alex.R.Thomas@ODAV.Oregon.Gov
SALEM, OR 97302
WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:

COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Marici Reid <marici@earthlink.net>
Date: Sunday, December 22, 2024 at 12:58
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Aurora Master Plan

[You don't often get email from marici@earthlink.net. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear ODAV,
I would like to register my strong objection to any proposal at KUAO to remove any hangars. This state has a shortage of aircraft hangars, which is apparent to me through being an FBO at a nearby airport (7S5) which has also experienced a complete paralysis at ODAV for the building of more hangar space. Whatever the role of some “access road”, its utility cannot remotely compensate for the loss of hangar space and interruption of businesses and livelihoods.
The fact that ODAV would even consider such a plan is alarming. This department needs to return to an attitude of fostering General Aviation, not crippling it.

Marici Reid
Independence Aviation LLC
7S5

Sent from my iPhone

Outlook

Fw: NO to KUAO Airport Hangers Destruction

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 12/18/2024 9:14 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
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I will be on vacation starting Monday, 12/23/24 and will return on Monday, 01/06/25.
JLA will be closed December 24 through January 1 to allow our entire team time to rest and recover. Please get in touch early with any anticipated needs during this time. Wishing you a lovely end to 2024!

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Wednesday, December 18, 2024 8:40 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: NO to KUAO Airport Hangers Destruction

Hello,

Good morning, please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:

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From: Itamar Reuven <itamarreuven@gmail.com>
Date: Tuesday, December 17, 2024 at 19:27
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: NO to KUAO Airport Hangers Destruction

You don't often get email from itamarreuven@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear ODAV c/o Alex Thomas,

As a pilot that flies off KUAO, please register and record my urgent input for the Aurora Airport master plan that is underway to NOT consider the condemnation and destruction of any aircraft hangars. There is already a shortage of reasonably priced hangers and this will make things worse.
Best regards,

--
-Itamar Reuven

Outlook

Fw: UAO Master plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-01-06 8:57 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, December 23, 2024 8:43 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: UAO Master plan

Hello,

Good morning. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357
EMAIL Alex.R.Thomas@ODAV.Oregon.Gov
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From: Mike Rhodes <mikerv9a@gmail.com>
Date: Sunday, December 22, 2024 at 11:47
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Marici Reid <marici@earthlink.net>, Hannah Mclaughlin <hannahmclaughlin13@yahoo.com>
Subject: UAO Master plan

[You don't often get email from mikerv9a@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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HOLY CRAP! You are condemning private property to the west, moving Hubbard Hiway, constructing an all new runway / taxiway 80 ft west, tearing down 237,000 SF of existing hangar space;

All for the purpose of adding a vehicle service road!!!???!!!

That’s the most insane idea and WASTE of millions of taxpayer dollars!!! Not to mention all the commercial businesses you’ll shutdown until your replacement hangar project is completed.
Not only no, but HELL NO!!!

Mike Rhodes - Pilot / Aircraft Owner
Independence, OR
Sent from my iPad

Outlook

Fw: KUAO

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 12/19/2024 8:10 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
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JLA will be closed December 24 through January 1 to allow our entire team time to rest and recover. Please get in touch early with any anticipated needs during this time. Wishing you a lovely end to 2024!

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Thursday, December 19, 2024 8:10 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: KUAO

Hello,

Good morning. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

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From: Phillip Rissel <phil@flyinghconstruction.com>
Date: Wednesday, December 18, 2024 at 22:26
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: KUAO

You don't often get email from phil@flyinghconstruction.com. Learn why this is important

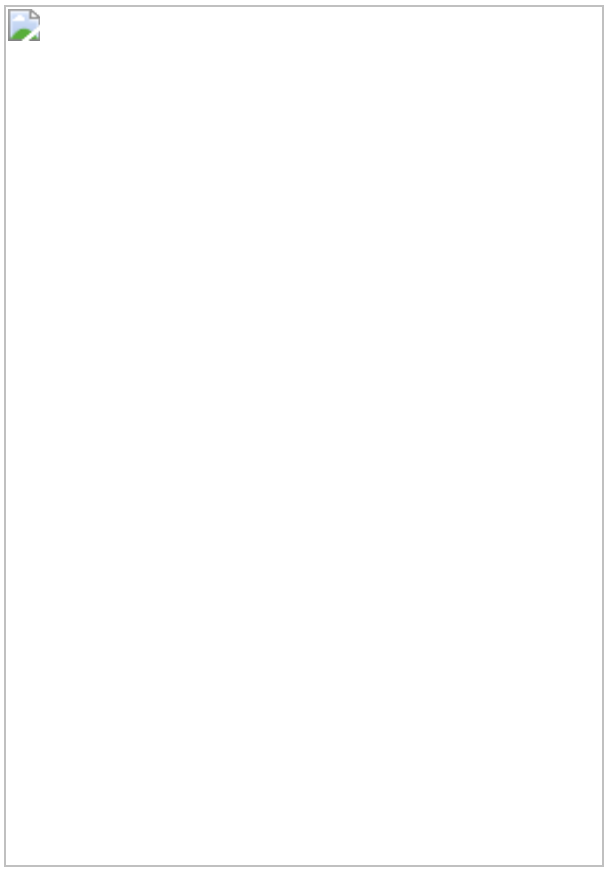
This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear ODAV c/o Alex Thomas,
As a pilot that flies off KUAO, please register and record my urgent input for the Aurora Airport Master Plan that is underway not to consider the condemnation and destruction of any aircraft hangars.
Thank you
CAA Member
C 182 N759RE

Phillip Rissel
Rivers Edge RV Resort & Camping
1309 Swedetown Rd, Clatskanie, Oregon 97016
[redacted]
riversedgervresortoregon@gmail.com
Riversedgervcamping.com

https://youtu.be/nJI3beE4z5k?si=NdNNLWqQ0oavsPXv

phil@flyinghconstruction.com
[redacted]



Outlook

Fw: KUAO masterplan comments

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-01-06 8:56 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, December 23, 2024 8:46 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: KUAO masterplan comments

Hello,

Good morning. Please include with the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

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Alternative Contacts:

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Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Matthew Robertson <matthew.oseu@gmail.com>
Date: Sunday, December 22, 2024 at 15:35
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: KUAO masterplan comments

You don't often get email from matthew.oseu@gmail.com. Learn why this is important

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Alex, I wish to submit my thoughts on the recently published master plan for the future of the Aurora airport. I have seen that a number of the options include acquisition and tear down of a number of existing hangars, several of which are host to active businesses.

I strongly suggest that refined alternative 1B is the preferred course of action. As both an engineer, and pilot, I can see the challenges that will be present in shifting the runway as called for by this plan. However, demolishing hangars that house active businesses would cause long term harm to the airport many years beyond completion of construction as those businesses would be seriously disrupted. Acquisition and tear down of the hangars host to those businesses may harm trust in airport management and as a result they may take operations elsewhere.

Outlook

Re: Aurora State Airport Master Plan Website Comments - Kristin Roche

From Kristin Roche <noreply@jotform.com>
Date Wed 6/12/2024 3:53 PM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	Kristin Roche
Comments or questions?	For too long Charlotte Lehan, Tim Knapp, Greg Leo and the current Wilsonville City Council have stood in the way of much needed progress of bringing the airport up to date. In fact I would argue the City makes a big show of fighting the airport expansion to secure NIMBY (not-in-my-backyard) votes to distract from the major issues it is dealing with. These include major traffic, congestion and parking issues that have been eroding public support for current council urban renewal projects like gutting Town Center with thousands of people. It is long passed time that the airport be upgraded and expanded. I would like to receive email updates.
Email	kristin.roche@gmail.com
Phone Number	[redacted]

You can edit this submission and view all your submissions easily.

Outlook

Fw: Response to ODAV Master Plan Alternatives issued July 30, 2024

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 8/29/2024 2:52 PM
To Jen Winslow <Jen.winslow@jla.us.com>

1 attachment (800 KB)
Signed Ltr to ODAV 082924.pdf;

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting

Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday. Administrative-only hours on Friday.
Check my availability » Schedule a 30 minute check-in
Email is the best way to reach me; I try to respond within 2 workdays.
However, urgent requests should be handled through a phone call or scheduling a meeting using the link above.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Thursday, August 29, 2024 2:33 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; W. Matt Rogers <WRogers@CenturyWest.com>
Subject: FW: Response to ODAV Master Plan Alternatives issued July 30, 2024

FYI, public comments on the alternatives.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Jeff Schreiber <jeff@flypacificair.com>
Sent: Thursday, August 29, 2024 1:58 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Brandy.Steffan@jla.us.com
Cc: wk@klgpc.com
Subject: Response to ODAV Master Plan Alternatives issued July 30, 2024

Please see attached letter with response to ODAV Alternatives.

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Jeff Schreiber
Pacific Aircraft Services
503-784-5580

PACIFIC AIRCRAFT SERVICES
14332 Stenbock Way, Hangar G101, Aurora OR 97002

September 3, 2024
Brandy Steffen,
JLA Public Involvement
Tony Beach, ODAV
Alex Thomas, ODAV
Samantha Peterson
Century West

RE: Comments on July 30, 2024 Aurora Master Plan Alternatives

Ladies and Gentlemen,

This letter is written on behalf of the direct airport stakeholders whose aviation related businesses are located at, and rely upon, the Aurora Airport. Please include this letter in the record of the 2023-2024 Aurora Airport Master Plan proceedings.

On July 30, 2024, the Oregon Department of Aviation (ODAV) presented three alternatives for the development of the Aurora Airport for the next 20 years and invited comment on those alternatives. **The direct airport stakeholders strongly OBJECT to all of those proposed alternatives: 1A, 1B and 2.**

Objection to Process

At the July 30, 2024 meeting, PAC members were invited to comment on the proposed alternatives via checking a box on an online form to identify which of ODAV's three alternatives they preferred. Participants had no way to offer meaningful comments or explain why none of the alternatives were acceptable. The undersigned strongly objects to ODAV's process as it is not reasonably calculated to solicit input from stakeholders as required by federal law to determine a

preferred alternative. Reserving that objection, the Aurora Airport direct airport stakeholders present the following comments on the July 30, 2024 ODAV proposed master plan alternatives.

General Objection – the Alternatives Present a False Choice: Sacrifice the Safety of the Aurora Airport in the Name of Safety

Under ODAV's "alternatives" the runway extension that is well-documented to be badly needed now for safety, is held hostage to prerequisites that will take a decade or more (if they can even happen at all) and hundreds of millions of dollars that no one has. In other words, ODAV's alternatives ensure that the runway safety improvement will never happen or will happen only if the airport is less safe, all in service of perfect prerequisite compliance with design standards. This is a false choice and one that FAA does not and in fact cannot demand and ODAV should not demand this false choice either. The false choice is not only contrary to the very purposes of aviation master planning and federal law but also ORS 836.600-642 and ODAV's mission.

Alternatives Proceed from False Assumptions

For the alternatives to have legitimacy, they must proceed from accurate assumptions. The proposed alternatives do not proceed from accurate assumptions. To the contrary, each of the three proposed alternatives proceed from false premises.

The first false assumption is that FAA will not allow the airport to "maintai[n] current non-standard conditions" and if the airport has any "non-standard conditions," then FAA will place the runway "in maintenance only mode ***."[1]

[1] ODAV July 30, 2024 PPT Presentation to Planning Advisory Committee. This erroneous assumption carries forward to the August 1, 2024 "Refined Preliminary Alternatives Analysis" which similarly begins by asserting that ODAV has "recognized that maintaining current non-standard conditions is not acceptable to the Federal Aviation Administration (FAA)." There is no such lawful FAA position that ODAV may "recognize." To the extent that ODAV has adopted such a "recognition" it is contrary to both federal and state law and may not serve as the foundation for the airport's 20-year future.

The second false ODAV assumption is that it is necessary for ODAV to acquire the privately owned "through the fence" properties adjacent to the airport "to ensure [their] continued long-term aeronautical use."

Starting with the second false assumption, we note that there is nothing to support the assumption that if ODAV owned the undersigned's private aviation related properties they would be bettered assured to remain in aeronautical use. Respectfully, there are a lot of reasons to believe ODAV ownership of our property would have a contrary result. It is we, the private through the fence owners, who have the strong incentive to maintain robust aviation use of our adjacent private property because it is suitable for no economic use other than aeronautical use and we have invested and continue to invest ***millions of dollars*** to assure the success of our aviation related uses there.

Conversely, we have not seen evidence that ODAV is committed to growing and supporting aeronautical use of our properties at the Aurora Airport. We have pushed for more than a decade for ODAV to remove trees that are a hazard to aviation. ODAV hasn't gotten around to doing that. We have pushed for decades for ODAV to extend the airport's runway for safety, but ODAV hasn't gotten around to doing that, despite the runway extension being approved on the 2012 airport ALP. ODAV told the airport's opponent's that the 2012 airport master plan had not been finally adopted when ODAV had clearly adopted it (otherwise there would have been no 2012 ALP), inviting years of litigation that resulted in a remand of the 2012 master plan on land use grounds. ODAV did not bother to respond to that remand of the 2012 master plan, as it should have.

In all respectfully, the only evidence is that the private through the fence owners have the great documented interest in the continued aeronautical use of their property – they (we) have invested millions of dollars to support aviation use at the Aurora Airport and we continue to do so, our properties are useful for nothing but aviation related use in fact. There is simply nothing to support ODAV's "assumption" that ODAV needs to buy our property to ensure its continued aeronautical

use. We note that this second premise is also contrary to the legislative command in ORS 836.640-642 that ODAV **support** the private through the fence ownerships and their economic development, not buy them out. ODAV is constrained by this legislative command. The second "assumption" is simply a nonstarter.

With respect to the first erroneous assumption, the assumption's referenced "non-standard conditions" are primarily the Runway Object Free Area (ROFA) required separation for C-II design aircraft between the runway and Highway 551. [2] The law does not support ODAV's first erroneous premise that FAA always requires that airports meet all design standards. The law and FAA's decades of practice is exactly the opposite.

In this regard, federal law expressly provides FAA with authority to issue modifications to standards "when necessary to meet local conditions" so long as the "modification will provide an acceptable level of safety, economy, durability and workmanship." 14 CFR 152.11(b). FAA staff lacks authority to override that federal law that recognizes that "non-standard conditions" happen and can be allowed to continue in the right circumstances, as presented here.

The truth is that FAA routinely approves modifications to standards where the modification provides the requisite "acceptable level of safety." FAA has approved modifications at airports from Renton where 737's takeoff and land daily at a B-II airport, to SJC which has modifications to standards for many FAA requirements. This happens frequently enough that, as required by Congress, FAA in conjunction with the National Transportation Research Board and

---

[2] ODAV's "alternatives" assume another "non-standard" condition regarding the location of the airport's septic drainfields in the north and south. The septic drainfield in the south was expressly approved by ODAV, FAA and Marion County in a land use process. It is not "non-standard" or if it is, it is already approved – by ODAV and FAA. Moreover, if necessary, those drainfields can be brought to whatever standard applies. But ODAV may not merely assume they are "non-standard", say they will be "removed" in all alternatives but have no other location for them and no analysis of whether it is feasible to establish any alternative location for them. If ODAV's unstated plan is just to annex the airport to the 900-population City of Auora that has done nothing but oppose the airport for the past decade, and that had a mayor who we understand to be on record saying the city wanted to annex the airport to shut it down, the private airport stakeholders strongly oppose any such -as yet – unarticulated plan.

National Academies of Sciences, published a technical handbook entitled "**Risk Assessment Method to Support Modification of Airfield Separation Standards"** that goes to a lot of trouble to explain exactly how to assess whether a modification to an airport design standard will provide an acceptable level of safety. Contrary to the July 30 ODAV "assumptions" and August 1 ODAV "recognition", this federal risk assessment publication states that "**FAA does accept requests from airports for modifications to standards**."

Following federal law and the FAA Risk Assessment publication, respected airport planner, Aron Faegre prepared such an analysis under the FAA published risk-assessment methodology that **concludes maintaining the existing ROFA between the runway and Highway 551 provides an acceptable level of safety.** In other words, were ODAV to merely ask (and Mr. Faegre has done the work to support that ask), a modification to the ROFA would be granted. Which means contrary to ODAV's "assumptions" underpinning the three alternatives ODAV revealed on July 30, 2024, FAA would approve maintaining the existing non-standard conditions at the airport. This should not be a surprise because FAA approved the exact ROFA modification for a C-II design aircraft that Mr. Faegre demonstrates meets modification standards, when it approved the 2012 ALP for the airport.

FAA Approved the Modification for the ROFA - Separation of the Runway to Highway 551 – in the 2012 ALP under Airport Design Standards for a C-II Airport

The approved ALP that currently governs the airport shows that FAA approved the runway extension to the south with a ROFA modification to standards for the C-II design aircraft for the separation between the runway and Highway 551.

Runway 17/35 Data		
	Existing	Ultimate
rcent Effective Gradient	0.06%	Same
rcent Wind Coverage (10.5 kts)	98.93%	Same
aximum Elevation Above MSL	199.5'	Same
nway Length	5,004'	6,004'
nway Width	100'	Same
nway Surface Type	Asphalt	Same
nway Strength (Dual Wheel Gear)	45,000 lbs	60,000 lbs
R Part 77 Approach Category		
Runway 17	C (NP)	Same
Runway 35	C (NP)	D (NP)
proach Type	Nonprecision	Same
Runway 17	Not lower than 1 sm	Same
Runway 35	Not lower than 1 sm	Not lower than 3/4 sm
proach Slope (Required / Clear)	34:1 / 34:1	Same
nway Lighting	MIRL	Same
nway Marking	Precision	Same
xiway Lighting	MITL / Reflectors	Same
xiway Marking	Standard	Same
vigation Aids	LOC/DME, NDB	Same
ual Aids	ODALS, VASI, REIL	ODALS, PAPI, REIL
nway Safety Area Dimension	500' x 1,000' beyond rwy end	Same
nway Object Free Area Dimension	800' x 1,000' beyond rwy end	Same
nway Obstacle Free Zone (OFZ)	No OFZ Penetrations	Same
nway End Coordinates		
nway 17 Latitude	45°15'14.166"N	Same
Longitude	122°46'07.828"W	Same
nway 35 Latitude	45°14'25.148"N	45°14'15.350"N
Longitude	122°46'16.515"W	122°46'18.251"W

Airport Data		
	Existing	Ultimate
Airport Elevation (MSL)	199.5'	Same
Airport Reference Point (ARP)		
Latitude	45°14'54.085"N	45°14'44.758"N
Longitude	122°46'11.405"W	122°46'13.040"W
Mean Maximum Temperature	84°	Same
Airport Reference Code (ARC)	C-II	C-II
Airport Service Level	General Aviation	Same
Design Aircraft	IAI Astra 1125	Cessna Citation X

Notes
Horizontal datum is NAD 1983, vertical datum is NAVD88.
The Airport is flat. Elevations / ground contours vary by less than 5 feet and are not shown. Drainage features are typically 2-3 feet lower than adjacent land.
Building restriction line is based on a 35-foot building located 495 feet from the runway centerline not penetrating FAR Part 77 surfaces for the Airport.
A Residential Through The Fence (RTTF) access exists at hangar #64 at the Wylee Condominium Association. The tenant is the resident caretaker for the airport.

FEE ACQUISITION		SAME
AVIGATION EASEMENT ACQUISITION		SAME
ON-AIRPORT BUILDING		
OFF-AIRPORT BUILDING		
FENCE		SAME
AIRPORT REFERENCE POINT		
BUILDING RESTRICTION LINE (35' AGL) (BRL)	BRL	SAME
RUNWAY SAFETY AREA (RSA)	RSA	RSA
RUNWAY OBJECT FREE AREA (ROFA)	ROFA	ROFA
RUNWAY PROTECTION ZONE (RPZ)		
EXTENDED RUNWAY CENTERLINE		SAME
DISPLACED THRESHOLD	N/A	
RUNWAY HOLDLINE		SAME
TAXIWAY SAFETY AREA (TSA)	TSA	TSA
TAXIWAY OBJECT FREE AREA (TOFA)	TOFA	TOFA
SERVICE ROAD	N/A	
HANGAR DEVELOPMENT AREA		SAME
APRON / TIEDOWN AREA		
WINDCONE & SEGMENTED CIRCLE		SAME
VASI		SAME
PAPI	N/A	
REIL		SAME
ODAL		
LOCALIZER		
LOCALIZER CRITICAL AREA	LOC	SAME
CARGO APRON	N/A	
PAVEMENT		
PAVEMENT REMOVAL		SAME
FUEL TANKS		
HELICOPTER PARKING		
RESIDENTIAL THROUGH THE FENCE ACCESS (RTTF)		SAME

Modifications to Standards		
	Standard Being Modified	Proposed Action
1	Advisory Circular (AC) 150/5300-13, para 307 (Runway Object Free Area)	The standard runway object free area (OFA) for Airport Reference Code C-II airports is 800 feet. Highway 551 runs north/south parallel to Runway 17/35; the approximate distance from the Runway 17/35 centerline to the Highway 551 centerline is 400 feet. As the airport geometry is not changing from the current condition, the Oregon Department of Aviation (ODA) requests a modification of the OFA design standard to allow the runway and highway to remain in their current positions.
2	AC 150/5300-13, Appendix 14 (Declared Distances)	The ODA requests the existing threshold for Runway 17 be referenced in determining FAR Part 77 surfaces and design standard surfaces referenced in AC 150/5300-13 (i.e., RSA, RPZ, OFA, OFZ).

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OREGON DEPARTMENT OF AVIATION

APPROVAL BLOCK		
OREGON DEPARTMENT OF AVIATION		
SIGNATURE	Michael Sweet	
TITLE	Director	DATE: 10/17/2012
FEDERAL AVIATION ADMINISTRATION		
SIGNATURE	Carol Suomi	
TITLE	Manager, Seattle ADO	DATE: 10/18/12
APPROVAL LETTER DATED:	See Letter dated 10/9/12	

SHEET INFO	
DESIGNED	SML
DRAWN	RAI
CHECKED	REA
APPROVED	---
LAST EDIT	10/17/2012
PLOT DATE	6/28/2012
SUBMITTAL	

REVISIONS			
NO.	BY	DATE	REMARKS

That means there is no reason to think that the same ROFA modification to standards cannot be approved here. ODAV should apply for it and FAA almost certainly will grant it.

Proper Assumptions for this Master Planning Effort

With all due respect, there are proper assumptions for this master planning effort. The direct airport stakeholders urge ODAV to adopt the following assumptions and goals for the Aurora Airport Master Plan:

- ODAV can and should apply for modifications to C-II design standards for existing conditions at the airport that would otherwise require unachievable prerequisites to the runway extension.
- ODAV should grow and support the through the fence aviation operations as it is instructed to do in ORS 836.640-642. Accordingly, ODAV should expand the airport boundary to enable the last undeveloped through the fence areas shown on the draft master plan to grow and flourish.
- ODAV has an obligation to manage the Aurora Airport to safely support the general aviation that has grown to rely upon it and the Oregonians who rely upon that general aviation.
- ODAV should support the Aurora Airport as an economic powerhouse for the region being responsible for thousands of jobs and millions of dollars in payroll and visitor spending.
- ODAV should support the Aurora Airport that is known to be a resiliency center in the event of natural disasters – whether they be wildfire disasters or the Cascadia Subduction Event.
- ODAV should support the Aurora Airport that is home to Life Flight that provides important air ambulance service to needy Oregonians and delivers organs for transplant that saves lives.
- To the extent ODAV is privately planning otherwise, ODAV should strongly resist efforts by opponent municipalities like the city of Aurora to annex the airport.
- The airport should not be casually discarded to the bin of unachievable prerequisites.

Alternative that ODAV Should Consider

A wholly achievable alternative that is consistent with FAA and state law that ODAV should consider is:

a. a 500' runway extension to the north; better yet a 750' runway extension to the north. 750' is well-understood to be better and more appropriate for the long master planning horizon.
b. Reapproval for the necessary existing modification to standards for existing conditions.
c. Adjust the airport boundary to include the undeveloped through the fence areas on the current draft,
d. Show the Internal Circulation Road location that was shown on the 2012 ALP.

Conclusion

The direct airport stakeholders stand ready to work cooperatively with ODAV toward an appropriate 20-year master plan for the Aurora Airport along the lines of the alternative that we outline above. However, respectfully, we cannot abide any of the July 30, 2024 proposed alternatives and strongly oppose all of them. We hope that ODAV will agree that the assumptions and alternative proposed by the direct airport stakeholders are appropriate ones that ODAV should adopt in support of general aviation at the airport, regional disaster resilience and economic vitality for the decades to come. The future of aviation at the Aurora Airport depends upon it.

Thank you for your consideration.

Sincerely,

Jeffrey Schreiber
Jeffrey Schreiber (Aug 29, 2024 13:51 PDT)

Jeff Schreiber
Pacific Aircraft Services
503-784-5580

CC: Kenji Sugahara, Director, ODAV
Brad Schuster, AOPA, NBAA

Outlook

Fw: Urgent input and Opposition to proposed Aurora Airport Master Plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-01-06 8:54 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Monday, December 23, 2024 2:38 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Urgent input and Opposition to proposed Aurora Airport Master Plan

Good afternoon, please include this email in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Monday, December 23, 2024 2:38 PM
To: Jeff Schreiber <jeff@flypacificair.com>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Wendy Schreiber <wendy@flypacificair.com>
Subject: RE: Urgent input and Opposition to proposed Aurora Airport Master Plan

Hi Jeff, thank you for your comment, I will forward it to the master plan team and it will be included in the public record.

Thanks again,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Jeff Schreiber <jeff@flypacificair.com>
Sent: Monday, December 23, 2024 2:27 PM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Wendy Schreiber <wendy@flypacificair.com>
Subject: Urgent input and Opposition to proposed Aurora Airport Master Plan

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear Alex Thomas and Tony Beach,
For the past 20 years, I have been flying and operating our business Pacific Aircraft Services at Aurora State Airport (KUAO). I strongly oppose the proposed condemnation and destruction of aircraft hangars in the Aurora Airport Master Plan.

Our business performs flights, maintenance and management for nine private Citation jets and King Airs. We play a vital role in supporting many local businesses, contractors, pilots and employees and contribute to the overall infrastructure of the airport. Removing the front row hangars would have significant negative impact on businesses whose aircraft operate in and out of Aurora Airport. The removal of the hangars would essentially drive away these businesses, to the detriment of KUAO and the local community.

Please consider this input and strong opposition to hangar removal as you work thru the planning process and register my urgent request to preserve these critical assets at KUAO.

Thank you.

Jeff Schreiber
Pacific Aircraft Services
503-784-5580

Outlook

Fw: Master Plan for Aurora State Airport

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2024-11-11 9:21 AM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Friday, November 8, 2024 1:44 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Master Plan for Aurora State Airport

Please include in the record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Friday, November 8, 2024 1:44 PM
To: Wendy Schreiber <wendy@flypacificair.com>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: RE: Master Plan for Aurora State Airport

Hi Wendy,

Thank you for your comments, I have forwarded the to the planning team and they will be part of the record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Wendy Schreiber <wendy@flypacificair.com>
Sent: Friday, November 8, 2024 1:35 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Master Plan for Aurora State Airport

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hello Tony and Alex,

We have operated our business at Aurora Airport since 2006 and now have 15 employee, contract pilots and workers, along with numerous aviation vendors who rely on our business. We have seen the town of Aurora improve and benefit economically from the airport community.

While we recommend airport safety improvements, we do not see the destruction of hangars and the businesses that operate at Aurora Airport as being the best option. The idea of having businesses completely unended for many months, and ultimately being forced to pay OR State to lease land is probably going to drive business away, making the future of Aurora Airport questionable.

Regarding the two objectives for the proposed destruction:
1. Vehicle lane: this would be more efficient and safer if placed to the East where most vehicles enter the airport, as far as possible from the taxiway.
2. Parallel taxi-lane: this seems unnecessary, I do not believe there is a compliance issue necessitating it. But it could be achieved with ODAV purchasing 1 acre at mid-field and the seller is willing. This was originally setup long ago for ODAV to purchase at a future date.

Please register and make part of the master plan record my very strong objection to the forced acquistion and destruction of any privately owned hangars and land at the Aurora Airport.

Wendy Schreiber
Pacific Aircraft Services
503-998-6987

Jeff Schreiber

Pacific Aircraft Services
503-784-5580

Outlook

Re: Charbonneau Replacement on PAC

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 6/10/2024 12:40 PM
To David Mauk <davidemascent@gmail.com>
Cc Anne Shevlin <a.shevlin@charbonneaucountryclub.com>

Wonderful, thank you for confirming! I'll see you virtually tomorrow.

Are you also able to share the Thursday open house with other residents? We want to make sure people know about the event so they can talk to staff from FAA and ODAV.

Thanks,
Brandy

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in » Email is the best way to reach me; I try to respond within 3 full workdays.

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

From: David Mauk <davidemascent@gmail.com>
Sent: Monday, June 10, 2024 12:07:51 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Anne Shevlin <a.shevlin@charbonneaucountryclub.com>
Subject: Re: Charbonneau Replacement on PAC

Greetings Brandy -
Yes, I received your notice & can say that this week's PAC meeting is on my calendar since. I look forward to attending & thank you for your follow-up.

Yours -
Dave
David E. Mauk
Charbonneau Civic Affairs Committee

On Mon, Jun 10, 2024 at 11:40 AM Brandy Steffen <brandy.steffen@jla.us.com> wrote:

> Hello again Anne and Dave,
>
> I just wanted to make sure you saw my previous email in advance of this week's PAC meeting and public open house. **Can you please let me know that you've received this?**

Thanks so much and I look forward to seeing you tomorrow, Dave!

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting
Meeting + email hours 9 a.m.–5 p.m. Tuesday–Friday. Administrative-only hours on Monday.
Check my availability » Schedule a 30 minute check-in

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Tuesday, May 28, 2024 2:36 PM
To: Anne Shevlin <a.shevlin@charbonneaucountryclub.com>
Cc: David Mauk <davidemascent@gmail.com>; Jen Winslow <Jen.winslow@jla.us.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Re: Charbonneau Replacement on PAC

Hello Anne,

Thank you for letting us know about the change. We will update our records. Please note that we have a virtual PAC meeting on Tuesday, June 11 from 5:00-8:00 pm. We hope that Dave can attend.

We are also hosting an in-person open house for anyone interested in the project on Thursday, June 13. We hope that you can help share the public open house with the rest of Charbonneau residents and that you can attend. I've attached a postcard that announces both events; feel free to share! The information is also listed below.

Thursday, June 13, 2024

Drop by between 4:00-7:00 pm

North Marion High School, Commons

(20167 Grim Rd NE, Aurora, OR 97002)

Light refreshments provided; children welcome

Tendremos interpretación en español en la reunión. We will have Spanish interpretation at the meeting.

This meeting provided an opportunity for the neighbors, PAC members, and other interested community members to learn about the Airport Master Plan project. This meeting will present the preliminary alternatives for the Aurora State Airport Master Plan. All written and verbal comments collected during the open house will be included in the event Summary.

Please let me know if you have any questions.

Thanks,

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com

Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday

Check my availability » Schedule a 30 minute check-in » Email is the best way to reach me; I try to respond within 3 full workdays.

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From: Anne Shevlin <a.shevlin@charbonneaucountryclub.com>
Sent: Tuesday, May 28, 2024 10:53:44 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: David Mauk <davidemascent@gmail.com>
Subject: Charbonneau Replacement on PAC

Brandy,

This message is to notify you that effective immediately, Charbonneau Country Club board director Dave Mauk will replace Jeff Baymor as the representative on the Aurora Airport PAC.

Please include Dave in all correspondence and meeting notices. Dave is copied on this message.

Please respond back that you have received this email and that you are the correct person to make these changes.

Thank you,
Anne Shevlin, President
Charbonneau Country Club

Outlook

Fw: Regarding the Aurora Airport Master Plan Process

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 11/19/2024 4:16 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, November 12, 2024 6:17 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Regarding the Aurora Airport Master Plan Process

Good morning, please include in the record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, November 12, 2024 6:17 AM
To: P Stack <pstack@affordableathomecare.com>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: RE: Regarding the Aurora Airport Master Plan Process

Hi Peter, thank you for your comments, I have forwarded them to the master plan team and they'll be included in the record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: P Stack <pstack@affordableathomecare.com>
Sent: Friday, November 8, 2024 6:01 PM

To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Regarding the Aurora Airport Master Plan Process

Some people who received this message don't often get email from pstack@affordableathomecare.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Regarding the Aurora Airport Master Plan Process.

I am requesting that you **make part of the record** that I have an absolute objection to the confiscation and destruction of hangers on the Aurora Airport. This is an unnecessary move and goes against the needs of the community.

Destroying private, functioning property, to build a parallel taxiway and roadway - that can be accommodated in other, more appropriate, and logical ways – needs to be selected as the solution. Example: build the roadway at the edge of airport property. And ask the willing party to sell the acre of land that is available and would support a more supportive option.

At some point our government officials need to use their knowledge and power to support business in Oregon and organizations that are functioning and profitable and contribute to society – not look for ways to destroy of dismantle them. When all the businesses have been decimated, who will pay the corporate and business taxes that the state lusts after?

I recommend airport safety improvements but only with no destruction of any hangars.

Sincerely,

Peter Stack
CEO | Affordable At Home Care
(503) 805-3304 m
Pstack@affordableathomecare.com

Outlook

Re: Aurora PAC membership

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 10/14/2024 1:41 PM
To Jamie Stickel <StickelJ@canbyoregon.gov>
Cc Jen Winslow <Jen.winslow@jla.us.com>; Eileen Stein <steine@canbyoregon.gov>; Don Hardy <HardyD@canbyoregon.gov>

Thank you all for confirming. We'll add you and Don as the main point of contacts. Tomorrow's meeting is the last one until 12/10 and then the PAC will be complete. We'll keep you posted and hope to see you at tomorrow's meeting.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Jamie Stickel <StickelJ@canbyoregon.gov>
Sent: Friday, October 11, 2024 3:40 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Jen Winslow <Jen.winslow@jla.us.com>; Eileen Stein <steine@canbyoregon.gov>; Don Hardy <HardyD@canbyoregon.gov>
Subject: RE: Aurora PAC membership

Brandy –

Thank you for reaching out about the PAC. Our team has talked internally. I will serve as the main PAC member, Don Hardy will serve as the alternate. Eileen Stein would like to stay on your email list so that she can stay on top of the issues that arise, though she does not intend to serve as a PAC member.

As Don Hardy and I were talking about the Aurora PAC, one item came up that we thought would be important to share. In the case that either Don Hardy or myself are unable to attend a PAC meeting, it is possible we will send a different staff person to the meeting to be able to ensure someone from our organization is present and to take notes to bring back to the City of Canby. We believe it is unlikely this will happen, however we thought it would be important to note in the case it does.

Thank you for checking in with the City of Canby – we appreciate it!

Sincerely,

Jamie Stickel
Economic Development Director | Communications Specialist
City of Canby
222 NE 2nd Avenue | PO Box 930
Canby, OR 97013

(p) 503.266.0701 | (m) 503.545.5808
StickelJ@CanbyOregon.gov

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Wednesday, October 9, 2024 1:22 PM
To: Eileen Stein <steine@canbyoregon.gov>; Jamie Stickel <StickelJ@canbyoregon.gov>
Cc: Jen Winslow <Jen.winslow@jla.us.com>
Subject: Aurora PAC membership

You don't often get email from brandy.steffen@jla.us.com. Learn why this is important

Hi Eileen and Jamie,

We're just updating our documentation for the project. Is Eileen the main PAC member and Jamie the alternate? Jamie submitted comments during the July comment period.

If that is right, we'll send you both the information for the 10/15 meeting.

Thanks,

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
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Outlook

Fw: Aurora State Airport Master Plan Proposed Preferred Alternative

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-01-06 8:52 AM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

1 attachment (193 KB)
12.23.24 Aurora Airport PAC Letter.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, December 23, 2024 3:22 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Aurora State Airport Master Plan Proposed Preferred Alternative

Hello,

Good afternoon. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357
EMAIL Alex.R.Thomas@ODAV.Oregon.Gov
SALEM, OR 97302
WWW.OREGON.GOV/AVIATION

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Schedule a meeting with any of the programs listed below.

Alternative Contacts:
COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Jamie Stickel <StickelJ@canbyoregon.gov>
Date: Monday, December 23, 2024 at 14:28
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Eileen Stein <steine@canbyoregon.gov>, Brian Hodson <hodsonb@canbyoregon.gov>
Subject: Aurora State Airport Master Plan Proposed Preferred Alternative

You don't often get email from stickelj@canbyoregon.gov. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Mr. Thomas -

My name is Jamie Stickel and I am the Economic Development Director for the City of Canby. I serve as a member of the Aurora Airport PAC. Please see the attached letter regarding the Aurora State Airport Master Plan Proposed Preferred Alternative.

Sincerely,

Jamie Stickel
Economic Development Director | Communications Specialist
City of Canby
222 NE 2nd Avenue | PO Box 930
Canby, OR 97013
(p) 503.266.0701 | (m) 503.545.5808
StickelJ@CanbyOregon.gov

City of Canby
222 NE 2nd Avenue, Canby OR 97013
www.CanbyOregon.gov | 503.266.4021

December 23, 2024

Alex Thomas
Planning and Programs Manager
Oregon Department of Aviation
3040 25th Ste SE
Salem, OR 97602
Alex.R.Thomas@odav.oregon.gov

Re: Aurora State Airport Master Plan Proposed Preferred Alternative

Mr. Thomas,

Please enter this letter into the record for the Oregon Department of Aviation's (ODAV) proposed "Preferred Alternative" for the Aurora State Airport Master Plan. We support Director Sugahara's statement that ODAV is willing to modify its Preferred Alternative for the Aurora Airport Master Plan. We believe that it is important that ODAV do so, to enable the airport to continue to deliver significant tax benefits, family wage jobs, emergency resiliency and aeronautical innovation to the region and state. The current version of ODAV's proposed Preferred Alternative is inconsistent with these objectives.

ODAV is bound by ORS 836.640-642 which was developed by Business Oregon. That statute strongly encourages private investment at the Aurora Airport and commands ODAV to carry out that objective. Contrary to that statute, ODAV's proposed alternative contemplates ODAV taking by eminent domain the Aurora Airport front line aircraft hangars for which the owners have invested more than $200 million, created millions in tax revenue, more than a 1000 good jobs and millions in directly and indirectly related tourist revenue for surrounding communities, with ORS 836.640-642 as the catalyst.

Against this backdrop, the "Preferred Alternative" anomalously designates areas that have been set aside in airport master plans for airport related development since 1976, as areas for ODAV acquisition instead of bringing them into the airport boundary established by ORS 836.640-642 for development for airport related uses and wipes out the front line hangars.

Both elements of the preferred alternative are misguided. Among other objectives for the Aurora Airport, ORS 836.642 requires ODAV to "Preserve investments [at the Aurora Airport] and the level of service provided by [the Aurora Airport]" and to "promote economic development" at Aurora "by creating family wage jobs, increasing local tax bases" through support of private aviation-related uses so that they may "develop and thrive." The preferred alternative is contrary to ORS 836.640-642 and expressly seeks to trade the private investment that the statute seeks to encourage and grow, for government condemnation and ownership.

Concerningly, ODAV's preferred alternative significantly gambles with the significant economic benefits that private investment at the airport has delivered, risking their continuation. The threat of ODAV condemnation, not to mention ODAV actually engaging in such litigation against those owners, presents an unacceptable risk of driving away not only those aircraft hangar owners, but also their businesses, jobs and related tax and tourist revenue. Once they are gone, the stigma of such ODAV action could make the airport and indeed any airport that ODAV manages, a private investment pariah for decades. Such a risk should not be taken where, as here, a state statute commands ODAV otherwise and there are alternatives.

It is respectfully submitted that the justification for the "preferred alternative" simply does not justify its deleterious effects. ODAV is on record stating that these harmful consequences only flow from ODAV's desire for a "vehicle service road" (VSR) and a new aircraft taxiway. But neither necessitates the preferred alternative.

Regarding the VSR, the 2012 master plan approved a VSR that has none of the Preferred Alternative's deleterious effects and does not carry a $200 million condemnation price tag. At worst, the 2012 VSR costs the state some pavement. Moreover, we are advised that the private aeronautical stakeholder owners have offered ODAV the land needed for the 2012 MP VSR free of charge. We are unaware of any reason for ODAV to not pursue that 2012 MP VSR and we can only see good reasons to do so.

We are further advised that there are alternatives for a new taxiway that ODAV has not explored. We understand that ODAV has not explored any such alternatives because it does not own the land needed for a taxiway to be located elsewhere. However, so far as we know this has never been an impediment previously to the development of the Aurora Airport and should not be an impediment now. Many features of the proposed alternative are now contemplated on land that ODAV does not own – including the taking of the frontline hangars. Even if ODAV had to acquire some private land for a new taxiway, ODAV should explore such alternatives having the least adverse impact on the continuation and growth of private aeronautical investment at the airport, not to mention a price tag well south of the $200 million under the Preferred Alternative. Finally, we are advised that ODAV simply does not "want" to extend the airport boundary to include the land that is now and has long been foreseen for airport-related development in the airport boundary. Such a justification if true, would obviously be contrary to ODAV's mission and responsibility to enable the Aurora Airport to grow with aviation-related uses.

We are frankly perplexed by these problems given the success of the airport and the commands of ORS 836.640-642. ODAV should be eager to develop a master plan that ensures the Aurora Airport's continued growth and success over the master plan's 20-year horizon. If these problems that risk sending the airport backwards by decades arise from a lack of meaningful airport stakeholder engagement in the development of the preferred alternative, then ODAV should meaningfully engage. But whatever the reason, we strongly encourage ODAV to dismiss the Preferred Alternative and to meet with the airport stakeholders and to explore a more normative and economically reasonable preferred alternative that is consistent with ORS 836.640-642.

Sincerely,

Jamie Stickel

Jamie Stickel, Director of Economic Development
City of Canby

Outlook

Re: Aurora State Airport Master Plan Website Comments - John Storey

---

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Fri 7/19/2024 10:50 AM
To stohn.stohn@gmail.com <stohn.stohn@gmail.com>

Hello John,

Thank you so much for your comments about the Aurora Airport Master Plan. I wanted to let you know that we've received your comments and they have been passed along to the technical team and the staff at the Oregon Department of Aviation (ODAV). Please let me know if you have any other questions or comments.

Thanks,
Brandy
(on behalf of Oregon Department of Aviation)

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting

Sent: Thursday, July 11, 2024 11:05 AM
Subject: Re: Aurora State Airport Master Plan Website Comments - John Storey

Aurora State Airport Master Plan Website Comments

Name	John Storey
Comments or questions?	I SUPPORT AURORA'S AIRPORT AND GENERAL AVIATION Aviation has become an indispensable component of the world's transportation infrastructure. However like the history of the automobile, growing from an affluent person's luxury to an every person transportation necessity, aviation needs the foundation to grow and continue to fill greater roles in the world's social and economic structure. Current benefits of an airport like Aurora: Jobs: Many people work at the airport maintaining the many aspects of aviation.

	Taxes: The employees, businesses and pilots using the airport pay various governmental fees and taxes. Professional pilot training: Many pilots that will someday fly the airline's airplanes are training at the airport. Disaster preparedness: In the event of a major transportation-impacting disaster, the airport would be a center for transportation support. Emergency services support: Many of the aircraft used in emergency operations use the airport for maintenance, training and storage. Volunteer activities: Many non-professional pilots contribute daily to charitable organizations supporting disaster preparedness, specialized medical transportation and other socially conscious efforts. Critiques to opposition: Noise: Pilots have special procedures to avoid noise pollution for nearby residents. Additionally without smaller airport like Aurora's, businesses that might advance less-noisy aircraft would not have a location to progress their technologies. Climate impacting pollution: Scientific conclusions indicate that general and business aviation are statistically insignificant compared to automobile transportation. Again technological advancements in cleaner (greener) aviation cannot progress without smaller, supporting airports. Traffic congestion on I-5: Come on!! Really?! When driving on I-5, I see selfish and distracted drivers and sheer vehicular volume being the greatest contributors. Besides with futuristic, affordable, accessible transportation network (evolving from local airports like Aurora's) traffic congestion will only get worse. We cannot continue to build more highways to support the growth of ground-based, personal transportation. We must begin to expand vertically, which would need supporting smaller airports for innovation and growth.
If you would like a response, please tell us	Email

the best way to contact you:

Email	stohn.stohn@gmail.com

You can edit this submission and view all your submissions easily.

Outlook

Fw: Objectction to current Aurora Airport master plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2024-11-11 9:18 AM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Friday, November 8, 2024 4:17 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Objectction to current Aurora Airport master plan

Please include in the record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Friday, November 8, 2024 4:17 PM
To: Stohn <stohn.stohn@gmail.com>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: RE: Objectction to current Aurora Airport master plan

Hi John, thank you for your feedback, I've sent it to the master plan team and it will be included in the record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Stohn <stohn.stohn@gmail.com>
Sent: Friday, November 8, 2024 3:48 PM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Objectction to current Aurora Airport master plan

Some people who received this message don't often get email from stohn.stohn@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Please note my ***very strong objection*** to the current master plan for the Aurora Airport.

The current plan is very excessive for the modest needs of the airport. Confiscating property and destroying facilities will negatively impact business -- potentially reducing airport employment and exacerbating the ongoing hangar shortage problem.

Instead of this overreaching master plan:

1. The taxiway could be much more accommodating with some intermittent passing zones, which can be acquired through negotiations with property owners.

2. Again through voluntary negotiations with current property owners, end-to-end, vehicle roads could be achieved through properties closer to Airport Rd.

I want safer airport operations, but not through grossly excessive means.

Thank you,
John Storey
11/8/2024

Outlook

Fw: Aurora State Airport Master Plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 11/19/2024 4:04 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, November 18, 2024 2:51 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Aurora State Airport Master Plan

Hello,

Good afternoon, please include in the record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:
COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Date: Monday, November 18, 2024 at 14:49
To: Stan Swan <slamdadswan@gmail.com>, BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Re: Aurora State Airport Master Plan

Hello Stan,

Good afternoon and thank you for your comments, we have forwarded them to the master plan team and they'll be included in the record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:
COAR Grants: Grants@ODAV.Oregon.Gov
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Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Stan Swan <slamdadswan@gmail.com>
Date: Sunday, November 17, 2024 at 13:08
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>, THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Aurora State Airport Master Plan

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This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Gentlemen,

Please register and make part of the Aurora Airport master plan record my objection to the "taking" of any privately owned hangars on the Aurora Airport. This looks as if it is a solution looking for a problem. The FAA can and will issue waivers for the issues at hand.

There is a significant shortage of hangars. The hangars sited for destruction are all currently providing significant employment. The two motivations for the proposed destruction, 1) a vehicle lane would work MUCH better as far as possible away from the taxiway 2) The parallel taxi-lane is unnecessary, and very similar results could be achieved with ODAV purchasing only 1 acre from a willing seller or as mentioned above, an FAA waiver.

I recommend airport safety improvements but only with no destruction of any hangars.

Respectfully submitted,

Stan Swan
CFII

Outlook

Fw: Aurora Airport Master Plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2024-11-11 9:18 AM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Friday, November 8, 2024 4:20 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora Airport Master Plan

Please include in the record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Friday, November 8, 2024 4:20 PM
To: Walter Swan <waswan@comcast.net>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Bruce Bennett <bruce@auroraaviation.com>
Subject: RE: Aurora Airport Master Plan

Hi Walt, thank you for your comments, they have been sent to the master plan team and will be included in the record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Walter Swan <waswan@comcast.net>
Sent: Friday, November 8, 2024 3:09 PM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Bruce Bennett <bruce@auroraaviation.com>
Subject: Aurora Airport Master Plan

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

I recently became aware of what the state is offering as the new master plan for the Aurora airport.
It seems highly impractical and extremely disrupting to demolish so many buildings to accomplish what you are proposing. There is a significant shortage of hangar space now and will be worse in the future. There is also many jobs in the buildings that would be lost, at least for a long time, until new buildings can be developed.It seems that locating the vehicle road further east, near Airport Way makes more sense. And I don't think that a parallel taxiway is worth the cost and disruption it would cause.
I recommend that the new plan NOT include destruction of buildings.

Walt Swan
Past hangar user for 15 years.
5777 Cascade St
West Linn, OR 97068

Outlook

Fw: Aurora Airport Master Plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 12/19/2024 8:11 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

I will be on vacation starting Monday, 12/23/24 and will return on Monday, 01/06/25.
JLA will be closed December 24 through January 1 to allow our entire team time to rest and recover. Please get in touch early with any anticipated needs during this time. Wishing you a lovely end to 2024!

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Wednesday, December 18, 2024 3:32 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Aurora Airport Master Plan

Hello,

Good afternoon. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357
EMAIL Alex.R.Thomas@ODAV.Oregon.Gov
SALEM, OR 97302
WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:

COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Walter Swan <waswan@comcast.net>
Date: Wednesday, December 18, 2024 at 15:29
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Aurora Airport Master Plan

You don't often get email from waswan@comcast.net. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Mr. Thomas;
I have been involved in flying activities at the Aurora Airport for many years, having flown my first solo flight there in 1967.
I am deeply disappointed that the master plan that you are considering will demolish many hangers and disrupt many businesses. I ask that the board come up with a plan that does not put the hangars in jeopardy.
Walt Swan

Outlook

Fw: UAO Master Plan PAC & Meeting

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 12/18/2024 10:16 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (242 KB)
uao-amp-pacprotocols-110221[60][32][27].pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Wednesday, December 18, 2024 10:01 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: UAO Master Plan PAC & Meeting

Hello,

Good morning. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

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From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Date: Tuesday, December 17, 2024 at 09:51
To: betsy@betsyjohnson.com <betsy@betsyjohnson.com>, SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>, BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: UAO Master Plan PAC & Meeting

Hello Betsy Johnson,

Thank you for contacting the Oregon Department of Aviation. Our team has been extremely busy with the legislative session and the Aurora PAC process, and we appreciate your patience.

This message is to acknowledge your recent phone calls and assure you that we will be in touch soon. To maintain transparency and avoid any appearance of impropriety or undue influence on the PAC process, we are happy to schedule a meeting after we have released a refined alternative for UAO.

ODAV values and welcomes all public input, and we encourage you to attend and provide comment during the public comment section of our next PAC meeting. Additionally, we deeply appreciate the perspectives and contributions from the organizations selected to participate on the PAC. These members represent the airport's direct users, relevant agencies, and the local community, ensuring a broad and informed range of viewpoints are considered.

As outlined on page 3 of the Protocols and Ground Rules (attached), any alternate must be identified to ODA(V) at the project onset and attend all meetings to prevent the need to revisit past business.

Thank you again for reaching out, and we look forward to connecting with you soon.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

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AURORA STATE AIRPORT MASTER PLAN

PLANNING ADVISORY COMMITTEE PROTOCOLS & GROUND RULES

Below is the proposed approach, including protocols and ground rules, for the Aurora State Airport Master Plan Project's Planning Advisory Committee (PAC).

STRUCTURE

Committee Structure

- The committee includes members appointed by Oregon Department of Aviation (ODAV) staff, in accordance with ODAV's State Agency Coordination Agreement. Members represent a wide array of organizations, including interested cities/counties, various state agencies, potentially affected tribal communities, adjacent property and business owners, developers, residents and community groups.
    - ODAV has tried to get a diverse range of viewpoints involved and represented on the PAC.
    - Additions or refinement of PAC members may take place at the discretion of ODAV staff.
- Members will provide input at key decision points in an advisory level; as a **sounding board**. No recommendations will be made by the committee; the group will be asked for feedback through poll questions and break out room discussions. All viewpoints will be represented in the meeting summaries.
- PAC Members will provide input as a representative of their organization. Personal opinions are not the intent of membership.

Decision-making

- All opinions will be part of the meeting record, attributed to specific committee members in the meeting notes. Recordings of the meetings will be posted on the project website.
- Decision points within the planning process will result in round table discussions and collection of committee member opinions. This will not be a formal recommendation; all opinions will be included in the meeting summary.
- As the airport sponsor, ODAV staff will be the final decision-making authority. They will decide what is included in the Master Plan.
- The Federal Aviation Administration (FAA) reviews all components of a Master Plan as it is prepared to provide input and guidance. However, the FAA only reviews and formally approves these components: Forecasts of aviation activity (based aircraft, operations, and peak activity); Selection of critical aircraft; and Airport Layout Plan (ALP). It is from these listed elements that the FAA makes a determination regarding eligibility of Airport Improvement Program (AIP) funding for any proposed development.

Meeting Process

Before each meeting the agenda and any meeting materials will be emailed (and mailed upon request) to all members. Notice will be posted in the local newspaper, at the Aurora Airport, and on the ODAV website and social media accounts 30 days before the meeting, so that interested individuals can choose to attend. Email notification will be sent via GovDelivery for interested parties that have signed up for the service. The proposed meeting topics and dates are below:

1. AMP introduction – 11/16/21 from 3:00-5:00 pm – Zoom
2. Existing conditions – Zoom
3. Optional meeting – if needed
4. Facility goals and requirements – Zoom
5. MOS/RPZ Analysis – Zoom
6. Preliminary development alternatives – Zoom
7. Optional meeting – if needed
8. Preferred development alternatives – Zoom
9. Implementation plan and CIP – Zoom

Meeting Guidelines

- Discussions will be facilitated and time will be allocated for all committee members to speak.
- Meetings will begin and end on time. If agenda items cannot be completed on time, ODAV staff will decide if the meeting should be extended or if an additional meeting should be scheduled.
- Meetings summaries will be prepared and distributed following the meetings.
    - All committee opinions will be documented in the summary.
    - All public comments, whether collected verbally or written, will be responded to in the summary.
    - A recording of the meeting will be posted to the project website.
- Facilitator will provide opportunities for 15 minutes of public comment or announcements relating to agenda items at the end of each meeting, with a maximum of 2 minutes per individual.
    - PAC members and staff should not answer public questions or respond, to allow the public their full time to provide comments.
    - Every agenda and virtual meeting will advertise the opportunity for comments to be emailed before or following the meeting.
    - Comments on non-agenda items should be provided in writing. Community members are encouraged to provide comments at least three days before meetings to allow members time to review and reflect on comments.

Group Agreements

The facilitator will:

- Ensure that everyone has an opportunity to participate.
- Keep meetings moving and focused on the agenda.
- Start and end meetings on time, unless ODAV agrees to extend the meeting time.

- Enforce group agreements and ground rules.
- Host and facilitate the meetings virtually on Zoom as long as requested by ODAV. Settings for the virtual meeting will:
    - Allow PAC members to have dialogue with ODAV and consultant staff; though everyone will be muted due to the size of the committee until the comment periods. Members will be labeled on Zoom as “panelists”.
    - Public participants can attend the meeting as “guests/participants” and provide comments at the designated time, but not during the rest of the meeting. They can also submit written comments throughout the meeting.

Committee Agreements

As a committee, we agree to approach this work with honesty, openness and willingness to work together. This includes building trust and assuming good intentions in others and ensuring that our behavior supports a successful process. We will work with each other and staff to address issues as they arise, utilize tools to ensure clear communication and robust participation, and meet the communication needs of members.

Specifically, we agree to the following ground rules:

- Be respectful of each other.
    - In discussions, challenge ideas rather than individuals.
    - Approach different opinions with curiosity, seek to understand.
    - Be mindful of your participation and the space you occupy in meetings: step up and step back.
- Keep the needs and concerns of the local community and the larger region at the forefront of the work.
- Keep focus on the objectives of the meetings; work with facilitator to note additional topics for discussion.
- Keep multi-tasking to a minimum
- Members commit to the spirit of transparency and sharing their interactions with the public by referring the public to provide comments at meetings, via email, or at one of the public outreach activities.
- Members are encouraged to share the committee’s progress with their respective constituencies/organizations at meetings, by e-mail or through newsletters.
- Notify ODAV staff of any media inquiries and refer requests for official statements or viewpoints to staff. Committee members will not speak to media on behalf of the committee or ODAV, but rather only on their own behalf.
    - Members will not undermine the work of the group by initiating contact with the media or officials to advance their opinions or to counter fellow members’ opinions.
- Attend all of the meetings; an alternate can attend in the place of a member.
    - The alternate must be identified to ODAV at the project onset and attend all meetings so that past business doesn’t need to be revisited.
    - Notes/comments from a member can also be sent to the facilitator in advance of a meeting if a member cannot attend; these notes will be read to the committee.

Outlook

Fw: KUAO Master Plan Input

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2024-11-11 9:18 AM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Friday, November 8, 2024 2:57 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: KUAO Master Plan Input

FYI, just wanted to make sure this was included in the record.

Thanks,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Mark <markrtipper@gmail.com>
Sent: Monday, July 1, 2024 11:51 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Bruce Bennett <bruce@auroraaviation.com>
Subject: KUAO Master Plan Input

You don't often get email from markrtipper@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hi, Anthony (CC Bruce Bennett)-
I'm reaching out directly to you with input on the Aurora State Airport (KUAO) Master Plan.

I wholeheartedly support continued aviation operations at the Aurora State Airport.

I am a private pilot who earned my pilot certificate at KUAO thanks to the existence of the airport and Fixed Based Operators (FBO's) like Willamette Aviation and Aurora Aviation at a location that was convenient for me with instruction and aircraft rentals that were affordable to me.

I am an active member of the Columbia Aviation Association, an aviation community of pilots based at KUAO that are united by a passion for aviation. Our mission includes fostering aviation safety, education, mentoring and outreach, and we provide opportunities to expand our members' aviation expertise.

I am proud to own and operate an aircraft that runs on unleaded gasoline ("MOGAS").

I support maintaining the existing runway, taxiways and control tower such that any future plans do not interrupt airport operations.

As a safety professional, I support the promotion of safety improvements for ground and air operations.

I also recommend connecting the south end operations with the midfield operations via a vehicle access behind the old church property as well as connecting the ramp in front of the Columbia Aviation Association's clubhouse directly to the taxiway toward runway 35.

I do NOT support the annexation of KUAO into the City of Aurora. I believe it would increase our taxes and provide no tangible benefit to airport users like me.

Thank you for your consideration of these comments,
Mark

Outlook

Re: Aurora State Airport Master Plan Website Comments - Mark Tipperreiter

From Mark Tipperreiter <noreply@jotform.com>
Date Mon 7/1/2024 11:45 AM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	Mark Tipperreiter
Organization	Columbia Aviation Associatioin
Comments or questions?	I wholeheartedly support continued aviation operations at the Aurora State Airport. I am a private pilot who earned my pilot certificate thanks to the existence of the airport and Fixed Based Operators (FBO's) like Willamette Aviation and Aurora Aviation at a location that was convenient for me with instruction and aircraft rentals that were affordable to me. I am proud to now own and operate an aircraft that runs on unleaded gasoline ("MOGAS"). I support maintaining the existing runway, taxiways and control tower such that any future plans do not interrupt airport operations. As a safety professional, I support the promotion of safety improvements for ground and air operations. I also recommend connecting the south end operations with the midfield operations via a vehicle access behind the old church property as well as connecting the ramp in front of the Columbia Aviation Association's clubhouse directly to the taxiway toward runway 35.

	I do NOT support the annexation of KUAO into the City of Aurora. I believe it would increase our taxes and provide no tangible benefit to airport users like me. Thank your for your consideration of these comments, Mark
	I would like to receive email updates.
If you would like a response, please tell us the best way to contact you:	Email
Email	markrtipper@gmail.com

You can edit this submission and view all your submissions easily.

Outlook

Fw: Update Re: KUAO 8/21/24 Master Plan Input

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 11/19/2024 4:18 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, November 6, 2024 9:54 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Update Re: KUAO 8/21/24 Master Plan Input

Please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Mark <markrtipper@gmail.com>
Sent: Wednesday, November 6, 2024 9:47 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Bruce Bennett <bruce@auroraaviation.com>
Subject: Re: Update Re: KUAO 8/21/24 Master Plan Input

You don't often get email from markrtipper@gmail.com. Learn why this is important

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👍

On Wed, Nov 6, 2024, 9:46 AM BEACH Anthony <Anthony.BEACH@odav.oregon.gov> wrote:

> Good morning Mark, I appreciate your perspective and suggestions.

Thank you for your comments, we have forwarded your email to the master plan team.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Mark <markrtipper@gmail.com>
Sent: Wednesday, November 6, 2024 7:55 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Bruce Bennett <bruce@auroraaviation.com>
Subject: Update Re: KUAO 8/21/24 Master Plan Input

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This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hi, Anthony-
I'm writing again to share additional input on the most recent version of the Aurora State Airport (KUAO) master plan (Refined Preliminary Alternatives Summary dated 8/21/24) being progressed by the Oregon Department of Aviation.

The current plan involves the removal of hangars closest to the east side of the runway. I am opposed to the demolition of this existing, useful infrastructure. Their existence provides commercial value to the airport and I believe the cost of their removal would outweigh the value they bring to the airport. An alternative to the addition of a full length parallel taxilane and vehicle service road directly east of Taxiway A should be sought to address/provide runway access issues while preserving the existing infrastructure. This approach could satisfy the needs of airport expansion while preserving the existing improvements (hangars) on the airport.

I am a private pilot who earned my pilot certificate at KUAO thanks to the existence of the airport and Fixed Based Operators (FBO's) like Willamette Aviation and Aurora Aviation at a location that was convenient for me with instruction and aircraft rentals that were affordable to me.

I am an active member of the Columbia Aviation Association, an aviation community of pilots based at KUAO that are united by a passion for aviation. Our mission includes fostering aviation safety, education, mentoring and outreach, and we provide opportunities to expand our members' aviation expertise.

I support maintaining the existing runway, taxiways and control tower such that any future plans do not interrupt airport operations. And as a safety professional, I support the promotion of safety improvements for ground and air operations. However, I am compelled to share this viewpoint in support of the rights of the existing property owners on the airport.

Please register and make part of the master plan record my opposition to the eminent domain-like intentions currently planned.

Thank you,

Mark Tipperreiter
6 November 2024

Outlook

Fw: The Aurora Airport master plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 12/3/2024 9:39 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, December 2, 2024 3:16 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Re: The Aurora Airport master plan

Hello Brandy & Samantha,

Good afternoon, please include within the UAO master plan record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

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Schedule a meeting with any of the programs listed below.

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From: Gary Turel <gturel_2000@yahoo.com>
Date: Monday, December 2, 2024 at 14:08
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: The Aurora Airport master plan

[You don't often get email from gturel_2000@yahoo.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Please register and make part of the master plan record my very strong objection to the "taking" of any privately owned hangers on the Aurora airport.

The hangers possibly slated for destruction are imperative for the safe storage of aircraft. These hangers are very valuable to the Oregon flying community.

Alternatives to the hangers destruction:

1. Create a vehicle lane as far away from the taxiway as possible.
2. The parallel taxi-lane is unnecessary. Very similar results could be achieved by ODAV purchasing one acre from a willing seller.

I recommend the airport safety improvements; but only without the destruction of any hangers. Thank you.

Gary J. Turel
December 2, 2024

Sent from my iPad

Outlook

Fw: Regarding the Aurora Airport master plan that is currently underway.

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 11/19/2024 4:09 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Thursday, November 14, 2024 2:48 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Regarding the Aurora Airport master plan that is currently underway.

Good afternoon, please include in the record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Thursday, November 14, 2024 2:49 PM
To: 'Don VanBeek' <dvanbeek503@gmail.com>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: RE: Regarding the Aurora Airport master plan that is currently underway.

Hi Don, thank you for your comments, I have forwarded them to the master plan team and they'll be included in the record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Don VanBeek <dvanbeek503@gmail.com>
Sent: Thursday, November 14, 2024 1:16 PM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Regarding the Aurora Airport master plan that is currently underway.

Some people who received this message don't often get email from dvanbeek503@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Please register and make part of the master plan record my very strong objection to the "taking" of any privately owned hangars on the Aurora Airport.

There is a significant shortage of hangars. The hangars sited for destruction are all currently providing significant employment. The two motivations for the proposed destruction, 1) a vehicle lane would work MUCH better as far as possible away from the taxiway 2) The parallel taxi-lane is unnecessary, and very similar results could be achieved with ODAV purchasing only 1 acre from a willing seller.

I recommend airport safety improvements but only with no destruction of any hangars.

Thank you, Name Don VanBeek and date 11/14/2024

George Van Hoomissen
VH4 Aviation, LLC
22320 Yellow Gate Ln NE, Unit N73
Aurora, OR 97002

August 1, 2024

Oregon Department of Aviation
Kenji Sugahara, Director; Tony Beach, State Airports Manager;
Alex Thomas, Planning & Project Manager; Brandon Pike, Aviation Planner

Gentlemen:

I am writing to provide comments regarding your most recent presentation to the Planning Advisory Committee for the Aurora State Airport Master Plan, which was presented to the PAC during the online meeting on July 30, 2024.

As a part of the July 30th presentation, ODAV's consultant Century West Engineering (CWE) explained that, after extensive analysis and consultation with ODAV and the FAA, CWE has determined that the Aurora State Airport currently does not meet applicable FAA design guidelines for a variety of reasons, including unacceptable items in the Runway Object Free Area (Hubbard Highway, Keil Road, ASOS equipment, wind cone), unacceptable items in the Runway Safety Area (south-end drain field, open drainage ditches), unacceptable direct runway access from aprons/hangars, and a runway length that is approximately 500' too short to meet the RDC C-II requirements.

Next, CWE explained that they had developed three "Refined Preliminary Alternatives" (identified as Alternatives 1A, 1B, and 2), each of which presents a potential way that ODAV could conceivably bring the airport into compliance with FAA requirements. Notably, all three of those Refined Preliminary Alternatives include lengthening the runway by 497' to the north (bringing the runway length to 5500'), which apparently could be accomplished on existing ODAV property, with no taking of any private property required at all. I want to point out that, even though this one airport improvement (i.e., a 500' runway extension) would not on its own resolve all of the airport's current deficiencies, nevertheless it would unquestionably make the airport significantly safer for all airport users, and I believe it would be a giant step toward meeting the FAA requirements applicable to this type of airport. Other minor changes to the airport could be made that would address many of the other deficiencies (e.g., moving the windsock and ASOS equipment, replacing open drainage ditches with covered drainpipes, etc.), without requiring significant land acquisitions or negative impacts on properties adjacent to the airport which are now privately owned.

However, as CWE explained during the July 30th presentation, in order to meet all of the FAA's guidelines, either the Hubbard Highway would need to be moved to the west, requiring acquisition and clearing of 39 to 43 acres of private commercial and residential property that is west of the current Hubbard Highway (as detailed in Refined Alternatives 1A and 1B), or the runway would need to be moved to the east, requiring acquisition and clearing of 37 acres of private property that is east of ODAV's current property line and is now in active aeronautical use (as detailed in Refined Alternative 2).

This work by CWE has produced some useful information, and it has been a necessary and helpful part of the Master Plan process – identifying the airport's current deficiencies and exploring the potential implications of various possible ways that the deficiencies, theoretically, could be fixed. Unfortunately, but most importantly, what I believe this work has revealed is that none of the Refined Preliminary Alternatives is even remotely realistic. In fact, I highly doubt that there is anybody at ODAV or CWE who believes that

any of the recently-presented Refined Alternatives will actually be implemented at any time during the Master Plan planning period. All of the presented alternatives are, in my opinion, obvious non-starters, as each of them would require a massive expenditures of public funds, at a level that is extraordinarily unlikely ever to be made available; and regardless which of the alternatives were to be pursued it would be nearly impossible to adequately justify the impacts on adjacent property owners.

While I would very much like to see the Aurora State Airport improved so that it would meet all FAA design guidelines, it is my opinion that this goal realistically cannot (and therefore will not) be achieved within the coming decades. Therefore, it would be very useful for ODAV to direct its consultants to begin exploring ideas for airport improvements that realistically could be accomplished within the Master Plan planning period.

To that end, what I would like to see is CWE developing and presenting to the public some alternatives for projects that would lead to substantial measurable progress in eliminating current non-standard conditions at the airport and that would move the airport meaningfully towards meeting RDC C-II requirements, while also acknowledging that, as a practical matter, it is extremely unlikely that the airport will ever be able to achieve 100% full compliance with FAA design guidelines.

I suggest that ODAV consider what I will call Realistic Alternative No. 3: Leave the runway right where it is now, but extend it 500' to the north. This could be done with or without various other minor changes on the airfield (such as moving the windsock and ASOS equipment and covering drainage ditches) and leaving the Hubbard Highway unchanged (noting that this would still leave the Hubbard Highway within the ROFA, which is undesirable, but perhaps cannot be helped within the foreseeable future). While not perfect, this alternative would make the airport much better for airport users, while minimizing impacts to off-airport lands. Btw, a vehicle service road could be added as well, but that road certainly does not need to be placed right along the taxiway.

I suggest you also consider Realistic Alternative No. 4, which would be the same as No. 3, except that it would also move the Hubbard Highway to the west as far as possible while still keeping it within the existing ODOT right-of-way. Of course, this variation would require cooperation/consent from ODOT, but it would avoid the need for acquisition of a large number of private properties. While this approach may not fully resolve the issue of vehicles traversing through the ROFA, it may enable cost-effective mitigation of that problem. To my knowledge, there is no law of nature, or anything in the Oregon Revised Statues, or any FAA or ODAV rule, that requires that a highway be centered within a public right-away.

Of course there are many other possible variations on this theme. My main point is that the time has come for ODAV to turn its attention to thinking about and exploring feasible alternatives that actually could be accomplished at the Aurora State Airport. If ODAV and CWE are unwilling to explore such alternatives (i.e., projects that would be less-than-perfect but feasible within the near term), then please explain to the PAC why that is.

Thank you for considering this input.

Sincerely,

George Van Hoomissen

Outlook

Re: Aurora State Airport Master Plan Website Comments - George Van Hoomissen

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2024-08-27 10:41 AM
To gtvh@vhfour.com <gtvh@vhfour.com>
Cc 'BEACH Anthony' <Anthony.BEACH@odav.oregon.gov>

Hello George,

Yes, we did receive and include your letter in the meeting summary. Thanks for confirming your question and please let me know if there is anything else.

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting

From: gtvh@vhfour.com <gtvh@vhfour.com>
Sent: Tuesday, August 27, 2024 10:37 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: 'BEACH Anthony' <Anthony.BEACH@odav.oregon.gov>
Subject: RE: Aurora State Airport Master Plan Website Comments - George Van Hoomissen

Hi Brandy,

Thanks for your email below. To be clear, I was not inquiring about the inclusion of comments that I made verbally during the meeting. What I want to make sure is included is the comments that I provided in writing, shortly after the meeting, by way of my letter dated August 1, 2024, a copy of which I have attached to this message. Please confirm that you will be including the attached letter as part of the public comments that will be available on your website.

Regards,

George

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Tuesday, August 27, 2024 10:25 AM
To: gtvh@vhfour.com
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Aurora State Airport Master Plan Website Comments - George Van Hoomissen

Hi George,

Thanks for your comment and I apologize for the delayed response. We are currently finalizing the summary and we do have your comments from the meeting included. As soon as that document is finalized, we will post it to the meetings page with the other July 30th materials.

Thanks,
Brandy
(on behalf of the Oregon Department of Aviation)

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
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From: George Van Hoomissen <noreply@jotform.com>
Sent: Friday, August 16, 2024 6:15 PM
To: JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Re: Aurora State Airport Master Plan Website Comments - George Van Hoomissen

Aurora State Airport Master Plan Website Comments

Name	George Van Hoomissen
Comments or questions?	Your "Meetings Page" has documents from the PAC meeting on July 30th, and underneath those documents there is a note which says that you have included all public comments received prior to, at, and during the week following the meeting in your Meeting Summary. I cannot find the Meeting Summary anywhere on the website. Please provide me the link. (If the Meeting Summary is missing from the website, please post it promptly.). Thank you. George Van Hoomissen Gtvh@vhfour.com
If you would like a response, please tell us the best way to contact you:	Email
Email	gtvh@vhfour.com

You can edit this submission and view all your submissions easily.

Outlook

Re: Aurora State Airport Master Plan Website Comments - George Van Hoomissen

---

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 8/27/2024 10:41 AM
To gtvh@vhfour.com <gtvh@vhfour.com>
Cc 'BEACH Anthony' <Anthony.BEACH@odav.oregon.gov>

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George

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To: gtvh@vhfour.com
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Brandy
(on behalf of the Oregon Department of Aviation)

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Sent: Friday, August 16, 2024 6:15 PM
To: JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Re: Aurora State Airport Master Plan Website Comments - George Van Hoomissen

Aurora State Airport Master Plan Website Comments

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If you would like a response, please tell us the best way to contact you:	Email
Email	gtvh@vhfour.com

You can edit this submission and view all your submissions easily.

Outlook

Fw: PAC public comment FW: Correspondence for ODAV Board Members

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Fri 2024-11-01 12:31 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (88 KB)
Aurora Master Plan-Comments.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, October 30, 2024 8:26 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: PAC public comment FW: Correspondence for ODAV Board Members

Please include this in the public record for the master plan.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Wednesday, October 30, 2024 8:24 AM
To: MORRIS Alexis <Alexis.MORRIS@odav.oregon.gov>
Subject: RE: PAC public comment FW: Correspondence for ODAV Board Members

It sounds like they wanted to submit this comment directly to the board after the September 5th work session, and it sounds like you already did that so we are good. We did already receive this letter on August 1st, and it has been forwarded to the Master Plan team, but I will make sure it is included in the public record.

Thank you for forwarding it.

Tony

From: MORRIS Alexis <Alexis.MORRIS@odav.oregon.gov>
Sent: Wednesday, October 30, 2024 8:19 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: PAC public comment FW: Correspondence for ODAV Board Members

Hiya Tony,

Attached was a public comment that was submitted back in September for the PAC meeting. At the time I had received it I thought it was for the State Board (I did forward this comment on to the board so it is possible Cathryn has already given it to you) but I think it may need to go to the PAC as it directly talks about the PAC meeting that had taken place.

I apologize that I am just now getting it to you. I was about to upload it onto the website for the board meeting when I noticed it was for the PAC meeting.

Thank you,

ALEXIS MORRIS
(She/Her/Hers)
OREGON DEPARTMENT OF AVIATION
BOARD ADMINISTRATOR
MARKETING & ADMINISTRATIVE SPECIALIST

CELL: 503-507-6965

EMAIL: alexis.morris@odav.oregon.gov

3040 25TH STREET SE, SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

From: Oregon Department of Aviation <mail.aviation@ODAV.oregon.gov>
Sent: Wednesday, October 2, 2024 3:41 PM
To: MORRIS Alexis <Alexis.MORRIS@odav.oregon.gov>
Subject: FW: Correspondence for ODAV Board Members

Alexis,

I thought I had forwarded this to you but I couldn't find it.

Gerri

From: gtvh@vhfour.com <gtvh@vhfour.com>
Sent: Sunday, September 8, 2024 7:57 PM
To: Oregon Department of Aviation <mail.aviation@ODAV.oregon.gov>
Subject: Correspondence for ODAV Board Members

You don't often get email from gtvh@vhfour.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

I would appreciate it if you would forward the attached letter to the members of the State Aviation Board: (Cathryn Stephens, Sarah Lucas, Steve Nagy, Bill Graupp, Jim Knight, and Jeffrey Pricher). The subject matter of this letter is directly relevant to the discussions at the Board's most recent Work Session held September 5, 2024.

Thank you,

George Van Hoomissen
VH4 Aviation, LLC

22320 Yellow Gate Ln NE, Unit N73
Aurora, OR 97002

George Van Hoomissen
VH4 Aviation, LLC
22320 Yellow Gate Ln NE, Unit N73
Aurora, OR 97002

August 1, 2024

Oregon Department of Aviation
Kenji Sugahara, Director; Tony Beach, State Airports Manager;
Alex Thomas, Planning & Project Manager; Brandon Pike, Aviation Planner

Gentlemen:

I am writing to provide comments regarding your most recent presentation to the Planning Advisory Committee for the Aurora State Airport Master Plan, which was presented to the PAC during the online meeting on July 30, 2024.

As a part of the July 30th presentation, ODAV's consultant Century West Engineering (CWE) explained that, after extensive analysis and consultation with ODAV and the FAA, CWE has determined that the Aurora State Airport currently does not meet applicable FAA design guidelines for a variety of reasons, including unacceptable items in the Runway Object Free Area (Hubbard Highway, Keil Road, ASOS equipment, wind cone), unacceptable items in the Runway Safety Area (south-end drain field, open drainage ditches), unacceptable direct runway access from aprons/hangars, and a runway length that is approximately 500' too short to meet the RDC C-II requirements.

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However, as CWE explained during the July 30th presentation, in order to meet all of the FAA's guidelines, either the Hubbard Highway would need to be moved to the west, requiring acquisition and clearing of 39 to 43 acres of private commercial and residential property that is west of the current Hubbard Highway (as detailed in Refined Alternatives 1A and 1B), or the runway would need to be moved to the east, requiring acquisition and clearing of 37 acres of private property that is east of ODAV's current property line and is now in active aeronautical use (as detailed in Refined Alternative 2).

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any of the recently-presented Refined Alternatives will actually be implemented at any time during the Master Plan planning period. All of the presented alternatives are, in my opinion, obvious non-starters, as each of them would require a massive expenditures of public funds, at a level that is extraordinarily unlikely ever to be made available; and regardless which of the alternatives were to be pursued it would be nearly impossible to adequately justify the impacts on adjacent property owners.

While I would very much like to see the Aurora State Airport improved so that it would meet all FAA design guidelines, it is my opinion that this goal realistically cannot (and therefore will not) be achieved within the coming decades. Therefore, it would be very useful for ODAV to direct its consultants to begin exploring ideas for airport improvements that realistically could be accomplished within the Master Plan planning period.

To that end, what I would like to see is CWE developing and presenting to the public some alternatives for projects that would lead to substantial measurable progress in eliminating current non-standard conditions at the airport and that would move the airport meaningfully towards meeting RDC C-II requirements, while also acknowledging that, as a practical matter, it is extremely unlikely that the airport will ever be able to achieve 100% full compliance with FAA design guidelines.

I suggest that ODAV consider what I will call Realistic Alternative No. 3: Leave the runway right where it is now, but extend it 500' to the north. This could be done with or without various other minor changes on the airfield (such as moving the windsock and ASOS equipment and covering drainage ditches) and leaving the Hubbard Highway unchanged (noting that this would still leave the Hubbard Highway within the ROFA, which is undesirable, but perhaps cannot be helped within the foreseeable future). While not perfect, this alternative would make the airport much better for airport users, while minimizing impacts to off-airport lands. Btw, a vehicle service road could be added as well, but that road certainly does not need to be placed right along the taxiway.

I suggest you also consider Realistic Alternative No. 4, which would be the same as No. 3, except that it would also move the Hubbard Highway to the west as far as possible while still keeping it within the existing ODOT right-of-way. Of course, this variation would require cooperation/consent from ODOT, but it would avoid the need for acquisition of a large number of private properties. While this approach may not fully resolve the issue of vehicles traversing through the ROFA, it may enable cost-effective mitigation of that problem. To my knowledge, there is no law of nature, or anything in the Oregon Revised Statues, or any FAA or ODAV rule, that requires that a highway be centered within a public right-away.

Of course there are many other possible variations on this theme. My main point is that the time has come for ODAV to turn its attention to thinking about and exploring feasible alternatives that actually could be accomplished at the Aurora State Airport. If ODAV and CWE are unwilling to explore such alternatives (i.e., projects that would be less-than-perfect but feasible within the near term), then please explain to the PAC why that is.

Thank you for considering this input.

Sincerely,

George Van Hoomissen

Outlook

Re: Aurora State Airport Master Plan Website Comments - George Van Hoomissen

From George Van Hoomissen <noreply@jotform.com>
Date Tue 2024-10-15 6:51 PM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	George Van Hoomissen
Comments or questions?	George Van Hoomissen (You): Question for the FAA representative — with the just disclosed preferred alternative, is it possible that the FAA would grant (or entertain a request for) a waiver/modification to the design standards to allow the runway extension to happen first, with other more expensive and difficult phases to follow? Note, I think most pilots would agree that the one change that would most positively impact airport safety is the contemplated 497' runway extension. I would like to receive email updates.
If you would like a response, please tell us the best way to contact you:	Email
Email	gtvh@vhfour.com

You can edit this submission and view all your submissions easily.

Outlook

Re: Aurora State Airport Master Plan Website Comments - George Van Hoomissen

From George Van Hoomissen <noreply@jotform.com>
Date Tue 2024-10-15 7:21 PM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	George Van Hoomissen
Comments or questions?	George Van Hoomissen (You): ODAV's consultants says that their "refined preliminary alternatives" were based in large part on what the consultants were told by FAA personnel as to what the FAA would allow, but the FAA representive has stated clearly that the FAA is not dictating what is in the master plan. So perhaps the consultants have misunderstood the input from the FAA and the consultants should go back to reconsider potential alternatives -- even potentially as interim solutions -- even if the other potential alternative would not meet 100% of design standards. Is it ODAV's understanding that the master plan must show a plan to acheive full compliance with design standards, but AFTER the plan is approved then ODAV could request a waiver/modification to allow a project intended to achieve an interim step that would move toward, but not fully meet, the design standards?
If you would like a response, please tell us the best way to contact you:	Email
Email	gtvh@vhfour.com

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Outlook

Re: Aurora State Airport Master Plan Website Comments - George Van Hoomissen

From George Van Hoomissen <noreply@jotform.com>
Date Tue 2024-10-15 8:03 PM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	George Van Hoomissen
Comments or questions?	There are many advantages to having meetings IN PERSON. Can you have the next PAC meeting and any future PAC meetings in person? If not, why not? Thank you. I would like to receive email updates.
If you would like a response, please tell us the best way to contact you:	Email
Email	gtvh@vhfour.com

You can edit this submission and view all your submissions easily.

Outlook

Re: Aurora State Airport Master Plan Website Comments - George Van Hoomissen

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 12/18/2024 11:16 AM
To gtvh@vhfour.com <gtvh@vhfour.com>
Cc 'THOMAS Alex R' <Alex.R.THOMAS@odav.oregon.gov>; 'BEACH Anthony' <Anthony.BEACH@odav.oregon.gov>; 'SUGAHARA Kenji' <Kenji.SUGAHARA@odav.oregon.gov>

Thanks for the follow up comments George. I'll make sure the rest of the team gets this as well. We'll be in touch soon.

Thank you,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com

From: gtvh@vhfour.com <gtvh@vhfour.com>
Sent: Wednesday, December 18, 2024 11:11 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: 'THOMAS Alex R' <Alex.R.THOMAS@odav.oregon.gov>; 'BEACH Anthony' <Anthony.BEACH@odav.oregon.gov>; 'SUGAHARA Kenji' <Kenji.SUGAHARA@odav.oregon.gov>
Subject: RE: Aurora State Airport Master Plan Website Comments - George Van Hoomissen

Or better yet, maybe ODAV and Century West could just publicly admit that, in fact, there is no such requirement from the FAA.

The FAA wants the master plan to show a pathway to potential/eventual full-compliance. After that, the sequencing of projects will be up to ODAV, with the only requirement from the FAA being that the projects move the airport toward full compliance.

As noted in my prior email, the most important improvement needed at UAO is a longer runway. It makes no sense to hold that improvement until you have completed other improvements that are clearly not achievable within the foreseeable future. The runway extension is feasible right now, without requiring any property acquisition at all.

George

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Wednesday, December 18, 2024 9:44 AM
To: gtvh@vhfour.com
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Re: Aurora State Airport Master Plan Website Comments - George Van Hoomissen

Hello George,

Thank you for your comments. I'll send this message to the rest of the project team and get an answer for you. However, with the holidays ahead, our response may be delayed.

Thanks,

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com

From: George Van Hoomissen <noreply@jotform.com>
Sent: Tuesday, December 10, 2024 4:57 PM
Subject: Re: Aurora State Airport Master Plan Website Comments - George Van Hoomissen

Aurora State Airport Master Plan Website Comments

Name	George Van Hoomissen
Comments or questions?	Your Project Update dated 10/15/2024 regarding the Preferred Alternative said: "The phases of these projects are in no specific order of implementation; however, based on FAA input, the phase to extend the runway would not occur until the phase to meet ROFA and RSA standards are completed." I am interested in knowing more about the "FAA input" on this topic. Has ODAV or ODAV's consultants received anything from the FAA in writing which states that the proposed runway extension may not be completed until after all ROFA and RSA standards have been met? If so, please provide copies of any such documents from the FAA.
If you would like a response, please tell us the best way to contact you:	Email
Email	gtvh@vhfour.com

You can edit this submission and view all your submissions easily.

Outlook

Re: Aurora State Airport Master Plan Website Comments - David Waggoner

From David Waggoner <willametteaviation@icloud.com>
Date Mon 4/29/2024 6:21 PM
To BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc Brandy Steffen <brandy.steffen@jla.us.com>; Dave Waggoner <dave@willametteair.com>; Jen Winslow <Jen.winslow@jla.us.com>

Thank you. I wanted to make sure I understood.

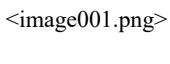
David Waggoner

Willamette Aviation Service
23115 Airport Rd NE
Aurora OR 97002

Direct: 503-680-3597
Office: 503-678-2252
dave@willametteair.com

> On Apr 29, 2024, at 4:20 PM, BEACH Anthony <Anthony.BEACH@odav.oregon.gov> wrote:
>
> Hi Dave,
>
> This chapter is discussing issues with design standards and safety, including hot spots. Mitigation and your proposal will be evaluated in the design alternatives, which comes after this chapter. I have forwarded your email over to the master plan team, and look forward to that discussion 😊
>
> **Tony Beach**
> **OREGON DEPARTMENT OF AVIATION**
> STATE AIRPORTS MANAGER
> **OFFICE** 503-378-2523 **CELL** 503-302-5455
> M-F 7:30am – 4pm
>
> **From:** Brandy Steffen <brandy.steffen@jla.us.com>
> **Sent:** Monday, April 29, 2024 3:18 PM
> **To:** dave@willametteair.com
> **Cc:** BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Jen Winslow <Jen.winslow@jla.us.com>
> **Subject:** Re: Aurora State Airport Master Plan Website Comments - David Waggoner
>
> This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.
>
> Hi David,
>
> Thanks so much for your comment. There will be time in the meeting tomorrow for you to bring comments (and this question) to the rest of the group. I've also copied Tony on this email.

Thank you and I look forward to seeing you tomorrow.
Brandy



BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com

Woman-led, community-centered, for 35 years and counting

Meeting + email hours 9 a.m.–5 p.m. Tuesday–Friday. Administrative-only hours on Monday.

Check my availability » Schedule a 30 minute check-in

From: David Waggoner <noreply@jotform.com>
Sent: Monday, April 29, 2024 1:26 PM
To: JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>
Subject: Re: Aurora State Airport Master Plan Website Comments - David Waggoner

<~WRD0001.jpg> **Aurora State Airport Master Plan Website Comments**

Name	David Waggoner
Organization	Willamette Aviation
Comments or questions?	Alex, How do I get an item in the Master Plan we're discussing tomorrow? I've have a solution that should remove Hot Spot 1. Tony Beach has a copy of the proposal. He said it needs to be in the Master Plan so the ALP can be modified. Thank you I would like to receive email updates.
If you would like a response, please tell us the best way to contact you:	Email
Email	dave@willametteair.com
Phone Number	(503) 680-3597

You can edit this submission and view all your submissions easily.

Outlook

Re: Hot Spot mitigation

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Fri 6/28/2024 2:31 PM
To David Waggoner <willametteair@icloud.com>
Cc Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Jen Winslow <Jen.winslow@jla.us.com>

Thank you David. We'll share your comment with the team.

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting
Meeting + email hours 9 a.m.–5 p.m. Tuesday–Friday. Administrative-only hours on Monday.
Check my availability » Schedule a 30 minute check-in

From: David Waggoner <willametteair@icloud.com>
Sent: Thursday, June 27, 2024 3:00 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Fwd: Hot Spot mitigation

Brandy,

Please add this comment.

Thank you,

David Waggoner

Willamette Aviation Service
23115 Airport Rd NE
Aurora OR 97002

Direct: 503-680-3597
Office: 503-678-2252
dave@willametteair.com

Begin forwarded message:

From: David Waggoner <willametteair@icloud.com>
Subject: Hot Spot mitigation

Date: June 21, 2024 at 10:50:27 AM PDT
To: Alex.R.Thomas@odav.oregon.gov
Reply-To: Dave Waggoner <dave@WillametteAir.com>

Upon a review of Figure 11, page 13, from the Preliminary Alternatives Summary, an important feature of the Hot Spot mitigation plan was omitted. The intent of the modification is to eliminate Hot Spot 1 and mitigate the traffic congestion on the Alpha Taxiway when runway 17 is in use.

To eliminate the Hot Spot aircraft taxing would need to make two ninety turns to enter the runway as depicted. Does the ALP need modification to allow access from the TTF property just north of the airport property at A1?

The second element is to reduce the traffic congestion that bottlenecks taxiway A. This is accomplished by establishing an exit only lane from the movement area. See the attached diagram and FAA 7460-1. The aircraft traffic flow on the TTF, non-movement area will be controlled by signage, pavement markings and reflectors.

Please let me know if you have any questions.

Thank you,

David Waggoner

Willamette Aviation Service
23115 Airport Rd NE
Aurora OR 97002

Direct: 503-680-3597
Office: 503-678-2252
dave@willametteair.com

Outlook

Fw: An option to relocation the Hubbard Hy

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 8/12/2024 9:17 AM
To Jen Winslow <Jen.winslow@jla.us.com>

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting

Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday. Administrative-only hours on Friday.
Check my availability » Schedule a 30 minute check-in
Email is the best way to reach me; I try to respond within 2 workdays.
However, urgent requests should be handled through a phone call or scheduling a meeting using the link above.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Monday, August 12, 2024 8:43 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; W. Matt Rogers <WRogers@CenturyWest.com>
Cc: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: FW: An option to relocation the Hubbard Hy

Good morning.

Forwarding this comment/suggestion.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: David Waggoner <willametteaviation@icloud.com>
Sent: Sunday, August 11, 2024 9:26 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Subject: An option to relocation the Hubbard Hy

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Tony and Brandy,

I’m not sure who is the proper person is to get this in the Master Plan conservation and to the other PAC members for consideration. If it is not you, please let know where to send this thought.

Could we consider an option to moving Hubbard Highway west as recommended in Refined Alternatives 1A and 1B? Instead of shifting the Hubbard Highway west could Hy 551 be rerouted over the existing Boones Ferry Rd NE?

Using Boones Ferry Rd as the location for Hy 551 I believe has several advantages over moving the current highway west.

First, it would eliminate the need acquire the approximately 39 or 43 acres of property. It would also eliminate the disruption of causing the relocation of residents and business.

Secondly, it is possible the cost of making the additions required for the Boones Ferry Rd/Hy 551 corridor would cost less than moving and rebuilding the old highway.

Thirdly, it would eliminate the sections of Hy 551 that are in the north and south RPZ.

David Waggoner

Willamette Aviation Service
23115 Airport Rd NE
Aurora OR 97002

Direct: 503-680-3597
Office: 503-678-2252
dave@willametteair.com

Outlook

Re: Aurora Airport - PAC meeting #7 tomorrow

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 10/15/2024 10:42 AM
To David Waggoner <willametteaviation@icloud.com>
Cc Jen Winslow <Jen.winslow@jla.us.com>

Thanks for letting us know! We'll see you tonight.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: David Waggoner <willametteaviation@icloud.com>
Sent: Tuesday, October 15, 2024 10:38 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Re: Aurora Airport - PAC meeting #7 tomorrow

Got it.

Thank you,

David Waggoner

Willamette Aviation Service
23115 Airport Rd NE
Aurora OR 97002

Direct: 503-680-3597
Office: 503-678-2252
dave@willametteair.com

> On Oct 15, 2024, at 9:35 AM, Brandy Steffen <brandy.steffen@jla.us.com> wrote:
>
> Thanks David. I just sent it to this address. We had a different email address listed for you. Please let me know if you don't get it.
>
> Thanks,
> **BRANDY STEFFEN** | **JLA PUBLIC INVOLVEMENT**
> Partner + Senior Program Manager
> brandy.steffen@jla.us.com » Schedule a 30 minute meeting
>
> ---
>
> **From:** David Waggoner <willametteaviation@icloud.com>
> **Sent:** Monday, October 14, 2024 6:23 PM
> **To:** Brandy Steffen <brandy.steffen@jla.us.com>
> **Subject:** Re: Aurora Airport - PAC meeting #7 tomorrow
>
> Brandy,
>
> I did not receive the Zoom link. Please resend it.

Thank you,

David Waggoner

Willamette Aviation Service
23115 Airport Rd NE
Aurora OR 97002

Direct: 503-680-3597
Office: 503-678-2252
dave@willametteair.com

> On Oct 14, 2024, at 3:28 PM, Brandy Steffen <brandy.steffen@jla.us.com> wrote:
>
> Hello PAC members,
>
> Just a reminder that you all should receive a Zoom meeting link directly to your email address this afternoon. Please let me know if you don't receive it by tomorrow morning. We look forward to our meeting with you tomorrow at 5:00 pm.
>
> Thank you,
> **BRANDY STEFFEN** | **JLA PUBLIC INVOLVEMENT**
> Partner + Senior Program Manager
> brandy.steffen@jla.us.com » Schedule a 30 minute meeting
>
> ---
>
> **From:** Brandy Steffen <brandy.steffen@jla.us.com>
> **Sent:** Friday, October 4, 2024 2:37 PM
> **Cc:** Anthony.BEACH@aviation.state.or.us <Anthony.BEACH@aviation.state.or.us>
> **Subject:** Aurora Airport - PAC meeting #7 (10/15/24) reminder
>
> Hello everyone,
>
> I wanted to send you a reminder for our next meeting on October 15. We won't be sending any other materials before the meeting; however, the summary from our last meeting has been added to thewebsite's meeting page.
>
> **Date/Time:** Tuesday, October 15, 2024 from 5:00-8:00 p.m.
> **Topic**: Continue discussions about the Aurora State Airport Master Plan Alternatives.
> **Materials:** agenda (posted at publicproject.net/AuroraAirport)
> **Location:** Zoom
>
> - PAC members have been registered via Zoom and will get an email directly from Zoom with the login information (please check your junk folder). Please do not forward this email to anyone.
> - Anyone else can attend the virtual meeting with this link: https://us02web.zoom.us/j/84488377615
>
> If you have any questions, please reach out to me.
>
> Thanks,
> Brandy
>
> <Outlook-A blue num.png>
> **BRANDY STEFFEN** | **JLA PUBLIC INVOLVEMENT**
> brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
> **Woman-led, community-centered, for 35 years and counting**
> Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday. Administrative-only hours on Friday.
> Check my availability » Schedule a 30 minute check-in

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Tuesday, September 10, 2024 11:49 AM
Cc: Anthony.BEACH@aviation.state.or.us <Anthony.BEACH@aviation.state.or.us>
Subject: Aurora Airport - PAC meeting #7 scheduled for Tuesday, October 15, 2024

Hi PAC members,

Thank you all so much for taking the time to submit your comments to the team over the last month. Some of you submitted very lengthy responses and the technical team needs more time to review and draft responses that we can bring back to the group. We also want to be respectful of your time, so we are going to reschedule our September 17 meeting to October 15.

Date/Time: Tuesday, October 15, 2024 from 5:00-8:00 p.m. *(please note this is an hour longer than our normal meeting time).*
Topic: Continue discussions about the Aurora State Airport Master Plan Alternatives.
Materials: Posted on the website: https://publicproject.net/AuroraAirport#
Location: Zoom

- PAC members have been registered via Zoom and will get an email directly from Zoom with the login information (please check your junk folder). Please do not forward this email to anyone.
- Anyone else can attend the virtual meeting with this link: https://us02web.zoom.us/j/84488377615

If you have any questions about the reschedule (or anything else) please reach out to me.

Thanks,
Brandy

<Outlook-A blue num.png>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting

Outlook

Fw: PAC

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 12/10/2024 6:27 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, December 10, 2024 3:47 PM
To: David Waggoner <willametteaviation@icloud.com>; Tony Helbling <helbling@wilsonconst.com>
Cc: Dave Waggoner <dave@WillametteAir.com>; Betsy Johnson <betsy@betsyjohnson.com>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: RE: PAC

Hi all,

I am sorry but we can't make last minute changes to the PAC. As you know, there is a lot of interest from airport users and local communities in representing a wide range of organizations for the UAO master plan. Our PAC is already significantly larger than used for most master plans, and our goal is to be as fair and transparent as possible. Most importantly, we value the feedback from the members of the organizations that we have requested representation on the PAC for this master plan.

The process in which we conduct the master plan for UAO is very important. For 3 years since this process started we have made sure that all PAC members had equal opportunities for engagement. This includes, for public benefit, transparency in who represents organizations and communities throughout this process. The PAC list is published on the project website.

The public will have ample opportunities to provide comments in the meeting as long as time allows. If there is not enough time, the public can submit written comments that will be considered by the planning team and included in the public record for this master plan.

Thank you for your understanding,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: David Waggoner <willametteaviation@icloud.com>
Sent: Tuesday, December 10, 2024 3:40 PM
To: Tony Helbling <helbling@wilsonconst.com>
Cc: Dave Waggoner <dave@WillametteAir.com>; Betsy Johnson <betsy@betsyjohnson.com>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Samantha Peterson <speterson@centurywest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Re: PAC

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Master Planning Committee,

I would like to appoint Betsy Johnson as my alternate for the PAC meeting this evening.

Please confirm receipt of this email and the appointment has been made.

I also want to register my concern on how the current Preferred Alternate would effect the emergency services provided from our property on the Airport and the devastating impact on our airport neighbors.

The Preferred Alternate would displace many of the airport neighbors living to the west of the Hubbard Hwy. Many of the residents are retired and living on a fixed income. In a time where there is a housing shortage, forcing the residents out of their homes would a horrendous burden.

The Civil Air Patrol (CAP) and the Disaster Airlift Response Team (DART) both have facilities on our property to support of Oregonians during and after an emergency.

We provide, at no cost, a facility where the CAP has established a permanent Emergency Operations Center (EOC). The CAP has installed communications equipment to coordinate their efforts with State and Federal agencies in responding to disasters. It is a communications hub for Oregon and Southwest Washington.

The EOC also is the home for a CAP Cadet program. CAP's cadet program is designed to inspire the country's youth to become leaders and good American citizens through their interest in aerospace and service to the country. Cadets work their way through a series of achievements by completing studies and other activities. Some of the achievements include aerospace education, moral leadership, physical fitness, drill and ceremonies, leadership, and other special activities.

The EOC is also used as a staging area for Oregon DART. This distribution hub is used to store and transport emergency supplies, medical equipment and responders from Aurora to outlying communities impacted by fire, floods and other natural disasters.

If the current Preferred Alternate is adopted, the EOC building would be demolished, forcing the EOC to be closed. This would significantly Oregon's emergency

preparedness response.

Thank you for your consideration,

David Waggoner

Willamette Aviation Service
23115 Airport Rd NE
Aurora OR 97002

Direct: 503-680-3597
Office: 503-678-2252
dave@willametteair.com

On Dec 10, 2024, at 1:50 PM, Helbling, Tony <helbling@wilsonconst.com> wrote:

Dave,

Please see thread below. We're going to need you to set up Betsy Johnson as your alternate for tonight's PAC meeting. Otherwise, she can only speak for 2 min during public testimony.

Durning the public input segment, you will still be able to share your direct concern about your property being taken and it's effect on emergency aero services associated with Willamette Aviation's property – detrimental effect on disaster response – but may be limited to two minutes.

Thanks for doing this…

Tony Helbling
Logistics Manager
Wilson Construction Company
1190 NW 3rd Ave
Canby, OR 97013
Cell: 503-519-6059
Office: 503-263-6882
helbling@wilsonconst.com
www.wilsonconst.com

From: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Sent: Tuesday, December 10, 2024 11:24 AM
To: Helbling, Tony <helbling@wilsonconst.com>; Samantha Peterson <speterson@centurywest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Re: PAC

Sorry man, it has to be during public comment. That would open the door to litigation.

From: Helbling, Tony <helbling@wilsonconst.com>
Sent: Tuesday, December 10, 2024 10:03:40 AM
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Subject: PAC

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Would you allow Betsy Johnson to participate during the PAC portion of tonight's meeting or will you require her to only speak during the public testimony portion?

Please let me know ASAP.
Tony Helbling
Logistics Manager
Wilson Construction Co.

Sent from my iPhone: (503) 519-6059

Outlook

Aurora Airport Master Plan

From Mike Walsh <skimike.walsh@comcast.net>
Date Thu 2024-06-13 3:26 PM
To MCCOLAUGH Annie * GOV <Annie.MCCOLAUGH@oregon.gov>; BROOKS Kelly S * GOV <Kelly.S.BROOKS@oregon.gov>

You don't often get email from skimike.walsh@comcast.net. Learn why this is important

June 13, 2024
State Aviation Board Member-
Re: Aurora State Airport Master Plan
I won't be able to attend the North Marion High meeting tonight to discuss the Airport Master Plan. I would like to itemize the problems or issues with the plan from my perspective as a home owner.
-I live in Charbonneau and have for the last 15 years. Over the last 4-5 years the number of aircrafts and the overflight noise has increased greatly which makes it very difficult to hear when sitting on my porch when the planes fly so close over Charbonneau. It sometimes feels like the plane is going to crash. The noise level is much more obvious at Charbonneau than downtown Wilsonville because the flight plans go straight over Charbonneau.
-to extend the airport runway will allow larger aircrafts to use it and increase even more the noise level. The infra structure to support increase usage is not mentioned in any of the master plans I have read. Why is that? Traffic on I-5 is already horrendous and the rural roads around the airport cannot handle more cars/trucks.
-if only the flight plans to depart and arrive would be vectored away from Charbonneau. I can see the aircraft markings from my porch so they are sometimes not very high in the sky….. For example why can't the planes fly over I-5 or over the many acres of forest and farm land to access the runway. Take the planes away from the populated areas of Wilsonville. Think of options which will accomplish what both the locals and the airport want… a compromise so one side isn't the loser.
-I fear the interests of our neighborhoods have taken a back seat for financial gain of the airport businesses and the ODA. The methods that the ODA has taken to push this master plan in the past is evidence of my concern.
-Bigger doesn't mean better nor changing what has worked for this small airport. Put the interest of local residents as the reason to NOT implement the master plan. Consider the future of the communities who have to live around the airport

Mike Walsh
Skimike.walsh@comcast.net
M=[redacted]
H=[redacted]

Outlook

Re: Aurora PAC membership

From Michael Weimer <MWeimer@lifeflight.org>
Date Wed 10/9/2024 7:43 PM
To Brandy Steffen <brandy.steffen@jla.us.com>
Cc Ben Clayton <bclayton@lifeflight.org>; Jen Winslow <Jen.winslow@jla.us.com>

Thank you, Brandy. I look forward to receiving information on future PAC meetings.

On Oct 9, 2024, at 7:48 PM, Brandy Steffen <brandy.steffen@jla.us.com> wrote:

WARNING: This email originated outside of Life Flight Network's email system.
DO NOT REPLY, OPEN OR CLICK links or attachments unless you recognize the sender and know the content is safe.

Hi Ben,

So sorry that last message went through before it was complete. I appreciate your confirmation. We will update the list accordingly.

Thanks and have a great day,
Brandy

Thanks,

BRANDY STEFFEN | JLA PUBLIC INVOLVEMENT

Senior Program Manager + Partner

She/Her » Why pronouns matter

brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com

Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday

Check my availability » Schedule a 30 minute check-in » Email is the best way to reach me; I try to respond within 3 full workdays.

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Wednesday, October 9, 2024 4:47:21 PM
To: Ben Clayton <bclayton@lifeflight.org>
Cc: Michael Weimer <MWeimer@lifeflight.org>; Jen Winslow <Jen.winslow@jla.us.com>
Subject: Re: Aurora PAC membership

Hi Ben, thank you so much

Thanks,

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**

Senior Program Manager + Partner

She/Her » Why pronouns matter

brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com

Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday

Check my availability » Schedule a 30 minute check-in » Email is the best way to reach me; I try to respond within 3 full workdays.

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

From: Ben Clayton <bclayton@lifeflight.org>
Sent: Wednesday, October 9, 2024 4:43:49 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Michael Weimer <MWeimer@lifeflight.org>; Jen Winslow <Jen.winslow@jla.us.com>
Subject: Re: Aurora PAC membership

Hi Brandy,

Yes, things have changed here since the PAC started. Mike stepped into my previous role as COO and has taken on many of my duties. Sorry, I didn't realize I hadn't made that notification.

Ben Clayton | Chief Executive Officer
Office 503.678.4364 | Mobile 503.477.2123 | www.LifeFlight.org
Life Flight Network | 22285 Yellow Gate Lane NE | Suite 102 | Aurora, OR 97002

> On Oct 9, 2024, at 13:25, Brandy Steffen <brandy.steffen@jla.us.com> wrote:
>
> WARNING: This email originated outside of Life Flight Network's email system.
> DO NOT REPLY, OPEN OR CLICK links or attachments unless you recognize the sender and know the content is safe.
>
> Hello Ben,
>
> We are updating our documentation and realized that we hadn't received notification from you that Michael Weimer is your new alternate on the PAC. Michael submitted comments

during our last round of feedback in September.

If you can let us know ASAP then we'll make sure to update our records and invite you both to next Tuesday's PAC meeting.

Thanks,

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday

Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

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Outlook

Re: Comments submitted during PAC meeting

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 3/12/2024 6:31 PM
To ben.williams@liturgica.com <ben.williams@liturgica.com>; 'BEACH Anthony' <Anthony.BEACH@odav.oregon.gov>
Cc Jen Winslow <Jen.winslow@jla.us.com>

Hi Ben,

Thanks so much for sending this. We have received.

Thank you,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday. Administrative-only hours on Friday
Check my availability » Schedule a 30 minute check-in

I WILL BE ON VACATION, WITHOUT ACCESS TO PHONE OR EMAIL, STARTING FRIDAY, 03/22 AND RETURNING MONDAY, 04/01. PLEASE CONTACT ANOTHER TEAM MEMBER FOR HELP WHILE I'M AWAY. I WILL RETURN YOUR MESSAGE WHEN I'M BACK AT MY DESK.

From: ben.williams@liturgica.com <ben.williams@liturgica.com>
Sent: Tuesday, March 12, 2024 5:58 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; 'BEACH Anthony' <Anthony.BEACH@odav.oregon.gov>
Subject: Comments submitted during PAC meeting

Brandy & Tony;

See attached Comments on Forecasted Aviation Activities and Forecasts section of Chapter 3, per the question I asked during the PAC meeting just now.

The Contact/comments page on the master plan website has no way to attach a document that I could find.

Please confirm receipt and assure this will be placed in the record.

Sincerely

Ben Williams
Friends of French Prairie

Friends of
French Prairie

Friends of French Prairie
is an Oregon non-profit corporation

PO Box 403 | Donald, Oregon 97020 | www.friendsoffrenchprairie.org

March 12, 2024

To: Oregon Department of Aviation; Kenji Sugahara, Director

Re Comments on FAA Forecast Approval letter and Chapter 3 Airport Activities Forecast

The FAA "Aurora (UAO) Aviation Activity Forecast Approval letter of November 15, 023 (Corrected January 23, 2024) approves the aviation forecasts from the current Aurora Airport Master Plan process for airport planning purposes. These forecasts are detailed in the table "Airport Planning and TAF Forecast Comparison" derived from data in Chapter 3 (Aviation Activity Forecasts) of the master plan.

The Forecast approval letter goes on to state:

Our approval is based on the following:

- *The forecast is supported by reasonable planning assumptions and current data*
- *The forecast appears to be developed using acceptable forecasting methodologies*
- *The difference between the FAA Terminal Area Forecast (TAF) and the Airport's forecast for total operations is within the 10 percent and 15 percent allowance for the 5 and 10 year planning horizons.*

Master Plan Aviation Activity Forecasts – Chapter 3

The Forecasts chapter lists four Operations Forecast Models that were agreed on with the FAA for consideration in in developing the aviation forecasts for UAO. They are:

- Hybrid TFMSC Itinerant/FAA National Aerospace Forecast GA Local Operations Model
- Marion and Clackamas County Combined Population Growth Model
- National Aerospace Forecast Operations (Airports with ATCT)
- Federal Contract Tower TAF State (Oregon) Model

On page 3-26 the section "Recommended Aircraft Operations Forecasts Summary" states:

The Marion and Clackamas County Combined Population Growth Model *is the recommended aircraft operations forecast for the 2021-2041 Aurora State Master Plan. In lieu of representative operational data specific to the Airport, population growth forecasts developed for the two counties most contributing to the Airport service area were selected to indicate future operational activity. The model assumes that operations will track with the local population as it reflects the number of people likely to use airport services. This model reflects*

the best data available considering the limitations of the available ATCT traffic counts. The model projects an average annual growth rate of 0.9% over the planning period.

No substantive justification is provided or data presented to make the case that The Marion and Clackamas County Combined Population Growth Model is more accurate and superior to the Federal Contract Tower TAF State (Oregon) Model beyond the assertion: "The model assumes that operations will track with local population, as it reflects the number of people likely to use airport services. This model reflects the best data available considering the limitations of the available ATCT traffic counts."

Validity of data

As stated, The Marion and Clackamas County Combined Population Growth Model projects a 0.9% average growth rate of the planning period of 20 years (from 2020 to 2040), and also states that "The model combines the Portland State University (PSU) Population Research Center (PRC) population forecasts for Marion and Clackamas Counties over the planning period." However, no references or supporting data from the PSU Population Research Center are presented, and the 0.9% AAGR number does not hold up to scrutiny.

Oregon's population has been in flux for the past four or five years, with some years showing population decline. PSU data for the period April 1, 2020 to July 1, 2022 (attached) show the following percent change in AAGR:

Clackamas County	0.9%
Marion County	0.3%

For the year 2023, they show the following change in AAGR:

Clackamas County	0.59%
Marion County	0.29%

The PSU forecast data by County (PSU-PRC Regional Meeting; Preliminary Population Projections), show population forecast for each Oregon county. The forecasts for Clackamas and Marion County do not show the 0.9% AAGR stated in the Aviation Activity Forecasts chapter of the master plan. Specifically, for the planning period they show the following (attached):

Clackamas County	0.72%
Marion County	0.46%

Furthermore, no empirical evidence is presented that there is ANY relationship or correlation between general population growth and increased operations at this airport or any other airport. This conclusion that general population growth corresponds to airport operations appears to be a long stretch to justify a higher forecast without any supporting documentation.

The Marion and Clackamas County Combined Population Growth Model, which was selected without justification or supporting data, does not result in an AAGR of 0.9% as alleged, but using a population-weighted average results in 0.62%.

Forecast Model Selection

The Marion and Clackamas County Combined Population Growth Model was selected without supporting data or justification, and the Federal Contract Tower TAF State (Oregon) Model dismissed with a statement about "*the limitations of the available ATCT traffic counts."*

Figure 3-6: Operations Forecast Models illustrates what is now common knowledge: there are 7 years of FAA operations data for UAO (FAA's ATADs data) which covers all operations during tower operation (daylight hours). The master plan process has an adjustment factor for non-tower operational hours. The point is that given the wildly overstated and erroneous that ALL previous operations forecasts have been there is 7 years of validated objective data. However, the forecast model that used this data was not selected.

That model, the Federal Contract Tower TAF State (Oregon) Model, is described in Chapter 3 as follows:

> *This model applies the Oregon Federal Contract Tower TAF forecast annual growth rates for aircraft classifications to Aurora State Airport's baseline operations counts (using the same classifications) over the 20-year period. The model assumes that operations at the Airport will be consistent with FAA's Terminal Area Forecast (TAF) for Oregon airports with contract air traffic control towers. This model provides a more focused regional assessment within the TAF, compared to the TAF national model for contract tower airports, as these airport are the most operationally similar to Aurora State Airport in the state. The model is non-linear and year-over-year growth rates vary. The model assumes that the Airport's operations will mirror state trends. The model results in an average annual growth rate of 0.6%.*
>
> *This model provides a projection of future changes in the Airport's annual aircraft operations that is consistent with the trends defined by FAA for similar Oregon airports with contract air traffic control towers. Similar to the contract tower model used for based aircraft forecasting, this projection does not establish an historical statistical relationship between the Airport and the larger data set, although it does provide a reasonable projection for long term planning. The underlying assumption is that future activity within a group of similar Oregon contract towered airports will be similar, and that on the whole, this activity will be consistent with the FAA's broad expectations defined in its TAF.*

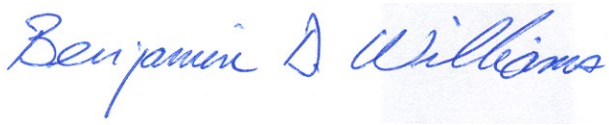
Of note, Federal Contract Tower TAF State (Oregon) Model, results in an AAGR of 0.6%.

The Marion and Clackamas County Combined Population Growth Model which was selected without justification or supporting data results in an AAGR of 0.9%.

It is no coincidence that a model resulting in a higher growth rate was selected.

The question that has to be answered, however, is what process and methodology was used by ODAV and its consultant along with the FAA to eliminate the Federal Contract Tower TAF State (Oregon) Model which is based on objective historical data at UAO and similar airports, and rather select The Marion and Clackamas County Combined Population Growth Model which not only resulted in a higher forecast rate, but is based on questionable population growth projections and a fundamentally flawed assumption that "that total airport operations will track with the combined population of Marion and Clackamas Counties."

Sincerely



Ben Williams, President

Population Research Center
PORTLAND STATE UNIVERSITY

2022 ANNUAL OREGON POPULATION REPORT TABLES

The population data in the 2022 annual report tables were compiled by the Population Research Center, Portland State University, 4/15/2023.

The tables in this workbook present the 2022 population estimates produced by the Population Research Center, Portland State University. The July 1 estimates of total population for counties and cities and towns were certified December 15, 2022.

Some tables include the U.S. Census Bureau's decennial Census counts and historical population estimates produced by our Center, and other tables include calculations of change since Census 2020. Also included are population estimates for broad age groups and 5-year age groups.

Contents of Sheets:

Sheet Name	Table Name and *description*
Table 1:	**Annual Population and Components of Population Change for Oregon: 1960-2022; July 1 Population Estimates and April Census Counts.** *Annual populations, population change and the components of population change (births, deaths, natural increase, and net migration) are reported for Oregon.*
Table 2:	**Population Estimates of Oregon by Area type and Specific Metropolitan Areas: 2000 to 2022.** *Population estimates are aggregated for incorporated and unincorporated, metropolitan and non-metropolitan areas in Oregon. Populations are also reported for each of Oregon's eight Metropolitan Statistical Areas, as designated by the U.S. Census Bureau.*
Table 3:	**Components of Population Change for Oregon's Counties: April 1, 2020 to July 1, 2022.** *Populations are reported for Oregon and the 36 counties; population change and the components of population change from 2010 to 2020 are also included.*
Table 4:	**Population for Oregon and its Counties and Incorporated Cities and Towns: July 1, 2020-July 1, 2022; and Census Counts 2000-2020.** *Annual population estimates from 2020-2022are reported along with April 1 Census counts from 2000-2020. Sub-county population estimates are grouped by county; cities that are split between counties are reported in parts respective to their county location. Population estimates for the county unincorporated areas are also reported.*

Table 5:	**Populations for Incorporated Cities Located in More than One County.** *Annual population estimates for 2020-2022, and 2010 and 2020 Census counts, for city parts by county are reported in this table.*
Table 6:	**Rank of Incorporated Cities and Towns by July 1, 2022 Population Size.** *This table displays the rank order of Oregon's incorporated cites and towns by 2022 population size, largest to smallest.*
Table 7:	**Alphabetical Listing of Oregon's Incorporated Cities and Towns with Populations for July 1, 2022 and Census 2020, and Change since Census 2020.** *Population estimates for 2022 and Census counts for 2020 are reported, along with numerical and percentage changes during the time period.*
Table 8:	**Population Added to Incorporated Cities Due to Annexations: April 1, 2020 - July 1, 2022.** *This table is a listing of Oregon's cities and towns in alphabetical order with the numbers of persons they have annexed since Census 2020.*
Table 9:	**Population Estimates by Age and Sex for Oregon and Its Counties: July 1, 2022.** *Population estimates for Oregon's counties by 5 -year age group are reported in three tables: 1) total population; 2) male population; and 3) female population. Population estimates for ages 15-19 are split into 15-17 and 18-19 age groups.*
Table 10:	**Population Estimates by Broad Age Group (<18 Years, 18-64 Years, & over 64 Years)** *Population Estimates for ages 0-17 years, 18-64 years, and 65 years and older are reported in this table for Oregon and its counties.*

Contact information

popest@pdx.edu

Table 3. Components of Population Change for Oregon and its Counties: April 1, 2020 to July 1, 2022

Prepared by Population Research Center, PSU, April 2023.

	July 1, 2022 Estimate	April 1, 2020 Census	Numeric Change April 2020 to July 2022	Percent Change April 2020 to July 2022	Average Annual Change since Census	Births 2020-22	Deaths 2020-22	Natural Increase 2020-22	Net Migration 2020-22
OREGON	**4,281,851**	**4,237,256**	**44,595**	**0.5%**	**0.6%**	**90,046**	**97,608**	**-7,562**	**52,157**
BAKER	17,148	16,668	480	1.3%	0.9%	345	590	-245	725
BENTON	95,594	95,184	410	0.2%	-1.0%	1,428	1,516	-88	498
CLACKAMAS	430,421	421,401	9,020	0.9%	0.7%	8,440	8,903	-463	9,483
CLATSOP	41,971	41,072	899	1.0%	0.7%	772	1,140	-368	1,267
COLUMBIA	53,156	52,589	567	0.5%	0.6%	1,101	1,331	-230	797
COOS	65,112	64,929	183	0.1%	0.3%	1,198	2,426	-1,228	1,411
CROOK	26,162	24,738	1,424	2.5%	2.4%	539	670	-131	1,555
CURRY	23,897	23,446	451	0.9%	0.7%	331	1,094	-763	1,214
DESCHUTES	207,561	198,253	9,308	2.1%	2.1%	4,085	3,878	207	9,101
DOUGLAS	111,716	111,201	515	0.2%	0.4%	2,215	4,261	-2,046	2,561
GILLIAM	2,071	1,995	76	1.7%	1.8%	44	60	-16	92
GRANT	7,337	7,233	104	0.6%	-0.1%	153	247	-94	198
HARNEY	7,640	7,495	145	0.9%	0.4%	188	246	-58	203
HOOD RIVER	23,894	23,977	-83	-0.2%	-0.3%	501	437	64	-147
JACKSON	224,013	223,259	754	0.1%	0.2%	4,794	6,374	-1,580	2,334
JEFFERSON	25,404	24,502	902	1.6%	1.3%	608	698	-90	992
JOSEPHINE	88,695	88,090	605	0.3%	0.6%	1,811	3,293	-1,482	2,087
KLAMATH	70,848	69,413	1,435	0.9%	0.5%	1,733	2,290	-557	1,992
LAKE	8,246	8,160	86	0.5%	0.2%	164	298	-134	220
LANE	383,958	382,971	987	0.1%	-0.1%	6,913	9,885	-2,972	3,959
LINCOLN	51,090	50,395	695	0.6%	0.8%	826	1,676	-850	1,545
LINN	131,194	128,610	2,584	0.9%	1.1%	3,205	3,626	-421	3,005
MALHEUR	32,095	31,571	524	0.7%	1.1%	835	880	-45	569
MARION	348,616	345,920	2,696	0.3%	0.3%	8,673	7,674	999	1,697
MORROW	12,315	12,186	129	0.5%	2.9%	349	275	74	55
MULTNOMAH	810,242	815,428	-5,186	-0.3%	0.5%	16,880	15,302	1,578	-6,764
POLK	90,593	87,433	3,160	1.6%	1.4%	1,996	1,912	84	3,076
SHERMAN	1,938	1,870	68	1.6%	1.6%	58	53	5	63
TILLAMOOK	27,868	27,390	478	0.8%	0.7%	530	906	-376	854
UMATILLA	80,401	80,075	326	0.2%	0.4%	1,988	1,943	45	281
UNION	26,673	26,196	477	0.8%	0.3%	574	759	-185	662
WALLOWA	7,541	7,391	150	0.9%	0.5%	140	221	-81	231
WASCO	26,794	26,670	124	0.2%	-0.3%	596	816	-220	344
WASHINGTON	609,219	600,372	8,847	0.7%	0.6%	13,679	9,228	4,451	4,396
WHEELER	1,436	1,451	-15	-0.5%	0.3%	18	50	-32	17
YAMHILL	108,993	107,722	1,271	0.5%	0.4%	2,331	2,585	-254	1,525

Population Estimates for Oregon and Counties (Vintage 2023, Certified)*

Geographic Area Name	Revised Population July 1, 2022 (A)	Certified Estimate July 1, 2023 (B)	Population Change 2022-2023 [B-A]	Percent Change 2022-2023 [B-A]/[A]
STATE				
OREGON	**4,269,529**	**4,291,525**	**21,996**	**+0.52%**
COUNTY				
BAKER	16,937	16,927	-10	-0.06%
BENTON	98,573	99,355	782	+0.79%
CLACKAMAS	421,537	424,043	2,506	+0.59%
CLATSOP	41,876	42,095	219	+0.52%
COLUMBIA	52,600	53,143	543	+1.03%
COOS	66,643	66,945	302	+0.45%
CROOK	26,282	26,583	301	+1.15%
CURRY	24,263	24,439	176	+0.73%
DESCHUTES	208,523	212,141	3,618	+1.74%
DOUGLAS	113,487	113,748	261	+0.23%
GILLIAM	2,043	2,062	19	+0.93%
GRANT	7,428	7,418	-10	-0.13%
HARNEY	7,623	7,600	-23	-0.30%
HOOD RIVER	24,290	24,406	116	+0.48%
JACKSON	222,949	222,762	-187	-0.08%
JEFFERSON	25,478	25,878	400	+1.57%
JOSEPHINE	88,867	88,814	-53	-0.06%
KLAMATH	71,495	71,919	424	+0.59%
LAKE	8,402	8,562	160	+1.90%
LANE	382,302	384,374	2,072	+0.54%
LINCOLN	51,713	51,930	217	+0.42%
LINN	131,192	131,984	792	+0.60%
MALHEUR	32,530	32,981	451	+1.39%
MARION	351,234	352,249	1,015	+0.29%
MORROW	12,599	13,010	411	+3.26%
MULTNOMAH	800,902	801,306	404	+0.05%
POLK	90,380	90,553	173	+0.19%
SHERMAN	1,884	1,917	33	+1.75%
TILLAMOOK	27,958	28,000	42	+0.15%
UMATILLA	80,942	81,842	900	+1.11%
UNION	26,568	26,335	-233	-0.88%
WALLOWA	7,631	7,631	0	0.00%
WASCO	26,996	27,052	56	+0.21%
WASHINGTON	604,568	610,245	5,677	+0.94%
WHEELER	1,516	1,533	17	+1.12%
YAMHILL	109,318	109,743	425	+0.39%

** Revised _ December 20, 2023*

Certified Population Estimates December 15, 2023

Population Research Center- College of Urban & Public Affairs-Portland State University

Comments & Questions?

Contact PRC

Email: askprc@pdx.edu

Telephone: 503-725-3922

Preliminary Population Projections

https://www.pdx.edu/population-research/population-estimate-reports

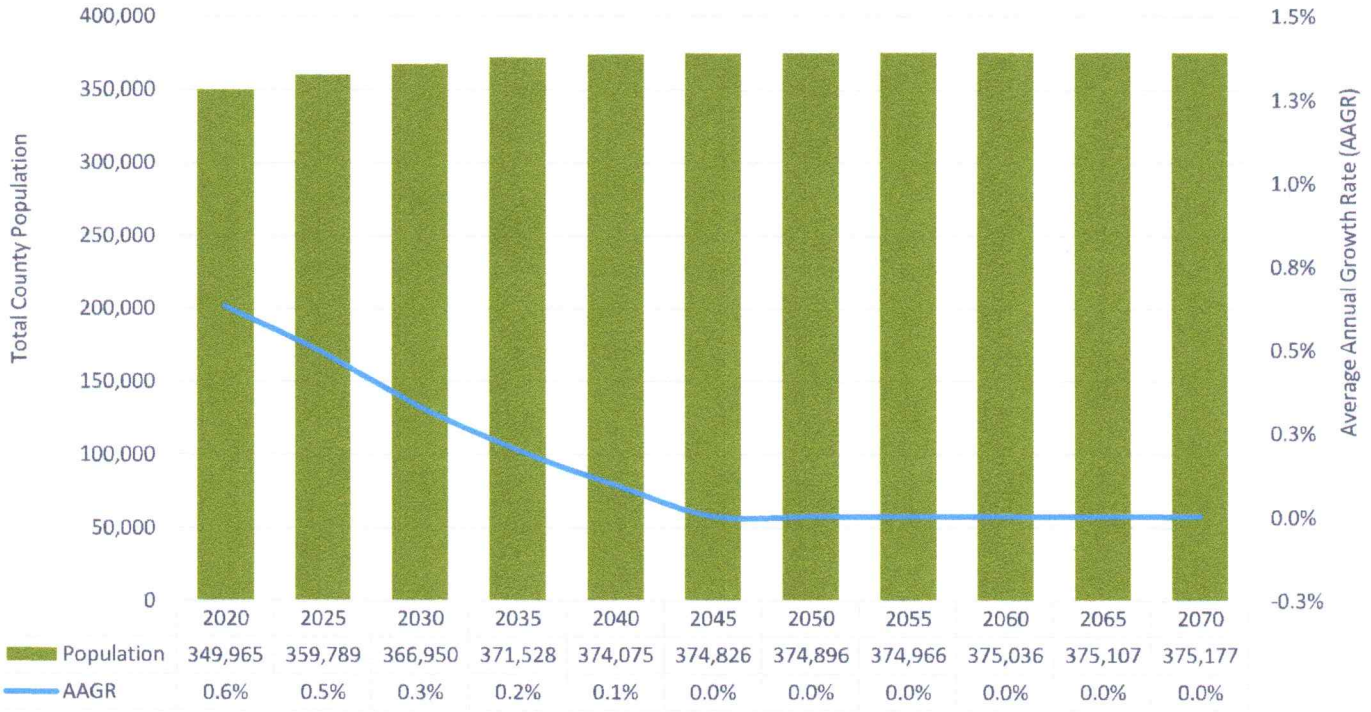
Proposed Forecast Results

Portland State UNIVERSITY

Population of Marion County is projected to grow from nearly 350,000 in 2020 to over 375,000 by 2070.

The growth rate is projected to decline from 0.6% to close to 0% between 2020 and 2045. The population is projected to remain stable without major change from 2045 to 2070.

Marion County - Total Population Point Estimates (2020-2070)



	2020	2025	2030	2035	2040	2045	2050	2055	2060	2065	2070
Population	349,965	359,789	366,950	371,528	374,075	374,826	374,896	374,966	375,036	375,107	375,177
AAGR	0.6%	0.5%	0.3%	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Source: Forecast by Population Research Center (PRC).
Historical trend

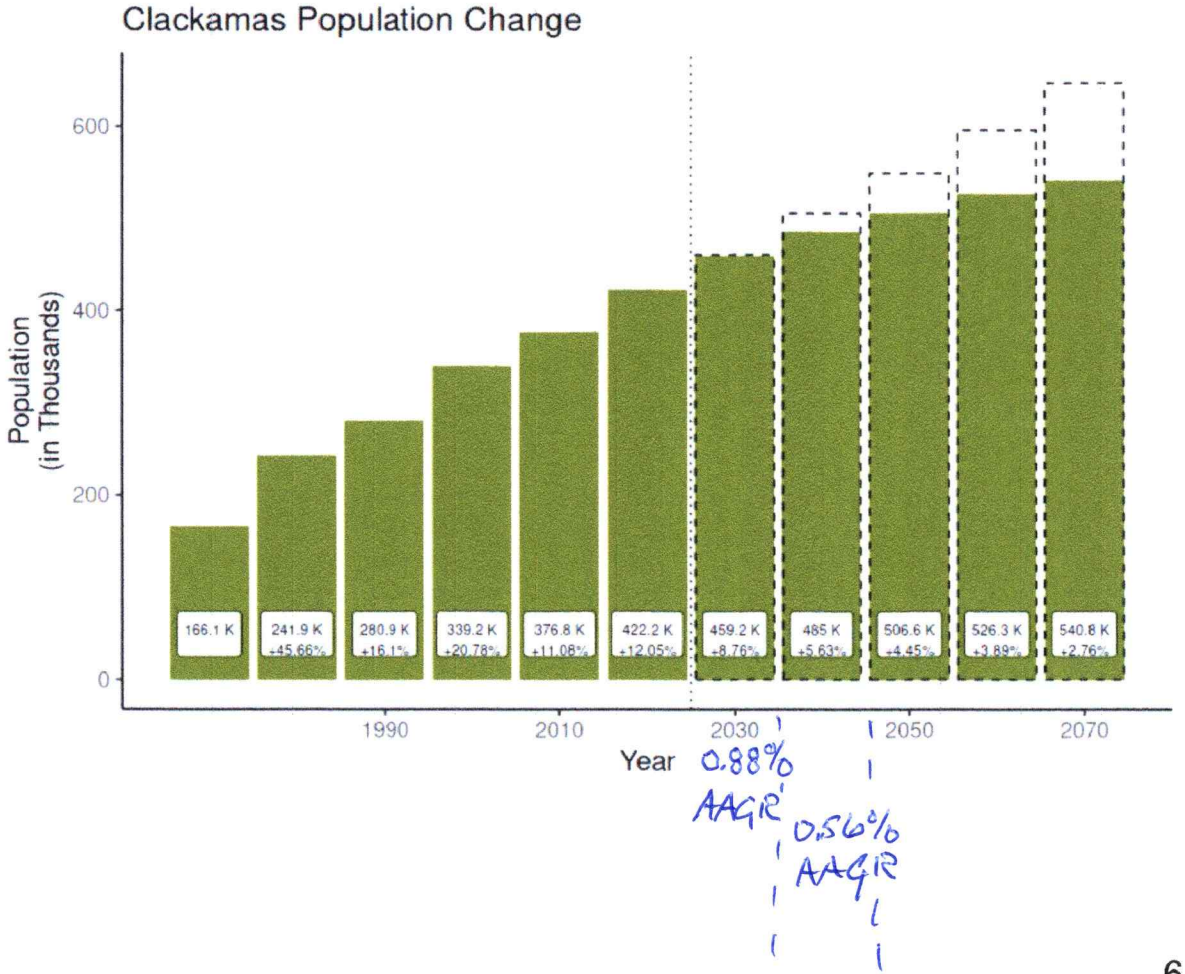
These numbers represent ***Proposed*** Forecast Results

20 yr Avg = 0.46% AAGR

Clackamas Population

Portland State UNIVERSITY

We project that Clackamas's population will grow in the next 50 years, albeit at a slower rate



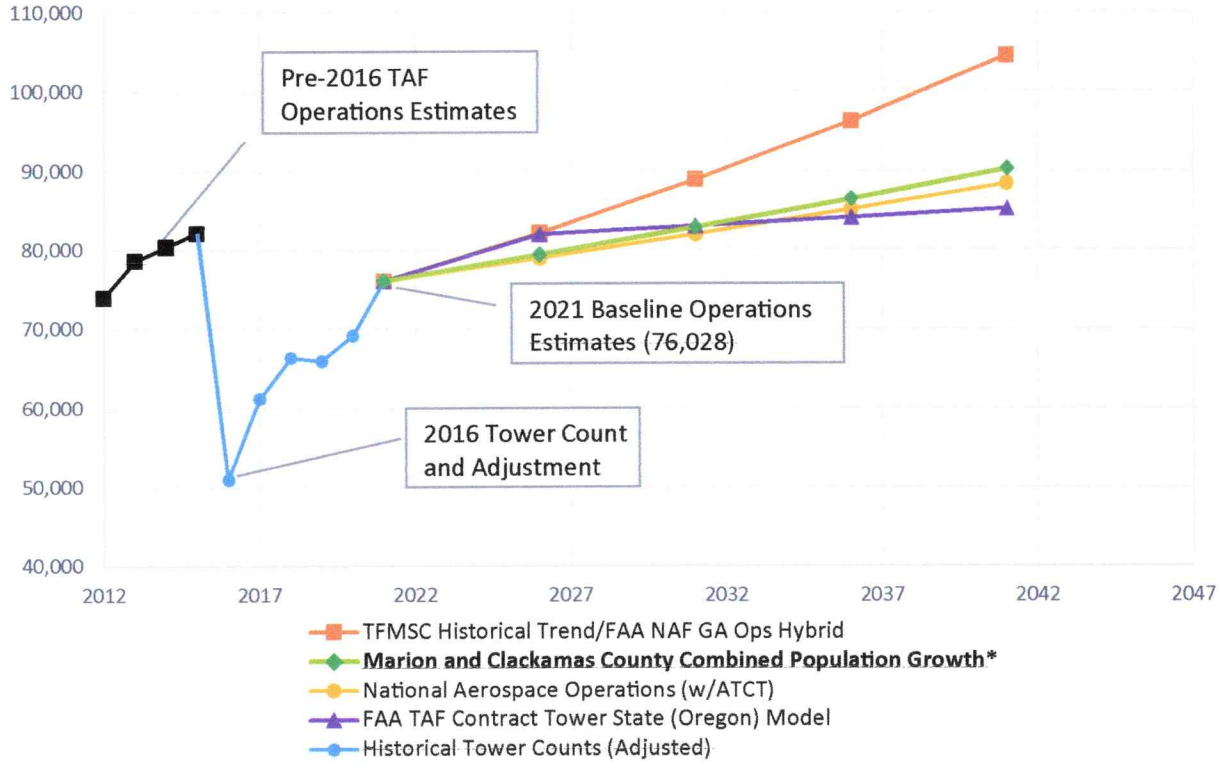
20 yr Avg = 0.72% AAGR

TABLE 3-17: OPERATIONS FORECAST

	CAGR	2021	2026	2031	2036	2041
TFMSC Historic Trend/FAA NAF GA Ops Hybrid	1.6%	76,028	82,123	88,855	96,298	104,537
Marion and Clackamas County Combined Population Growth*	**0.9%**	**76,028**	**79,354**	**82,825**	**86,449**	**90,230**
National Aerospace Operations (w/ ATCT)	0.8%	76,028	78,939	81,966	85,114	88,388
FAA TAF Contract Tower State (Oregon) Model	0.6%	76,028	81,924	82,972	84,046	85,151

Source: Century West Engineering developed using FAA TFMSC Data
* Denotes recommended forecast

FIGURE 3-6: OPERATIONS FORECAST MODELS



Source: Century West Engineering using FAA TAF, FAA OPSNET, and FAA National Aerospace Forecast Data
* Denotes recommended forecast

AIRCRAFT OPERATIONS FLEET MIX AND SPLITS

The distribution of total operational activity attributed to each of the five primary types of aircraft – single engine piston, multi-engine piston, turboprop, jet, and helicopter – is called the fleet mix. An understanding of the current and projected fleet mixes enables airports to plan for improvements to accommodate for growth or decline in activity by the specific aircraft type.

The fleet mix is derived from the current and projected operations totals established in the existing conditions analysis (base year counts) and the preferred forecast (projected estimates). ATCT operations counts do not distinguish between the individual aircraft types. So, fleet mix shares are estimated based on ancillary information, including TFMSC data, national trends, and input from knowledgeable sources such as ATCT controllers.

Outlook

Re: Webinar host invited you to be panelist for Aurora Airport Master Plan - PAC meeting #5

From ben.williams@liturgica.com <ben.williams@liturgica.com>
Date Mon 4/29/2024 3:51 PM
To Brandy Steffen <brandy.steffen@jla.us.com>
Cc Wayne Richards <rich4748@outlook.com>; Jen Winslow <Jen.winslow@jla.us.com>

Thank you, Brandy!

Ben Williams

> On Apr 29, 2024, at 3:12 PM, Brandy Steffen <brandy.steffen@jla.us.com> wrote:
>
> Hi Ben,
>
> Yes, Wayne can use your link and then just adjust the name accordingly. If for some reason Wayne can't attend, please reach out and let me know if you have any questions about Chapter 4. We will also post the video of the meeting a few days later (probably by Friday of this week).
>
> Thanks,
> Brandy
>
> <Outlook-A blue num.png>
>
> **BRANDY STEFFEN** | **JLA PUBLIC INVOLVEMENT**
> brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
> **Woman-led, community-centered, for 35 years and counting**
> Meeting + email hours 9 a.m.–5 p.m. Tuesday–Friday. Administrative-only hours on Monday.
> Check my availability » Schedule a 30 minute check-in
>
> ---
>
> **From:** ben.williams@liturgica.com <ben.williams@liturgica.com>
> **Sent:** Monday, April 29, 2024 2:10 PM
> **To:** Brandy Steffen <brandy.steffen@jla.us.com>
> **Cc:** Wayne Richards <rich4748@outlook.com>
> **Subject:** FW: Webinar host invited you to be panelist for Aurora Airport Master Plan - PAC meeting #5
>
> Brandy;
>
> I can’t make the PAC meeting tomorrow night, and need to assure that the FOFP alternate, Wayne Richards, is able to be there in my place.
>
> Can he use my log in for the organization so that he can participate, or do you need to set another invite up?
>
> Thanks
>
> Ben Williams
> Friends of French Prairie

From: Zoom
Sent: Monday, April 29, 2024 12:37 PM
To: ben.williams@liturgica.com
Subject: Webinar host invited you to be panelist for Aurora Airport Master Plan - PAC meeting #5

Hi Ben Williams,

Webinar host invited you to be panelist for Aurora Airport Master Plan - PAC meeting #5.

Aurora Airport Master Plan - PAC meeting #5

Date & Time	Apr 30, 2024 05:00 PM Pacific Time (US and Canada)
Webinar ID	896 1030 2184
Participant ID	462738

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Please submit any questions to: info@jla.us.com

Thank you!

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+1 386 347 5053 or +1 507 473 4847 or +1 564 217 2000 or +1 646 931 3860 or +1 689 278 1000 or +1 929 205 6099 or +1 301 715 8592 or +1 305 224 1968 or +1 309 205 3325 or +1 312 626 6799

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Outlook

Fw: Letter to Chair Stephens & Aviation Board re: Aurora Airport Master Plan

From Jen Winslow <Jen.winslow@jla.us.com>
Date Mon 2024-09-16 1:05 PM
To Ashley Balsom <ashley.balsom@jla.us.com>

JEN WINSLOW | **JLA PUBLIC INVOLVEMENT**
She/Her » Why pronouns matter
jen.winslow@jla.us.com » Cell 503-367-6447 » jla.us.com
Woman-led, community-centered, for 35 years and counting
I typically work Mon - Fri | 9 am - 5 pm

From: W. Matt Rogers <WRogers@CenturyWest.com>
Sent: Friday, September 13, 2024 2:48 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>
Cc: Samantha Peterson <SPeterson@CenturyWest.com>
Subject: FW: Letter to Chair Stephens & Aviation Board re: Aurora Airport Master Plan

Brandy and Jen,

Here is additional communication on the UAO AMP that we received from ODAV that we would like to add to the record.

Thanks,
Matt

From: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Sent: Thursday, September 12, 2024 2:33 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; W. Matt Rogers <WRogers@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Cathryn.E.Stephens@ci.eugene.or.us
Subject: FW: Letter to Chair Stephens & Aviation Board re: Aurora Airport Master Plan

---

From: Ben Williams <fofp99@gmail.com>
Date: Thursday, September 12, 2024 at 10:17 AM
To: Oregon Department of Aviation <mail.aviation@ODAV.oregon.gov>
Cc: Governor.Kotek@oregon.gov <Governor.Kotek@oregon.gov>, WARNER Chris * GOV <Chris.WARNER@oregon.gov>, Sydney_Beasley@wyden.senate.gov <Sydney_Beasley@wyden.senate.gov>, Caitlin_Yntema@merkley.senate.gov <Caitlin_Yntema@merkley.senate.gov>, Sara_Schmitt@merkley.senate.gov <Sara_Schmitt@merkley.senate.gov>, Jihun.Han@mail.house.gov <Jihun.Han@mail.house.gov>, Benjamin.Owens@mail.house.gov <Benjamin.Owens@mail.house.gov>, MCCOLAUGH Annie * GOV

<Annie.MCCOLAUGH@oregon.gov>, PORTERFIELD Amelia * GOV <Amelia.Porterfield@oregon.gov>, HYZY Kathy * GOV <Kathy.Hyzy@oregon.gov>, WYTOSKI Beth * GOV <Beth.Wytoski@oregon.gov>, BROOKS Kelly S * GOV <Kelly.S.BROOKS@oregon.gov>, SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>, POWER Karin * GOV <Karin.POWER@oregon.gov>, Mayor Julie Fitzgerald <fitzgerald@ci.wilsonville.or.us>, Mayor Brian Asher (mayor@ci.aurora.or.us) <mayor@ci.aurora.or.us>, House Timothy <Timothy.A.House@faa.gov>, William.Garrison@faa.gov <William.Garrison@faa.gov>
Subject: Letter to Chair Stephens & Aviation Board re: Aurora Airport Master Plan

Some people who received this message don't often get email from fofp99@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Chair Stephens;

I'm sure that burned into your memory, as it is the memories of all of us who were on the Teams call for the State Aviation Board (SAB) meeting last week, was among the final comments made by Board member Jim Knight: "What a conundrum."

As you subsequently pointed out when you agreed to carry the Aurora State Airport Master Plan agenda item forward to the October SAB meeting for continued discussion: "Those of us operating airports understand that there are finite resources for airport improvement projects and there's just not enough money to go around… Millions and millions of dollars going to a general aviation airport would take away funds from other airports across the entire system."

The sad reality is that once again as a master plan process for the Aurora State Airport draws to a conclusion, the options are appalling and terribly expensive. I would point you to page 9 of draft Chapter 5 of the master plan which states: **"Aurora State Airport is located on a constrained site."**

This fundamental reality was a recurring theme in the 2010–2012 master plan process. One that was acknowledged in the recommendation by ODAV and the engineering consultant to select a No Build alternative. That recommendation was overruled by Chair Gardener and the SAB, which led to over a decade of pursuing unattainable expansion alternatives and incurring huge, budget-busting legal expenses to defend those illegal expansion decisions at the Land Use Board of Appeals and the Court of Appeals and the Supreme Court — where each government body ruled against ODAV's expansion plans as a violation of state laws.

I write this letter to you and the Aviation Board not just to recapitulate the history of the last master plan process of which you were not a part, but also to correct some of the statements, inferences and implications made to the Board at last week's meeting by Century West and ODAV personnel.

After the PAC was assembled for the current master plan and the first meeting was held, I sent the following to then-Chair Meeker and the Board on December 2, 2021:

> *My comments have to do with the Public Advisory Committee, whose first meeting on November 16 [2021] kicked off the current master planning process for the Aurora State Airport.*
>
> *In case you are not aware of the contents of that meeting, I want to share with you what was presented to the PAC by the lead Century West consultant on a slide titled "Decision-Making Process":*
>
> - *PAC will provide input at key decision points in an advisory level; as a sounding board. No recommendations will be made*
> - *ODA staff will be the final decision-making authority*
>
> *I am here to say to you that this is a travesty. It is quite evident that no one at OAB or Century West or JAL, the facilitator, owns a dictionary or knows how to use one. Because if you look it up, you will learn that Recommendation is a synonym of Advice.*
>
> *So, the notion that you can have an "Advisory" committee that will make no recommendations is a contradiction in terms and outlandish.*

I share this to make sure you understand that some of the PAC members are on record noting that the PAC was not intended to provide recommendations, but only to be a sounding board.

This is important given the implications of what the Board was told last week. Matt Rogers, Century West project manager, spoke of “Extensive public involvement” and listed 6 PAC meetings, 2 Open Houses and 3 Work Sessions. For the record, the earliest PAC meetings had no public involvement because the Zoom calls were limited to PAC members. Then after complaints, members of the public were allowed to participate, but they had to pre-register before the meeting in order to attend. Finally, members of the public were allowed to speak in the public comments section at the end of the meeting. ODAV appears to have failed to promote the ONE Open House event held on June 13, 2024; however, due to a massive mailing by the City of Wilsonville alerting the public to the Open House event, public attendance was high, but then JLA Public Involvement ran out of public comment forms after about one hour into the three-hour event, thereby preventing a majority of attendees from providing written public comment.

The implications made by David Miller of Century West were that PAC input specifically shaped the draft chapters in the master plan, and particularly the iterations of the alternatives. That is not the case. The draft chapters were presented to the PAC as completed documents in lecture format, and the only adjustments made were after the fact following challenges to data and data errors pointed out.

In early June, draft Chapter 5 was provided to the PAC with 7 alternatives, four that promoted C-II ARC designation and three that maintained the current “as built” reality of B-II. Then, just prior to the Open House held at North Marion on June 13, the PAC was notified that the three alternatives to maintain B-II had been withdrawn and would no longer be considered “after coordination with FAA.” You can imagine the surprise! The majority of PAC members and the public arrived at the Open House event to learn that nearly half of the alternatives had been removed from consideration.

Then at the next PAC meeting on July 30, 2024, the members were informed that the four alternatives that remained and were on display at the Open House had been unilaterally reduced to three—all done without consultation with the PAC.

To summarize, the PAC has been informed (and mainly after the fact) from start to finish, but never consulted or asked for recommendations. Additionally, the fundamental flaw of trying to force not just a C-II ARC designation (per an FAA approved airport layout plan) but airfield build out to C-II standards continues to ignore the fundamental reality noted above: this is a constrained site.

That very reality in addition to a decade of legal battles and now the “conundrum” that the three final alternatives will cost “hundreds of millions of dollars” and negatively impact the regional aviation system cries out for the recognition of reality.

Accompanying that recognition of reality would be a formal revision to B-II and ceasing the futile efforts to expand the Aurora State Airport into something it can never be.

Sincerely

--
Ben Williams
Friends of French Prairie
fofp99@gmail.com

Outlook

Re: Aurora Airport - PAC meeting #7 (10/15/24) reminder

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2024-10-08 8:00 AM
To ben.williams@liturgica.com <ben.williams@liturgica.com>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>

Hi Ben,

Thanks for the email. In the October PAC meeting we will review the refined alternatives, PAC feedback form results, answer PAC questions, and review the preferred alternative. We'll also talk about next steps for the project. I hope that helps answer your question.

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday. Administrative-only hours on Friday.
Check my availability » Schedule a 30 minute check-in

From: ben.williams@liturgica.com <ben.williams@liturgica.com>
Sent: Friday, October 4, 2024 3:05 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Re: Aurora Airport - PAC meeting #7 (10/15/24) reminder

Hi Brandy;

I have a question about your email below Re: the next PAC meeting.

You say: **Topic**: Continue discussions about the Aurora State Airport Master Plan Alternatives.
I thought the next meeting, following the reduction of alternatives down to the final three as presented at the last PAC meeting, would be the presentation for the preferred alternative.

What is there to "discuss" given that the FAA orientation is one of the three and FAA said select one of these expansion alternatives or be moved to "maintenance only?"

Thanks

Ben Williams

> On Oct 4, 2024, at 2:37 PM, Brandy Steffen <brandy.steffen@jla.us.com> wrote:

Hello everyone,

I wanted to send you a reminder for our next meeting on October 15. We won't be sending any other materials before the meeting; however, the summary from our last meeting has been added to the website's meeting page.

Date/Time: Tuesday, October 15, 2024 from 5:00-8:00 p.m.
Topic: Continue discussions about the Aurora State Airport Master Plan Alternatives.
Materials: agenda (posted at publicproject.net/AuroraAirport)
Location: Zoom

- PAC members have been registered via Zoom and will get an email directly from Zoom with the login information (please check your junk folder). Please do not forward this email to anyone.
- Anyone else can attend the virtual meeting with this link: https://us02web.zoom.us/j/84488377615

If you have any questions, please reach out to me.

Thanks,
Brandy

<Outlook-A blue num.png>

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brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
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Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday. Administrative-only hours on Friday.
Check my availability » Schedule a 30 minute check-in

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Tuesday, September 10, 2024 11:49 AM
Cc: Anthony.BEACH@aviation.state.or.us <Anthony.BEACH@aviation.state.or.us>
Subject: Aurora Airport - PAC meeting #7 scheduled for Tuesday, October 15, 2024

Hi PAC members,

Thank you all so much for taking the time to submit your comments to the team over the last month. Some of you submitted very lengthy responses and the technical team needs more time to review and draft responses that we can bring back to the group. We also want to be respectful of your time, so we are going to reschedule our September 17 meeting to October 15.

Date/Time: Tuesday, October 15, 2024 from 5:00-8:00 p.m. *(please note this is an hour longer than our normal meeting time).*
Topic: Continue discussions about the Aurora State Airport Master Plan Alternatives.
Materials: Posted on the website: https://publicproject.net/AuroraAirport#
Location: Zoom

- PAC members have been registered via Zoom and will get an email directly from Zoom with the login information (please check your junk folder). Please do not forward this email to anyone.
- Anyone else can attend the virtual meeting with this link: https://us02web.zoom.us/j/84488377615

If you have any questions about the reschedule (or anything else) please reach out to me.

Thanks,
Brandy

<Outlook-A blue num.png>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner

She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
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Outlook

Re: Aurora Airport Master Plan Preferred Alternative

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2024-10-14 12:56 PM
To Ben Williams <fofp99@gmail.com>
Cc THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; STEPHENS Cathryn E <CStephens@eugene-or.gov>

Hi Ben,

I'm sorry for a typo in the previous email: (7) should have been (6) in our response. It should have been written: "the Board makes a decision whether to reject or adopt the findings and the draft master plan under OAR 738-130-0055 (6)."

I will get back to you about your question about the cost estimates.

Thank you,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Friday, October 11, 2024 9:52 AM
To: Ben Williams <fofp99@gmail.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; STEPHENS Cathryn E <CStephens@eugene-or.gov>
Subject: Re: Aurora Airport Master Plan Preferred Alternative

Hi Ben,

Thanks for your questions. I will find you some answers and get back to you ASAP.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Ben Williams <fofp99@gmail.com>
Sent: Friday, October 11, 2024 9:39 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>;

STEPHENS Cathryn E <CStephens@eugene-or.gov>
Subject: Re: Aurora Airport Master Plan Preferred Alternative

Brandy;

Thanks for the explanation of how subsections (5) and (7) work. It does seem that the explanation is missing the board's role in subsection (6). The board is charged with adopting the findings and the master plan. The board can presumably accept, reject, or revise the findings and/or the plan. The Court of Appeals emphasized the Board's role under subsection (6) in the very first paragraph of the opinion. See also pages 325-327, and 330-331.

Subsection (6) is the crucial piece of the land use compliance, and it feels like there's an effort to sideline the board on this and other topics. At a recent meeting the board requested more time to review the three alternatives, but that topic has not appeared on another board agenda. The board also asked about project costs for the alternatives. When will cost estimates be provided?

Sincerely

Ben Williams
Friends of French Prairie

On Wed, Oct 9, 2024 at 4:10 PM Brandy Steffen <brandy.steffen@jla.us.com> wrote:

> Hi Ben,
>
> Thank you for your email. Tony Beach passed it along to me since we're tasked with tracking all comments on this project. I see that you've noted Chair Stephens' confirmation of your email and questions which were: Has the Preferred Alternative been presented to the Board? Did the Board make the decision or approve the department decision? Is it a Department decision or a Board decision?
>
> The Department as part of its planning duties under ORS 836.025(1) is charged with drafting all the components of the draft master plan, which includes the alternatives analysis and selection of the preferred alternative. The Department is then required to present to the Board the draft master plan and findings of compatibility and compliance with the appropriate acknowledged comprehensive plan and relevant statewide land use goals under OAR 738-130-0055(5). The Board then makes a decision whether to reject or adopt the findings and the draft master plan under OAR 738-130-0055 (7).
>
> I hope that answers your questions, but if not, please let me know.
>
> Thank you,
> **BRANDY STEFFEN | JLA PUBLIC INVOLVEMENT**
> Partner + Senior Program Manager
> brandy.steffen@jla.us.com » Schedule a 30 minute meeting
>
> ---
>
> **From:** Ben Williams <fofp99@gmail.com>
> **Sent:** Tuesday, October 8, 2024 11:38 AM
> **To:** STEPHENS Cathryn E <CStephens@eugene-or.gov>
> **Cc:** Oregon Department of Aviation <mail.aviation@ODAV.oregon.gov>; WARNER Chris * GOV <Chris.WARNER@oregon.gov>; BROOKS Kelly S * GOV <Kelly.S.BROOKS@oregon.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Mayor Julie Fitzgerald <fitzgerald@ci.wilsonville.or.us>; Mayor Brian Asher (mayor@ci.aurora.or.us) <mayor@ci.aurora.or.us>; WYTOSKI Beth * GOV <Beth.Wytoski@oregon.gov>; HYZY Kathy * GOV <Kathy.Hyzy@oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
> **Subject:** Re: Aurora Airport Master Plan Preferred Alternative
>
> Some people who received this message don't often get email from fofp99@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Chair Stephen's;

Thank you for acknowledging receipt of my email.

I hope you will also provide answers to the questions I asked.

Sincerely

Ben Williams
Friends of French Prairie
fofp99@gmail.com

On Tue, Oct 8, 2024 at 10:49 AM STEPHENS Cathryn E <CStephens@eugene-or.gov> wrote:

> Hello Ben,
>
> I am acknowledging receipt of your email.
>
> Thank you,
> Cathryn
>
> Cathryn Stephens, A.A.E.
> Airport Director
> 28855 Lockheed Drive
> Eugene, Oregon 97402
> 541-682-5430
> www.flyEUG.com
>
> *Team EUG is committed to creating a welcoming and safe community for everyone and a place where every person can experience a sense of belonging. We value and promote diversity, equity, and inclusion while actively working to ensure our actions reflect these core principles.*
>
> ---
>
> **From:** Ben Williams <fofp99@gmail.com>
> **Sent:** Tuesday, October 8, 2024 10:29 AM
> **To:** STEPHENS Cathryn E <CStephens@eugene-or.gov>
> **Cc:** mail.aviation@odav.oregon.gov; Chris.warner@oregon.gov; kelly.s.brooks@oregon.gov; Kenji.SUGAHARA@odav.oregon.gov; Mayor Julie Fitzgerald <fitzgerald@ci.wilsonville.or.us>; Mayor Brian Asher (mayor@ci.aurora.or.us) <mayor@ci.aurora.or.us>; Beth.Wytoski@oregon.gov; Kathy.Hyzy@oregon.gov
> **Subject:** Aurora Airport Master Plan Preferred Alternative
>
> [EXTERNAL ⚠]
>
> To: Chair Stephens and Aviation Board Members;
>
> I'm sending you and the Aviation Board this inquiry following delivery of the agenda for the next Aurora Airport Master Plan PAC meeting on October 15. The following was sent to the PAC:

AC MEETING #7 AGENDA

Date/Time: October 15, 2024, from 5:00-8:00 pm

Location: Zoom Webinar: https://us02web.zoom.us/j/84488377615

Meeting Goals: Continue discussions about the Aurora Airport Master Plan Alternatives.

Time	Topic	Person
5:00-5:15 pm	**Introductions**	Brandy Steffen
5:10-5:20 pm	**Review feedback form results**	David Miller
5:20-5:30 pm	**PAC clarifying questions**	Brandy Steffen
5:30-5:40 pm	**Review refined alternatives**	David Miller
5:40-5:50 pm	**PAC clarifying questions**	Brandy Steffen
5:50-6:10 pm	**Review preferred alternative for Master Plan**	David Miller
6:10-7:40 pm	**PAC questions and comments**	Brandy Steffen
7:40-7:55 pm	**Public Comments** · Comments may be emailed before the meeting through the website: https://publicproject.net/AuroraAirport# · Commenters may have up to 2 minute to speak. We ask that only one representative from each organization speaks. We may not be able to hear from everyone. · *Reminder:* public comments typed into Zoom may not be answered during the meeting, but answers will be included in the written meeting summary.	Brandy Steffen
7:55-8:00 pm	**Next Steps**	Brandy Steffen

A meeting summary with all PAC and public comments will be posted to the project website.

***

I sent Brandy Steffen of JLA Public Involvement the following question: “What is there to ‘discuss’ given that the FAA orientation is one of the three and FAA said select one of these expansion alternatives or be moved to ‘maintenance only’?”

Her response was: “Thanks for the email. In the October PAC meeting we will review the refined alternatives, PAC feedback form results, answer PAC questions, and review the preferred alternative. We’ll also talk about next steps for the project. I hope that helps answer your question.”

The reason I send this email to you and the Board is that in the 2009-2012 Aurora Airport Master Plan process, the Department and their consultant presented to the Board at a scheduled Aviation Board meeting the alternatives in the master plan and formally presented the Preferred Alternative

(No Build) for the Board to approve and adopt. The Board did not do so, sending it back to the Department and directing them to do more work and return with an expansion alternative.

The point here is that the agenda implies that the Preferred Alternative decision has already been made by the Department without Board input and next week will be presented to the PAC. At the September Board meeting, Steve Nagy made the statement that the Preferred Alternative selection should be an ODAV decision.

Has the Preferred Alternative been presented to the Board? Did the Board make the decision or approve the department decision? Is it a Department decision or a Board decision? My understanding is that according to the Court of Appeals, the administrative rule OAR 738-130-0055, means the decision (approval and adoption) lies with the Board, not the Department.

The Board should take an active role in the selection of the preferred alternative, and consider a No-Build alternative as one of the potential alternatives.

Sincerely

Ben Williams, President

fofp99@gmail.com

--

Ben Williams
Friends of French Prairie
fofp99@gmail.com

Outlook

Re: Comments in advance of Aurora Airport PAC Meeting 8 Roundtable Discussion

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Fri 12/6/2024 10:58 AM
To Ben Williams <fofp99@gmail.com>; Kenji.SUGAHARA@odav.oregon.gov <Kenji.SUGAHARA@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc Chris.warner@oregon.gov <Chris.warner@oregon.gov>; kelly.s.brooks@oregon.gov <kelly.s.brooks@oregon.gov>; Courtney Neron <Rep.CourtneyNeron@oregonlegislature.gov>; Mayor Julie Fitzgerald <fitzgerald@ci.wilsonville.or.us>; Mayor Brian Asher (mayor@ci.aurora.or.us) <mayor@ci.aurora.or.us>

Thanks for your comments, Ben. I'll make sure to pass them along to any team members who weren't on your original email. I look forward to our meeting next week.

Thank you,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Ben Williams <fofp99@gmail.com>
Sent: Friday, December 6, 2024 9:43 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Kenji.SUGAHARA@odav.oregon.gov <Kenji.SUGAHARA@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Chris.warner@oregon.gov <Chris.warner@oregon.gov>; kelly.s.brooks@oregon.gov <kelly.s.brooks@oregon.gov>; Courtney Neron <Rep.CourtneyNeron@oregonlegislature.gov>; Mayor Julie Fitzgerald <fitzgerald@ci.wilsonville.or.us>; Mayor Brian Asher (mayor@ci.aurora.or.us) <mayor@ci.aurora.or.us>
Subject: Comments in advance of Aurora Airport PAC Meeting 8 Roundtable Discussion

Brandy, et al;

Your last email re: PAC meeting 8 scheduled for next Tuesday states:

We are looking forward to seeing you at the **next meeting (VIRTUAL) on Tuesday, December 10, 2024 from 5:00-8:00 p.m.** The Planning Team and ODAV appreciates your feedback on the preferred alternative that was presented at PAC Meeting 7. Based on the feedback and requests to discuss the Preferred Alternative further, ODAV would like to use PAC Meeting 8 to review the noise analysis and have a roundtable discussion with you all regarding comments on the preferred alternative and any additional input or recommendations that you would like to bring to the meeting.

Please see attached comments from Friends of French Prairie.

The reality that is clearly now being avoided is that the almost two year delay in the master planning process has put us into the forecast period, and the present has caught up with the future.

The forecasted operations are already falling short of the real operation numbers, and those real operations numbers for 2022, 2023 and YTD 2024 are being ignored.

It is our hope that this reality will be discussed at next week's PAC meeting.

Sincerely

--
Ben Williams
Friends of French Prairie
fofp99@gmail.com

Comments for Aurora Airport PAC Meeting 8 Roundtable discussion on Preferred Alternative

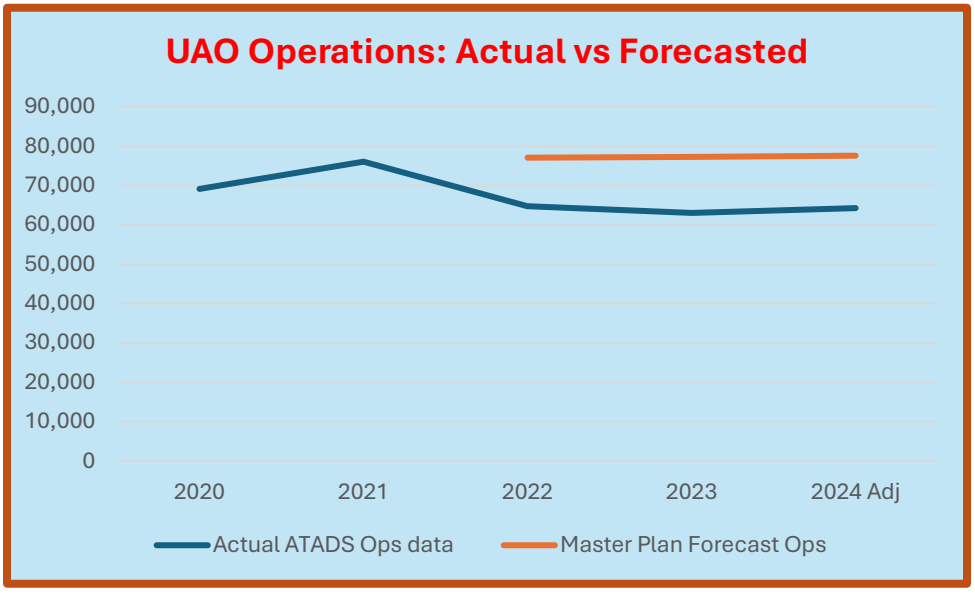
Friends of French Prairie has previously (March 12, 2024 letter) commented on the forecast approval by the FAA and specifically the selection of the Marion and Clackamas County Population Growth Model rather than the Federal Contract Tower TAF State (Oregon) Model.

Additionally, in Response 7 to Comments made at 11-15-24 PAC meeting, Century West and ODAV respond: *FAA has stated that alternatives that artificially downgrade to AAC/ADG BII do not reflect the current or forecasted operational environment at the Airport and they are not viable options*.

Compounding the problem of the forecast model chosen is a much more fundamental problem which is now visible due to the delay in the Aurora Airport Master Plan process which was originally expected to deliver a Final Report in March of 2023. The data set being used is 2016 through 2021, and we are now at the end of 2024.

Specifically, the forecast model selected is not only the one most favorable that results in the highest growth forecast, but it is built off the 2021 operations data. When compared to the subsequent years, 2021 can now be seen as a one-year fluke with increased operations followed by three years of reduced operations.

When total operations of 76,028 in 2021 are compared using the FAA's own ATADS data, 2022 dropped to 64,651, followed by a further drop in 2023 to 63,015, and a slight increase in 2024 to 64,259 (adjusting 2024 YTD data for twelve months). See attached ATADS data. All three of these subsequent years are lower than both 2021 and 2020, and look like this:



Note: 2024 Adjustment begins with Jan-Sep data and adds 16.5% (same % for period as 2023)

We are now in the forecasted period and are already falling far short of the forecasted operations.

The present has caught up with the future, and it is incumbent upon the FAA, Century West and ODAV to acknowledge this reality and correspondingly get real about the future of Aurora State Airport and give up on the outlandish and expensive C-II based Preferred Alternative, and seriously assess reverting to B-II status.

Ben Williams

Friends of French Prairie

ANALYSIS: KUAO Monthly ATADS data, 2015 thru SEP 2024 (pg.1 of 2)

	FAA's ATADS data									12-Month Running Sum								
	Itinerant ops					Local ops					Ave. ops/day			12mo RS: yr2yr chg				
month	AC	AT	GA-I	MI-I	ITIN	GA-L	MI-L	LCL	TOTAL	TOTAL	AC+AT	LCL	%LCL	LCL	ITIN	AC+AT		
11/2015	14	129	2,156	17	2,316	1,296	32	1,328	**3,644**									*..ATC tower opens, including daily ops counts (earlier counts are NOT reliable)*
12/2015	1	106	979	3	1,089	466	6	472	**1,561**									
01/2016	0	143	1,853	13	2,009	1,018	0	1,018	**3,027**									
02/2016	0	106	2,429	13	2,548	1,202	0	1,202	**3,750**								**2016**	
03/2016	0	142	2,382	29	2,553	1,012	74	1,086	**3,639**									
04/2016	0	190	2,895	18	3,103	1,242	6	1,248	**4,351**									
05/2016	0	213	3,142	14	3,369	1,484	14	1,498	**4,867**									
06/2016	0	183	3,183	32	3,398	1,140	10	1,150	**4,548**									
07/2016	0	220	3,229	28	3,477	1,303	6	1,309	**4,786**									
08/2016	0	180	3,589	44	3,813	1,477	2	1,479	**5,292**									
09/2016	0	205	3,027	19	3,251	1,576	0	1,576	**4,827**									
10/2016	0	160	2,015	12	2,187	1,106	4	1,110	**3,297**	**47,589**	5	40	30%					
11/2016	0	153	2,156	15	2,324	1,586	0	1,586	**3,910**	**47,855**	5	40	31%					
12/2016	0	145	1,009	9	1,163	907	13	920	**2,083**	**48,377**	6	42	31%					
01/2017	0	157	1,691	4	1,852	954	10	964	**2,816**	**48,166**	6	41	31%				**2017**	
02/2017	0	121	1,301	4	1,426	668	0	668	**2,094**	**46,510**	6	40	31%					
03/2017	1	130	1,856	10	1,997	1,090	0	1,090	**3,087**	**45,958**	6	40	32%					
04/2017	0	198	2,340	9	2,547	1,325	0	1,325	**3,872**	**45,479**	6	40	32%					
05/2017	0	186	3,482	40	3,708	2,593	28	2,621	**6,329**	**46,941**	6	43	34%					
06/2017	0	198	3,396	15	3,609	2,700	0	2,700	**6,309**	**48,702**	6	48	36%					*..initial large growth in local ops as area pilots learn to trust ATC at new control tower*
07/2017	0	212	4,057	24	4,293	3,500	22	3,522	**7,815**	**51,731**	6	54	38%					
08/2017	0	239	3,928	8	4,175	2,962	8	2,970	**7,145**	**53,584**	6	58	39%					
09/2017	0	188	3,317	35	3,540	2,674	28	2,702	**6,242**	**54,999**	6	61	40%					
10/2017	0	158	2,865	11	3,034	2,014	6	2,020	**5,054**	**56,756**	6	63	41%	*59%*	*19%*	*5%*		
11/2017	0	210	1,844	7	2,061	1,245	18	1,263	**3,324**	**56,170**	6	62	41%	*55%*	*17%*	*7%*		
12/2017	0	166	2,214	19	2,399	1,666	0	1,666	**4,065**	**58,152**	6	64	40%	*55%*	*20%*	*6%*		
01/2018	0	150	2,138	12	2,300	1,552	32	1,584	**3,884**	**59,220**	6	66	41%	*60%*	*23%*	*5%*	**2018**	
02/2018	0	161	2,098	2	2,261	1,618	8	1,626	**3,887**	**61,013**	6	69	41%	*72%*	*31%*	*6%*		
03/2018	0	216	2,750	13	2,979	1,892	142	2,034	**5,013**	**62,939**	6	71	41%	*78%*	*37%*	*11%*		
04/2018	0	137	2,742	9	2,888	1,973	2	1,975	**4,863**	**63,930**	6	73	42%	*82%*	*41%*	*8%*		
05/2018	0	171	3,537	20	3,728	2,484	10	2,494	**6,222**	**63,823**	6	73	42%	*68%*	*36%*	*8%*		
06/2018	0	179	3,731	9	3,919	2,644	0	2,644	**6,563**	**64,077**	6	73	41%	*53%*	*32%*	*6%*		
07/2018	0	165	3,660	131	3,956	2,860	5	2,865	**6,821**	**63,083**	6	71	41%	*32%*	*22%*	*5%*		
08/2018	0	220	3,558	11	3,789	3,004	12	3,016	**6,805**	**62,743**	6	71	41%	*23%*	*17%*	*1%*		
09/2018	0	179	3,437	26	3,642	3,154	6	3,160	**6,802**	**63,303**	6	72	42%	*19%*	*15%*	*1%*		
10/2018	0	144	2,801	11	2,956	2,308	2	2,310	**5,266**	**63,515**	6	73	42%	*15%*	*12%*	*1%*		*..air charter decline begins ~16-months ahead of COVID*
11/2018	0	144	2,311	9	2,464	1,640	4	1,644	**4,108**	**64,299**	6	74	42%	*19%*	*14%*	*-5%*		
12/2018	0	123	1,752	6	1,881	1,072	6	1,078	**2,959**	**63,193**	5	72	42%	*12%*	*9%*	*-8%*		
01/2019	0	139	2,190	5	2,334	1,699	4	1,703	**4,037**	**63,346**	5	73	42%	*10%*	*7%*	*-8%*	**2019**	
02/2019	1	96	1,229	7	1,333	1,040	0	1,040	**2,373**	**61,832**	5	71	42%	*3%*	*1%*	*-13%*		
03/2019	1	125	2,695	2	2,823	1,911	2	1,913	**4,736**	**61,555**	5	71	42%	*-1%*	*-2%*	*-20%*		*..LCL ops flatten out briefly, indicating transition to and acceptance of local tower is complete*
04/2019	0	117	2,388	3	2,508	1,904	0	1,904	**4,412**	**61,104**	5	71	42%	*-3%*	*-4%*	*-19%*		
05/2019	0	133	3,118	25	3,276	3,031	4	3,035	**6,311**	**61,193**	5	72	43%	*-1%*	*-4%*	*-20%*		
06/2019	0	176	3,337	4	3,517	2,854	0	2,854	**6,371**	**61,001**	5	73	43%	*0%*	*-5%*	*-19%*		
07/2019	0	196	3,386	2	3,584	3,597	0	3,597	**7,181**	**61,361**	5	75	44%	*5%*	*-3%*	*-16%*		
08/2019	0	188	3,803	21	4,012	3,683	5	3,688	**7,700**	**62,256**	5	77	45%	*8%*	*-1%*	*-17%*		
09/2019	0	127	2,878	14	3,019	2,653	1	2,654	**5,673**	**61,127**	5	75	45%	*4%*	*-3%*	*-19%*		
10/2019	0	138	3,276	8	3,422	2,752	8	2,760	**6,182**	**62,043**	5	76	45%	*5%*	*-2%*	*-19%*		
11/2019	0	70	2,619	4	2,693	1,915	8	1,923	**4,616**	**62,551**	4	77	45%	*4%*	*-3%*	*-20%*		
12/2019	0	62	1,664	5	1,731	1,527	0	1,527	**3,258**	**62,850**	4	78	46%	*8%*	*-1%*	*-21%*		
01/2020	0	50	1,653	3	1,706	1,648	0	1,648	**3,354**	**62,167**	4	78	46%	*8%*	*-2%*	*-25%*	**2020**	*..accelerated growth in LCL ops prior to and during COVID*
02/2020	0	53	2,548	4	2,605	2,479	4	2,483	**5,088**	**64,882**	4	82	46%	*15%*	*5%*	*-25%*		
03/2020	0	125	2,028	2	2,155	2,268	0	2,268	**4,423**	**64,569**	4	83	47%	*17%*	*5%*	*-21%*		*..begin widespread air travel collapse due to COVID…*
04/2020	0	46	2,052	1	2,099	2,073	0	2,073	**4,172**	**64,329**	4	84	47%	*18%*	*5%*	*-24%*		

ANALYSIS: KUAO Monthly ATADS data, 2015 thru SEP 2024 (pg.2 of 2)

FAA's ATADS data										12-Month Running Sum								
	Itinerant ops					Local ops					Ave. ops/day			12mo RS: yr2yr chg				
month	AC	AT	GA-I	MI-I	ITIN	GA-L	MI-L	LCL	TOTAL	TOTAL	AC+AT	LCL	%LCL	LCL	ITIN	AC+AT		
05/2020	0	77	2,713	1	2,791	3,332	1	3,333	6,124	64,142	4	84	48%	17%	5%	-26%		..during the pandemic, ops by GA pilots (mostly personal and recreational hobby flying) saw substantial growth, while commercial flying was all but frozen for more than a year
06/2020	0	86	2,730	2	2,818	3,398	1	3,399	6,217	63,988	3	86	49%	18%	5%	-31%		
07/2020	0	155	3,837	8	4,000	3,855	10	3,865	7,865	64,672	3	87	49%	16%	5%	-34%		
08/2020	0	133	3,721	1	3,855	3,642	0	3,642	7,497	64,469	3	87	49%	13%	4%	-36%		
09/2020	0	67	2,377	9	2,453	2,501	0	2,501	4,954	63,750	3	86	49%	15%	4%	-38%		
10/2020	0	86	3,328	1	3,415	4,154	0	4,154	7,569	65,137	3	90	50%	18%	5%	-41%		
11/2020	0	122	1,665	2	1,789	2,166	2	2,168	3,957	64,478	3	91	51%	17%	3%	-35%		
12/2020	0	61	2,028	2	2,091	2,638	0	2,638	4,729	65,949	3	94	52%	19%	5%	-32%		
01/2021	0	96	2,107	4	2,207	2,651	4	2,655	4,862	67,457	3	96	52%	23%	9%	-25%	2021	
02/2021	0	59	1,758	3	1,820	1,882	4	1,886	3,706	66,075	3.0	95	52%	15%	2%	-22%		
03/2021	0	134	3,142	12	3,288	3,419	0	3,419	6,707	68,359	3.1	98	52%	18%	6%	-22%		
04/2021	0	128	3,379	2	3,509	3,095	26	3,121	6,630	70,817	3.3	101	52%	21%	10%	-12%		..begin post-COVID resumption of air travel; result was slightlyh more than 2-years of sating pent-up elite travel demand
05/2021	0	177	3,364	1	3,542	4,301	0	4,301	7,843	72,536	3.6	103	52%	23%	13%	0%		
06/2021	0	248	3,621	19	3,888	3,756	8	3,764	7,652	73,971	4.0	104	52%	22%	16%	20%		
07/2021	0	189	4,102	4	4,295	4,033	0	4,033	8,328	74,434	4.1	105	51%	21%	15%	27%		
08/2021	0	220	4,016	4	4,240	3,762	0	3,762	8,002	74,939	4.3	105	51%	22%	16%	41%		
09/2021	0	207	3,393	8	3,608	3,198	3	3,201	6,809	76,794	4.7	107	51%	24%	20%	63%		..peak in LCL ops per day
10/2021	0	148	2,781	9	2,938	2,272	8	2,280	5,218	74,443	4.9	102	50%	13%	14%	77%		
11/2021	0	132	2,093	6	2,231	1,754	0	1,754	3,985	74,471	4.9	101	49%	11%	15%	69%		
12/2021	0	147	1,552	2	1,701	1,098	8	1,106	2,807	72,549	5.2	97	49%	3%	10%	78%		
01/2022	0	150	2,315	2	2,467	1,460	10	1,470	3,937	71,624	5.3	93	48%	-3%	6%	75%	2022	
02/2022	0	122	2,307	13	2,442	1,428	12	1,440	3,882	71,800	5.5	92	47%	-3%	9%	80%		
03/2022	4	229	2,766	5	3,004	2,289	6	2,295	5,299	70,392	5.8	89	46%	-9%	3%	87%		
04/2022	0	161	2,295	14	2,470	1,884	4	1,888	4,358	68,120	5.8	86	46%	-15%	-4%	77%		
05/2022	0	202	3,045	7	3,254	2,616	4	2,620	5,874	66,151	5.9	81	45%	-22%	-9%	66%		
06/2022	0	178	3,633	4	3,815	2,948	0	2,948	6,763	65,262	5.7	79	44%	-24%	-12%	42%		
07/2022	0	241	3,717	38	3,996	2,900	2	2,902	6,898	63,832	5.9	76	43%	-28%	-14%	43%		
08/2022	0	361	4,204	10	4,575	3,968	0	3,968	8,543	64,373	6.3	76	43%	-27%	-14%	44%		
09/2022	0	200	3,573	9	3,782	2,800	0	2,800	6,582	64,146	6.2	75	43%	-30%	-16%	32%		
10/2022	0	181	2,873	4	3,058	2,178	6	2,184	5,242	64,170	6.3	75	43%	-26%	-14%	29%		
11/2022	0	171	2,290	5	2,466	1,798	4	1,802	4,268	64,453	6.4	75	43%	-26%	-13%	30%		
12/2022	0	154	1,661	0	1,815	1,190	0	1,190	3,005	64,651	6.4	75	43%	-22%	-11%	25%		
01/2023	0	180	1,911	3	2,094	1,574	0	1,574	3,668	64,382	6.5	76	43%	-19%	-10%	23%	2023	
02/2023	0	159	1,854	4	2,017	1,276	0	1,276	3,293	63,793	6.6	75	43%	-18%	-11%	21%		
03/2023	0	175	2,212	7	2,394	1,698	4	1,702	4,096	62,590	6.5	74	43%	-17%	-11%	12%		
04/2023	0	177	2,509	29	2,715	1,714	4	1,718	4,433	62,665	6.5	73	43%	-15%	-8%	11%		..LCL ops per day bottomed out at 2018 base level, and ~80%+ over 2016 rates
05/2023	0	261	3,500	55	3,816	2,757	10	2,767	6,583	63,374	6.7	74	42%	-9%	-4%	13%		
06/2023	0	239	3,253	7	3,499	2,752	0	2,752	6,251	62,862	6.8	73	42%	-8%	-4%	20%		
07/2023	0	277	3,556	22	3,855	3,704	0	3,704	7,559	63,523	6.9	75	43%	-1%	0%	18%		
08/2023	0	262	3,447	12	3,721	3,734	0	3,734	7,455	62,435	6.7	75	44%	-2%	-3%	7%		..air charter COVID-recovery ends; begin period of flat or declining commercial ops
09/2023	0	209	3,053	4	3,266	3,524	0	3,524	6,790	62,643	6.7	77	45%	2%	-2%	7%		
10/2023	0	226	2,739	9	2,974	2,564	16	2,580	5,554	62,955	6.8	78	45%	3%	-2%	8%		
11/2023	0	162	2,133	5	2,300	2,248	0	2,248	4,548	63,235	6.8	79	45%	5%	-2%	6%		
12/2023	0	120	1,412	5	1,537	1,242	6	1,248	2,785	63,015	6.7	79	46%	5%	-3%	4%		
01/2024	0	135	1,213	13	1,361	1,210	4	1,214	2,575	61,922	6.6	78	46%	3%	-4%	1%	2024	
02/2024	0	154	2,093	0	2,247	2,072	0	2,072	4,319	62,948	6.6	80	46%	7%	-1%	-1%		
03/2024	0	174	2,644	6	2,824	2,112	6	2,118	4,942	63,794	6.6	81	47%	11%	2%	1%		
04/2024	0	178	2,877	23	3,078	2,526	18	2,544	5,622	64,983	6.6	84	47%	14%	4%	1%		
05/2024	0	174	3,516	6	3,696	3,938	12	3,950	7,646	66,046	6.3	87	48%	18%	4%	-5%		..the trend in 2024: air charter (large planes) is declining, while personal flying and flight training (small planes) are increasing
06/2024	0	196	3,355	13	3,564	3,636	18	3,654	7,218	67,013	6.2	89	49%	22%	7%	-9%		
07/2024	0	192	2,910	9	3,111	3,874	2	3,876	6,987	66,441	6	90	49%	19%	5%	-14%		
08/2024	0	185	3,508	18	3,711	4,808	0	4,808	8,519	67,505	6	93	50%	24%	8%	-14%		
09/2024	0	192	3,177	23	3,392	3,936	2	3,938	7,330	68,045	6	94	50%	23%	9%	-15%		

Outlook

Fw: Aurora Airport master plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 8/28/2024 1:31 PM
To THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Jen Winslow <Jen.winslow@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>

FYI

Thanks,
Brandy

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting

Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday. Administrative-only hours on Friday.
Check my availability » Schedule a 30 minute check-in
Email is the best way to reach me; I try to respond within 2 workdays.
However, urgent requests should be handled through a phone call or scheduling a meeting using the link above.

From: Joshua Williams <jwilliams@aurorafire.org>
Sent: Wednesday, August 28, 2024 1:26 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Re: Aurora Airport master plan

Thank you for the prompt reply.

Chief Williams

Fire Chief
Joshua L. Williams
21390 E Main St.
Aurora, OR 97002

Aurora Fire District No. 63

On Wed, Aug 28, 2024 at 1:10 PM Brandy Steffen <brandy.steffen@jla.us.com> wrote:

> Good day Chief Williams,

We appreciate you taking the time to review the draft refined preliminary alternatives for the Aurora State Airport Master Plan and providing valuable input. We understand your concern to maintain tax revenues that support the fire district. You are correct, the land the Oregon Department of Aviation (ODAV) owns is tax exempt; however, the private improvements on leased land (hangars, buildings, etc.) are taxed and invoiced by Marion County to ODAV, which are paid by the lessees.

The refined preliminary alternatives illustrates "priority" parcels that would need to be acquired by ODAV to meet Federal Aviation Administration (FAA) design standards as well as to support the existing and future facility needs. Property identified as reserve is shown in the event that the property becomes available for purchase, ODAV would be able to utilize federal funding to acquire the land. There is no timeline or requirement to acquire the reserve property.

Thank you again for your review and comments.

Thanks,
Brandy Steffen
(on behalf of the Oregon Department of Aviation)

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Strategist + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » 503-235-5881 » jla.us.com
Woman-led, community-centered, for 35 years and counting

Good morning,

I left you a voicemail this morning, but thought I would email you my question. I was reading the alternates for the UAO airport and could not help but to notice there was a lot of property acquisition. Specifically the property acquisition for aeronautic reserve, and the high priority acquisition. All of that property is currently privately owned, thus they pay property taxes. My question is who will be acquiring the proposed property for the reserve? Is it the State of Oregon, because if that is the case the state is exempt from paying property tax.

As an example, I pulled up only 5 parcels contained in the area and those 5 parcels bring the Aurora Fire District over $100,000 in tax revenue. If this represents only 5 parcels, one could imagine the impact of all of them to be significant.

The loss of revenue from just those 5 parcels alone would cause a devastating cascade of events that may lead to the loss of career staffing and end 24 hour career coverage.

I am looking forward to a response.

Chief Williams

Fire Chief
Joshua L. Williams
21390 E Main St.
Aurora, OR 97002

Outlook

Fw: Aurora Airport Master Plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-01-06 8:56 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, December 23, 2024 8:48 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Aurora Airport Master Plan

Hello,

Good morning. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357
EMAIL Alex.R.Thomas@ODAV.Oregon.Gov
SALEM, OR 97302
WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:

COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Patrick Willis <patrick.a.willis@gmail.com>
Date: Sunday, December 22, 2024 at 19:00
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Aurora Airport Master Plan

You don't often get email from patrick.a.willis@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Greetings,

As a pilot who learned to fly at the Aurora Airport and has continued to use the airport's services for thirty years, I must strenuously object to the plan to condemn and remove existing hangars. The airport needs more general aviation hangars, not fewer.

Thank you.

Patrick Willis

Outlook

Fw: Aurora Airport plans

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 12/19/2024 8:09 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

I will be on vacation starting Monday, 12/23/24 and will return on Monday, 01/06/25.
JLA will be closed December 24 through January 1 to allow our entire team time to rest and recover. Please get in touch early with any anticipated needs during this time. Wishing you a lovely end to 2024!

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Thursday, December 19, 2024 8:07 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Aurora Airport plans

Hello,

Good morning. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

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Schedule a meeting with any of the programs listed below.

Alternative Contacts:

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Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Norm Willis <haledna@aol.com>
Date: Wednesday, December 18, 2024 at 15:58
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Aurora Airport plans

You don't often get email from haledna@aol.com. Learn why this is important

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Oregon Department of Aviation, Alex Thomas, ODAV Planning and Programs Manager, 503-378-4880
Alex.R.Thomas@odav.oregon.gov

Dear ODAV c/o Alex Thomas,

As a pilot that flies off KUAO, please register and record my urgent input for the Aurora Airport Master Plan that is underway and my recommendation and request not to consider the condemnation and destruction of any aircraft hangars.

The number of planes at KUAO has steadily increased over the 40 years that I have had a plane based there. The airport's economic impact on the local area and region is significant and of course it has a tremendous impact on general aviation. Hangar space is already scant at the local GA airports making it expensive in the unlikely event hangar space can be found. It's also hard to justify the economic impact on the hangar owners who for the most part have the hangars for their pleasure flying not business. They have invested substantially in purchasing hangars to sublease for income or for personal use only. Condemnation and demolition is an unfair overreach of state government that creates a significant economic loss for those owners.

Thank you

Norman R. Willis, MD
Radiation Oncology

Outlook

Re: Aurora State Airport Master Plan Website Comments - Eric Winston

From Eric Winston <noreply@jotform.com>
Date Sun 11/24/2024 4:15 PM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	Eric Winston
Organization	Self
Comments or questions?	There is already a huge shortage of hangars at Aurora. The proposed destruction of hangars makes no sense with the economic damage it will cause by evicting multiple businesses with no options of relocating at the airfield. A vehicle lane could be built away from the taxiway and would be much safer and not require hangar removal. I'm for all of the improvements at the airfield but only with no destruction of hangars. I also propose the ODAV approve the development and airfield access to more hangars on the north end of the airport to satisfy hangar demand without an undue red-tape filled approval process. I would like to receive email updates.
If you would like a response, please tell us the best way to contact you:	Email
Email	ewinston70@yahoo.com
Phone Number	[redacted]

You can edit this submission and view all your submissions easily.

Outlook

Fw: Aurora State Airport Comment Letter - Umpqua Bank

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-01-06 8:51 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (122 KB)
Umpqua Bank Letter to Oregon Department of Aviation 12.23.24.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Tuesday, December 24, 2024 8:58 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Aurora State Airport Comment Letter - Umpqua Bank

Hello,

Good morning. Please include within the UAO record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

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Schedule a meeting with any of the programs listed below.

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Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Trent Wright <TrentWright@UmpquaBank.com>
Date: Monday, December 23, 2024 at 17:06
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Aurora State Airport Comment Letter - Umpqua Bank

You don't often get email from trentwright@umpquabank.com. Learn why this is important

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Alex Thomas
ODAV Planning and Programs Manager
Oregon Department of Aviation

Mr. Thomas-

Please find attached Umpqua Banks Comment Letter regarding Aurora State Airport's Master Plan.

Respectfully,
Trent-

Trent Wright
SVP, Director of Government Relations
Legal

O (208) 926-6336
M (208) 781-1623

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UMPQUA BANK

Trent Wright
Director of Government Relations
Umpqua Bank
225 N. 9th St., Ste. 510
Boise, ID 93702
trentwright@umpquabank.com
208 926-6336

12.23.24

Alex Thomas
Planning and Programs Manager
Oregon Department of Aviation
3040 25th Street SE
Salem, OR 97302

Dear Mr. Thomas,

Subject: Strong Opposition to the "Preferred Alternative" in the Aurora State Airport Master Plan

I am writing on behalf of Umpqua Bank to express our strong opposition to the "preferred alternative" proposed in the Aurora State Airport Master Plan. As a key stakeholder with ongoing investments in the airport we have significant concerns regarding the potential impacts of this plan on our operations and the broader economic environment.

The proposed 500-foot extension is inadequate to meet the needs of general aviation aircraft. This limitation could hinder the airport's ability to attract and accommodate a diverse range of aviation activities, ultimately affecting its economic viability. Additionally, the inclusion of a parallel taxi lane and a vehicle service road, which are not FAA requirements, appears to be an unjustified measure primarily aimed at property acquisition. This approach raises serious concerns about the fairness and necessity of such expansions.

The potential condemnation of properties, with compensation based on tax roll values rather than market value, is deeply troubling. This method fails to account for the true economic impact on property owners and does not cover costs related to business dislocation or disruption. The airport is a significant economic asset, contributing to job creation and local development. The current approach could lead to extensive legal battles over property rights and the legitimacy of the master plan, which the state cannot

UMPQUA BANK

afford. Such litigation would create an environment of uncertainty, negatively impacting ongoing and future investments.

We advocate for a phased approach to extend the runway, which would address immediate needs without unnecessary property condemnation. This strategy would allow for incremental development, ensuring that the airport can grow sustainably. We urge the Oregon Department of Aviation to engage in mediation through Oregon Solutions to facilitate open discussions and build consensus among all stakeholders. This process would help address concerns and find mutually beneficial solutions. It is crucial to improve public involvement and transparency in the planning process. Ensuring that all stakeholders have a voice and that their concerns are adequately addressed will foster a more collaborative and supportive environment.

Umpqua Bank remains committed to supporting the development of Aurora State Airport in a manner that balances economic growth with the rights and interests of all stakeholders. We strongly urge the Oregon Department of Aviation to reconsider the "preferred alternative" and adopt a more inclusive and sustainable approach to the airport's master plan.

Thank you for your attention to this matter. We look forward to your response and are willing to engage in further discussions to find a viable path forward.

Sincerely,

Trent Wright
Umpqua Bank

Public Comments (2025)

AURORA AIRPORT MASTER PLAN

All emails, letters, calls outside of meetings are included in this document for 2025 only; other years are included in separate documents to minimize the document size/length. PAC meeting conversations and questions, as well as emails sent specifically regarding the meetings can be found in the PAC meeting summaries. Comments during Public Open Houses can be found in the Open House summaries.

Please note: Emails and documents are listed alphabetically by last name, then date (from January to June for 2025).

2025

Last Name	First Name	Date of Comment	Received through	Subject Line
Altemus	Bob	01/19/2025	Email	Revised Aurora Master Plan recommendations
Asher	Brian	01/21/2025	Email	Questions for the next meeting
Bennett	Bruce	01/18/2025	Email	Re: Reminder - Submit comments on Refined Preferred Alternative by 01/21/25
Bennett	Bruce	01/22/2025	Email	Re: Reminder - Submit comments on Refined Preferred Alternative by 01/21/25
Bergman	Bruce	02/17/2025	Website comment	NA
Bickford/Kellington	Jon/Wendy	02/03/2025	Email	Atlantic Aviation Alternative
Brenneke	Stephen	01/19/2025	Email	Master plan at KUAO
Buehrig	Karen	02/05/2025	Email	RE: Aurora Airport expansion - ODAV seeking comment
Buley	George	01/21/2025	Website comment	NA
Bush	Steve	01/20/2025	Email	Aurora Airport Plan
Buss	Jonathan	01/21/2025	Email	Aurora Airport - Suggestions for Current Refined Alternative
Cahill	Kaelyn	02/08/2025	Website comment	NA

Curtiss	Sarah	01/21/2025	Email; Attachment letter	Comment on Aurora State Airport Master Plan Refined Preferred Alternative from Anderson Hay & Grain Co. [SR-ACTIVE.FID6023036] Attachment: RE: Anderson Hay & Grain Co. Comments on Refined Preferred Alternative
Curtiss	Sarah	02/25/2025	Email; Letter to ODAV	Email: Fw: Comment on Aurora State Airport Master Plan Refined Preferred Alternative from Anderson Hay & Grain Co. [SR-ACTIVE.FID6023036] Letter to ODAV: RE: Anderson Hay & Grain Co. Comments on ODAV's Next Steps
Davis	Ted	01/27/2025	Email	Regarding the Aurora Airport - Current Refined Preferred Alterna
DeMarco	Rubylea	01/20/2025	Email	Airport plan concerns
Dierks	John	01/19/2025	Email 1; Email 2	Emails 1 and 2: Regarding the Aurora Airport - Current Refined Preferred Alternative
Donaldson	Patrick	05/05/2025	Email	Aurora State Airport Master Plan
Faegre	Aron	01/21/2025	Email; Attachment 1; Attachment 2; Attachment 3	Email: Additional AAIA Testimony for the Aurora Airport Updated Refined Preferred Alternative Attachment 1: Re: Aurora State Airport Master Plan AAIA Master Plan Requests Attachment 2: e: Aurora State Airport Master Plan process must Acknowledge the FAA HQ Modification of Standards Process Available for all Federally Funded Airports Attachment 3: Re: Aurora State Airport Master Plan process FAA approved documents Clarify that 500-foot Runway Extension is to meet safety needs of current C-II aircraft, not for larger aircraft
Faegre	Aron	02/25/2025	Email 1; Email 2; Letter Attachment	Email 1: Aurora Airport Can Use Modification Process to Avoid Moving Hwy 551 Email 2: Aurora Airport Master Plan – Letter from Aron Faegre Letter: Re: Aurora State Airport Master Plan Proposed Preferred Alternative, HDSE Septic Drainfield Correction of the Record and Next Steps Forward
Ferretti	Darlene	02/25/2025	Email; attachment	Email: Draft Airport Layout Plan Sketch Attachment: Re: Draft Airport Layout Plan Sketch

Gage	Chris	01/29/2025	Website comment	NA
Gage	Chris	02/19/2025	Website comment	NA
Grano	Karin	03/04/2025	Email	Aurora Airport expansion question
Green	Norm	01/19/2025	Email	KUAO - Current Refined Preferred Alternative
Helbling	Tony	01/10/2025	Email	RE: Aurora Airport - Refined Preferred Alternative comments by 01/21/25
Helbling	Tony	01/21/2025	Email; Attachment 1; Attachment 1.2	Email: FW: Thanks for visit today- Attachment 1: EC2501 Sunset Water Systems Award Letter Attachment 1.2: EC2501 Sunset Water Systems Summary of Award
Helbling	Tony	01/21/2025	Email; Attachment 2.1	Email: RE: quick question Attachment 2.1: Commercial Access Agreement.pdf
Helbling	Tony	01/21/2025	Email; DocuSign Document, Attachment 3.1	Email: FW: Completed: Complete with Docusign: Final HDSE -AAIA Feedback to RPA to KUAO MP.pdf DocuSign Document: Re – Comments to Refined Preferred Alternative, Aurora State Airport Master Plan, Report on HDSE Easement, Drain Field Options, and AAIA's Request for Involvement in Master Plan Process Attachment 3.1: Rutland Airport Layout Plan
Helbling	Tony	02/25/2025	Email; Attachment	Email: AAIA Comments to ALP Attachment: Re AAIA Comments to Airport Layout Plan
Hickman	Pat	01/20/2025	Email; Attachment	Email: Submittal for the record on Aurora State Airport and expansion plans and alternatives Attachment: Letter from Pat Hickman
Howley	Jamie	02/25/2025	Email; Attachment	Email: Draft Airport Layout Plan Sketch Attachment: Re: Draft Airport Layout Plan Sketch
Johnson	Betsy	01/21/2025	Email; Attachment.	Email: Aurora Attachment: RE: January 21, 2025 Comment Letter ODAV Updated Refined Proposed Preferred Alternative
Johnson	Betsy	02/06/2025	Call record	Telephone call to CWE office from Ms. Betsy Johnson

Kacalek	Brett	01/22/2025	Website comment	NA
Kanso	Michael	01/20/2025	Email	UAO airport plan
Kellington	Wendie	01/21/2025	Email; Attachment; Exhibit	Email: AAIA Testimony For Record Concerning Kuao Updated Refined Preferred Alternative Attachment: Re: January 21, 2025 Comment Letter on Behalf of Aurora Airport Improvement Association for Aurora State Airport Master Plan – ODAV Updated Refined Proposed Preferred Alternative Exhibit: Site Plan for Aurora state Airport Master Plan Alternative AAIA
Kellington	Wendie	02/11/2025	Email; Attachment 1; Attachment 2	Email: Improper actions allowing some substitutions and alternates versus denying others Attachment 1: our client ODAV - Aurora Airport Master Plan PAC Attachment 2: RE: ODAV Ad Hoc Exclusion of Designated Alternates for Aurora Airport Master Plan Public Advisory Committee Meetings
Kellington	Wendie	02/25/2025	Email 1; Email 2; Attachment; exhibit 1; exhibit 2; exhibit 3; exhibit 4	Email 1: TLM 2.25.25 comments - Aurora Airport Master Plan Record part 1 of 2 Email 2: TLM 2.25.25 comments - Aurora Airport Master Plan Record part 2 of 2 Attachment: Re: February 25, 2025, Comment Letter on Behalf of TLM Holdings LLC for Aurora State Airport Master Plan – ODAV Updated Refined Proposed Preferred Alternative Exhibit 1: 2017 SAC Exhibit 2: HDSE Goal Exception Exhibit 3: NA Exhibit 4: Airport Layout Plan Drawing
Kellington	Wendie	04/10/2025	Email	040725-UAO-ALPFullSet.pdf
Mauk	Dave	01/21/2025	Email; Attachment, Website comment	Email: Comments regarding Refined Alternative Plan, Aurora State Airport Attachment: Comments Submitted In Reference to the Refined Preferred Alternative
Mauk	Dave	02/05/2025	Email; Attachment	Email: Public Comment Submission Attachment: Letter

Mauk	Dave	02/25/2025	Email; Attachment	Email: Comment re February 11 PAC Meeting Attachment: Letter
McGuire	Daniel	01/24/2025	Website comment	NA
Neamtzu	Chris	02/10/2025	Email	PAC meeting
Nickerson	Lukas	02/24/2025	Email; Attachment	Email: KUAO Mater Plan Testimony Attachment: Comments on Proposed Master Plan for the Aurora State Airport Notice under Aurora State Airport Lease and Easement
Nickerson	Lukas	02/28/2025	Letter; Response email; Attached email	Letter: Comments on Proposed Master Plan for the Aurora State Airport Notice under Aurora State Airport Lease and Easement Response Email: HDSE Letter and Holdover Status Attached Email: Existing Drain Field
Nickerson	Lukas	03/17/2025	Email	HDSE/ODAV Meeting 3/19
O'Malley	Kevin	01/21/2025	Email; Attachment	Email: Comment Letter ODAV updated Refined Proposed Preferred Alternative Attachment: Re: January 21, 2025 Comment Letter on Behalf of Wilsonville Area Chamber of Commerce for Aurora State Airport Master Plan - ODAY Updated Refined Proposed Preferred Alternative
Ottenad	Mark	01/24/2025	Email	City of Wilsonville Rep to ASA MP PAC
Ottenad	Mark	02/06/2025	Email	RE: City of Wilsonville Rep to ASA MP PAC
Poehler	Bill	01/02/2025	Email	Email: Highway 551
Poehler	Bill	01/16/2025	Email	Email: Question about
Pruzek	Josh	01/20/2025	Email	Aurora airport master plan comments
Reid	Kelly	02/03/2025	Email	Aurora Airport expansion - ODAV seeking comment
Rottinghaus	Mike	02/28/2025	FAA Email	FAA Modifications of Standards

Schu	Mary	01/18/2025	Email	Aurora Oregon Airport KUAO
Schuster	Brad	01/21/2025	Email	Email: AOPA Testimony For Record Concerning Aurora State Airport Updated Refined Preferred Alternative
Stevenson	Tom	01/21/2025	Email; Attachment	Email: 1-21-25 Comment For Aurora Airport Master Plan - Current Refined Preferred Alternative Attachment: RE: Aurora State Airport (UAO) Master Plan Alternatives – Concerns/Recommendations
Swan	Walt	01/19/2025	Email	Auora master plan
Waggoner	David	01/16/2025	Email; Attachment	Email: Re: Reminder - Submit comments on Refined Preferred Alternative by 01/21/25 Attachment: Attached comments
Weimer	Michael	02/04/2025	Email	RE: Reminder - PAC Meeting 9 is next Tuesday
Williams	Ben	02/17/2025	Email; Attachment 1; Attachment 2	Email: Communications re: Aurora Airport Master Plan Adoption and Compatibility Process Attachment 1: NA Friends of French Prairie v. Dept of Aviation.pdf Attachment 2: p17027coll5_29140.pdf
Williams	Ben	02/23/2025	Email	Re: FW: Communications re: Aurora Airport Master Plan Adoption and Compatibility Process

Outlook

Fw: Revised Aurora Master Plan recommendations

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 1:10 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 7:38 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Revised Aurora Master Plan recommendations

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 CELL 503-302-5455
M-F 7:30am – 4pm

-----Original Message-----
From: BEACH Anthony
Sent: Tuesday, January 21, 2025 7:32 AM
To: Bob Altemus <alto53@comcast.net>; brandy.steffen@jla.us.com
Subject: RE: Revised Aurora Master Plan recommendations

Hi Bob, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Answers to your questions are on the project website at: https://publicproject.net/auroraairport

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 CELL 503-302-5455
M-F 7:30am – 4pm

-----Original Message-----
From: Bob Altemus <alto53@comcast.net>
Sent: Sunday, January 19, 2025 6:35 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; brandy.steffen@jla.us.com
Subject: Revised Aurora Master Plan recommendations

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Dear Tony and Brandy,

I was pleased to see the latest UAO Master Plan adjustments and appreciate ODAV's endeavor to respect the feedback and community inputs received.

Regarding the current septic systems currently in place within the UAO boundary, I understand they're a major part of the local tenant infrastructure. Do they constitute that significant of a degradation of the RSA/TSA to justify the costs for replacement system? Just curious. And would any replacement system costs, should the current systems be removed, be ODAVs or the lease holders?

As a final thought, the comment In regards to non-standard RSA/TSA and ROFA conditions "are not acceptable" to the FAA seems rather extreme, whereas "are not preferable" would be more appropriate considering these non-standard conditions have been accommodated for quite a while.

I appreciate the challenge of managing a growing and actively dynamic airfield such as Aurora. Thank you for taking the time to consider (or not) my comments regarding Aurora's Master Plan.

Respectfully,

Bob Altemus

Sent from my iPad

Outlook

Re: Questions for the next meeting

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2025-01-22 2:47 PM
To mayor <mayor@ci.aurora.or.us>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Samantha Peterson <SPeterson@CenturyWest.com>

Hello Mayor Asher,

The team indicated that I should point you to the following email from Tim House, FAA about the "Potential for MOS related to runway extensions at UAO (03/26/24)."

Here is a direct link and you can also find it by visiting the "Public Records" page on the project website (https://publicproject.net/AuroraAirport). All FAA comments are at the top of the page.

Please let us know if you have any other questions.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Wednesday, January 22, 2025 9:13 AM
To: mayor <mayor@ci.aurora.or.us>
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Samantha Peterson <SPeterson@CenturyWest.com>
Subject: Re: Questions for the next meeting

Hello Mayor Asher,

I'm not sure about your question, but I'm looping in the technical team and they may be able to answer it.

Thanks,

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: mayor <mayor@ci.aurora.or.us>
Sent: Tuesday, January 21, 2025 3:51 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Questions for the next meeting

Brandy
If the master plan is passed can the runway be extended be for the highway 551 is moved ?? Thanks Mayor Asher

Get Outlook for iOS

Outlook

Fw: Reminder - Submit comments on Refined Preferred Alternative by 01/21/25

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2025-01-22 9:31 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, January 22, 2025 7:36 AM
To: Bruce Bennett <bruce@auroraaviation.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Samantha Peterson <SPeterson@CenturyWest.com>
Subject: RE: Reminder - Submit comments on Refined Preferred Alternative by 01/21/25

Hi Bruce, thanks for the clarification, it will be included in the record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Bruce Bennett <bruce@auroraaviation.com>
Sent: Wednesday, January 22, 2025 4:50 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: Re: Reminder - Submit comments on Refined Preferred Alternative by 01/21/25

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Master plan team,

Thank you for your work coordinating this project.
Please record this clarification to my January 18 letter, that by “airport boundary” I meant all the property bordered by Arndt rd, Airport rd, Keil rd, and highway 551.
Thank you

Bruce Bennett
Aurora Aircraft llc
Mbl 503-709-7383

Sent from my iPhone

On Jan 18, 2025, at 1:29 PM, Bruce Bennett <bruce@auroraaviation.com> wrote:

January 18, 2014
Regarding Aurora Airport Master Plan - PAC member input, Refined Preferred Alternative comments

First, I want to thank ODAV and Century West for the very significant improvements in the current preferred alternative from prior considerations.

Still significant, I believe is for the plan to include ODAV honoring the four leases and protecting the huge investments in their infrastructure/septic systems by private aviation companies based at Aurora. This would include finding a safe and proper way to modify the systems that were installed with ODAV's approval in the overrun areas on both ends of the runway. This would also include possibly improving CAA's system for any future added users or planning for a suitable alternate septic system for CAA.

Finally, As safety is the highest priority and improved operational design is very important, i believe the ODAV purchase of the 1.1 acre on the south end of main UAO aircraft ramp and taxi-lane should be added to the "property acquisition priority" category as this would achieve most of the aircraft and vehicle separation benefits of the formerly planned parallel taxiway and VSR at only a tiny fraction of the land use and total costs.

Again, thank you for the progress and improvements on this latest alternative. Although I feel it a huge compromise that the 1000-foot runway lengthening that has been planned since 1976 (and needed per FAA guidance only for the safe operation of the aircraft using UAO currently and since 1976) has been reduced to only 500 feet, I do believe this is a worthy compromise as it is a significant improvement and can be accomplished with ZERO "airport expansion" and completely on the existing airport footprint.
I am convinced that the load capacity benefits of this lengthening will be more critical every day as UAO acts to support disaster relief as it has historically and as it is extremely capable of.

I do recommend strictly minimizing any airport boundary increases limited only to that absolutely necessary for FAA minimum required safety requirements considering any and all mitigation allowances. This will be financially much more efficient and will be much more acceptable for our neighbors.

Bruce Bennett
Aurora Airport property/business owner since 1968, Aurora based pilot since 1973

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Tuesday, January 14, 2025 4:00 PM
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Reminder - Submit comments on Refined Preferred Alternative by 01/21/25

Hello PAC members,

Thank you to those of you who have already submitted comments on the refined preferred alternative. If you haven't done so already, please email your comments to me by Tuesday, January 21 (a week from today).

Thank you,
BRANDY STEFFEN | JLA PUBLIC INVOLVEMENT
Senior Program Manager + Partner

From: Brandy Steffen
Sent: Tuesday, January 7, 2025 1:22 PM
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Aurora Airport - Refined Preferred Alternative comments by 01/21/25

Good afternoon PAC members,

Thank you for attending PAC Meeting #8 and submitting your feedback on the Preferred Alternative. ODAV and the Planning Team has reviewed all feedback received and has made the following key refinements:

- Removed the proposed parallel taxilane.
- Removed the proposed vehicle service road that would require additional property acquisition.
- Depicted the priority property acquisition as the property required to meet FAA standards, based on the existing and future runway configuration. Reserve property acquisition is depicted in the event of a future willing seller and for the purpose of FAA grant funding eligibility.

The Refined Preferred Alternative maintains the improvements needed to comply with RSA, TSA, and ROFA standards. Please review the Refined Preferred Alternative Summary including the Refined Preferred Alternative figures for additional detail on the project website: https://publicproject.net/auroraairport# (on the "Resources & Documents" Page).

Please submit any comments on the Refined Preferred Alternative no later than Tuesday, January 21, 2025.

Thank you,

BRANDY STEFFEN | JLA PUBLIC INVOLVEMENT
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com

Outlook

Re: Aurora State Airport Master Plan Website Comments - Bruce Bergman

From Bruce Bergman <noreply@jotform.com>
Date Mon 2025-02-17 5:06 PM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	Bruce Bergman
Organization	Wylee Hangars Condominium Association
Comments or questions?	During the last Master Plan meeting, I picked up off the layout plans that a portion of our property is slated for State acquisition. I asked a question during the meeting on why and how it affected our drain field. The quick response was for Taxiway Safety Area, but the drain field question was not answered. So, please explain the reason this property needs to be acquired and the ramifications for our vital drain field. Assuming this is not reversible, when will we receive details on boundaries, value, timing, etc. I would like to receive email updates.
If you would like a response, please tell us the best way to contact you:	Email
Email	wyleehangars@gmail.com
Phone Number	(503) 572-3831

You can edit this submission and view all your submissions easily.

Outlook

Fw: Atlantic Aviation Alternate

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-02-04 1:49 PM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, February 4, 2025 1:49 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Atlantic Aviation Alternate

Good afternoon, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Wendie Kellington <wk@klgpc.com>
Sent: Tuesday, February 4, 2025 6:49 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Bickford, Jon <Jon.Bickford@atlanticaviation.com>
Cc: Tony Helbling <helbling@wilsonconst.com>
Subject: RE: Atlantic Aviation Alternate

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Tony, please provide the source of this rule. Regards, Wendie Kellington

---

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, February 4, 2025 6:14 AM
To: Bickford, Jon <Jon.Bickford@atlanticaviation.com>

Cc: Tony Helbling <helbling@wilsonconst.com>; Wendie Kellington <wk@klgpc.com>
Subject: RE: Atlantic Aviation Alternate

Good morning Jon, we don't designate PAC members or alternates for specific meetings. Will you not be able to attend?

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Bickford, Jon <Jon.Bickford@atlanticaviation.com>
Sent: Monday, February 3, 2025 5:10 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Tony Helbling <helbling@wilsonconst.com>; Wendie Kellington <wk@klgpc.com>
Subject: Atlantic Aviation Alternate

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Good Morning. I would like to take this time to designate Wendie Kellington as my alternate for the meeting on Feb 11th.

Jon Bickford
General Manager - UAO

T: 503-678-1336 | M: 503-899-7676
jon.bickford@atlanticaviation.com

Outlook

Fw: Master plan at KUAO

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 1:11 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
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Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 7:37 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Master plan at KUAO

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 7:27 AM
To: Stephen Brenneke <stephen@brenneke.net>; brandy.steffen@jla.us.com
Cc: Bruce Bennett <Bruce@auroraaviation.com>
Subject: RE: Master plan at KUAO

Hi Steve, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Stephen Brenneke <stephen@brenneke.net>
Sent: Sunday, January 19, 2025 9:34 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; brandy.steffen@jla.us.com
Cc: Bruce Bennett <Bruce@auroraaviation.com>
Subject: Master plan at KUAO

You don't often get email from stephen@brenneke.net. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Thank you for considering us airport users' and property owners (as Columbia Aviation Association members) input and for the significant improvements in the current plan over the previous.

Please consider highlighting the importance of maintaining the septic systems and their leases, these are owned by airport tenants and located on airport property as we feel these are a critical piece of the airport infrastructure and represent major investments.

We ask that you include the 1.1 acre ODAV property purchase of the ramp space currently adjoining the south end of main UAO ramp (south of the tower) in your "priority purchase" list as this will significantly improve access to CAA as well as Pacific Coast Avionics, the main public ramp, all the mid-field hangars and Aurora Flight trainings ramp. This notable ramp and taxi-lane improvement will increase safety and flow much like the prior plan considered via a parallel taxiway and road but without displacing any hangars or the huge cost.

Thank you again for listening and your recent improvements to the plan.

Steve Brenneke, President of Columbia Aviation Association

Outlook

Fw: Aurora Airport expansion - ODAV seeking comment

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 2025-02-06 4:00 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Thursday, February 6, 2025 10:59 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; PIKE Brandon <Brandon.PIKE@odav.oregon.gov>
Subject: FW: Aurora Airport expansion - ODAV seeking comment

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: PIKE Brandon <Brandon.PIKE@odav.oregon.gov>
Sent: Thursday, February 6, 2025 10:58 AM
To: KarenB@clackamas.us
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: RE: Aurora Airport expansion - ODAV seeking comment

Hi Karen,

Thanks for reaching out about this. I'd be glad to chat with you sometime if you'd like. I've also provided an explanation below:

Yes, in the proposed scenario, dubbed the *refined preferred alternative*, the runway would be extended to the north 497'. You may have already seen this version of the plan, but just in case, here's a link to the

preferred alternative I'm referencing: https://publicproject.net/files/UAOAMP/uao-refinedpreferredalternative-010725.pdf

As an aside, full project information and maps can be found on the project website: https://publicproject.net/auroraairport#

The lines you're noticing to the north of Arndt Road are likely the new boundaries of the runway protection zone (RPZ), shown in light blue in Figure 1 of the refined preliminary alternative. Because the runway's dimensions would change under the new plan, with the runway extending farther to the north, the associated RPZ would shift to the north, as well. Pursuant to the FAA's design guidelines for airports and runways (AC 150/5300-13B), the RPZ is designed to enhance the protection of people and property on the ground.

In an ideal scenario, the airport sponsor/owner would have ownership or control over the land in the RPZ in order to reduce the potential for conflicts and ensure compatible land uses. But in cases like this where it's under separate ownership, there are a number of land use types that can still be deemed compatible. Pursuant to the State of Oregon's *Airport Land Use Compatibility Guidebook*, agricultural uses (excluding livestock), parks, utilities, and certain transportation features (roads, parking, terminals) can all be deemed compatible assuming they meet a list of criteria relating to height, creation of smoke, creation of bird attractants, etc. (per Table 3-4: Compatible Land Uses per FAR Part 77 Surfaces and FAA Safety Areas).

When coming up with this plan, our consultant reviewed Clackamas County's zoning for the area north of Arndt Road and determined that it was zoned EFU—which is generally one of the zones that's easiest to ensure compatibility when located inside an RPZ. Like any development or land use actions on property adjacent to public-use airports in Oregon, if future development or zoning changes were to occur on this land, ODAV would comment at that time, as appropriate (if, for example, a proposed structure would impact airspace).

Finally, with the proposed changes to the dimensions of the runway, Clackamas County's associated airport overlay zone would automatically expand 497' to the north, based on my understanding of how your overlay zone is written (ZDO 713). Therefore, while I don't think your code would need revisions as a result of the new airport master plan, the dimensions of your overlay zone would change. Structures north of the runway would be subject to slightly more stringent height limitations per federal (14 CFR FAR Part 77) and state (OAR 738, Division 70) aviation regulations, since the approach surface would begin 497' sooner than it currently does.

Let us know if you foresee any issues with any of this at this stage. As part of the airport master planning process, our goal is to include the local community, public officials, and other stakeholders throughout the process.

Additionally, let us know if you'd like to discuss this further or if you have follow-up questions.

Best,

BRANDON PIKE
OREGON DEPARTMENT OF AVIATION (ODAV)
AVIATION PLANNER

PHONE 971-372-1339

EMAIL brandon.pike@odav.oregon.gov

3040 25TH STREET SE, SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Alternative Contacts:

COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structures: LandUse@ODAV.Oregon.Gov

*****CONFIDENTIALITY NOTICE*****

This e-mail may contain information that is privileged, confidential, or otherwise exempt from disclosure under applicable law. If you are not the addressee or it appears from the context or otherwise that you have received this e-mail in error, please advise me immediately by reply e-mail, keep the contents confidential, and immediately delete the message and any attachments from your system.

From: Buehrig, Karen <KarenB@clackamas.us>
Date: Wednesday, February 5, 2025 at 10:21
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora Airport expansion - ODAV seeking comment

You don't often get email from karenb@clackamas.us. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Alex-

Do you have the time to talk with me to help me understand the implications of this plan on land in unincorporated Clackamas County? It appears that there are some lines that extend north of Arndt Road, but I can't really tell what they mean.

Thank you for your assistance.

Karen

Karen Buehrig
Long Range Planning Manager, Clackamas County
Phone – (503) 742-4683
Mobile – (971) 291-8127

Clackamas County
Working Hours: Monday – Friday 8 AM – 5 PM

From: REID Kelly * DLCD <Kelly.REID@dlcd.oregon.gov>
Sent: Monday, February 3, 2025 1:38 PM
To: Hughes, Jennifer <jenniferh@clackamas.us>; Buehrig, Karen <KarenB@clackamas.us>
Subject: Aurora Airport expansion - ODAV seeking comment

Warning: External email. Be cautious opening attachments and links.

Hi Jennifer and Karen,

I am not sure if you all have been involved in any of the Aurora Airport Master Plan meetings, but Melissa Ahrens shared with me that the Dept. of Aviation is seeking comment on the preferred alternative and has another meeting scheduled for February 11th.

We thought it might be possible that some land under Clackamas County jurisdiction on the north side of Arndt Road could be impacted, based on the maps in this revised plan: uao-refinedpreferredalternative-010725.pdf

Just wanted to make sure you are aware.

Best,

Kelly Reid
Regional Representative for Multnomah and Clackamas Counties
Portland Metro Regional Solutions
Pronouns: She/her
Oregon Department of Land Conservation and Development
1600 SW Fourth Avenue, Suite 109 | Portland, OR 97201
Cell: 971-345-1987
kelly.reid@dlcd.oregon.gov | www.oregon.gov/LCD

Outlook

RE: Aurora State Airport Master Plan Website Comments - George Buley

From BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Date Wed 2025-01-22 1:11 PM
To Brandy Steffen <brandy.steffen@jla.us.com>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc Samantha Peterson <SPeterson@CenturyWest.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

Thanks Brandy.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Wednesday, January 22, 2025 9:35 AM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Samantha Peterson <SPeterson@CenturyWest.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>
Subject: Fw: Aurora State Airport Master Plan Website Comments - George Buley

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

This comment didn't look like it needed a response, but I'm passing it along to you all for an FYI.

Thanks,

BRANDY STEFFEN | JLA PUBLIC INVOLVEMENT

Senior Program Manager + Partner

She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com

Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: George Buley <noreply@jotform.com>
Sent: Tuesday, January 21, 2025 9:13 PM
To: JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Re: Aurora State Airport Master Plan Website Comments - George Buley

Aurora State Airport Master Plan Website Comments

Name	George Buley
Comments or questions?	I, George Buley, am a private citizen and an Airport & Airway Trust Fund Taxpayer. I recommend the following proposals be considered in the Aurora State Airport Master Plan Update. With Emphasis, ODAV's mission statement is… "to provide infrastructure, financial resources, and expertise to ensure safe and efficient air transportation…" ODAV should consider suspending the Aurora State Airport Master Plan for 3 months to submit to the FAA a Modification of Standards (MOS) for the Runway Object Free Area (ROFA) in accordance with MOS Order 5300-1G. Filing a MOS is "free" and could save the State of Oregon hundreds of millions of taxpayers dollars! The MOS Order states…"The FAA Modification to Standards is for any deviation from or addition to standards applicable to airport design, material, and construction standards or equipment projects resulting in an acceptable level of safety, useful life, lower costs, greater efficiency, or the need to accommodate an unusual local condition on a specific project through approval on a case-by-case basis." Past FAA MOS Approvals: A. Key West International (EYW) Airport's Modification of Standards was recently approved by the FAA for excessive cost associated with relocating a roadway, swimming pool, tennis courts and drainage ponds for a proposed runway extension. EYW is a commercial service, certificated airport and has the same Runway Object Free Area (ROFA) dimensions as Aurora

State Airport (UAO), except UAO does not have B-737's operations. The MOS was determined to provide an acceptable level of safety by constructing an Engineered Material Arresting System (EMAS) at both ends of the runway, thereby reducing the ROFA from 800' to 500' wide and the Runway Safety Area from 500' to 400' wide. The reduction in size of ROFA and the RSA did not remove all of the obstructions such as the ponds, but did provide an acceptable level of safety.

B. Friedman Memorial Airport (SUN) has 8 Modifications of Standards (MOS) approved by the FAA. One of the MOS's is for the ROFA encompassing the entire width of State Highway 75 which is located parallel to the runway. This commercial service, certificated airport has the same size ROFA as UAO. The acceptable level of safety was accomplished by not allowing aircraft with larger than 100' wingspans to operate at SUN.

From ODAV Mission website, "The Oregon Department of Aviation Visions an integrated Aviation System benefiting all Oregonians." The latest preferred development plan does not seem to be consistent with ODAV's Vision, especially, since it will be at an excessive cost to the community. The proposal will force relocation of businesses and residents (property value taking), all what appears to be an unnecessary effort to preserve the ROFA for one aircraft that may excurse 400' east or west of the runway, estimated to occur once every 200+ years. It strongly appears that only a very few will benefit from the proposed plan, but not all Oregonians. The estimated cost for this project is over $200M. How will ODAV cover this excessive cost? Will private interests help ODAV with the AIP grant matching funds?

Has ODAV conducted a benefit cost analysis to determine how the loss of over a thousand high paying jobs is beneficial to the community to meet one safety standard that could be addressed with a simple MOS? The MOS could provide an acceptable level of safety, such as utilizing

EMAS or limiting the wingspan of aircraft operations.

Has ODAV conducted a benefit cost analysis to determine how a non-commercial service airport community will operate in the future without user fees and local tax revenues? How will emergency services respond during a major earthquake?

Can ODAV show the current Trump Administration that the proposed Airport Master Plan is NOT disruptive and costly to airport businesses when asking for federal grant funding participation for meeting ROFA standards without a MOS?

From ODAV's Mission Statement excerpt (Values):
• Customer service
• Collaboration
• Integrity
• Passion
• Healthy Relationships

When incorporating the aforementioned Values, one can openly analyze in depth community proposals, which in turn promotes teamwork and brainstorming ideas. The product of the Teamwork is to mutually find airport master planned steps forward that enhance aviation safety and preserve a unified quality of life, that benefits the Oregon community. ODAV's Mission Statement, Vision and Values are the key to this success.

Sincerely,

George Buley
Private Citizen, Aviation Trust Fund Taxpayer
I would like to receive email updates.
Email georgebuley@yahoo.com

You can edit this submission and view all your submissions easily.

Outlook

Fw: Aurora Airport Plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 1:09 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 7:38 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora Airport Plan

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 7:33 AM
To: Steve Bush <bushaviationllc@gmail.com>
Subject: RE: Aurora Airport Plan

Hi Steve, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Steve Bush <bushaviationllc@gmail.com>
Sent: Monday, January 20, 2025 9:43 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Aurora Airport Plan

You don't often get email from bushaviationllc@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear Tony,

Thank you for considering the opinions of the airport users' and property owners input and for the significant improvements in the current plan over the previous.

As a member of the Columbia Aviation Association, I request that you please also consider the importance of maintaining the septic systems and their leases. These are owned by airport tenants and located on airport property. These systems are a critical piece of the airport infrastructure and represent major investments by the tenants.

I request that you include the 1.1 acre ODAV property purchase of the ramp space currently adjoining the south end of main UAO ramp (south of the tower) in your "priority purchase" list. This will significantly improve access to CAA as well as Pacific Coast Avionics, the main public ramp, all the mid-field hangars, and Aurora Flight trainings ramp. This ramp and taxi-lane improvement will increase safety and flow much like the prior plan considered via a parallel taxiway and road but without displacing any hangars or the significant cost.

Thank you for listening and for your recent improvements to the plan.

Steve Bush
Treasurer, CAA

Outlook

Fw: Aurora Airport - Suggestions for Current Refined Alternative

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 1:08 PM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 8:49 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora Airport - Suggestions for Current Refined Alternative

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 8:49 AM
To: Jonathan Buss <jbuss@bussmold.com>
Subject: RE: Aurora Airport - Suggestions for Current Refined Alternative

Hi Jonathan, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Jonathan Buss <jbuss@bussmold.com>
Sent: Tuesday, January 21, 2025 8:30 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Aurora Airport - Suggestions for Current Refined Alternative

You don't often get email from jbuss@bussmold.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear Mr. Beach,

Thank you for taking the time to consider the input from Aurora airport users and property owners, including members of the Columbia Aviation Association (CAA), and for the positive changes made in the current plan.

The improvements over the previous proposal are greatly appreciated.

One key issue we would like to highlight is the importance of maintaining the septic systems and their associated leases. These systems are owned by airport tenants and are situated on airport property. They are a vital part of the airport's infrastructure and represent substantial investments. We respectfully request that these systems be carefully considered in the final design.

Additionally, we urge you to prioritize the purchase of the 1.1-acre ODAV property, currently adjacent to the south end of the main UAO ramp (south of the tower). This acquisition would significantly enhance access to CAA, Pacific Coast Avionics, the main public ramp, mid-field hangars, and the Aurora Flight Training ramp. Incorporating this improvement would enhance safety and flow without the high costs and disruption associated with the previously considered parallel taxiway and road, which would have required hangar displacement.

Finally, we ask that you minimize any expansion of the airport boundaries. Any significant addition of real estate to UAO would be costly and is highly unpopular with our neighboring communities. We encourage the use of all FAA-approved mitigation measures to ensure the airport’s operations remain safely within its current boundaries.

Once again, thank you for your consideration of these points and for your commitment to improving the plan.

Best regards,

Jonathan Buss | President
Buss Precision Mold, Inc.
13581 SE Ambler Rd | Clackamas, OR 97015
http://www.bussmold.com
503.652.5804 Ext. 11

Outlook

Re: Aurora State Airport Master Plan Website Comments - Kaelyn Cahill

From Kaelyn Cahill <noreply@jotform.com>
Date Sat 2025-02-08 12:12 PM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	Kaelyn Cahill
Organization	Aurora Flight Training
Comments or questions?	I am an instructor at Aurora Flight Training and was looking at the latest preferred alternate and it appears there are plans to build new apron space/hangars where our flight school is located. I'm just curious on what exactly the plan is with that is and if that can be addressed during the next meeting.
If you would like a response, please tell us the best way to contact you:	Email Phone
Email	kaelyncahill@gmail.com
Phone Number	(503) 939-3519

You can edit this submission and view all your submissions easily.

Outlook

Fw: Comment on Aurora State Airport Master Plan Refined Preferred Alternative from Anderson Hay & Grain Co. [SR-ACTIVE.FID6023036]

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2025-01-22 9:30 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (187 KB)
2025.01.21 Letter to Oregon Department of Aviation.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, January 22, 2025 7:41 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Comment on Aurora State Airport Master Plan Refined Preferred Alternative from Anderson Hay & Grain Co. [SR-ACTIVE.FID6023036]

Here it is.
Thanks,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Samantha Peterson <SPeterson@CenturyWest.com>
Sent: Tuesday, January 21, 2025 9:37 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: RE: Comment on Aurora State Airport Master Plan Refined Preferred Alternative from Anderson Hay & Grain Co. [SR-ACTIVE.FID6023036]

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Tony,

I'm not seeing the attached letter for this email. Can you resend?

Samantha

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 5:21 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Comment on Aurora State Airport Master Plan Refined Preferred Alternative from Anderson Hay & Grain Co. [SR-ACTIVE.FID6023036]

Good afternoon, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 5:14 PM
To: sarah.curtiss@stoel.com
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: RE: Comment on Aurora State Airport Master Plan Refined Preferred Alternative from Anderson Hay & Grain Co. [SR-ACTIVE.FID6023036]

Hi Sarah, thank you for your input. I've forwarded it to the master plan team and it will be included in the public record.

We will address comments and questions and get back to you shortly, thank you for reaching out.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Curtiss, Sarah Stauffer <sarah.curtiss@stoel.com>
Date: Tuesday, January 21, 2025 at 09:21
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Jason Paolo <Jason.Paolo@anderson-hay.com>, Steve Gordon

<Steve.Gordon@anderson-hay.com>
Subject: Comment on Aurora State Airport Master Plan Refined Preferred Alternative from Anderson Hay & Grain Co. [SR-ACTIVE.FID6023036]

You don't often get email from sarah.curtiss@stoel.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Alex,

Please find attached a letter providing comment on the Aurora State Airport Master Plan Revised Preferred Alternative. As noted in the letter, our client plans to attend the upcoming PAC meeting and would welcome a one-on-one conversation focused on impacts to properties and businesses along the Hubbard Highway.

Thank you in advance for your consideration.

Sarah Stauffer Curtiss | Partner
STOEL RIVES LLP | 760 SW Ninth Ave, Suite 3000 | Portland, OR 97205
Direct: (503) 294-9829 | Mobile: (971) 533-6215
sarah.curtiss@stoel.com | Bio | vCard | www.stoel.com

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January 21, 2025

Sarah Stauffer Curtiss
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
D. 503.294.9829
sarah.curtiss@stoel.com

VIA EMAIL (Alex.R.Thomas@odav.oregon.gov)

Alex Thomas
ODAV Planning and Programs Manager
Oregon Department of Aviation

RE: Anderson Hay & Grain Co. Comments on Refined Preferred Alternative

Dear Alex:

This office represents Anderson Hay & Grain Co. ("AHG"). Please find below AHG's comments on the Refined Preferred Alternative that was distributed to the Aurora State Airport Master Plan ("Master Plan") Planning Advisory Committee ("PAC") on January 7, 2025. As outlined below, AHG is very concerned with the Oregon Department of Aviation's ("ODAV") lack of engagement with AHG and other neighboring properties that would be impacted by the Refined Preferred Alternative. Please include the below comments in the administrative record related to the Master Plan.

A. AHG Background

Established during the 1960's in Washington State's Kittitas Valley, AHG is a leading supplier of hay products to the dairy, beef and horse industries. AHG operates two production facilities, one located in Ellensburg, Washington and the other located in Aurora, Oregon. The Aurora plant is focused on providing straw products grown in Oregon's Willamette Valley to markets in Asia, primarily Japan and South Korea. AHG sells products domestically throughout the U.S. and to over 30 countries internationally. The AHG brand is recognized worldwide for quality, consistency, and reliability.

AHG's Oregon operation is located across the Hubbard Highway from the Aurora State Airport. AHG's Oregon location is strategically positioned to be linear with supply locations relative to port locations to optimize operational overhead. To meet customer demands, AHG requires a substantial amount of onsite storage capacity at the Aurora location to store products produced during a 3-month harvest period but distributed over 12 months. Because onsite storage at the Aurora location is critical to AHG's global operations, any reduction in footprint would require AHG to locate product offsite and contribute to increased operational costs.

B. Questions and Comments Related to Refined Preferred Alternative.

Has ODAV done any outreach to neighboring property owners related to the Refined Preferred Alternative?

AHG was aware that ODAV had formed the PAC to provide feedback related to a proposed update to the Master Plan but only recently learned that the alternatives under consideration would impact AHG's Aurora location. Importantly, AHG did not receive any official communications from ODAV related to the master planning process or potential impacts to its property or business. Instead, AHG learned that the PAC was reviewing proposed alternatives for the future airport layout and that certain alternatives might impact AHG's operations through informal contact with Ben Williams, the PAC representative for the Friends of French Prairie.

Although the materials on the Master Plan website indicated that ODAV included a "robust and varied membership" in the PAC, including "adjacent property and business owners," it does not appear that any of the adjacent Hubbard Highway property owners were included in the PAC. Perhaps more troubling, it does not appear that ODAV made any effort to reach out to Hubbard Highway property owners when it began to consider alternatives that would move Hubbard Highway and impact the properties adjacent to the Hubbard Highway.

AHG is concerned that the interests of the Hubbard Highway property owners were not considered in the development of the Refined Preferred Alternative. Did ODAV reach out to neighboring property owners? What information was provided? What input was considered when developing the Refined Preferred Alternative?

What is ODAV's rational for choosing an alternative that relocates a major state highway and impacts multiple private businesses over expanding runway facilities to the east within the existing Aurora State Airport?

AHG understands that the Refined Preferred Alternative would require the relocation of Hubbard Highway. Based on review of the Refined Preferred Alternative figures, it appears that the necessary right-of-way acquisition would significantly encroach on AHG's Aurora location and reduce overall storage capacity for AHG's product. It would also impact many other property owners that operate adjacent to the Hubbard Highway.

AHG is concerned that interests of users within the existing Aurora State Airport footprint were considered but the interests of property owners adjacent to Hubbard Highway were not. Perhaps more importantly, the existing documents available on the Master Plan website do not explain why ODAV is pursuing the Refined Preferred Alternative (which requires the relocation of a state highway) over alternatives that would have expanded the runway within the existing Aurora State Airport footprint. Why were other alternatives rejected? How were competing concerns and interests evaluated as part of the master planning process?

AHG Plant Manager Jason Paolo is planning to attend the PAC meeting scheduled for February 11, but AHG would welcome a one-on-one conversation with you or other ODAV staff related to the process and the Refined Preferred Alternative. Jason Paolo can be reached directly at Jason.Paolo@anderson-hay.com or 503-678-7332.

Thank you in advance for your careful consideration of these comments.

Very truly yours,

Sarah Stauffer Curtiss

Outlook

Fw: Comment on Aurora State Airport Master Plan Refined Preferred Alternative from Anderson Hay & Grain Co. [SR-ACTIVE.FID6023036]

From THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Date Tue 2/25/2025 2:36 PM
To Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>

1 attachment (165 KB)
2025.02.25 Letter to Oregon DAV.pdf;

Hello,

Please include within the UAO master plan record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357
EMAIL Alex.R.Thomas@ODAV.Oregon.Gov
SALEM, OR 97302
WWW.OREGON.GOV/AVIATION

Image Image Image

From: Curtiss, Sarah Stauffer <sarah.curtiss@stoel.com>
Sent: Tuesday, February 25, 2025 11:32:32 AM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Jason Paolo <Jason.Paolo@andersonhay.com>; Steve Gordon <Steve.Gordon@andersonhay.com>; Crow, Matteo G. <matteo.crow@stoel.com>
Subject: RE: Comment on Aurora State Airport Master Plan Refined Preferred Alternative from Anderson Hay & Grain Co. [SR-ACTIVE.FID6023036]

Alternative Contacts:
COAR Grants: Grants@ODAV.Oregon.Gov
Pavement/Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

*****CONFIDENTIALITY NOTICE*****
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Alex,

This e-mail may contain information that is privileged, confidential, or otherwise exempt from disclosure under applicable law. If you are not the addressee or it appears from the context or otherwise that you have received this e-mail in error, please advise me immediately by reply e-mail, keep the contents confidential, and immediately delete the message and any attachments from your system.

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Please find attached a letter providing comment on the Aurora State Airport Master Plan Revised Preferred Alternative.

Thank you in advance for your consideration.

Sarah Stauffer Curtiss | Partner
STOEL RIVES LLP | 760 SW Ninth Ave, Suite 3000 | Portland, OR 97205
Direct: (503) 294-9829 | Mobile: (971) 533-6215
sarah.curtiss@stoel.com | Bio | vCard | www.stoel.com

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February 25, 2025

Sarah Stauffer Curtiss
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
D. 503.294.9829
sarah.curtiss@stoel.com

VIA EMAIL (Alex.R.Thomas@odav.oregon.gov)

Alex Thomas
ODAV Planning and Programs Manager
Oregon Department of Aviation

RE: Anderson Hay & Grain Co. Comments on ODAV's Next Steps

Dear Alex:

This office represents Anderson Hay & Grain Co. ("AHG"). This letter supplements our prior comment letter submitted on January 21, 2025. Please find below AHG's comments on the Oregon Department of Aviation's ("ODAV") statutory obligations to seek local land use compatibility and the State Aviation Board's (the "Board") adoption obligations thereafter. As outlined below, AHG is very concerned with ODAV's messaging regarding the agency's next steps. Our client participated in the last Planning Advisory Committee ("PAC") meeting, but ODAV staff provided no additional clarity on this timeline. Likewise, ODAV staff did not address any of our client's concerns about the proposed relocation of the Hubbard Highway.

For further background on AHG's business and relationship with the Aurora Airport Master Plan Update, please see our January 21, 2025, comment letter. Please include the below comments in the administrative record related to the Master Plan.

A. Questions and Comments Related to Refined Preferred Alternative.

When and how does ODAV intend to engage in its land use compatibility obligations?

In the powerpoint presentation for the February 11, 2025 PAC meeting, ODAV stated that the final step after Airport Layout Plan ("ALP") approval by the Federal Aviation Administration ("FAA") would be the Board's Master Plan approval process. However, that presentation noted that this step is "beyond the scope of this project." Before the Board can adopt this master plan, ODAV must engage in consultation with local governments affected by the project pursuant to OAR 738-130-0055(2)-(4). When does ODAV intend to publish its proposed timeline for this local government consultation process and any opportunities for public engagement? AHG understands that this step may be beyond the scope of the consultant's scope of work, but ODAV should be transparent about how it intends to meet its regulatory obligations.

When does ODAV intend to present findings of compatibility to the State Aviation Board?

The Master Plan update must also be adopted by the Board alongside findings that it is compatible with all applicable local land use comprehensive plans and other regulations, pursuant to OAR 738-130-0055(6). When does ODAV intend to seek Board approval? AHG understands that this final step cannot occur until the FAA approves the ALP and ODAV completes the local jurisdiction consultation process, but ODAV should be transparent about when it expects to present its findings to the Board.

Unfortunately, the limited engagement with the property owners west of the Hubbard Highway during the PAC process has necessitated AHG's engagement at this stage to ensure that AHG can fully participate in any future discretionary decision-making regarding the Aurora Airport. As we outlined in our January 21, 2025 letter, the refined preferred alternative as currently proposed would substantially disrupt AHG's business operations. Given AGH's experience with the PAC process (and ODAV's failure to engage with AHG and other neighbors that will be impacted by the refined alternative), AHG seeks to ensure that it does not learn about any future opportunities for public engagement after it is too late to engage.

As noted in our prior letter, AHG would welcome a one-on-one conversation with ODAV staff related to the master planning process and the next steps discussed above. Jason Paolo can be reached directly at jason.paolo@anderson-hay.com or 971-237-0510.

Thank you in advance for any information you can provide.

Very truly yours,

Sarah Stauffer Curtiss

Outlook

Fw: Regarding the Aurora Airport - Current Refined Preferred Alternative

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-02-04 4:24 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Monday, January 27, 2025 11:03 AM
To: T Davis <trdavis1@comcast.net>
Cc: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: RE: Regarding the Aurora Airport - Current Refined Preferred Alternative

Hi Ted, thanks for your comments, I've forwarded them to the master plan team and will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: T Davis <trdavis1@comcast.net>
Sent: Monday, January 27, 2025 10:22 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: brandy.steffen@jla.us.com
Subject: Regarding the Aurora Airport - Current Refined Preferred Alternative

You don't often get email from trdavis1@comcast.net. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear Tony,

Thank you for considering us airport users' and property owners (as Columbia Aviation Association members) input and for the significant improvements in the current plan over the

previous.

Please consider highlighting the importance of maintaining the septic systems and their leases, these are owned by airport tenants and located on airport property as we feel these are a critical piece of the airport infrastructure and represent major investments.

We ask that you include the 1.1 acre ODAV property purchase of the ramp space currently adjoining the south end of main UAO ramp (south of the tower) in your "priority purchase" list as this will significantly improve access to CAA as well as Pacific Coast Avionics, the main public ramp, all the mid-field hangars and Aurora Flight trainings ramp. This notable ramp and taxi-lane improvement will increase safety and flow much like the prior plan considered via a parallel taxiway and road but without displacing any hangars or the huge cost.

Thank you again for listening and your recent improvements to the plan.

Sincerely,

Ted Davis
T Davis
trdavis1@comcast.net

Outlook

Fw: Airport plan concerns

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 1:09 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 7:39 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Airport plan concerns

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 7:33 AM
To: Ruby DeMarco <rubylea@yahoo.com>
Cc: brandy.steffen@jla.us.com
Subject: RE: Airport plan concerns

Hi Rubylea, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Ruby DeMarco <rubylea@yahoo.com>
Sent: Monday, January 20, 2025 5:42 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: brandy.steffen@jla.us.com
Subject: Airport plan concerns

You don't often get email from rubylea@yahoo.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear Tony,

Thank you for considering all airport users, neighbors, airport businesses and airport property owners input. Thank you for the significant improvements in the current plan over the previous plan!

Please consider highlighting the importance of maintaining the septic systems and their leases, these are owned by airport tenants and located on airport property as we feel these are a critical piece of the airport infrastructure and represent major investments.

We ask that you include the 1.1 acre ODAV property purchase of the ramp space currently adjoining the south end of main UAO ramp (south of the tower) in your "priority purchase" list as this will significantly improve access to CAA as well as Pacific Coast Avionics, the main public ramp, all the mid-field hangars and Aurora Flight trainings ramp. This notable ramp and taxi-lane improvement will increase safety and flow much like the prior plan considered via a parallel taxiway and road but without displacing any hangars or the huge cost.

Finally, please eliminate or reduce to an absolute minimum the amount of airport boundary increase, my definition of the airport boundary is all the property currently in aviation use or development and outlined by Arndt rd, Airport rd, Keil rd, & highway 551. Adding additional real estate to UAO would be extremely expensive and is very unpopular with our neighbors. Please use any and all FAA approved mitigation measures to keep the airport safely in its current boundaries.

Thank you again for listening and your recent improvements to the plan.

Sincerely,

Rubylea Demarco

Sent from Yahoo Mail for iPhone

Outlook

Re: Regarding the Aurora Airport - Current Refined Preferred Alternative

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 1:12 PM
To John Dierks <john.dierks.pilot@gmail.com>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Samantha Peterson <SPeterson@CenturyWest.com>

Thank you so much for your comments John. I will pass these along to the rest of the team.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: John Dierks <john.dierks.pilot@gmail.com>
Sent: Sunday, January 19, 2025 9:53 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Regarding the Aurora Airport - Current Refined Preferred Alternative

Dear Brandy,

Thank you for considering us airport users' and property owners (as Columbia Aviation Association members) input and for the significant improvements in the current plan over the previous.

Please consider highlighting the importance of maintaining the septic systems and their leases, these are owned by airport tenants and located on airport property as we feel these are a critical piece of the airport infrastructure and represent major investments.

We ask that you include the 1.1 acre ODAV property purchase of the ramp space currently adjoining the south end of main UAO ramp (south of the tower) in your "priority purchase" list as this will significantly improve access to CAA as well as Pacific Coast Avionics, the main public ramp, all the mid-field hangars and Aurora Flight trainings ramp. This notable ramp and taxi-lane improvement will increase safety and flow much like the prior plan considered via a parallel taxiway and road but without displacing any hangars or the huge cost.

Thank you again for listening and your recent improvements to the plan.

Sincerely,
John Dierks, pilot and Columbia Aviation Association member.

Outlook

Fw: Regarding the Aurora Airport - Current Refined Preferred Alternative

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 1:10 PM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 7:37 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Regarding the Aurora Airport - Current Refined Preferred Alternative

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 7:28 AM
To: John Dierks <john.dierks.pilot@gmail.com>
Subject: RE: Regarding the Aurora Airport - Current Refined Preferred Alternative

Hi John, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: John Dierks <john.dierks.pilot@gmail.com>
Sent: Sunday, January 19, 2025 9:48 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Regarding the Aurora Airport - Current Refined Preferred Alternative

You don't often get email from john.dierks.pilot@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear Tony,

Thank you for considering us airport users' and property owners (as Columbia Aviation Association members) input and for the significant improvements in the current plan over the previous.

Please consider highlighting the importance of maintaining the septic systems and their leases, these are owned by airport tenants and located on airport property as we feel these are a critical piece of the airport infrastructure and represent major investments.

We ask that you include the 1.1 acre ODAV property purchase of the ramp space currently adjoining the south end of main UAO ramp (south of the tower) in your "priority purchase" list as this will significantly improve access to CAA as well as Pacific Coast Avionics, the main public ramp, all the mid-field hangars and Aurora Flight trainings ramp. This notable ramp and taxi-lane improvement will increase safety and flow much like the prior plan considered via a parallel taxiway and road but without displacing any hangars or the huge cost.

Finally, please eliminate or reduce to an absolute minimum the amount of airport boundary increase, adding additional real estate to UAO would be extremely expensive and is very unpopular with our neighbors. Please use any and all FAA approved mitigation measures to keep the airport safely in its current boundaries.

Thank you again for listening and your recent improvements to the plan.

Sincerely,
John Dierks, pilot and Columbia Aviation Association member.

Outlook

Fw: Aurora State Airport Master Plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 5/7/2025 1:36 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN
| **JLA PUBLIC INVOLVEMENT**

Partner + Senior Program Manager

brandy.steffen@jla.us.com »
Schedule
a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Monday, May 5, 2025 8:48 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora State Airport Master Plan

Good morning, please include in the public record.

Thanks,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Monday, May 5, 2025 8:48 AM
To: Patrick F. Donaldson <pfdforbes@aol.com>
Subject: RE: Aurora State Airport Master Plan

Hi Patrick,

That is correct, we do not have any PAC meetings scheduled.

As we work through our State Agency Coordination program and interagency review of the draft master plan documents, we'll share updates and keep the PAC/public informed throughout.

I hope this helps, thanks for reaching out,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Patrick F. Donaldson <pfdforbes@aol.com>
Sent: Monday, May 5, 2025 8:15 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Aurora State Airport Master Plan

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Tony;
Good morning.
I missed the PAAM meeting last week so was not able to ask about the final steps of the Master Plan process.
The calendar provided by the Master Plan team does NOT show any further zoom or in-person meetings for Committee members.
Is that correct?
What additional, if any, duties do we as committee members have …. or …. are we done with our service?
Your response will be helpful.
Thank you.

Patrick F. Donaldson
7450 S.W. Downs Post Road
Wilsonville OR 97070-8454
([redacted])
pfdforbes@aol.com

ONWARD! - BYDAND!

Outlook

Fw: Aurora Airport Can Use Modification Process to Avoid Moving Hwy 551

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-03-04 2:22 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, February 26, 2025 10:37 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora Airport Can Use Modification Process to Avoid Moving Hwy 551

Good morning, please include in the record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Sent: Wednesday, February 26, 2025 4:24 AM
To: faegre@earthlink.net
Cc: Governor.Kotek@oregon.gov; kcameron@co.marion.or.us; dbethell@co.marion.or.us; cwillis@co.marion.or.us; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Re: Aurora Airport Can Use Modification Process to Avoid Moving Hwy 551

Aaron,

Good to hear from you. Thanks for the comments and checking in with HQ. We are doing the same as well for 551. We'll go ahead and add this to the record and let folks know if there is any progress.

Kenji

From: faegre@earthlink.net <faegre@earthlink.net>
Sent: Tuesday, February 25, 2025 6:25:03 PM
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Cc: Governor.Kotek@oregon.gov <Governor.Kotek@oregon.gov>; kcameron@co.marion.or.us <kcameron@co.marion.or.us>; dbethell@co.marion.or.us <dbethell@co.marion.or.us>; cwillis@co.marion.or.us <cwillis@co.marion.or.us>
Subject: Aurora Airport Can Use Modification Process to Avoid Moving Hwy 551

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hi Kenji,

I have called FAA Headquarters in D.C. and from what they told me, it is clear that their Modification of Standards process can work for Aurora and we can avoid spending $100 million to move Hwy 551.

Looking forward to talking further about this with you.

Aron

Aron Faegre, AIA, PE
Aron Faegre Architect – Airport Planning & Development
13200 Fielding Road
Lake Oswego, Oregon 97034
faegre@earthlink.net
www.faegre.org
503-880-1469

Outlook

Fw: Aurora Airport Master Plan - Letter from Aron Faegre

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-03-04 2:27 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (12 MB)
HDSE Drainfields in Runway Safety Area at Aurora Airport - History and Next Steps 2025-2-25 with Exhibits.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: faegre@earthlink.net <faegre@earthlink.net>
Sent: Tuesday, February 25, 2025 2:57 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; 'Tony Beach' <anthony.beach@aviation.state.or.us>; 'THOMAS Alex R' <Alex.R.THOMAS@odav.oregon.gov>
Subject: Aurora Airport Master Plan - Letter from Aron Faegre

Brandy, Tony, and Thomas,

Please accept this letter with critical information needed for the Master Plan process to ensure all options are understood.

Please confirm receipt.

Thanks

Aron

Aron Faegre, AIA, PE
Aron Faegre Architect
13200 Fielding Road
Lake Oswego, Oregon 97034
faegre@earthlink.net
www.faegre.org
503-880-1469

Aron Faegre, AIA, PE 13200 Fielding Road Lake Oswego Oregon 97034 503-880-1469 faegre@earthlink.net

February 25, 2025

Alex Thomas, Planning and Programs Manager
Tony Beach, State Airports Manager
Oregon Department of Aviation
Brandy Steffen, JLA
Oregon Department of Aviation
3040 25th Ste SE
Salem, OR 97602
Alex.R.Thomas@odav.oregon.gov

Re: Aurora State Airport Master Plan Proposed Preferred Alternative
HDSE Septic Drainfield Correction of the Record and Next Steps Forward

Mr. Thomas, Mr. Beach, and Ms. Steffen:

This letter is to provide comment on ODAV's draft master plan for the Aurora State Airport, with particular attention to the issue of the HDSE drainfield at the south end of the airport. Please share this letter with the ODAV and FAA design team, and enter it into the record for the Oregon Department of Aviation's (ODAV) proposed "Preferred Alternative" for the Aurora State Airport Master Plan.

1. Correcting the Record: History of the HDSE Proposal to Strengthen the Drainfield– ODAV was not awaiting any answer from HDSE to ODAV questions. ODAV Advised HDSE that ODAV Preferred to study HDSE effluent being taken to the Columbia Helicopter drainfield.

There has been much discussion during the past two PAC meetings about HDSE's proposal to modify the existing drainfield in the Runway Safety Area at the south end of the runway, by using a top layer of modern geofabrics through which grass can grow up through. A very detailed geotechnical report by NV5 dated November 8, 2021 (Exhibit 6 to this letter) was provided to ODAV showing through engineering analysis of existing soils at the site that the proposed modification would result in soil strength consistent with FAA's guidance for soil in Runway Safety Areas.

During the PAC meetings, ODAV asserted that it had questions about the proposed modification to the existing drainfield that were not answered, and that it was HDSE's failure to respond that caused ODAV to decide to remove HDSE's drainfield.

For example, in the ODAV issued transcript of PAC Meeting #9 on February 11, 2025 Tony Beach states:

[Tony Beach] 17:36:59
We have… gone thoroughly over the report that you've submitted and And we had questions that as far as we're aware have not been answered.

In fact, ODAV had asked numerous questions about the NV5 report, to which the NV5 and the HDSE team had provided written answers on December 20, 2021. See attached Exhibit 1. ODAV next asked follow-up questions in an email dated February 7, 2022. See attached Exhibit 2. The follow-up questions were extremely detailed geotechnical ones, the answers for which would surely trigger further ODAV questions. At this point drainfield strengthening was not an issue, just the specific design. Therefore, the HDSE team requested that all questions be answered in a meeting with ODAV's geotechnical engineer (GRI) and HDSE's engineer (NV5), to enable a drainfield strengthening plan to move forward.

Thus, ODAV's Tony Beach on February 7, 2022 issued an invitation for a Teams meeting on February 16, 2022 at 10am (see attached Exhibit 3: Aron Faegre meeting confirmation). The meeting invitation went to Tony Beach (ODAV), Betty Stansbury (then the ODAV director), James Kirby (an engineer with Century West), Tony Helbling (then the President of HDSE), Ted Millar (HDSE Board member), and Aron Faegre. Also attending the meeting was Brett Shipton (an engineer with NV5) using Aron Faegre's link. ODAV's last round of detailed questions were discussed and resolved with ODAV.

The next communication with ODAV was an email from Tony Beach on February 16, 2022, sent after the meeting (attached as Exhibit 4). It summarized the general conditions ODAV wished that the Runway Safety Area meet, and suggested the next step would be "stamped engineering plans that we can review before we agree." There were no more questions asked, that were unanswered.

However, the Exhibit 4 email added that ODAV was forbidding NV5 from speaking with ODAV's geotechnical engineer GRI. That email also suggested that HDSE continue to search for other drainfield locations, stating: "Have you considered locating the drainfields on the new Aurora Airport Business Center (AABC) property,

or have you tried reaching out to HTS?" HDSE reported back verbally to ODAV that they had already searched for other locations, including AABC and HTS, and none were available.

The next step in trying to resolve this issue, was the ODAV Director Betty Stansbury and Aviation Board Chair Martha Meeker suggesting that perhaps the HDSE effluent could be piped to the north end of the airport, and use Columbia Helicopter's existing septic system and drainfield, located at the north end of the runway. ODAV indicated it believed that the Columbia Helicopter septic system had capacity for HDSE's effluent. HDSE agreed they would cooperate with this goal of looking at some wider options before settling on the geofabric option for the existing drainfield. This resulted in ODAV hiring Century West Engineering to do a study of the possibility of sending HDSE effluent (and perhaps other effluent from other airport businesses) to Columbia Helicopter's system. Tony Helbling (then HDSE's president) even provided volunteer assistance to this study by calling other airport companies to gather their effluent flow information to be used in ODAV's study.

A copy of an email from ODAV director Betty Stansbury is attached as Exhibit 5 which shows ODAV's continuing to examine piping HDSE effluent to the Columbia Helicopter drainfield. Director Stansbury's email also flagged FAA concerns but notes that "If a drainage field Engineer" were able to provide documented evidence that the drainage field will not compromise the safety area's load bearing capacity over the length of time the drainage fields remain under the safety area" that ODAV and FAA could "consider it acceptable." FAA noted that the drainfield was not funded by FAA grant money and so, in its view, if it remained in place as strengthened, would simply be considered a "nonstandard" condition – it did not require an MOS. We pause to point out here that FAA's claim that the strengthened the drainfield would be nonstandard, is technically inaccurate because strengthening the drainfield consistent with FAA's AC guidance would make the drainfield a wholly standard, not nonstandard, condition.

Regardless, in response to her Exhibit 5 email, HDSE pointed out to Director Stansbury that HDSE's 2021 geotechnical study provided the specific information by an engineering company – NV5 – that provides engineering expertise for airfields all over the United States, demonstrating that HDSE's proposed geofabric strengthening

was consistent with FAA's AC guidance and the FAA representative's email that Stansbury cited in Exhibit 5.

Unfortunately, HDSE is still awaiting the outcome of that septic study by ODAV. But it is important to be clear that it is ODAV that had asked for a hold on the HDSE geofabric project. It is time for ODAV to share what their study found.

2. HDSE has submitted detailed geotechnical engineering analysis showing that the proposed reconstruction of the drainfield with geofabric will comply with FAA standards, and that the septic drainfield will continue to function per DEQ standards.

The REPORT OF GEOTECHNICAL ENGINEERING SERVICES, Aurora State Airport, Septic Drain Field Improvements for HDSE Sewer System, Aurora, Oregon November 8, 2021 was prepared by NV5 (https://www.nv5.com/) and is attached as Exhibit 6, for ease of reference. NV5 is an internationally recognized geotechnical firm with an office in Wilsonville, Oregon, and has provided extensive engineering work on airports all over the United States. The report was prepared by Brett Shipton, Principal Engineer, and contains his stamp as an Oregon Registered Professional Engineer. The report discusses FAA guidance in detail and shows that the use of the geofabric ensures the drainfields are fully consistent with the Runway Safety Area soil compaction guidance. When HDSE completes its work, its southend drainfield will not be a "nonstandard" condition.

The designer of the HDSE septic system, including the drainfield, is Environmental Management Systems (EMS) https://envmgtsys.com/ located in Portland, Oregon. A letter is attached as Exhibit 7 from EMS principal Bob Sweeney, confirming that the addition of the strengthening geofabric demonstrates that the drainfield will continue to operate fully in compliance with all DEQ standards for drainfields. Bob Sweeney was integral to suggesting that the geofabric material to strengthen the drainfield consistent with FAA's guidance.

Finally, my firm Aron Faegre, AIA, PE, Airport Planning is ready, willing, and able to oversee the project as a whole for HDSE. Aron Faegre is an architect, civil engineer, physicist, and pilot who has been the lead planner and designer on over two

hundred airport planning and development projects in Oregon, Washington, California, New York, and British Columbia over the past 35 years. He has a Master of Architecture from MIT and a Bachelor of Physics from Reed College. It is noted that FAA's Airport Design AC150-5300-13B acknowledges that utility systems can be located in the Runway Safety Area as noted in Section 3.10.1.5 since it specifically discusses the requirements for "foundations, inlets, and manholes" that are located in the Runway Safety Area. Aron Faegre will coordinate additional civil engineering and survey work to ensure: a) overall longitudinal and transverse grading is fully consistent with FAA standards for Runway Safety Areas; b) all utility control boxes for valves and controls have traffic rated lids to match the soil load capacity requirements; and c) the drainfield area remains object free above ground per FAA standards.

Respectfully submitted,

Aron Faegre, AIA, PE
Aron Faegre Airport Planning and Design

Attached Exhibits:

- Exhibit 1: NV5 and Faegre response to ODAV Tony Beach by email December 20, 2021, 145 pages, which includes the Attachments 1 through 6.

- Exhibit 2: ODAV Tony Beach email February 7, 2022 at 8:06am with additional questions to HDSE, 10 pages.

- Exhibit 3: ODAV Tony Beach email February 7, 2022 invitation for an HDSE Teams Meeting February 16, 2022 at 10am, 1 page.

- Exhibit 4: ODAV Tony Beach email February 16, 2022 at 12:56pm following the HDSE meeting, 1 page.

- Exhibit 5: ODAV Betty Stansbury email May 26, 2022 discussing the Columbia Helicopters septic system option relative to HDSE, 2 pages.

- Exhibit 6: NV5 geotechnical report, REPORT OF GEOTECHNICAL ENGINEERING SERVICES, Aurora State Airport, Septic Drain Field Improvements for HDSE Sewer System, Aurora, Oregon November 8, 2021, 35 pages.

- Exhibit 7: EMS septic system letter: Suitability of Proposed Modifications to the Onsite Wastewater Treatment System Drainfield at Aurora State Airport, February 25, 2025, 6 pages.

NV5 and Aron Faegre response to ODA email from Tony Beach dated December 9, 2021 4:20 PM
concerning HDSE drainfield expansion area at UAO December 20, 2021

Aron,

Here is our response to the questions from the airport's geotechnical consultant along with all of the attachments.

Brett

==========

- Field Data Collection
  - Date of soil sampling
    We conducted 2 site visits: September 9, 2021 and October 11, 2021. The samples for proctor testing were collected on October 11, 2021.

  - Were any logs prepared to describe the bulk sampling results?
    Logs were not prepared for bulk samples. A bulk sample was collected from each area. Each bulk sample was not collected from a discrete test location. Soil collected from the testing locations were combined to form the bulk sample that was tested in the laboratory. Separate bulk samples from the existing and proposed drain field were prepared and tested in the laboratory.

  - Was a sieve analysis and/or Atterberg Limits test performed to validate the Silt visual classification?
    Sieve tests and/or Atterberg Limits tests were not conducted. The samples were visually classified in the field and in the laboratory. Other geotechnical studies at Aurora State Airport confirm our classification. Laboratory tests from these studies were used in conjunction with our visual classification to classify the soil. We have attached a copy of pertinent information from these studies (Attachment 1 - Lab Data).

  - Was infiltration testing performed? If not, why?
    Drain field design will be conducted by others and therefore we did not conduct infiltration testing as part of scope of services. A drain field feasibility study was conducted by Environmental Management Systems, Inc. A November 5, 2020 report that documents their study is attached (Attachment 2 - EMS drainfield feasibility report.pdf).

- As-builts or other construction documents pertaining to the existing drain field

To be provided by others. [Note: Attachment 6 added by Aron Faegre to this memo for providing this information to Tony Beach.]

- Report references
  - Geoweb design procedure
    The Geoweb design procedure is attached: "GeoWeb Load Support System, Technical Overview" (Attachment 3 - Geoweb Technical Overview.pdf)

  - Provide addition discussion on how the 6-inch geoweb, with 2/3 aggregate and 1/3 topsoil, replaces 12 inches of compacted soil.
    According to the FAA Airport Construction Standards (AC150/5370-10) Item P-152, the specified method of stabilizing the subgrade outside of paved areas is to compact the upper 12-inches to at least 95 percent of the maximum dry density, as determined by ASTM D698. It is further specified that the upper 4 inches must be scarified and be in a loose state. The intent of this is to provide a subgrade that can support snow removal equipment, aircraft rescue and firefighting equipment, and an occasional aircraft without causing damage to the aircraft. The intent of the geoweb is to provide a subgrade that will provide a subgrade that will support such traffic. It does so by confining the infill soil with the cells which gives the infill soil added shear strength when it is loaded from the top. It reduces the stress directly below the loaded area by transferring stress to the cell walls. Our calculation shows that the Geoweb provides a subgrade with an adequate factor of safety.

  - Equivalent Single Wheel Load source
    AASHTO H20: AASHTO HB-17 Standard Specifications for Highway Bridges, 17th Edition standard

    Gulfstream 550: Gulfstream Flight Ops, Operations Briefing, Pavement Weight Bearing Capacity (CAN/PCN) a copy is attached (Attachment 4 - Gulfstream Flight Ops.pdf)

  - Source identifying the critical aircraft type
    A Gulfstream G-V aircraft was selected based on a report prepared by Geotechnical Resources, Inc., dated September 16, 2019, that documents a pavement evaluation of Runway 17-35 at Aurora State Airport. We have attached a copy of that report (Attachment 5 – GRI Report)

- Report figures
  - Figure A-1: graphic does not show up in the provided pdf
  - Figure A-2: graphic does not show up in the provided pdf

We have attached another copy of our report that a shows Figures A-1 and A-2 when opened with Bluebeam Revu X64 Version 2016.5.1 and with Google Chrome Version 96.0.4664.110

- "Such stringent compaction is not permitted in the soil cover of drain fields"
    - Where does this statement come from?
      This statement was written by NV5 based on the requirement from drain filed designer that the drain field cover material must allow evapotranspiration and oxygen exchange to function efficiently. Compacted soil will inhibit both of these processes.

In addition to the list above, we will also need specifics on the proposed Geoweb reinforced drain field construction.

- Materials/Construction Proposed
    - What materials specification is to be used (ODOT, proprietary, etc.) for the aggregate?
      Per the GeoWeb Manufacturer the infill material should consist of one third pulverized topsoil and two thirds crushed aggregate. The aggregate portion should be crushed rock that has a particle size range from 0.375 to 1.0 inches with a D50 of 0.5 inches and a 30 percent void space. The engineered fill should lightly be compacted to allow vegetation growth.

    - What compaction specifications and test methods are proposed to achieve the proposed Geoweb strengths?
      After the cells have been filled the prepared ground surface should be proofrolled with a fully loaded dump truck. Some rutting and deflection is acceptable considering that the FAA specifies the upper 4-inches of subgrade consist loose uncompacted soil over 12-inches of compacted subgrade.

    - What compaction specifications and test methods are proposed for soil layers to be placed along with the Geoweb?
      The only other soil that will be placed is the washed gravel or drain rock in the drainage trenches. We recommend only light compaction of this material until it is well keyed. Even at this level of compaction we believe its load bearing characteristics will be superior to the soil that exists in the RSA. Over compacting this material will inhibit its drainage characteristics

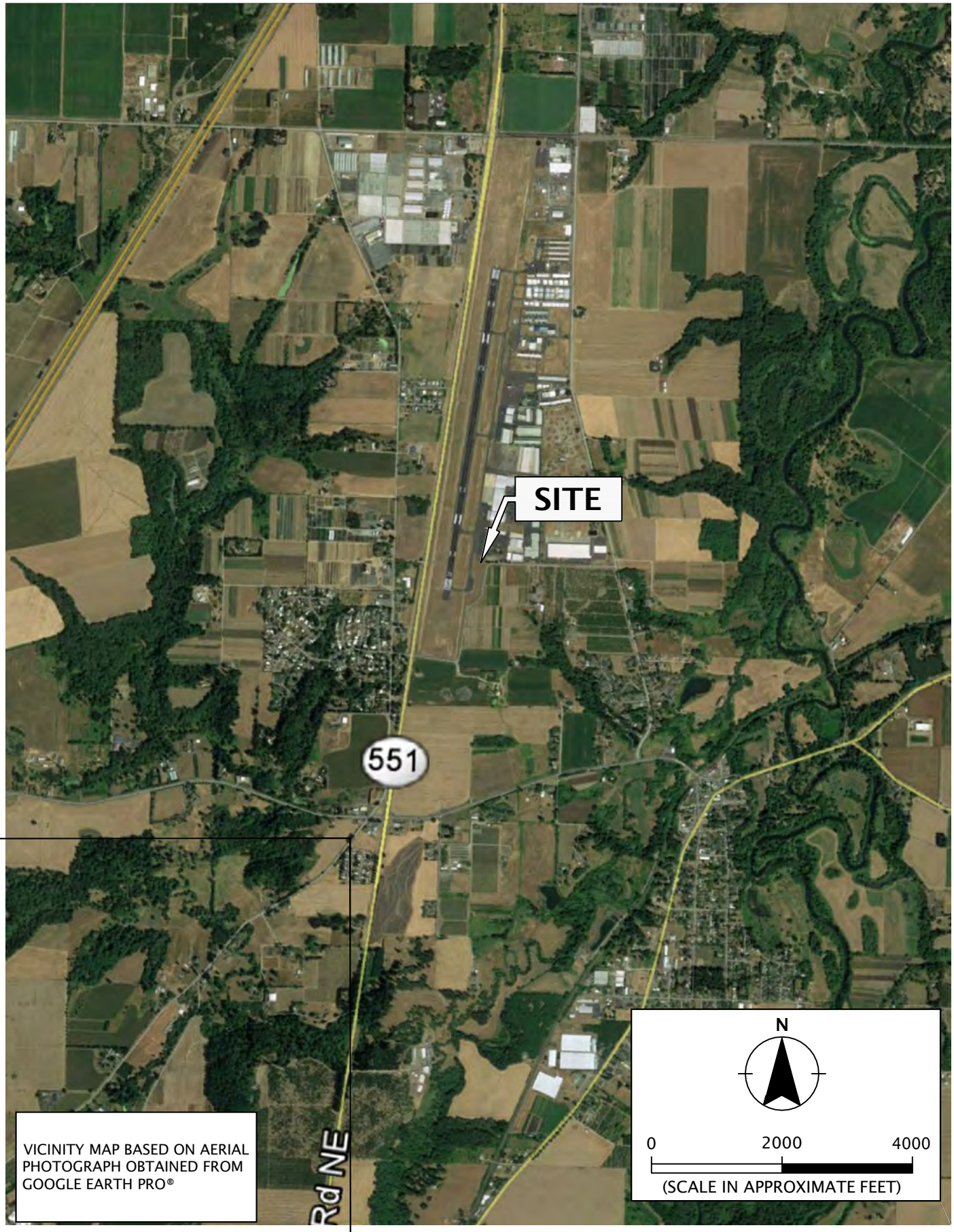
- What subgrade compaction specifications and test methods are proposed for the expanded drain field areas?
  See our response to the two prior questions.

- What materials are proposed for use in the rest of the elements of the drain field system (pipes, manifolds, perf spec., etc.)?
  To be addressed by others. [[Note: Attachment 6 added by Aron Faegre to this memo for providing this information to Tony Beach.]

Attachments:

Attachment 1 – Lab Data
Attachment 2 – EMS drainfield feasibility report
Attachment 3 – Geoweb Technical Overview
Attachment 4 – Gulfstream Flight Ops
Attachment 5 – GRI Report
Attachment 6 – Construction Documents for HDSE Drainfield

Exhibit 1, Attachment 1



VICINITY MAP BASED ON AERIAL PHOTOGRAPH OBTAINED FROM GOOGLE EARTH PRO®

GEODESIGN INC 9450 SW Commerce Circle - Suite 300 Wilsonville OR 97070 503.968.8787 www.geodesigninc.com	CENTEREXCON-4-01	**VICINITY MAP**
	MARCH 2019	AURORA AIRPORT FUEL FARM AURORA, OR — **FIGURE 1**

Printed By: mmiller | Print Date: 3/6/2019 4:52:23 PM
File Name: J:\A-D\CentrexCon\CentrexCon-4\CentrexCon-4-01\Figures\CAD\CentrexCon-4-01-VM01.dwg | Layout: FIGURE 1

LEGEND:

- SITE BOUNDARY
- B-1 BORING
- CPT-1 CONE PENETRATION TEST

N

0 20 40

(SCALE IN FEET)

SITE PLAN BASED ON AERIAL PHOTOGRAPH OBTAINED FROM GOOGLE EARTH PRO®, MARCH 6, 2019

SITE PLAN

AURORA AIRPORT FUEL FARM
AURORA, OR

FIGURE 2

CENTEREXCON-4-01

MARCH 2019

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Printed By: mmiller | Print Date: 3/6/2019 4:52:25 PM
File Name: J:\A-D\CentrexCon\CentrexCon-4\CentrexCon-4-01\Figures\CAD\CentrexCon-4-01-SP01.dwg | Layout: FIGURE 2

APPENDIX A

APPENDIX A

FIELD EXPLORATIONS

GENERAL

We explored subsurface conditions at the site by drilling one boring (B-1) to a depth of 26.5 feet BGS and completing one CPT probe (CPT-1) to a depth of approximately 58.7 feet BGS. The boring was drilled on February 22, 2019 using a trailer-mounted drill rig and solid-stem drilling techniques by Dan J. Fischer Excavating, Inc. of Forest Grove, Oregon. The exploration log is presented in this appendix. The CPT data are presented in Appendix B.

The approximate locations of the explorations are shown on Figure 2. Exploration locations were chosen based on preliminary site plan provided to our office by N.D. Eryou, PhD, P.E. The exploration locations were determined by pacing from existing site features and should be accurate implied by the methods used.

SOIL SAMPLING

Samples were collected from the boring using 1½-inch-inner diameter SPT split-barrel sampler in general accordance with ASTM D1586. The sampler was driven into the soil with a 140-pound hammer free-falling 30 inches. The sampler was driven a total distance of 18 inches. The number of blows required to drive the sampler the final 12 inches is recorded on the exploration log, unless otherwise noted. Samples were generally collected at 2.5- to 5-foot intervals throughout the depth of the boring. In addition, relatively undisturbed samples were collected by pushing thin-walled standard Shelby tubes into the base of the exploration in general accordance with ASTM D1587. Sampling methods and intervals are shown on the exploration log.

We understand that calibration of the SPT hammer used by Dan J. Fischer Excavating, Inc. has not been completed. The SPT blows completed by Dan J. Fischer Excavating, Inc. were conducted using two wraps around a cathead.

SOIL CLASSIFICATION

The soil samples were classified in accordance with the "Explorations Key" (Table A-1) and "Soil Classification System" (Table A-2), which are presented in this appendix. The exploration log indicates the depths at which the soils or their characteristics change, although the change actually could be gradual. If the change occurred between sample locations, the depth was interpreted. Classifications are shown on the exploration log.

LABORATORY TESTING

We visually examined soil samples collected from the exploration to confirm field classifications. We also performed the following laboratory testing.

MOISTURE CONTENT

We tested the natural moisture content of select soil samples in general accordance with ASTM D2216. The natural moisture content is a ratio of the weight of the water to soil in a test sample and is expressed as a percentage. The test results are presented in this appendix.

ATTERBERG LIMITS TESTING

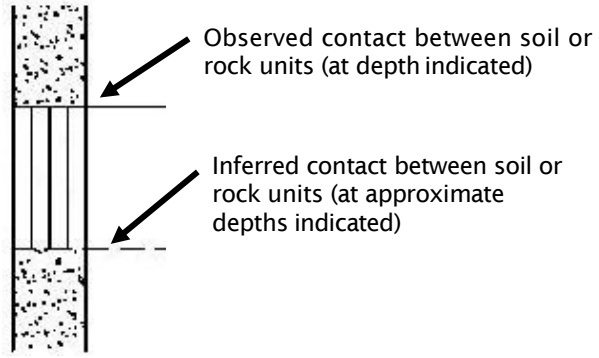
Atterberg limits (plastic and liquid limits) testing was performed on a select soil sample in general accordance with ASTM D4318. The plastic limit is defined as the moisture content where the soil becomes brittle. The liquid limit is defined as the moisture content where the soil begins to act similar to a liquid. The plasticity index is the difference between the liquid and plastic limits. The test results are presented in this appendix.

PARTICLE-SIZE ANALYSES

Particle-size analysis was completed on select soil samples in general accordance with ASTM D1140. The test results are presented in this appendix.

SYMBOL	SAMPLING DESCRIPTION
	Location of sample obtained in general accordance with ASTM D 1586 Standard Penetration Test with recovery
	Location of sample obtained using thin-wall Shelby tube or Geoprobe® sampler in general accordance with ASTM D 1587 with recovery
	Location of sample obtained using Dames & Moore sampler and 300-pound hammer or pushed with recovery
	Location of sample obtained using Dames & Moore sampler and 140-pound hammer or pushed with recovery
	Location of sample obtained using 3-inch-O.D. California split-spoon sampler and 140-pound hammer
	Location of grab sample
	Rock coring interval
▽	Water level during drilling
▼	Water level taken on date shown

Graphic Log of Soil and Rock Types



GEOTECHNICAL TESTING EXPLANATIONS

ATT	Atterberg Limits	P	Pushed Sample
CBR	California Bearing Ratio	PP	Pocket Penetrometer
CON	Consolidation	P200	Percent Passing U.S. Standard No. 200 Sieve
DD	Dry Density		
DS	Direct Shear	RES	Resilient Modulus
HYD	Hydrometer Gradation	SIEV	Sieve Gradation
MC	Moisture Content	TOR	Torvane
MD	Moisture-Density Relationship	UC	Unconfined Compressive Strength
NP	Nonplastic	VS	Vane Shear
OC	Organic Content	kPa	Kilopascal

ENVIRONMENTAL TESTING EXPLANATIONS

CA	Sample Submitted for Chemical Analysis	ND	Not Detected
P	Pushed Sample	NS	No Visible Sheen
PID	Photoionization Detector Headspace Analysis	SS	Slight Sheen
		MS	Moderate Sheen
ppm	Parts per Million	HS	Heavy Sheen

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EXPLORATION KEY

TABLE A-1

RELATIVE DENSITY - COARSE-GRAINED SOIL

Relative Density	Standard Penetration Resistance	Dames & Moore Sampler (140-pound hammer)	Dames & Moore Sampler (300-pound hammer)
Very Loose	0 – 4	0 - 11	0 - 4
Loose	4 – 10	11 - 26	4 - 10
Medium Dense	10 – 30	26 - 74	10 - 30
Dense	30 – 50	74 - 120	30 - 47
Very Dense	More than 50	More than 120	More than 47

CONSISTENCY - FINE-GRAINED SOIL

Consistency	Standard Penetration Resistance	Dames & Moore Sampler (140-pound hammer)	Dames & Moore Sampler (300-pound hammer)	Unconfined Compressive Strength (tsf)
Very Soft	Less than 2	Less than 3	Less than 2	Less than 0.25
Soft	2 - 4	3 – 6	2 - 5	0.25 - 0.50
Medium Stiff	4 - 8	6 – 12	5 - 9	0.50 - 1.0
Stiff	8 - 15	12 – 25	9 - 19	1.0 - 2.0
Very Stiff	15 - 30	25 – 65	19 – 31	2.0 - 4.0
Hard	More than 30	More than 65	More than 31	More than 4.0

PRIMARY SOIL DIVISIONS			GROUP SYMBOL	GROUP NAME
COARSE-GRAINED SOIL (more than 50% retained on No. 200 sieve)	GRAVEL (more than 50% of coarse fraction retained on No. 4 sieve)	CLEAN GRAVEL (< 5% fines)	GW or GP	GRAVEL
		GRAVEL WITH FINES (≥ 5% and ≤ 12% fines)	GW-GM or GP-GM	GRAVEL with silt
			GW-GC or GP-GC	GRAVEL with clay
		GRAVEL WITH FINES (> 12% fines)	GM	silty GRAVEL
			GC	clayey GRAVEL
			GC-GM	silty, clayey GRAVEL
	SAND (50% or more of coarse fraction passing No. 4 sieve)	CLEAN SAND (<5% fines)	SW or SP	SAND
		SAND WITH FINES (≥ 5% and ≤ 12% fines)	SW-SM or SP-SM	SAND with silt
			SW-SC or SP-SC	SAND with clay
		SAND WITH FINES (> 12% fines)	SM	silty SAND
			SC	clayey SAND
			SC-SM	silty, clayey SAND
FINE-GRAINED SOIL (50% or more passing No. 200 sieve)	SILT AND CLAY	Liquid limit less than 50	ML	SILT
			CL	CLAY
			CL-ML	silty CLAY
			OL	ORGANIC SILT or ORGANIC CLAY
		Liquid limit 50 or greater	MH	SILT
			CH	CLAY
			OH	ORGANIC SILT or ORGANIC CLAY
HIGHLY ORGANIC SOIL			PT	PEAT

MOISTURE CLASSIFICATION

Term	Field Test
dry	very low moisture, dry to touch
moist	damp, without visible moisture
wet	visible free water, usually saturated

ADDITIONAL CONSTITUENTS

Secondary granular components or other materials such as organics, man-made debris, etc.

Percent	Silt and Clay In: Fine-Grained Soil	Silt and Clay In: Coarse-Grained Soil	Percent	Sand and Gravel In: Fine-Grained Soil	Sand and Gravel In: Coarse-Grained Soil
< 5	trace	trace	< 5	trace	trace
5 – 12	minor	with	5 – 15	minor	minor
> 12	some	silty/clayey	15 – 30	with	with
			> 30	sandy/gravelly	Indicate %

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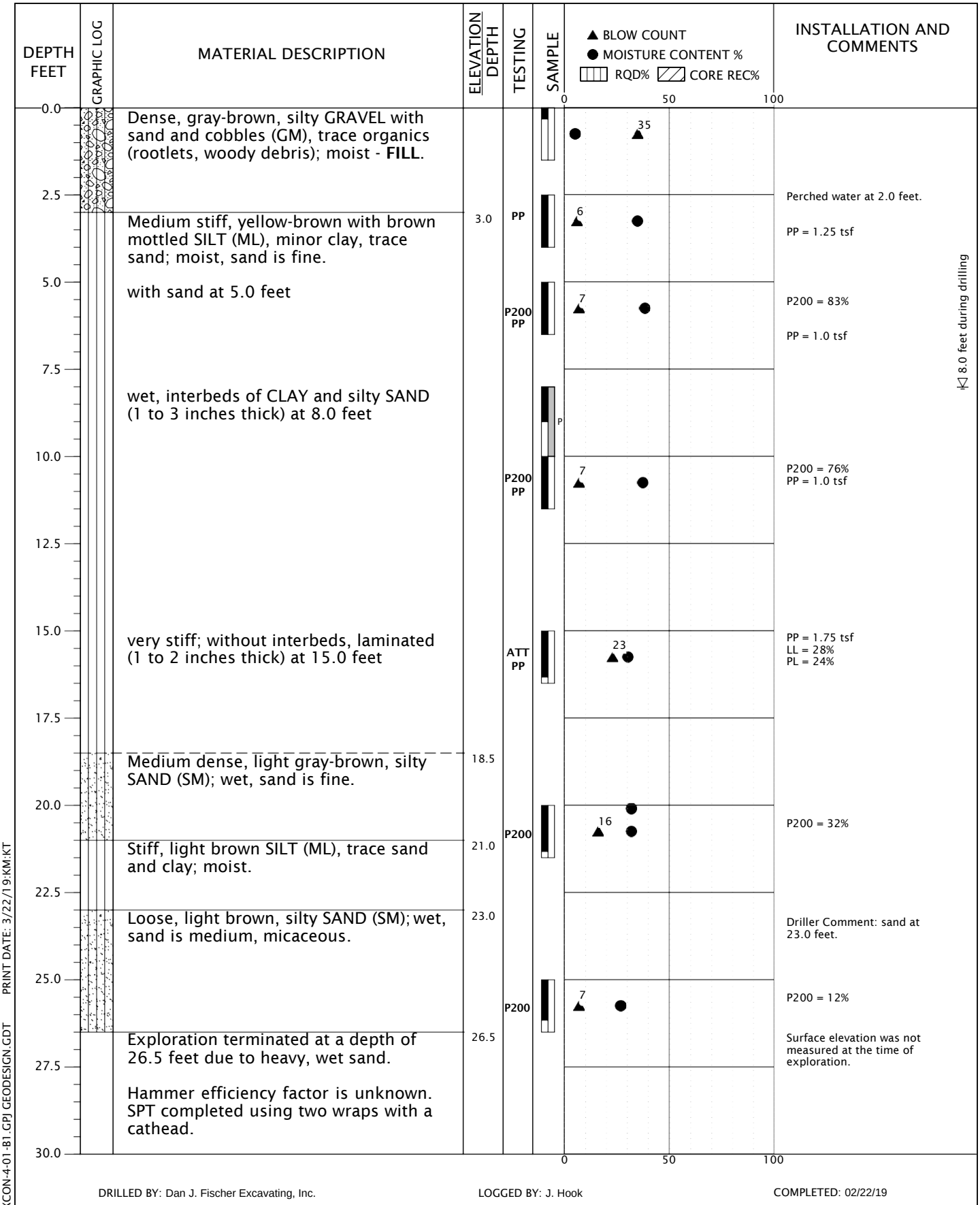
SOIL CLASSIFICATION SYSTEM

TABLE A-2



DRILLED BY: Dan J. Fischer Excavating, Inc.

LOGGED BY: J. Hook

COMPLETED: 02/22/19

BORING METHOD: solid-stem auger (see document text)

BORING BIT DIAMETER: 4 inches

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CENTREXCON-4-01

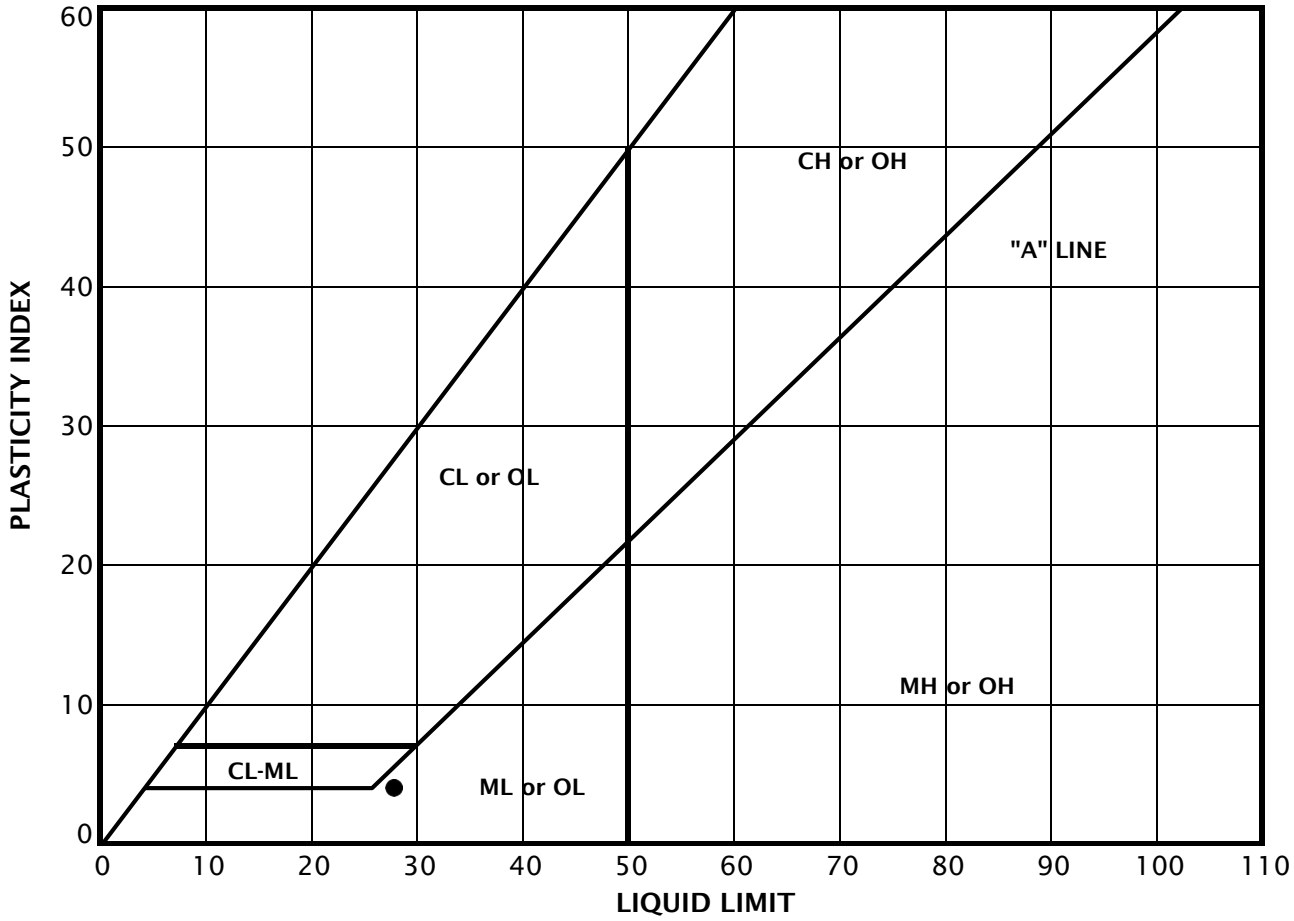
MARCH 2019

BORING B-1

AURORA AIRPORT FUEL FARM
AURORA, OR

FIGURE A-1

BORING LOG CENTREXCON-4-01-B1.GPJ GEODESIGN.GDT PRINT DATE: 3/22/19:KM:KT



KEY	EXPLORATION NUMBER	SAMPLE DEPTH (FEET)	MOISTURE CONTENT (PERCENT)	LIQUID LIMIT	PLASTIC LIMIT	PLASTICITY INDEX
●	B-1	15.0	30	28	24	4

ATTERBERG_LIMITS 7 CENTREXCON-4-01-B1.GPJ GEODESIGN.GDT PRINT DATE: 3/13/19:KM

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CENTREXCON-4-01

ATTERBERG LIMITS TEST RESULTS

MARCH 2019

AURORA AIRPORT FUEL FARM
AURORA, OR

FIGURE A-2

SAMPLE INFORMATION			MOISTURE CONTENT (PERCENT)	DRY DENSITY (PCF)	SIEVE			ATTERBERG LIMITS		
EXPLORATION NUMBER	SAMPLE DEPTH (FEET)	ELEVATION (FEET)			GRAVEL (PERCENT)	SAND (PERCENT)	P200 (PERCENT)	LIQUID LIMIT	PLASTIC LIMIT	PLASTICITY INDEX
B-1	0.0		5							
B-1	2.5		35							
B-1	5.0		38				83			
B-1	10.0		37				76			
B-1	15.0		30					28	24	4
B-1	20.0		32				32			
B-1	20.1		32							
B-1	25.0		27				12			

LAB SUMMARY CENTREXCON-4-01-B1.GPJ GEODESIGN.GDT PRINT DATE: 3/13/19:KM

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CENTREXCON-4-01

MARCH 2019

SUMMARY OF LABORATORY DATA

AURORA AIRPORT FUEL FARM
AURORA, OR

FIGURE A-3

Geotechnical Investigation

Aurora State Airport
Parallel Taxiway Relocation

Aurora, Oregon

Prepared for:

W&H Pacific
Portland. Oregon

February 9, 2007

Professional Geotechnical Services

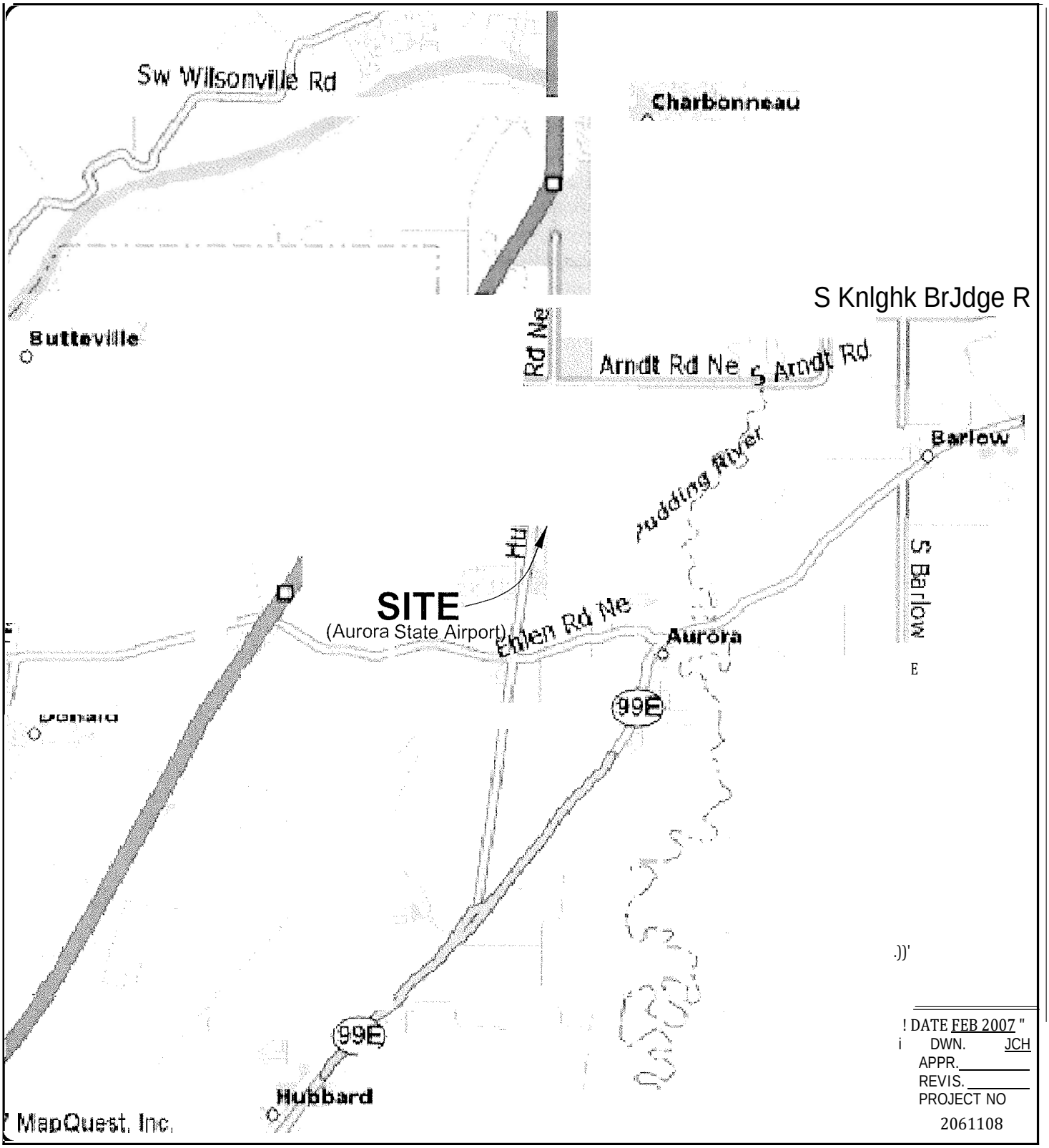
Foundation Engineering, Inc.

Appendix **A**

Figures

Professional
Geotechnical
Services

Foundation Engineering, Inc.



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PROFESSIOHAL GEOTECHNICAL SERVICES
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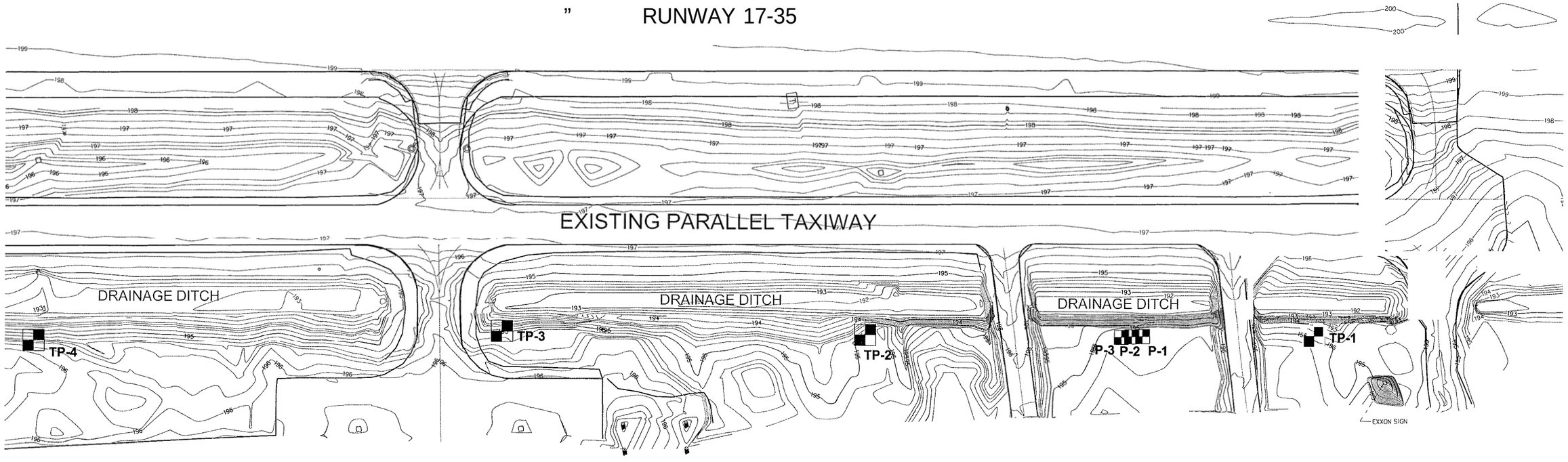
CORVALLJS, OR 7330-4517
BUS. (54t) 757-?845 r"1X (54t) 757—7es0

VICINITY MAP
AURORA STATE AIRPORT
PARALLEL TAXI WAY RELOCATION
AURORA, OREGON

FIGURE NO.
1A

”

RUNWAY 17-35



SCALE: I" = i 00'

0 50 100 200

NOTES:

I. TEST PIT, CORE HOLE AND PERMEABILITY TEST LOCATIONS WERE ESTABLISHED USING A MEASURING WHEEL AND ARE APPROXIMATE ONLY.
2. SEE REPORT FOR A DISCUSSION OF SUBSURFACE CONDITIONS.
3. BASE MAP WAS PROVIDED BY W&H PACIFIC.

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PROFESSIONAL GEOTECHNICAL SERVICES
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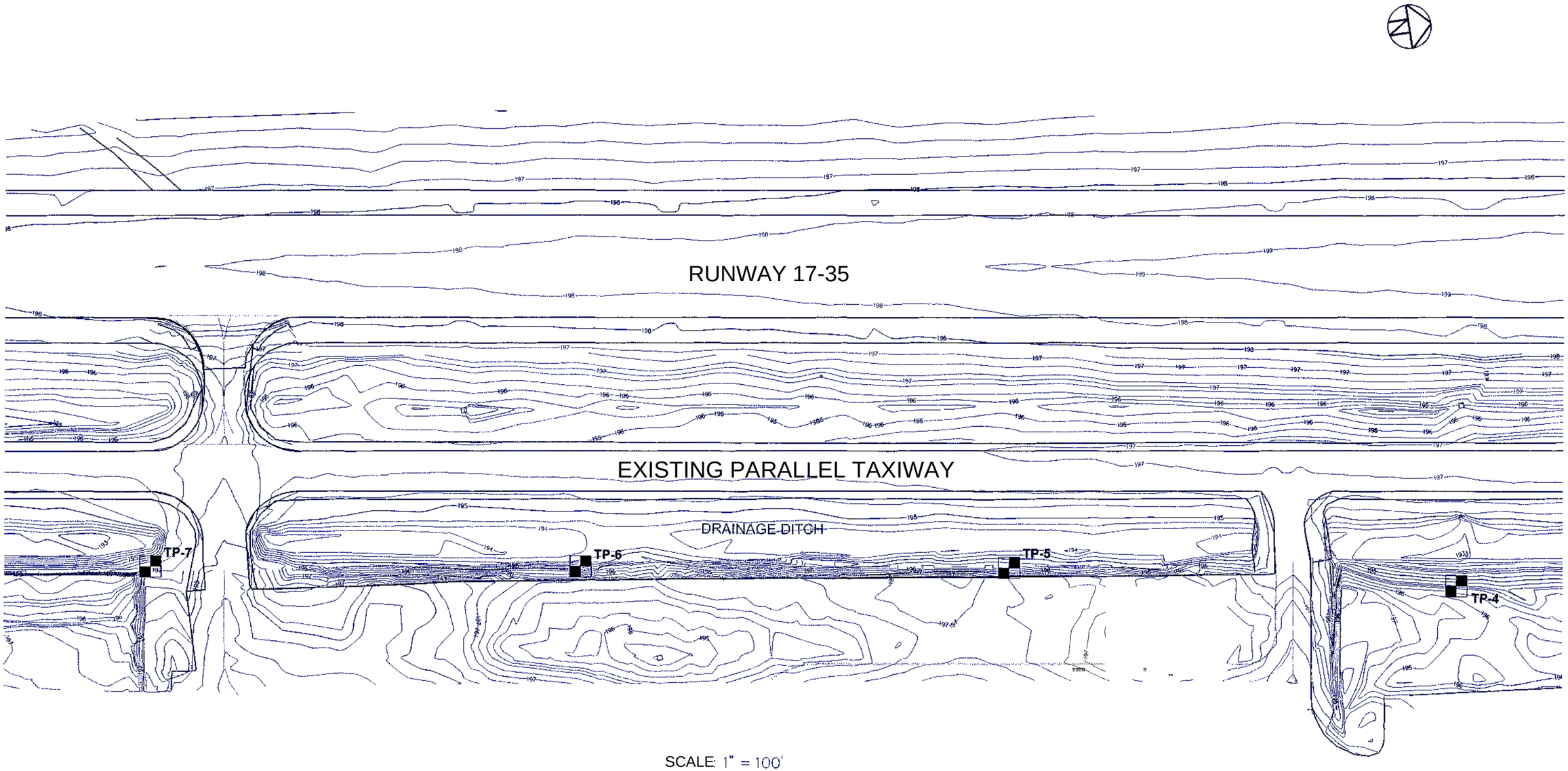
CORVALLIS, OR 97330-1517
BUS. (541) 757-1855 FAX (541) 757-1850

DATE FEB 2007
DWN. JCH
APPR. _____
REVIS. _____
PROJECT NO. 2061108

SITE LAYOUT AND EXPLORATION LOCATIONS
AURORA STATE AIRPORT
PARALLEL TAXIWAY RELOCATION PROJECT
AURORA, OREGON

FIGURE NO. 2A



SCALE: 1" = 100'

0 50 100 200

NOTES:

t. TEST PIT, CORE HOLE AND PERMEABILITY TEST LOCATIONS WERE ESTABLISHED USING A MEASURING WHEEL AND ARE APPROXIMATE ONLY
2. SEE REPORT FOR A DISCUSSION OF SUBSURFACE CONDITIONS.
3. BASE MAP WAS PROVIDED BY W&H PACIFIC.

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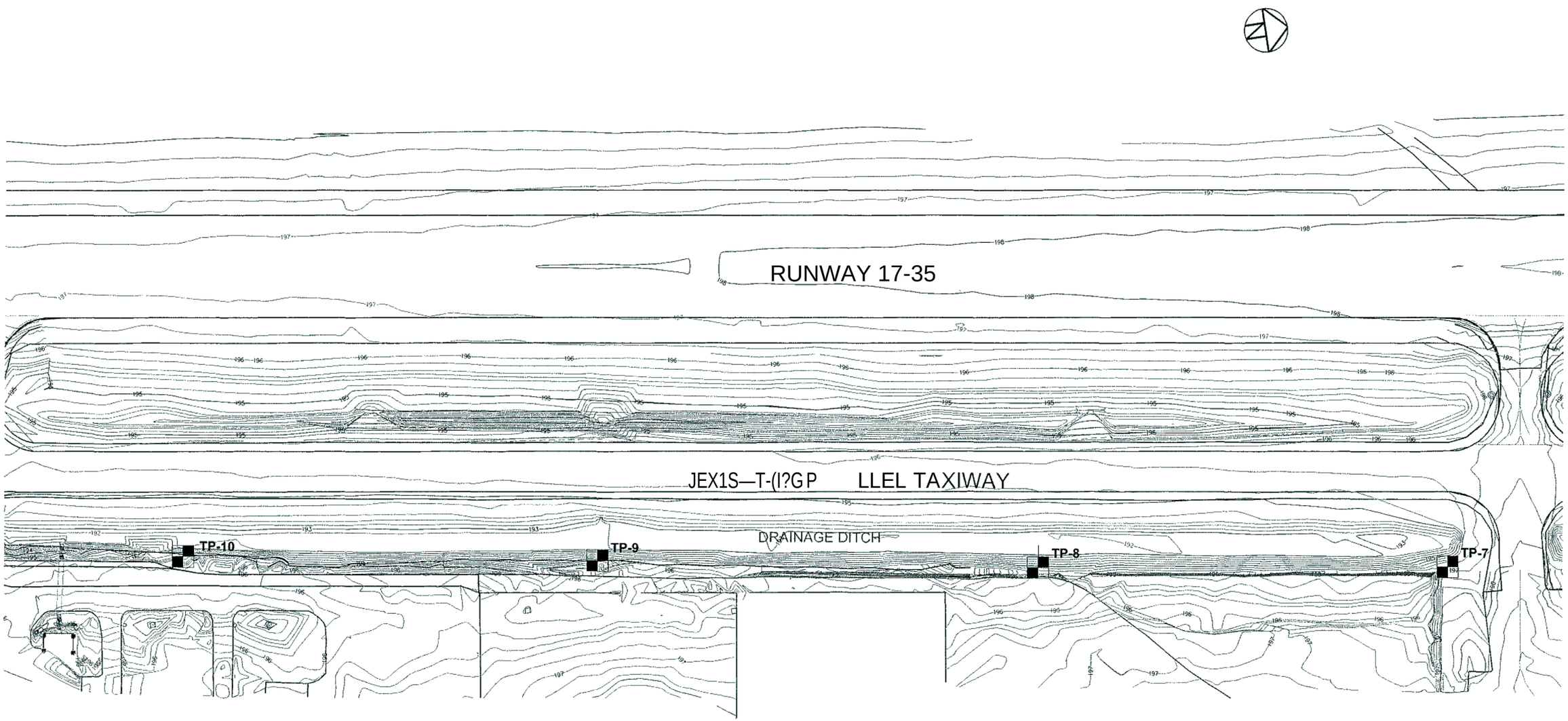
PROJECT NO. 2O61108

SITE LAYOUT AND EXPLORATION LOCATIONS
AURORA STATE AIRPORT
PARALLEL TAXIWAY RELOCATION PROJECT
AURORA, OREGON

FIGURE NO.
3A



SCALE: I" = 100'

0 50 IOO 200

NOTES:

I. TEST PIT, CORE HOLE AND PERMEABILITY TEST LOCATIONS WERE ESTABLISHED USING A MEASURING WHEEL AND ARE APPROXIMATE ONLY.
2. SEE REPORT FOR A DISCUSSION OF SUBSURFACE CONDITIONS.
S. BASE MAP WAS PROVIDED BY W&H PACIFIC.

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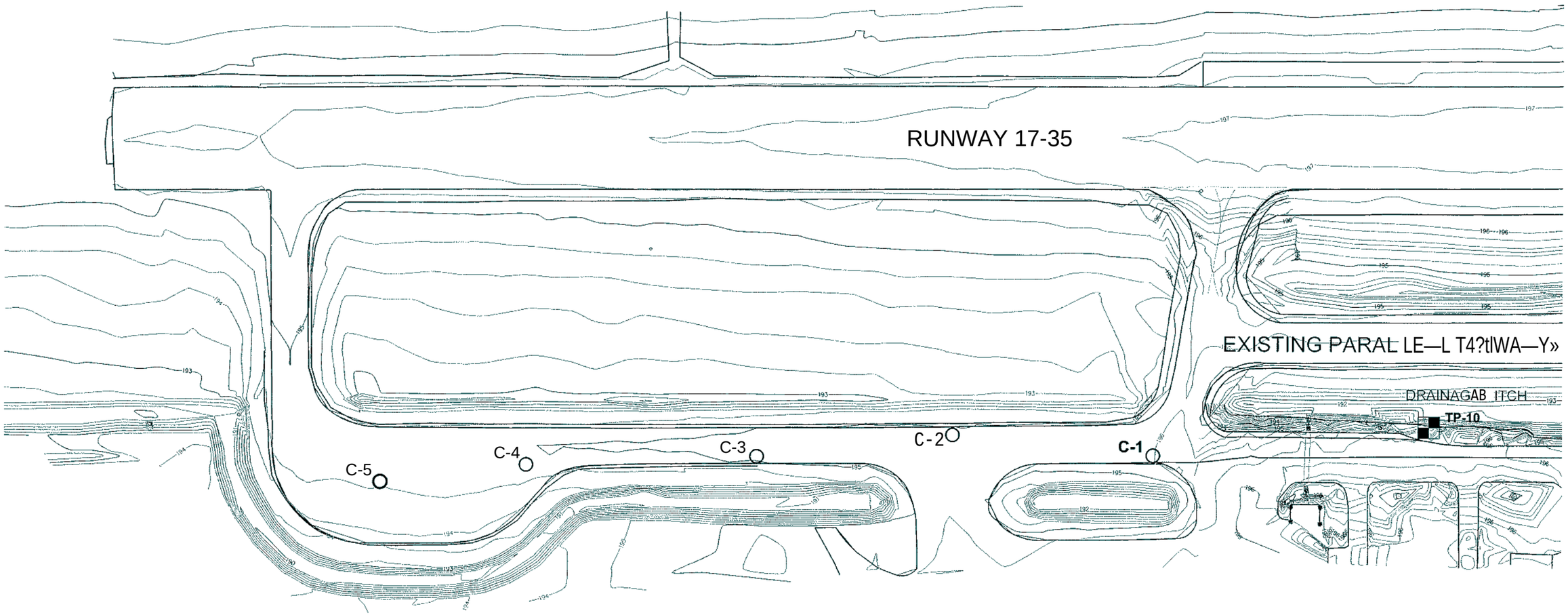
APPR.
REV IS.
PROJECT NO
2061108

SITE LAYOUT AND EXPLORATION LOCATIONS
AURORA STATE AIRPORT
PARALLELTAXIWAYRELOCATIONPROJECT
AURORA, OREGON

FIGURE NO.
4A



SCALE: 1" = 100'

0 50 100 200

NOTES:

I. TEST PIT, CORE HOLE AND PERMEABILITY TEST LOCATIONS WERE ESTABLISHED USING A MEASURING WHEEL AND ARE APPROXIMATE ONLY.
2. SEE REPORT FOR A DISCUSSION OF SUBSURFACE CONDITIONS.
3. BASE MAP WAS PROVIDED BY W&H PACIFIC.

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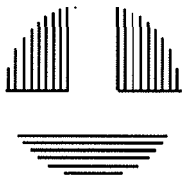
SITE LAYOUT AND EXPLORATION LOCATIONS
AURORA STATE AIRPORT
PARALLEL TAXIWAY RELOCATION PROJECT
AURORA, OREGON

FIGURE NO.
5 A



Appendix B

Test Pit and Core Hole Logs

Professional
Geotechnical
Services

Foundation Engineering, Inc.

DISTINCTION BETWEEN FIELD LOGS AND FINAL LOGS

A field log is prepared for each boring or test pit by our field representative. The log contains information concerning sampling depths and the presence of various moterials such as grovel, cobbles, and fill, and observations of ground water. It also contains our interpretation of the soil conditions between samples. The final logs presented in this report represent our interpretation of the contents of the field logs *and* the results of the laboratory examinations and tests. Our recommendations are based on the contents of the final logs and the information contained therein and not on the field logs.

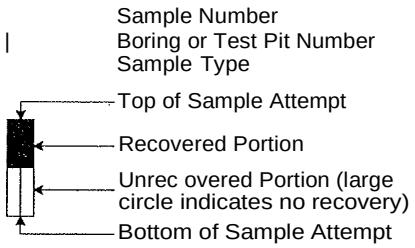
VARIATION IN SOILS BETWEEN TEST PITS AND BORINGS

The dnol log ond reloted infomnoGon depict subsudoce condiGons only ot the speciWc locoGon ond on the dote indicoted. Those using the informotion contained herein should be aware that soil conditions at other locations *or* on other dates may differ. Actual foundation or subgrade conditions should be confirmed by us during construction.

TRANSITION B EEN SOIL OR ROCK TYPES

The lines designating the interface between soil, fill or rock on the final logs and on subsurface profiles presented in the report are determined by interpolation ond are therefore approximote. The transition between the materials may be obrupt or gradual. Only at boring or test pit locations should profiles be considered as reasonably accurate and then only to the degree implied by the notes thereon.

SAMPLE OR TEST SYMBOLS



S — Grab Samples
SS — Standard Penetration Test Sample (split—spoon)
SH — Thin—wolled Shelby Tube Sample
C — Core Sample
CS — Continuous Sample

▲ Standard Penetration Test Resistance equals the number of blows a 140 lb. weight falling 3O in. is required to drive a standard split— spoon sampler 1 ft. Practical refusal is equal to 50 or more blows per 6 in. of sampler penetration.

● Water Content (@).

UNIMED SOIL OLASSIMCAION SYMBOLS

G — Gravel	W — Well Graded
S — Sand	P — Poorly Graded
M — Silt	L — Low Plasticity
C — Clay	H — High Plosticity
Pt — Peat	O — Organic

MELO SHEAR STRENGTH TEST

Shear strength measurements on test pit side wolfs, blocks of soil or Shelby tube samples are typically made with Torvane or pocket penetrometer devices.

TYPICAL SOIL/ROCK SYMBOLS

Sond
Silt
Clay
Gravel
Basalt
Siltstone

WATER TABLE

Water Table Location

(1/31/00) Date of Measurement

Piezometer Tip Location (it used)

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SYMBOL KEY
BORING AND TEST PIT LOGS

Explanation of Common Terms Used in Soil Descriptions

field Identification	Cohesive Soils			Gronulor Soils " ""	
	SPT	s„° (tel)	Term	SPT	Term
Eosily penetrated several inches by fist.	0 — 1	0.125	Very Soft	0 — 4	Very Loose
Eosily penetrated several inches by thumb.	2 — 4	0.123 0.25	Soft	5 — 10	Loose
Can be penetrated several inches by thumb with moderate effort.	5 — 8	0.25 — 0.50	Medium Stiff (Firm)	11 — 30	Medium Dense
Readily indented by thumb but penetrated only with great effort.	9 — 1g	0.50 — 1.0	Stiff	31 — 50	Dense
Readily indented by thumbnail.	16 — 30	1.0 — 2.0	Very Stiff	> 50	Very Dense
Indented with difficulty by thumbnail.	31 — 60	> 2.0	Hard		

+ Undrained shear strength

	Soil Moisture Field Description
Dg	Absence of moisture. Dusty. Dry to the touch.
Domp	Soil has moisture. Cohesive soils ore below plastic limit and usually moldable.
Moist	Groins appear darkened, but no visible woter. Silt/clay will clump. Sand will bulk. Soils are often at or near plastic limit.
Wet	Visible water on larger grain surfaces. Sand ond cohesionless silt exhibit dilotancy. Cohesive silt/clay can be readily remolded. Soil leaves wetness on the frond when squeezed. "Wet" indicotes that the soil is wetter than the optimum moisture content and above the plastic limit.

Term	PI	Plosticity Field Test
Nonplastic	0 — Z	Connot be rolled into a thread.
Low Plasticity	3 — 15	Can be rolled into a thread with some difficulty.
Medium Plasticity	15 — 30	Easily rolled into thread.
High Plasticity	TO	Easily rolled and rerolled into thread.

Tenm	Soil Structure Criterio "
Strotitieb	Alternating foyers at least 1 inch thick — describe variation.
Laminated	Alternating layers at less th on 1 inch thick — describe variation.
Fissured	Contains shears and partings along planss of weakness.
Slickensides	Partings appear glossy *or* striated.
Blocky	Breaks into lumps — crumbly.
Lensed	Contains pockets of different soils — describe variation.

Term	Soil Cementotion Criterio "
Weak	Breaks under light finger pressure.
Moderate	Breaks under hard finger pressure.
Strong	Will not breok with finger pressure.

FOUNDATION ENGINEERING INC.
PROFESSIONAL GEOTECHNICAL SERVICES
8E0 NW CORNELL AVENUE
CORVALLIS, OR 97330-1617
BUS. (541) 757-7646 FAX (541) 757-7680

COMMON TERMS
SOIL DESCRIPTIONS

Comments	pth, Fe	mple #	0 W * 0	Soil and Rock Description
Surface: short grass.				Medium stif, clayey SILT, (ML); brown, moist, low plasticity, blocky structure, (topsoil).
Fine roots extend to +12 inches.	1		020	Soft to medium stiff, clayey SILT, (ML); brown-grey, trace iron-staining, moist to wet, low plasticity, micaceous, (alluvium).
	2	S-1-1		
Moderate seepage noted at +3 feet.	3			
	4			Medium stiff SILT, some sand, (ML) brown-grey, wet, non-plastic to low plasticity, fine sand, (alluvium).
	8			
	9			BOTTOM OF TEST PIT
	10—			
	11			

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 9, 2007

Test Pit Log: TP- 1

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	pth,	mpl	cati	Class	Water	T:	m	Soil and Rock Description
	1	S-2-1						i st)P ayeySd.QT tpaa L a!k bro d , uo ticity, becky n turM," (topsoi).
Fine roots extend to +18 inches.	2	5-2-2						Medium stiff to stiff, SILT, some clay, trace sand, (CL-ML); brown-prey, trace iron-staining, moist, medium plasticity, semi-blocky structure, micaceous, (alluvium).
	3							
Slow seepage noted at +4 feet.	4—	52						Stiff SILT, some clay, trace sand, (CL-ML); brown-grey, moist to wet, low to medium plasticity, fine sand, micaceous, (alluvium).
	5–							
	6–							
	8							
	9							BOTTOM OF TEST PT
	10–							

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 9, 2007

Test Pit Log: TP- 2”

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	pth, Fe	mple #	ocation	lass Sy	/ater Ta	, TSF	m	Soil and Rock Description
Su aces short grass.	'	S-3-1						Soft to stiff, SILT, some clay, trace sand, (ML); brown-grey, trace iron-staining, moist, low to medium plasticity, fine sand, micaceous, (alluvium).
	2							
	3-							
Slow seepage noted at a3.5 feet.	4–	S-3-2						Stiff, clayey SILT, trace sand, (CL-ML); brown-grey; moist to wet, low to mediumplasticity, fine sand, micaceous, (alluvium).
	5–							
Rapid seepage noted at +6.5 feet.	y							
	8							BOTTOM OF TEST PIT
	9							
	10-—							
	11							

Project No.: 2061108

Surface Elevation: N/A

DateofTestPit: January 9, 2007

Test Pit Log: TP- 3

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	Depth, Feet	Sample #	Location	Class Symbol	Water Table	C, TSF	Symbol	Soil and Rock Description
Surface: short grass.	1-							Stiff, SILT, some clay, trace sand, (ML); brown-grey, trace iron-staining, moist to wet, low plasticity, micaceous, (alluvium).
Fine roots extend to ±2 feet.	2-	S-4-1						Blocky structure noted in upper±5 feet.
Moderate seepage noted at ±3 feet.	3-							
	4-							
	5-							
	6-							
	7-							
	8-							BOTTOM OF TEST PIT
	9-							
	10—							
	11-							

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 9, 2007

Test Pit Log: TP- 4

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	Depth, Feet	Sample	Location	Class Symbol	Water Table	C, TSF	Symbol	Soil and Rock Description
Surface: short grass and trace gravel fill.	1							Medium stiff, gravelly "SLT, some clay, (CL-ML); dark brown, moist to wet, medium plasticity, fine to coarse, subrounded to rounded gravel, blocky structure, (fill).
Fine roots extend to +2 feet.	2	S-5-1				0.80		Medium stiff to stiff, clayey SILT, (CL-ML); brown-grey, trace iron-staining, moist to wet, medium plasticity, micaceous, (alluvium).
Slow to moderate seepage noted at +3 feet.	3							
	4							Stiff SILT, trace clay and sand (ML)) brown-greys moist to wet, low plasticity, fine sand, micaceous, (alluvium).
	5							
	6							
	7							
	8							BOTTOM OF TEST PIT
	10							
	11							

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 9, 2007

Test Pit Log: TP- 5

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments		Sample	Location	Class Symbol	Water Table	C, TSF	Symbol	Soil and Rock Description
Surface: short grass and trace gravel.								Medium stiff, clayey SILT, trace gravel, (CL-ML); dark brown, moist, medium plasticity, blocky structure, (topsoil/fill).
		5-6-1						Medium stiff, clayey SILT, (CL-ML); brown-grey, trace iron-staining, moist to wet, low to medium plasticity, blocky structure, micaceous, (alluvium).
Fine roots extend to +2 feet.	2	S-6-2						
Slow to moderate seepage noted at +3 feet.								Stiff SILT, some clay, trace sand, (ML); brown-grey, moist to wet, low plasticity, fine sand, micaceous, (alluvium).
	4							
	5							
	7							
	9							BOTTOM OF TEST PIT
	10							
	11							

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 9, 2007

Test Pit Log: TP- 6

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	Depth, Feet	m	Location	Class Symbol	Water Table	C, TSF	m	Soil and Rock Description
								Medium stiff, gravelly SILT, some clay, (ML)/ brown, moist, medium plasticity, fine to coarse, subrounded gravel, (fill).
Fine roots extend to +2 feet.	2	S-7-1						Stiff clayey SILT, (ML), brown-grey, trace ironstaining, moist to wet, low plasticity, micaceous, (alluvium).
Slow seepage noted at +4 feet.	4							
Rapid seepage noted at +5.5 feet.	5							
	7							
								BOTTOM OF TEST PIT
	40							
	11							

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 9, 2007

Test Pit Log: TP- 7

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	Depth, Feet	Sample #	Location	Class Symbol	Water Table	C, TSF	Symbol	Soil and Rock Description
Surface: tall grass.								Medium stiff to stiff SILT, trace clay and sand, (ML); brown-grey, moist to wet, low plasticity, fine sand, micaceous, (alluvium).
Fine roots extend to ±12 inches.	1							
	2	S-8-1						
Slow seepage noted at ±3 feet.	3							
	4							
	5							
	6							
	7							
	8							
Rapid seepage noted at ±8.5 feet.	9							
								BOTTOM OF TEST PIT
	10							
	11							

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 9, 2007

Test Pit Log: TP- 8

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	Depth, Feet	Sample #	Location	Class Symb	Water Table	C, TSF	m	Soil and Rock Description
Surface: tall grass.								Soft to medium stiff, clayey SILT, (ML) dark brown, moist, low to medium plasticity (topsoils
	1	S-9-1						Medium stiff, clayey SILT, (CL-ML); grey-brown, trace iron-staining, moist to wet, medium plasticity, blocky structure, micaceous, (alluvium).
	2	g 2						
Slow seepage noted at +2.5 feet.	3							Stiff SILT, some clay, (ML); brown-grey, moist to wet, low to medium plasticity, micaceous, (alluvium).
	4							
	5							
	6							
	7							
	9							
	10							BOTTOM OF TEST PIT
	11							

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 9, 2007

Test Pit Log: TP- 9

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	pth,	mpl	ation	Class S	Water T	C, TSF	Symbol	Soi I and Rock Description
Surface: short grass.								Medium stiff to stiff, clayey SILT, (ML); dark brown, moist, low plasticity, (possible topsoil).
		5-10-1						
	2							
	3	S-10-2						Stiff, SILT, some clay, trace sand, (CL-ML); brown-grey, moist, medium plasticity, fine sand, micaceous, (alluvium).
	4					045		
	5							
	6							
No ground water encountered to the limit of excavation.	9							
	40							BOTTOM OF TEST PIT
	11							

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 9, 2007

Test Pit Log: TP-10

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	Depth, Feet	Sample #	Location	Class Sym	Water Tabl	C, T	Sym	Soil and Rock Description
								ASPHALTIC CONCRET E (+4 inches).
		C-1-1						Dense CRUSHED ROCK (+14inches), (GW); grey, moist, +2-inch minus, (base rock).
	1							
								+3?•-inch, rounded cobble encountered at +18 inches.
		SHC-1-2						Stiff, clayey SILT, (CL-ML), grey, moist, medium plasticity, (alluvium).
No ground water encountered to the limit of excavation.	2							BOTTOM OF CORE HOLE
	3							
	4							
	5							

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 10, 2007

Core Hole Log: C-1

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	Depth,	Sampl	Locati	Class	Water T	C, TSF	Symbol	Soil and Rock Description
								ASPHALTIC CONCRETE (14"é inches).
		C-2-1						Dense CRUSHED ROCK (/+14a inches); (GW); grey to brown, damp, 1-inch minus, (base rock).
		SHC-2-2						Stiff, clayey SILT, (CL-ML); brown-grey, moist, medium plasticity, (alluvium).
No ground water encountered to the limit of excavation.								BOTTOM OF CORE HOLE
	3							
	4							
	5							

Project No.: 2061408

Surface Elevation: N/A

Date of Test Pit: January 10, 2007

Core Hole Log: C-2

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	Depth, Feet	Sample #	Location	Class Symbol	Water Table	C, TSF	Symbol	Soil and Rock Description
								ASPHALTIC CONCRETE (±4 inches).
	1	C-3-1						Dense CRUSHED ROCK (±13 inches), (GW); grey, moist, 2-inch minus, (base rock).
No ground water encountered to the limit of excavation.	2	C-3-2						Stiff, clayey SILT, (CL-ML); grey-brown, trace iron-staining, moist, medium plasticity, micaceous, (alluvium).
								BOTTOM OF CORE HOLE
	3							
	4							
	5							

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 10, 2007

Core Hole Log: C-3

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	Depth, Feet	Sample #	Location	Class Symbol	Water Table	C, TSF	Symbol	Soil and Rock Description
								ASPHALTIC CONCRETE (±5½ inches).
	1	C-4-1						Dense CRUSHED ROCK (±13½ inches), (GW); grey, moist ±2-inch minus, (base rock).
Slow seepage noted at +1.5 feet	2	SHC-4-2						Stiff, clayey SILT, (CL-ML); grey, moist, medium plasticity, (alluvium).
								BOTTOM OF CORE HOLE
	3							
	4							
	5							

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 10, 2007

Core Hole Log: C-4

Aurora State Airport Parallel Taxiway Relocation

Aurora, Ore9on

Comments	Depth, Feet	Sample #	Location	Class	Water	Test	Soil and Rock Description
							ASPHALTIC CONCRETE (+5 inches).
	1	C-5-1					Dense CRUSHED ROCK (+27 inches), (GW); grey, moist, +2-inch minus, (base rock).
	2						
No ground water encountered to the limit of excavation.	3						BOTTOM OF CORE HOLE
	4						
	5						

Project No.: 2061408

Surface Elevation: N/A

Date of Test Pit: January 10, 2007

Core Hole Log: C-5

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	Depth, Feet	Sample#	Class Symbol	Water Table	C, TSF	Soil and Rock Description
						Medium stff, clayey SILT, (ML); dark brown, moist, low to medium plasticity, blocky structure, (topsoil).
	1					Soft to medium stiff, clayey SILT, (CL-ML); light brown-grey, trace iron-staining, wet, medium plasticity, blocky structure, (alluvium).
Moderate seepage noted at ±1.5 feet.	2					
	3					BOTTOM OF PERMEABILITY TEST
	4					
	6					

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 9, 2007

Test Pit Log: P-1

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	Depth, Feet	Sample #	Location	Class Symb	Water Table	C, TSF	Soil and Rock Description
							Medium stiff, clayey SILT, (ML); dark brown, moist, low to medium plasticity, blocky structure, (topsoil).
	1						Soft to medium stiff, clayey SILT, (CL-ML); brown-grey, trace iron-staining, wet, medium plasticity, blocky structure, (alluvium).
Moderate seepage noted at +1.5 feet.	2						
	3	P-2-1					Stiff, clayey SILT, trace sand, (CL-ML); brown-grey, wet, medium plasticity, (alluvium).
	4						
	5						BOTTOM OF PERMEABILITY TEST
	7						

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 9, 2007

Test Pit Log: P-2

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Comments	Depth, Feet	Class Symbol	Water Table	C, TSF	Symbol	Soil and Rock Description
Moderate seepage noedat +1.5 feet.	1					Medium stiff, clayey SILT, (ML): dark brown, moist, low to medium plasticity, blocky structure, (topsoil).
	2					Soft to medium stiff, clayey S"ILT, (CL-ML); brown-grey, trace iron-staining, wet, medium plasticity, blocky structure, (alluvium).
	3–					"Stiff, clayey SILT, trace sand, (CL-ML); wet, brown-grey, medium plasticity, (alluvium).
	4-					
	5					
	6					
	7					BOTTOM OF PERMEABILITY TEST
	8-					

Project No.: 2061108

Surface Elevation: N/A

Date of Test Pit: January 9, 2007

Test Pit Log: P-3

Aurora State Airport Parallel Taxiway Relocation

Aurora, Oregon

Appendix **C**

Field and Laboratory Test Results

Professional Geotechnical Services

Foundation Engineering, Inc.

Table 1C. Summary of Field Permeability Testing

Test Location	Test Depth (feet)	Soil Description at Test Depth	Average k V at ue (cm/sec)
P—1	2.9	Medium stiff, brown-grey, medium plasticity, Clayey SILT (CL—ML)	i3x10-’
P-2	5	Stiff, brown—grey, medium plasticity, Clayey SILT; trace sand (CL—ML)	+ 3x10 7
P-3	7	Stiff, brow n-grey, medium pt asticity, Clayey SILT; trace sand (CL ML)	+ 5x 1 0

Note: Tests were conducted on January 1 0 and 12, 2007.

Table 2C. Natural Water Content and Atterberg Limits

Sample Number	Sample Depth (feet)	Natural Water Content (percent)	LL	PL	PI	FAA/USCS Classification
S-1 -1	2.0 — 3.0	33.0				
S—2—1	1.0 — 1.5	33.7				
S-2-2	2.0 — 3.0	30.3	44	26	17	CL—ML
S—2-3	3.5 — 4.0	47.8				
S-3-1	1.0 — 1.5	386				
5-3-2	3. 5 — 4. 0	38.8				
S-4-1	2.0 3.0	37.6				
S-5-1	2.0 2.5	42.7				
S-6-1	1.0 – 1.5	42.4				
5-6-2	20 4.0	33.8	42	29	13	ML
S—7—1	2.0 2.5	30.5				
S-8-1	2.0 — 3.0	38.1				
5-9-1	1.0—1.5	34.1				
S—9—2	2.5 — 3.5	36.4				
S-10—1	1. 0 1. 5	31.0				
S—10—2	3.0 3. 5	39.7				
SEC—1-2	1. 8 2.1	25.4				
SHC-2—2	1.7 2.2	27.7				
SHC-4—2	1.9 — 2.7	25.2	42	24	18	CL
C-3—2	1.5 — 1.8	29.6				

Foundation Engineering, Inc.
Aurora State Airport Parallel Taxiway Relocation
Project 2061108

Table 3C. Summary of Previous and Recent Moisture-Density and CBR Test Results

Test Date	Location	Soil Description	FAA/USCS Classification	Maximum Dry Density (pcf)	Optimum Moisture Content (%)	CBR at 95% Relative Compaction
1999	Apron	Brown, silty CLAY	CL	100.0	21.0	5.8
2005	Runway	Grey, Clayey SILT; trace sand	ML—OL	1OO.5	20.0	6.1
2005	Runway	Brown—G rey SILT; some clay, trace sand	ML	103.5	19.0	5.5
2005	Runway	Brown-Grey SILT; some clay, trace sand	ML	980	23.0	5.5
2007	Taxiway	Brown—Grey SILT; some clay, trace sand	CL—ML	97.4	19.9	5.7
2007	Taxiway	Brown-Grey SILT; some clay, trace sand	ML	95.9	20.5	7.2
			Average =	99.2	20.6	6.0

Note: Maximum dry densities and Optimum moisture contents are based on ASTM D698 moisture-density test results.

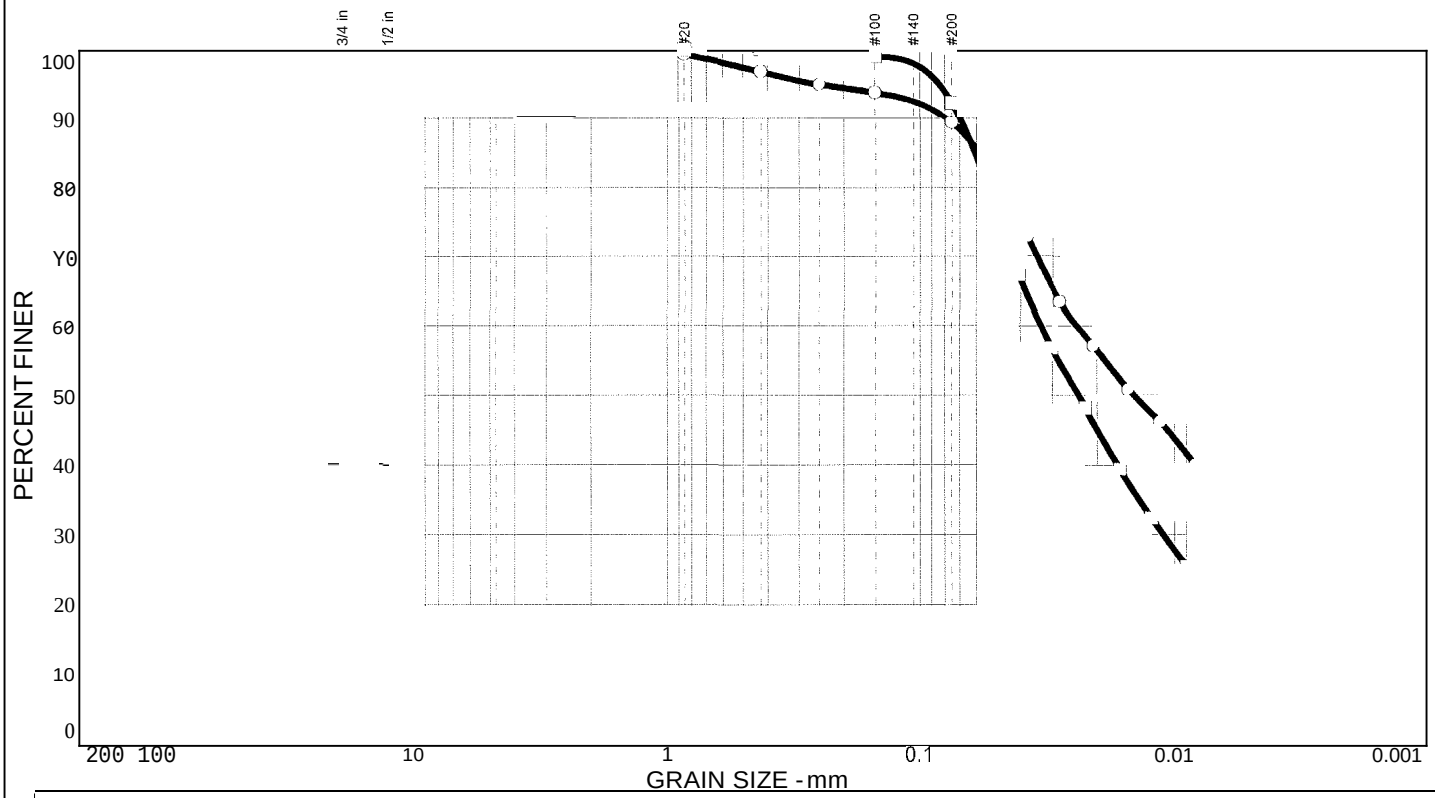
Foundation Engineering, Inc.
Aurora State Airport Parallel Taxiway Relocation
Project 206 1 108

Table 4C. Bulk Densities

Sample Number	Sample Depth (feet)	Soil Description	Water Content (%)	Moist Bulk Density (pcf)	Dry Density (pcf)	Relativ e Compaction
SEC-1-2	1.8 - 2.1	Grey, clayey SILT	25.4	124.8	99.4	100
SHC-2-2	4 7-2.2	Light brown, clayey SILT	27.7	1 17.0	91.6	94
SHC-4-2	1.9 - 2.7	Grey, clayey SILT	25.2	12 1.4	97.0	98

Note: Relative compaction is based on a maximum dry density of 99.2 pcf, which is based on the average results of six moisture-density tests (ASTM D698) on subgrade from Aurora Airport.

Particle Size Distribution Report



% COBBLES	% GRAVEL		% SAND			% FINES	
	CRS.	FINE	CRS.	MEDIUM	FINE	SILT	CLAY
0.0	0.0	0.0	0.0	3.1	7.5	65.2	24.2
00	00	00	00	û0	77	80.3	12.0

LL	PL	D_{es}	D_{60}	D_{so}	D_{uo}	D_{15}	D_{10}	C_c	C_u
44	26	0.0583	0.0242	0.0144	0.004 1				
		0.06 10	0.0334	0.0238	0.0111	0.0044			

MATERIAL DESCRIPTION	USCS	AASHTO
Brown—grey Sl LT; soiaae clay, t1‘ace sand	ML—CL	A-7-6(18)
Brown-grey *SI* LT; some clay, trace sand	ML	A-4(0)

Project No. 20G I ! 08 Client: FoutJdatiotJ Eng\‹ eei \‹Jg, I\Jc.

Project: Art otaState Aitpoi-t Tax\way; Arltota, O\cgo‹

‹. Source: 3423 Sample No.: S-2-2 Elev./Depth: 2.0-3.0

Source: 3423 Sample No.: S-8-1 Elev./Depth: 2.0-3.0

Remarks:

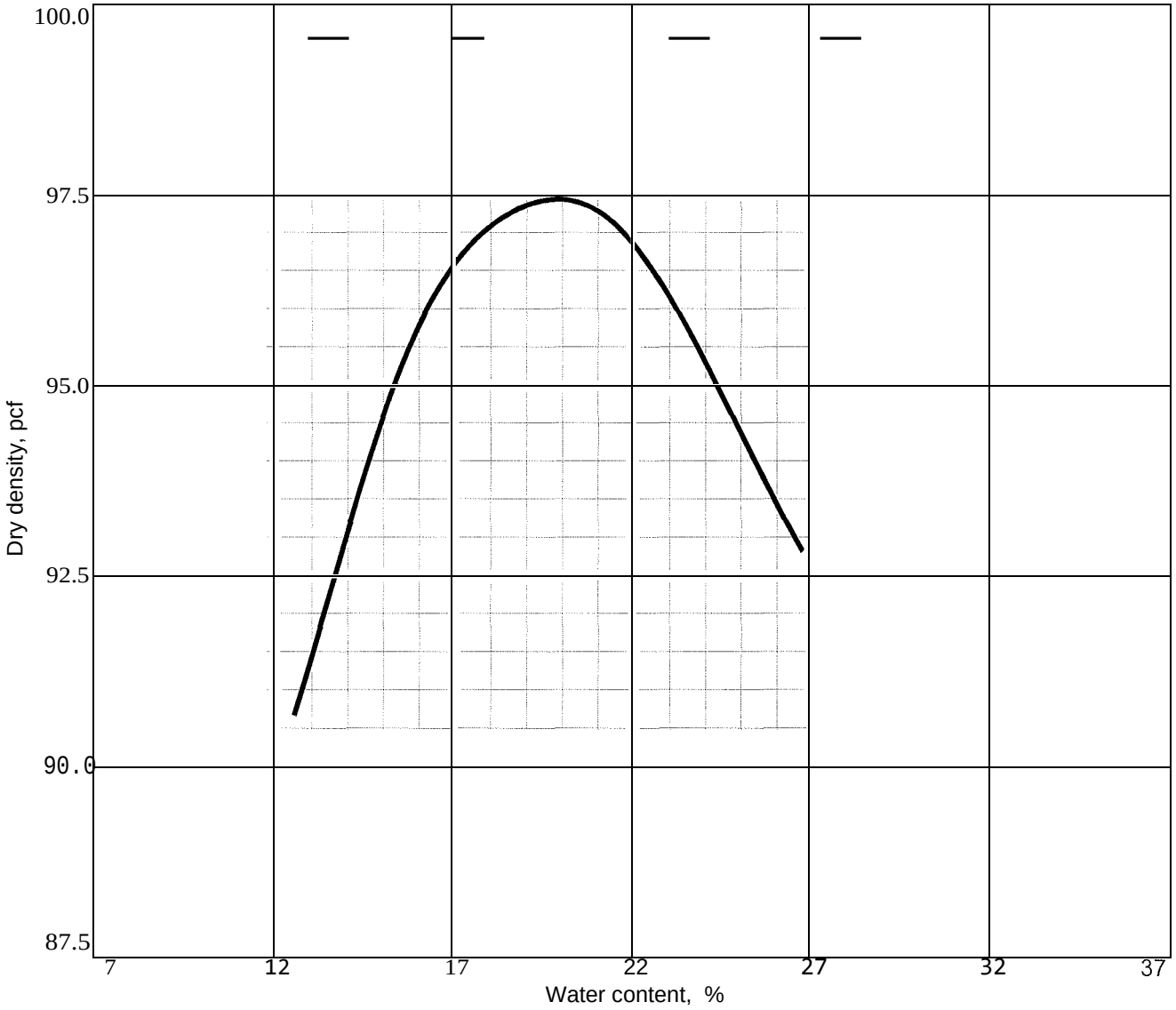
Particle Size Distribution Report

FEI Testing & Inspection, Inc.

Corvallis, OR

Fig. No: IC

MOISTURE - DENSITY RELATIONSHIP TEST



Test specification: ASTM D G98-00a Met) oJ A StatJda\ d

Elev/ Depth	Classification USCS	Classification AASHTO	Nat. Moist.	Sp.G.	LL	PI	% > No.4	% < No.200
2.0-3.0	CL—ML		303		44	18	0.0	24.2

TEST RESULTS

Maximum dry density = 97.4 pcf

Optimum moisture — 19.9 %

MATERIAL DESCRIPTION

Drown-grey SILT; some clay, ti'ace sand

Project N o. 2061 108 Client: Foundation Engineering, Inc.

Project: Aurora State Airport Taxiway; Au1'ora, Oregon

u Source: 3425 Sample No.: S-1-1/S-2-2 Elev./Depth: 2.0-3.0

Remarks:

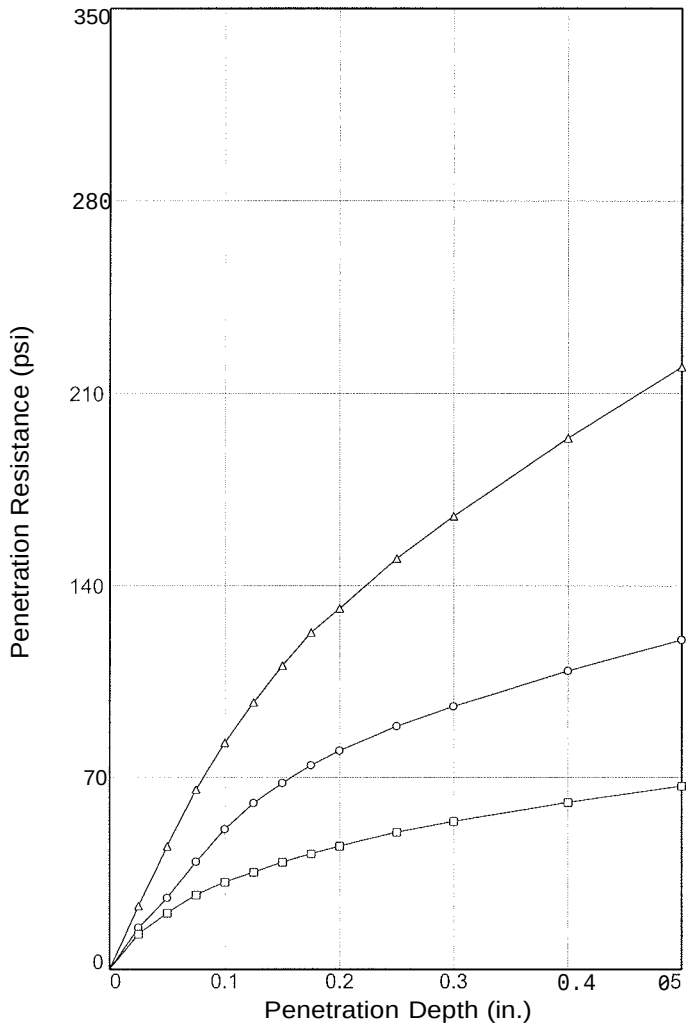
Datc: ! -! 8-07

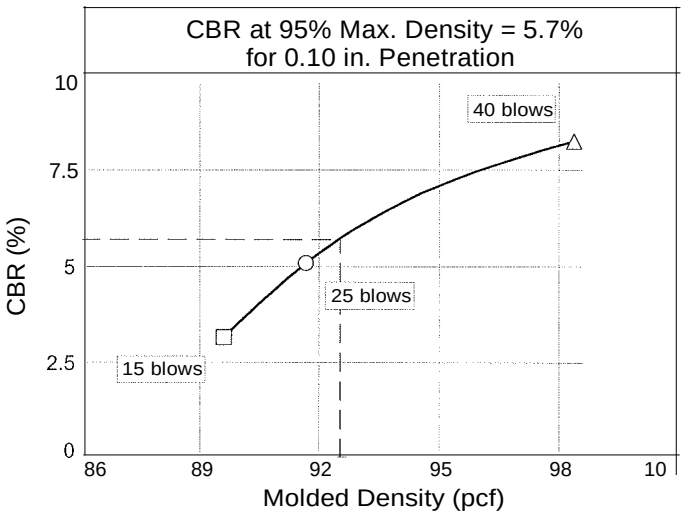
MOISTURE - DENSITY RELATIONSHIP TEST

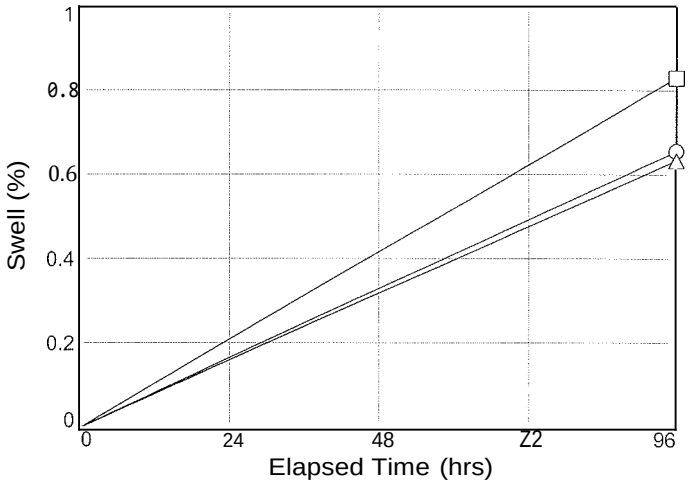
FEI Testing & Inspection, Inc.
Corvallis, OR

Fig. No: 2C

BEARING RATIO TEST REPORT
ASTM D 1883-99







	Molded			Soaked			CBR (%)		Linearity Correction (in.)	Surcharge (lbs.)	Max. Swell (%)
	Density (pcf)	Percent of Max. Dens.	Moisture (%)	Density (pcf)	Percent of Max. Dens.	Moisture (%)	0.10 in.	0.20 in.			
1 ○	91.7	94.1	19.6	91.1	93.5	30.2	5.1	5.3	0.000	32	0.7
2 △	98.4	101	18.7	97.8	100.4	28.2	8.3	8.8	0.000	32	0.6
3 □	89.6	92	19.0	88.9	91.2	30.8	3.2	3.0	0.000	32	0.8

Material Description	USCS	Max. Dens. (pcf)	Optimum Moisture (%)	LL	PI
Brown—grey SILT; some clay, trace sand	CL—ML	97.4	19.9	44	18

Project No: 2061108

Project: Auiola State Aiipoil Taxiway; Auiola, Oiegon

Source of Sample: 3425 Depth: 2.0-3.0

Sample Number: S-1-1/S-2-2

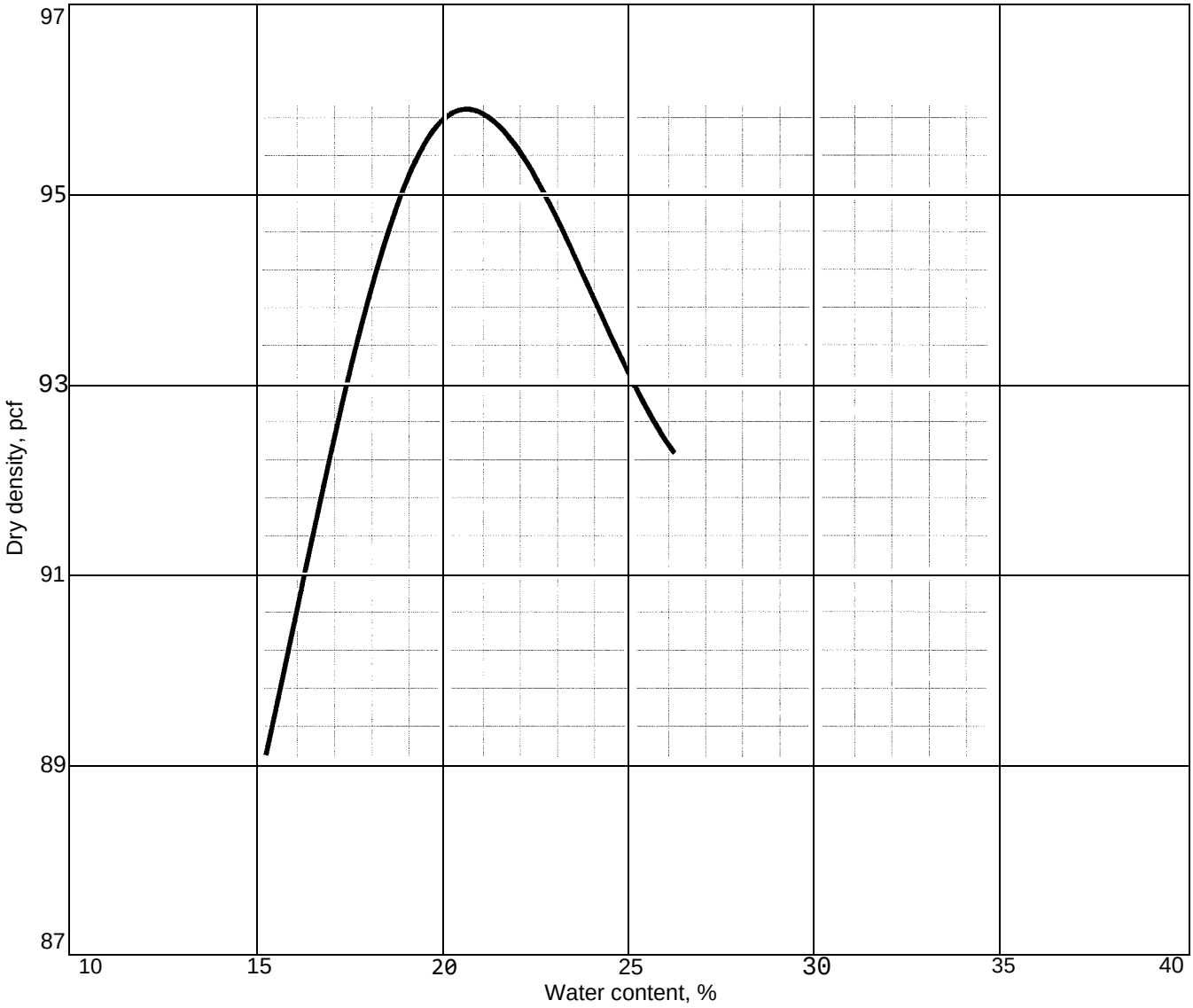
Date: 1-29-07

BEARING RATIO TEST REPORT
FEI Testing & Inspection, Inc.
Corvallis, OR

Test Description/Remarks:

Fig. No: 3C

MOISTURE - DENSITY RELATIONSHIP TEST



Test specification: ASTM D 698-00a Method A Standard

Elev/ Depth	Classification		Nat. Moist.	Sp.G.	LL	PI	% ≥ No.4	% ≤ No.200
	USCS	AASHTO						
2.0-4.0	ML		33.8		42	13		

TEST RESULTS	MATERIAL DESCRIPTION
Maximum dry density = 95.9 pcf Optimum moisture = 20.5 %	Brown-grey SILT; some clay, ti‘ace sand

Project No, 2061108 Client: Foundation Engineering, Inc.

Project: A tu‘ora State Airport Taxiway; Abu or a, Oregon

o Source: 3425 Sample No.: S-5-2 Elev./Depth: 2.0-4.0

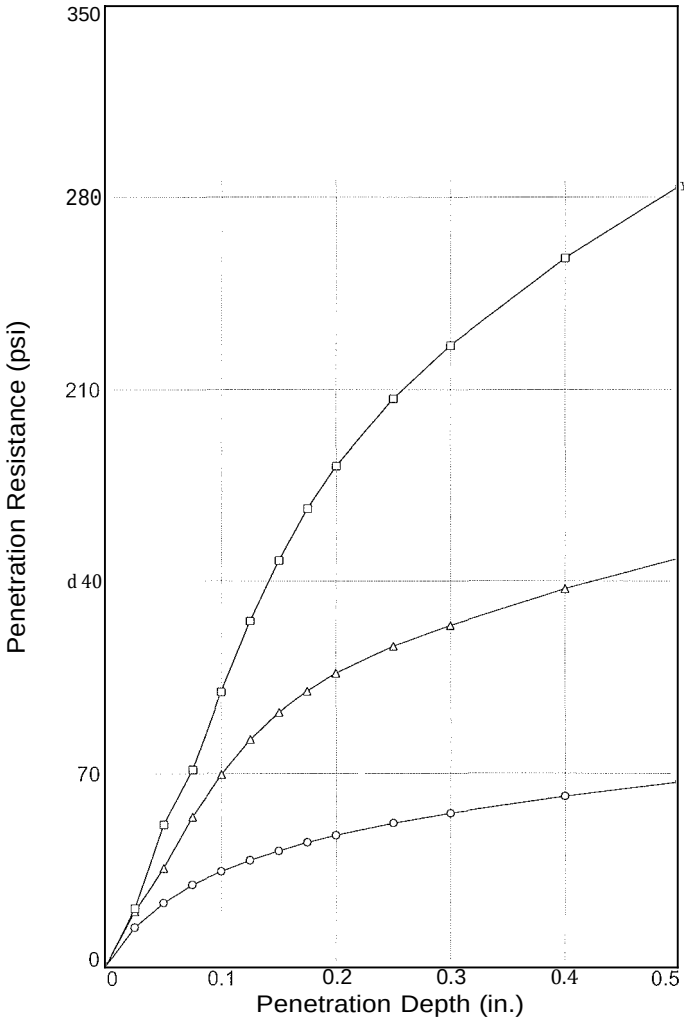
Remarks:

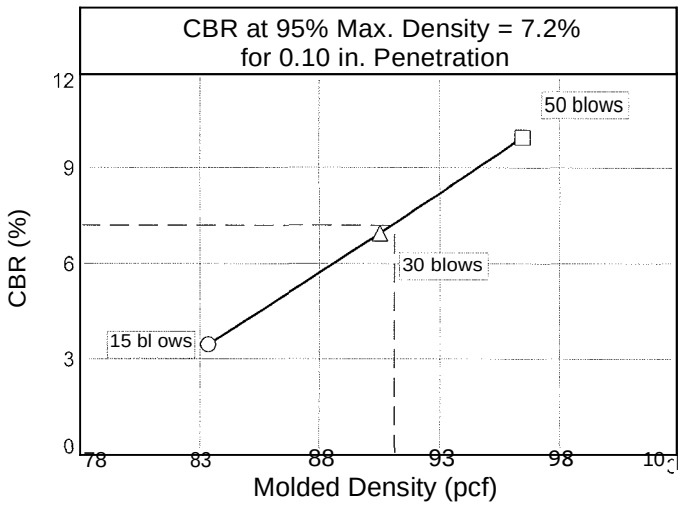
MOISTURE - DENSITY RELATIONSHIP TEST

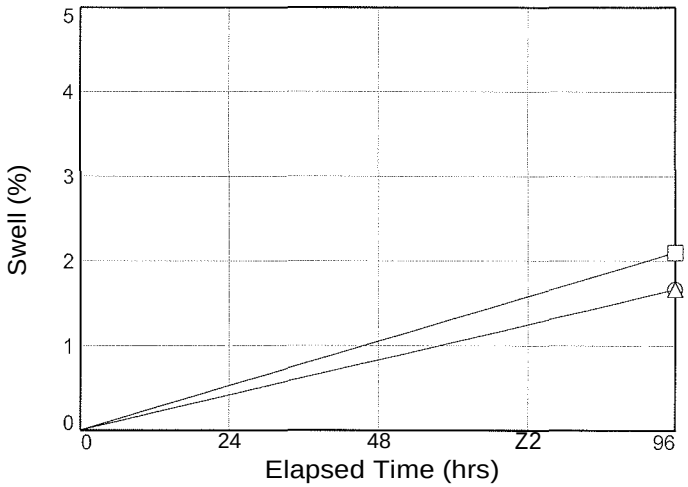
FEI Testing & Inspection, Inc.
Corvallis, OR

Fig. No: 4C

BEARING RATIO TEST REPORT
ASTM D 1883-99







	Molded Density (pcf)	Molded Percent of Max. Dens.	Molded Moisture (%)	Soaked Density (pcf)	Soaked Percent of Max. Dens.	Soaked Moisture (%)	CBR (%) 0.10 in.	CBR (%) 0.20 in.	Linearity Correction (in.)	Surcharge (lbs.)	Max. Swell (%)
1 O	83.4	87	20.2	82.0	85.5	35.0	3.4	3.2	0.000	32	1.7
2 A	90.5	94.4	19.1	89.0	92.8	32.2	6.9	7.1	0.000	32	1.7
3 D	96.5	100.6	19.4	94.5	98.5	29.7	10.0	12.1	0.000	32	2.1

Material Description	USCS	Max. Dens. (pcf)	Optimum Moisture (%)	LL	PI
Brown-grey SILT; some clay, trace sand	ML	95.9	20.5	42	13

Project No: 2061108

Project: Autoia State Aiipoi1 Taxiway; Auioia, Oiegon

Source of Sample: 3425 Depth: 2.0-4.0

Sample Number: S—6-2

Date: 1-29-07

Test Description/Remarks:

BEARING RATIO TEST REPORT
FEl Testing & Inspection, Inc.
Corvaiiis, OR

Fig. No: DC

ENVIRONMENTAL MANAGEMENT SYSTEMS, INC.

OR: 503-353-9691
FAX: 503-353-9695
WA: 360-735-1109
www.envmgtsys.com
4080 SE International Way
Suite B-112
Milwaukie, OR 97222

5 November 2020
Report # 19-0054-02

Mr. Ted Millar
c/o: Aron Faegre & Associates
520 SW Yamhill St., Roofgarden 1
Portland, OR 97204

REGARDING: Winter Evaluation for feasibility of onsite wastewater treatment, HDSE Sewer System Association, Aurora State Airport, adjacent to Keil Rd. NE and Hubbard Cuttoff Rd. NE, Aurora, OR 97002. T: 4S, R: 1W, Sec: 11, T.L: 800, 17.79 Acres

Dear Mr. Millar & Mr. Faegre,

As requested, Environmental Management Systems, Inc. (EMS) has performed the following services and provides this report for your use.

PROJECT DESCRIPTION:

The goal of this project is to expand the approved drainfield area for onsite wastewater treatment to serve future expansion of your existing HDSE Sewer System Association facilities located at the Aurora State Airport. The subject property is leased from the Oregon Department of Aviation by the HDSE Sewer System Association. The lease was recently renewed to accommodate expansion to include enough drainfield area to double the existing system's capacity in support of future development. The existing drainfields in this area were approved by DEQ in 2005 and have been functioning with no problems in the intervening 15 years since installation. There have been no documented drainfield problems in these soils. On September 25th, 2019, twelve test pits adjacent to the existing drainfields were evaluated by Marion County for feasibility for onsite wastewater treatment. EMS's analysis was that the soils are similar to the adjacent existing soils and will function acceptably. However, Marion County staff initially denied the application on October 8th, 2019 because they felt there was potential for seasonally high groundwater which could be a problem, and because they believed there was a presence of fill in this area. They recommended that for re-evaluation a tile dewatering system be installed to drain the area, and that a winter evaluation be conducted to determine the actual depth to seasonal water table. EMS designed a tile dewatering system which was installed in January of 2020. A winter evaluation was conducted through the winter of 2020. This report details our methods, findings, and recommendations for next steps and continues to recommend approval of the soils for the expansion use.

SUMMARY:

The average water depth across all twelve wells was 28 inches from the surface, after the tile dewatering system (TDS) was installed on January 23rd, 2020. The longest consecutive number of days that the water table rose above 12" below ground surface anywhere in the drainfield was about 3.8 days. On average, the water table rose above 12" for less than 1 day, with five out of the twelve wells having no shallow water table readings after the TDS was completed. Each well was dry when they were re-inspected in June following excessive rainfall during the previous six weeks. Based on success of the existing system and this study, we recommend approval of the drainfield areas for installation of a shallow pressure distribution drainfield, following Treatment Standard 1 or 2 similar to that currently in use. Permits require review and approval by DEQ.

METHODS: The following methods were used:

Observation x Measurement x Staking x Soil Evaluation x
Sampling x Inspection x Laser Elevations x Total Station x
Gov Records x Interview x Aerial Photo _x_ Soil Survey x
Geologic Maps _x_ Wetland Inventories x other (specify) Weather tracking x

LIMITATIONS: This investigation is limited by the precipitation frequency and duration.

LANDSCAPE SETTING:
The study area consists of Tax Lot 800 in Township 4S, Range 1W, Section 11, in Marion County Oregon, totaling 17.79 acres. The site is outside of the urban growth boundary for Aurora and is zoned P (public) by Marion County. The site is part of a complex of many lots all making up the Aurora State Airport. The onsite wastewater treatment system is owned and operated under a common entity known as the HDSE Sewer System Association. Lot 800 is owned by Oregon Department of Aviation, with part of the site leased by the Association as a private septic system easement. The proposed drainfield area is within the easement, south of the airport runway and on either side (east and west) of the runway flight path and instrument landing system (FAA localizer). An existing drainfield is located at the southeast corner of the easement, south and southeast of the new proposed drainfields. An approved reserve area is in the southwest corner of the easement. No signs of failure, such as surfacing or odors, have been observed in the existing system since its installation in 2005. Also, this state-owned property is fenced and monitored to protect it from unauthorized public access and or contact with sewage.

The site is situated in the lowlands of the Willamette Valley, northwest of the town of Aurora. The average elevation of the site is approximately 193 feet above sea level. The site is fairly flat, sloping 1-2% east and west, with a crown along the runway flight path. The soils in this area were established in 1993 when the runway was extended over existing farmland. There has been no disturbance of those soils in the intervening 27 years. Two drainage swales are located along the east and west property lines, draining surface runoff to the south. Concrete culverts at the southwest and southeast corners of the site convey drainage off site. The property is open and vegetated with grasses and other low-lying forbs. No wetlands are mapped on the property by the National Wetlands Inventory (US Fish & Wildlife), and none were observed during the site visit. According to Oregon Department of Geology and Mineral Industries (DOGAMI) geology of the site is mapped as Quaternary surficial deposits (fine grained sediments) of the Missoula Flood Deposits formation.

The soil on site is mapped by the Natural Resource Conservation Service (NRCS) as Amity silt loam. Amity is described as somewhat poorly drained with a depth to water table of 6 to 16 inches, and depth to restrictive layer over 80 inches. Conditions associated with saturation (redoximorphic features) were observed at 6-16 inches from the soil surface, indicating potential for a seasonally high-water table. Runway construction resulted in the deposition of fill soil along the sides. This soil has remained essentially undisturbed for 23 years.

The new drainfield lease area was surveyed prior to conducting the study. Enough area was included for two new drainfields and reserve areas to support a design flow of approximately 10,000 gpd, thereby doubling the existing system's capacity. Twelve test pits were dug across the site in the summer of 2019, with six on the eastern proposed drainfield area, and six in the western proposed drainfield area. Various depths of the (at least) 27 year old fill were observed over the native silt loam in the 6 eastern test pits dugs on the site (TP's 5-10).

TILE DEWATERING SYSTEMS

Tile dewatering systems (TDS) were installed on the site in mid-January 2020, with completion on January 23rd, 2020. In both the east and west drainfield areas, two adjacent 70' by 350' rectangular dewatering trenches were installed. The field collection tile was installed with a slope of 0.2-0.4 percent at the bottom of the trenches; trench depths vary between 15 and 52 inches from ground surface. The trenches are 1 foot wide and are filled with EZFlow synthetic drain media. Each drainage system is connected to a 4" tight line installed on a 1% slope, which discharges to either the east or west drainage swale. Sediment basins were installed at the inlet end of each outfall pipe.

WATER TABLE MONITORING

While DEQ does not provide guidance on how to evaluate data, research has demonstrated that 21 days per season of actual saturation is needed to create the Redoximorphic Features which form the basis for Oregon DEQ to judge depth to water table. Published guidance from several sources, primarily the Recommended Procedures and Standards for Conducting a Water Table Study from Virginia Tech University[1] (2008) was used for conducting the water table study. On December 4th, 2019, thirteen (13) monitoring wells (piezometers) were installed on the site by registered geologist and licensed well constructor, Roger N. Smith (RG, License #10225).

Within each 70' x 350' tile dewatering area, 3 piezometers wells were installed (12 total). One additional well was installed approximately 20 feet north of the eastern tile system to collect barometric pressure. Each monitoring well consists of a 5-foot long, 1-inch diameter plastic PVC pipe capped with a plastic lid. The wells were installed approximately 3 feet below the surface, with 22-29 inches of pipe above ground surface. Special Standards were requested from and approved by the Oregon Water Resources Department. Silica filter sand was placed in the hole around the piezometer at the lowest 26 inches, followed by a 12-inch bentonite seal to the soil surface. A slit was sawed in the top of each pipe to allow the lid to be easily removed, and to release air pressure inside the well from the rising and lowering water table. Each well was assigned a number (Pz1 – Pz13) which was noted on metal start card tags and written in permanent marker on the pipe itself. Start cards for the wells were registered with the Oregon Water Resources Department.

Table 1. Measured and calculated Barodiver cord lengths relative to grade

Piezometer	Cord length (in.)	Cord length above grade (in.)	Cord length below grade (in.)
Pz1	57	27	30
Pz2	56	25	31
Pz3	57	29	28
Pz4	57	27	30
Pz5	57	28	29
Pz6	58	29	29
Pz7	57.5	27	30.5
Pz8	58	27	31
Pz9	56	27	29
Pz10	57.5	25.5	32
Pz11	57.5	25	32.5
Pz12	57	22	35

[1] Cobb, PR, Conta, JF, Steverson, ED, and Stull RL. Recommended Procedures and Standards for Conducting a Water Table Study, Version 1.0. Crop and Soil Environmental Sciences Department, Virginia Tech, Blacksburg, VA

DATA COLLECTION.

Barodiver data loggers were placed inside Pz's 1-12, between 28 and 35 inches below grade to collect water column pressure. One additional Barodiver was placed in Pz13 above the soil surface to collect atmospheric pressure for the study area. Technical specifications for the Barodiver data loggers are enclosed at the end of this report. The total cord length (CL) and cord length above grade (COG) for each Barodiver was measured manually and recorded (see Table 1). Data was collected automatically every four hours (6 times per day) from January 9th, 2020 until approximately 9:00 am on May 1st, 2020. Data for the date of the installation (January 8th) was omitted to avoid false readings caused by system testing, and an artificially high-water table immediately after the wells were dug. Each piezometer was surrounded by wooden stakes and caution tape for protection (see Figure 1 below).

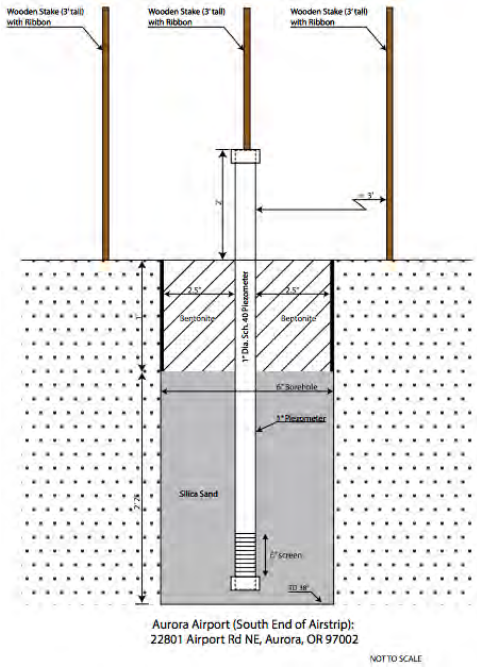


Figure 1. Piezometers were installed approximately 3 feet below grade and pressure sensors were hung from the top of the pipe. The well was sealed with bentonite clay.

The site was visited once each month during the study; a total of 5 times after setup. Each site visit consisted of the following:

1. Inspect each well to ensure they are still fully functioning and had not been tampered with
2. Download data from Barodiver data loggers onto laptop using USB data port
3. Visually inspect the tile dewatering system and assess flow

After all data was collected, the water level (WL) for each well was then determined using the following equation, where ρ is the density of water (1000 kg/m3) and g is the acceleration due to gravity (9.80665 m/s2s). :

$$WL = COG - CL + 9806.65 \frac{P_{diver} - P_{baro}}{\rho * g}$$

RAINFALL MONITORING

Precipitation data for January 2020 through April 2020 was collected from the Aurora State Airport weather station in Aurora, Oregon (45.2485, -122.7686). Normal precipitation levels were determined using the US Normal Data (1981-2010) from the National Oceanic and Atmospheric Administration (NOAA), obtained from the NRCS National Water and Climate

Center (https://www.wcc.nrcs.usda.gov/climate/navigate_wets.html). However, because the NOAA uses data from 1981-2010 to determine Climate Normals, this year's precipitation was also compared to the previous two years (2018 and 2019). Precipitation was found to be only 5% drier than last year (2019). Daily precipitation levels were monitored and compared to water table levels.

FINDINGS:

Precipitation

The precipitation for the past three years in the Aurora area has been less than what previously has been considered "normal" based on long term records. Table 2 below shows the monthly precipitation for 2020, 2019, and 2018 from data from the airport weather station. It is unknown whether there is going to be a new normal, however we can say this study was performed under precipitation conditions that were only 5% different than the previous year.

Table 2 – Monthly precipitation totals in inches for 2018, 2019, 2020.

Month	2020	2019	2018
January	7.06	3.49	5.57
February	1.64	3.97	2.06
March	2.53	1.54	2.97
April	1.32	4.24	5.04
Total	**12.55**	**13.24**	**15.64**

Table 3 shows total precipitation for the months of January through April 2020. Although the month of January was above normal, February, March, and April were drier than normal. The expected normal and the measured precipitation for the months of the study were totaled, and overall, the precipitation was found to be 70% of historic normal. Daily precipitation levels are graphed in Figure 2, below.

Table 3 – Percent of NOAA Normal precipitation for January 2020 – April 2020

Month	Normal (inches)	Measured (inches)	Percent of Normal
January	5.87	7.06	120
February	4.75	1.64	35
March	4.23	2.53	60
April	3.13	1.32	42
Total	**17.98**	**12.55**	**70**

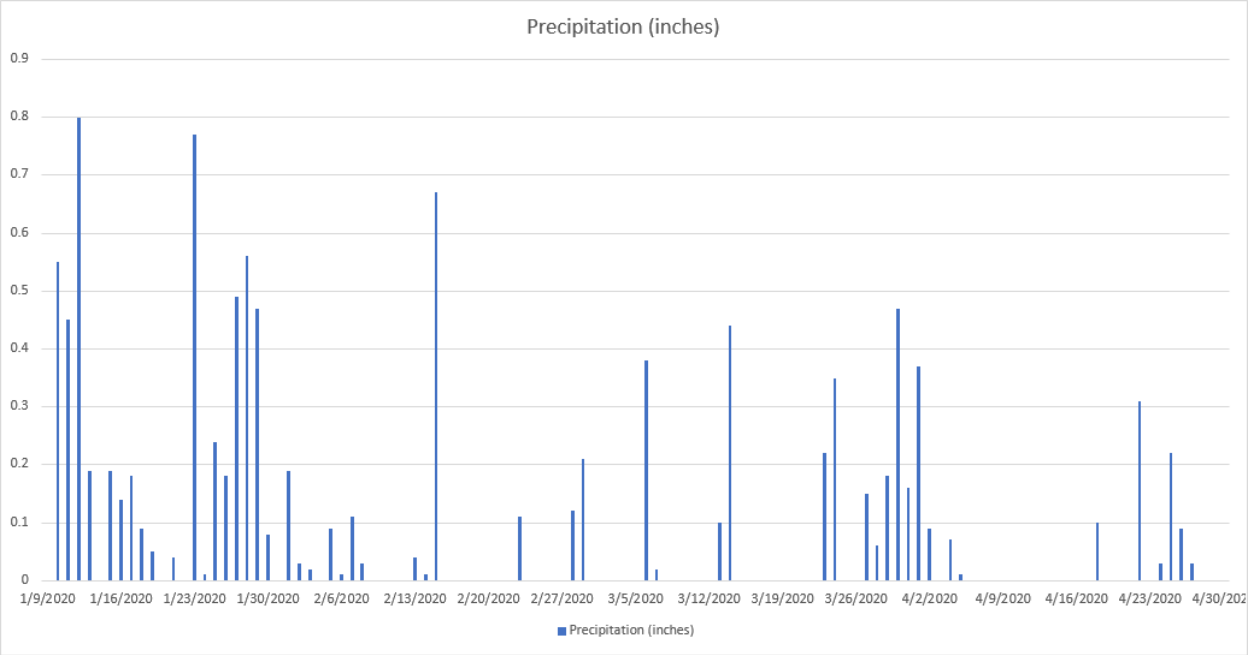


Figure 2 –Daily precipitation (inches) from the Aurora State Airport weather station (June 9th – May 1st).

Precipitation for May and June of 2020 was greater than normal, with 2.82 inches of rain in May (119% of normal), and 2.96 inches of rain in the first half of June (147% of monthly normal as of June 16th). EMS returned to the site on June 16th to manually measure the water table in each well. Each of the 12 piezometers was dry (no standing water in the well). 0.24 inches of rain fell on the day the measurements were taken. The ten days prior to the measurements each had precipitation, with the biggest rain event being on June 15th when 0.84 inches of rain fell. Daily climate data for each month is enclosed at the end of this report.

Well data and water table levels

A total of 681 readings were automatically collected every 4 hours from each piezometer during the study. The results were variable across all wells. Some of the wells exhibited periods of time where the water table was less than 12” from the ground surface (up to 37 readings a row in Pz9) whereas others had none at all. The average water table depth across all wells was 21” and 28” from ground surface, before and after the installation of the TDS respectively. Pz4 and Pz11 were always deeper than 12” throughout the study. The shallowest water table depth was in Pz12, at 3” on the dates of 01/16/2020 and 1/29/2020. Most shallow water table readings occurred in January, which had 120% of normal rainfall, and prior to the tile dewatering system being installed. Average and minimum water table depths before the tile dewater system was installed are summarized in Table 4, below. Piezometers are located on either the east or west side of the runway approach and departure areas.

Table 4. Average and highest water table levels, in inches, before the TDS installation (01/09/2020 – 01/22/2020.

Piezometer	Average water level	Highest water level	Location
Pz1	20	8	West
Pz2	19	6	West
Pz3	22	7	West
Pz4	26	13	West
Pz5	28	22	East
Pz6	20	9	East
Pz7	21	9	East
Pz8	17	6	East
Pz9	14	4	East
Pz10	23	12	East
Pz11	29	23	West
Pz12	17	3	West
Average	**21**	**12**	

After the tile dewatering system was completed, only seven of the twelve wells had occurrences of the water table being less than 12” from the surface (Table 5). These shallow water table events were brief periods that to correlate with significant rain events of 0.5 inches of rain or more over a 24-hour period. The average water table depth across all wells was 28” inches from the surface between 01/23/2020 and 05/01/2020.

Table 5. Average and highest water table levels, in inches, after TDS installation (01/23/2020 – 05/2020)

Piezometer	Average water level	Highest water level	Location
Pz1	24	5	West
Pz2	26	7	West
Pz3	27	5	West
Pz4	29	17	West
Pz5	28	10	East
Pz6	28	10	East
Pz7	31	30	East
Pz8	31	28	East
Pz9	28	17	East
Pz10	30	6	East
Pz11	30	17	West
Pz12	25	3	West
Average	**28**	**13**	

Daily precipitation is graphed along with water table levels in the enclosed hydrographs. All shallow water table readings occurred in January, which had 120% of normal rainfall, except for Pz1, which had one reading on 2/16/2020, and Pz12, which had three readings on 2/16/2020. 0.67 inches of rainfall occurred on the previous day (2/15/2020). The longest duration that any well had a shallow water table of 12” or less was 23 consecutive readings (about 3.8 days). See Table 6 below. In Pz1, Pz2, Pz5, Pz6, Pz10, and Pz12, the longest duration of shallow water table conditions occurred around the dates of 01/27/2020 - 01/29/2020, when approximately 1.5 inches of rain fell. On average, the water table was only above 12 inches for about 0.9 days after significant rain events. According to the standards recommended by Virginia Tech, less than 21 consecutive days of high-water table conditions is considered acceptable.

Table 6. Consecutive time of shallow water table conditions for each piezometer, after installation of TDS (01/23/2020 – 05/01/2020).

Piezometer	# of readings	Consecutive hrs.	Consecutive days	Dates
Pz1	13	5	2.2	1/28 - 1/30
Pz2	12	48	2.0	1/27 - 1/29
Pz3	0	0	0	--
Pz4	0	0	0	--
Pz5	4	16	0.7	1/28
Pz6	4	16	0.7	1/23, 1/28
Pz7	0	0	0	--
Pz8	0	0	0	--
Pz9	0	0	0	--
Pz10	10	40	1.7	1/27 - 1/29
Pz11	0	0	0	--
Pz12	23	92	3.8	01/27 - 01/31
Average	**6**	**22**	**0.9**	

Since May and June were wetter than normal, EMS returned to the site on June 16th to manually measure the water table in each well. Each well was dry, with no standing water at the bottom of the well.

Tile Dewatering System

The tile dewatering system was completed on January 23rd, 2020. During each site visit, water was observed flowing from the field collection tile into the outfall pipes. Water was also observed draining from the outlet of the pipe and discharging to the swales near the east and west property lines. Prior to the installation of the TDS, ten out of twelve wells had a high-water table of 12" or less from the surface. After the installation of the TDS, only seven out of twelve wells had a high-water table, and only for relatively short periods during significant rain events. The TDS is functioning as designed and has contributed to lowering the water table.

Figure 3 –Tile dewatering trenches were installed 15-52 inches below grade and filled with 12" EzFlow bundles. 4" pipes at the bottom of the trench sloped are at 0.2-0.4%.

Figure 4 –24" silt traps were installed at the inlet end of each tight line outfall, which discharged toward existing drainage swales on the site. Photo taken facing west toward the west property line (fence) with Hubbard Cuttoff Rd. NE in the background.

CONCLUSIONS:

1. Precipitation for the months of January through April 2020 was only 5% drier than 2019. When compared to the NOAA 1981-2010 Climate Normals, precipitation during the study was 70% of “normal”.

2. May and June were wetter than normal. May had 119% of normal precipitation. In June, 147% of the monthly normal precipitation had accumulated in the first half of the month. EMS returned to the site in mid-June to manually measure the water table levels.

3. Between January 9th and January 22nd, the average water table depth for each piezometer ranged between 14” (Pz9) and 29” (Pz10) from the ground surface and averaged 21” across all wells.

4. After installation of the tile dewatering system on January 23rd, the average water table depth across all wells increased to 28”. In half of the wells, the water table never rose above 12” from the surface after the TDS was installed.

5. Most shallow water table readings (less than 12” from the ground surface) occurred in January, which had 120% of normal precipitation. Spikes in the water table levels appear to correlate with significant rain events of 0.5 inches or more over 24 hours.

6. The most consecutive number of days that the water table was rose above 12” from the soil surface was about 3.8 days in Pz12. On average, the water table lingered above 12” for about 0.9 days, although five out of twelve wells had no shallow water table readings after the TDS was installed. Less than 21 consecutive days of shallow water table is considered acceptable for onsite wastewater treatment.

7. No water was observed in the bottom of the wells when manual measurements were taken on June 16th, 2020. This was following an unusually wet June, which had already accumulated 2.96 inches of the total normal 2.02 inches of monthly precipitation in the first half of the month. 0.84 inches of rain fell the previous day (June 15th). The first half of June's 2.96 inches amounts to 146% of the whole months normal or 293% of the first half's expected 1.01 inches.

8. Onsite wastewater treatment appears feasible. Effluent will be highly treated to Treatment Standard 2 and disinfected, using the existing Advantex AX100 textile filters, or similar technology with Ultra Violet Disinfection when these future repair drainfields are needed. High water table levels only occur after significant rain events and for relatively short durations (less than 21 consecutive days).

9. This site is protected from public access by fencing and constant observation, thereby further limiting the risk of human contact with sewage.

10. Further, the existing drainfield has been in use for fifteen years in similar soils and treatment with no signs of failure.

RECOMMENDATIONS: The following additional steps or services appear to be needed:

1. Feasibility review. The result of this study will need to be presented to and assessed by Marion County and/or Oregon Department of Environmental Quality (DEQ) to reevaluate feasibility of the site for on-site wastewater treatment.

2. On-site Wastewater Treatment System Design. A final design will need to be prepared that meets DEQ specifications for a Water Pollution Control Facility Permit.

DISCLOSURE: The information and statements in this report are true and accurate to the best of our knowledge. Neither Environmental Management Systems, Inc., nor the undersigned have any economic interests in the project.

Thank you for your business. We look forward to assisting you to achieve your development goals. If you have any questions, please contact Emma Eichhorn, REHS, or me at 503-353-9691.

Sincerely

Robert F. Sweeney, MS, REHS
President
ENVIRONMENTAL MANAGEMENT SYSTEMS, INC.

Enclosures:
1. Site Plan
2. Tile Dewatering System Details
3. Tax Lot Map
4. Hydrographs for piezometers Pz1 – Pz12
5. Barodiver data logger spec sheet
6. Precipitation data for the Aurora State Airport weather station

EMS 503-353-9691 360-735-1109 www.envmgtsys.com 4080 SE International Way Suite B112 Milwaukie, OR 97222 ENVIRONMENTAL MANAGEMENT SYSTEMS, INC.	CHECKED: DRAWN:	AABC-HD AVIATION T: 4S, R: 1W, Sec 2 & 11, TL: 200, 203, 400, 401, 800, 900 & 1600 AIRPORT SITE PLAN	19-0054 12/10/2019 1 OF 3

Aurora Airport
Located at Airport & Keil Roads NE
Aurora, OR 97002

52 LF 4" SCH40 PVC TIGHTLINE TO OUTFALL
186.16 ELEV.

EXISTING GROUNDWATER INTERCEPTOR

24" CONCRETE CULVERT
I.E. 186.08'

EXISTING DRAINFIELD
3,000 LF

KEIL RD NE

◆ = TEST PIT
⊗ = PIEZOMETER

FENCE
DRAINAGE SWALE
~70.7'

24" SILT TRAP

B A
70' MAX
140'
70' MAX
C D
350'

TILE DEWATERING SYSTEM
SEE PAGE 3 FOR DETAILS

PROPOSED RESERVE DRAINFIELDS FOR FUTURE USE

PROPOSED EXPANDED LEASE AREA
TOTAL 263.229.5 SQFT
SUBJECT TO CHANGE

RUNWAY

RUNWAY LIGHTS

KEIL RD NE

G F
350'
TILE DEWATERING SYSTEM
SEE PAGE 3 FOR DETAILS
70' MAX
140'
70' MAX
H E

EXISTING RESERVE DRAINFIELD AREA

24" SILT TRAP

GATE

UTILITY BUILDING

DRAINAGE SWALE
FENCE

24" CONCRETE CULVERT
I.E. 186.72'

45 LF 4" SCH40 PVC TIGHTLINE TO OUTFALL
188.0' ELEV.

HUBBARD CUTOFF RD NE

THIS DOCUMENT IS NOT A SURVEY. LOCATIONS OF SITE FEATURES ARE APPROXIMATE.

0 100
SCALE 1"= 100'

19-0054

12/10/2019

2 OF 3

AABC-HD AVIATION

T: 4S, R: 1W, Sec 2 & 11, TL: 200, 203, 400, 401, 800, 900 & 1600

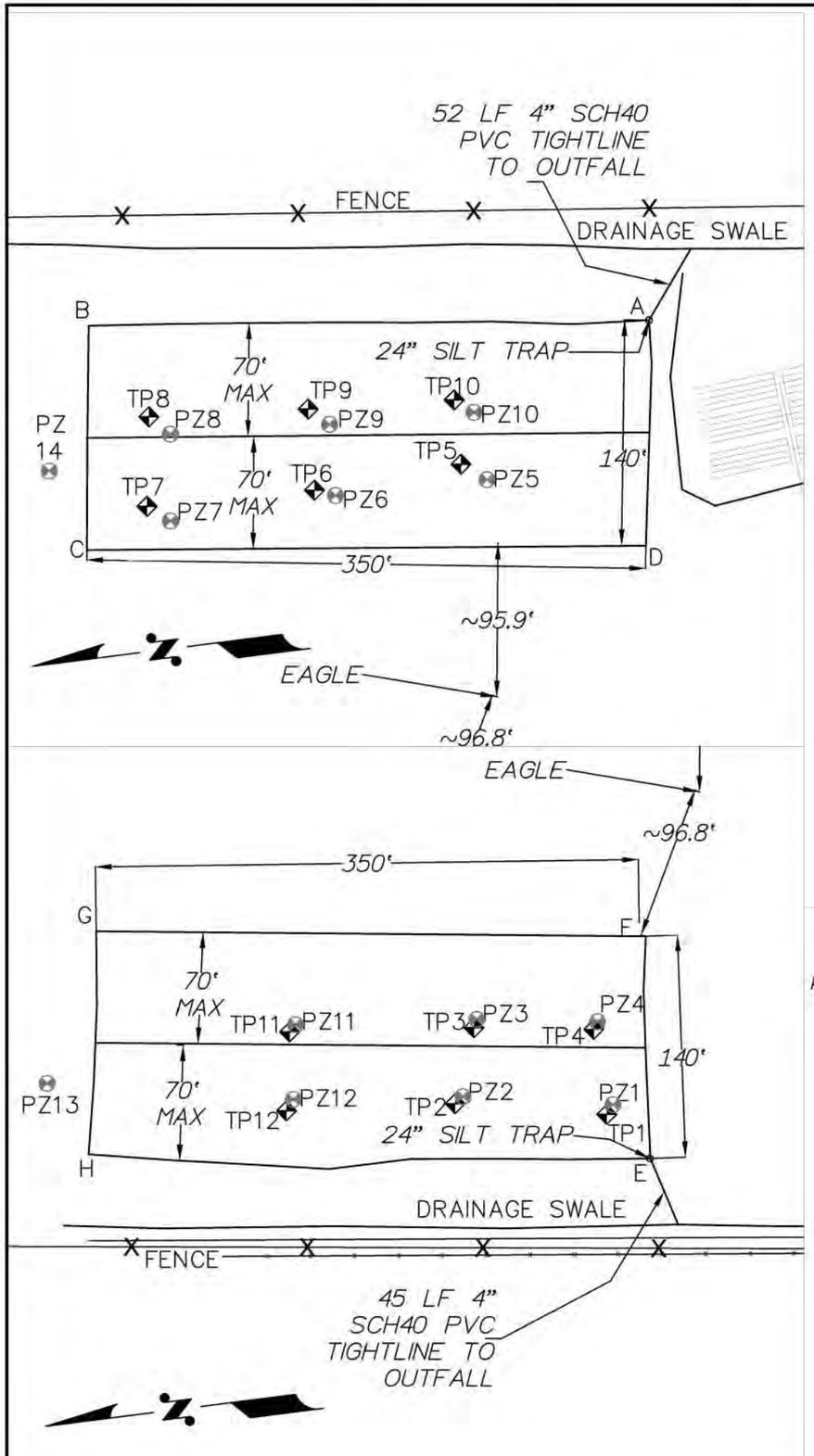
SITE PLAN

CHECKED:

DRAWN:

EMS
4080 SE International Way
Suite B112
Milwaukie, OR 97222
503-353-9691
360-735-1109
www.envmgtsys.com
ENVIRONMENTAL MANAGEMENT SYSTEMS, INC.

Aurora Airport
Located at Airport & Keil Roads
NE
Aurora, OR 97002

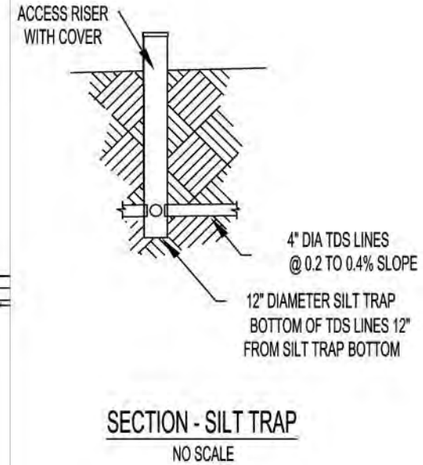


East TDS

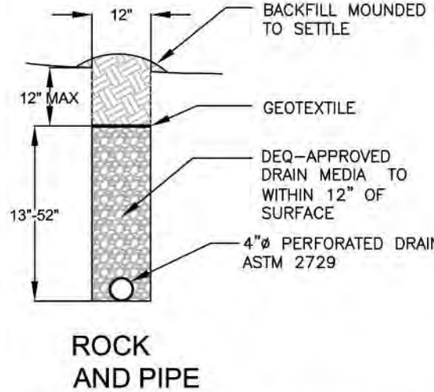
POINT	Trench Elevation (feet)	Surface Elevation (feet)	Trench Depth (feet)	Trench Depth (inches)
A	186.72	189.28	2.57	30.79
B	187.59	189.71	2.11	25.36
C	187.94	191.44	3.50	41.94
D	187.07	191.42	4.35	52.24

West TDS

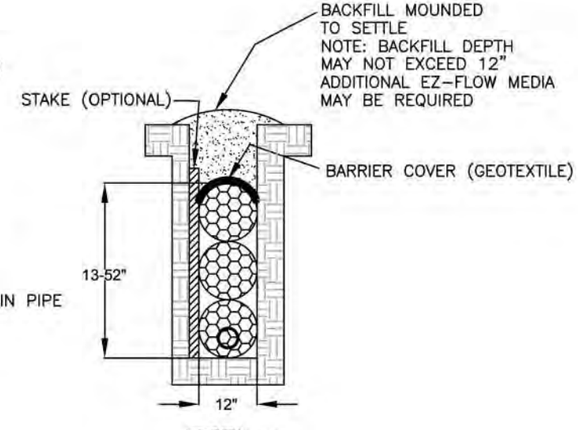
POINT	Trench Elevation (feet)	Surface Elevation (feet)	Trench Depth (feet)	Trench Depth (inches)
E	188.45	189.73	1.29	15.42
F	188.73	192.07	3.35	40.17
G	189.43	192.42	3.00	35.94
H	189.15	190.28	1.13	13.59



SECTION - SILT TRAP
NO SCALE



ROCK
AND PIPE



EZFlow
EZ1203V

DEWATERING TRENCH DETAIL

SCALE : NTS

REFER TO TABLE FOR TRENCH DEPTHS. SLOPE MUST BE 0.2-0.4% IN FIELD COLLECTION DRAINAGE TILE.

19-0054

12/10/2019

3 OF 3

AABC-HD AVIATION

T: 4S, R: 1W, Sec 2 & 11, TL: 200, 203, 400, 401, 800, 900 & 1600

TILE DEWATERING SYSTEM DETAIL

CHECKED:

DRAWN:

EMS
ENVIRONMENTAL MANAGEMENT SYSTEMS, INC.
4080 SE International Way
Suite B112
Milwaukie, OR 97222
503-353-9691
360-735-1109
www.envmgtsys.com

04 1W 11A

MARION COUNTY, OREGON

NE1/4 SEC11 T4S R1W W.M.

SCALE 1" = 200'

LEGEND

LINE TYPES

- Taxlot Boundary
- Historical Boundary
- Road Right-of-Way
- Easement
- Railroad Right-of-Way
- Railroad Centerline
- Private Road ROW
- Taxcode Line
- Subdivision/Plat Bndry
- Map Boundary
- Waterline - Taxlot Bndry
- Waterline - Non Bndry

CORNER TYPES

- 1/16TH Section Cor.
- 1/4 Section Cor.
- DLC Corner
- Section Corner (16 15 / 21 22)

NUMBERS

Tax Code Number

000 00 00 0

Acreage *0.25 AC*

All acres listed are Net Acres, excluding any portions of the taxlot within public ROWs

NOTES

Tick Marks: A tick mark in the road indicates that the labeled dimension extends into the public ROW

200.00 / 175.00

CANCELLED NUMBERS

101, 200A1, 200A2, 200A5, 201, 202, 203, 204, 207, 300, 401, 402, 405, 406

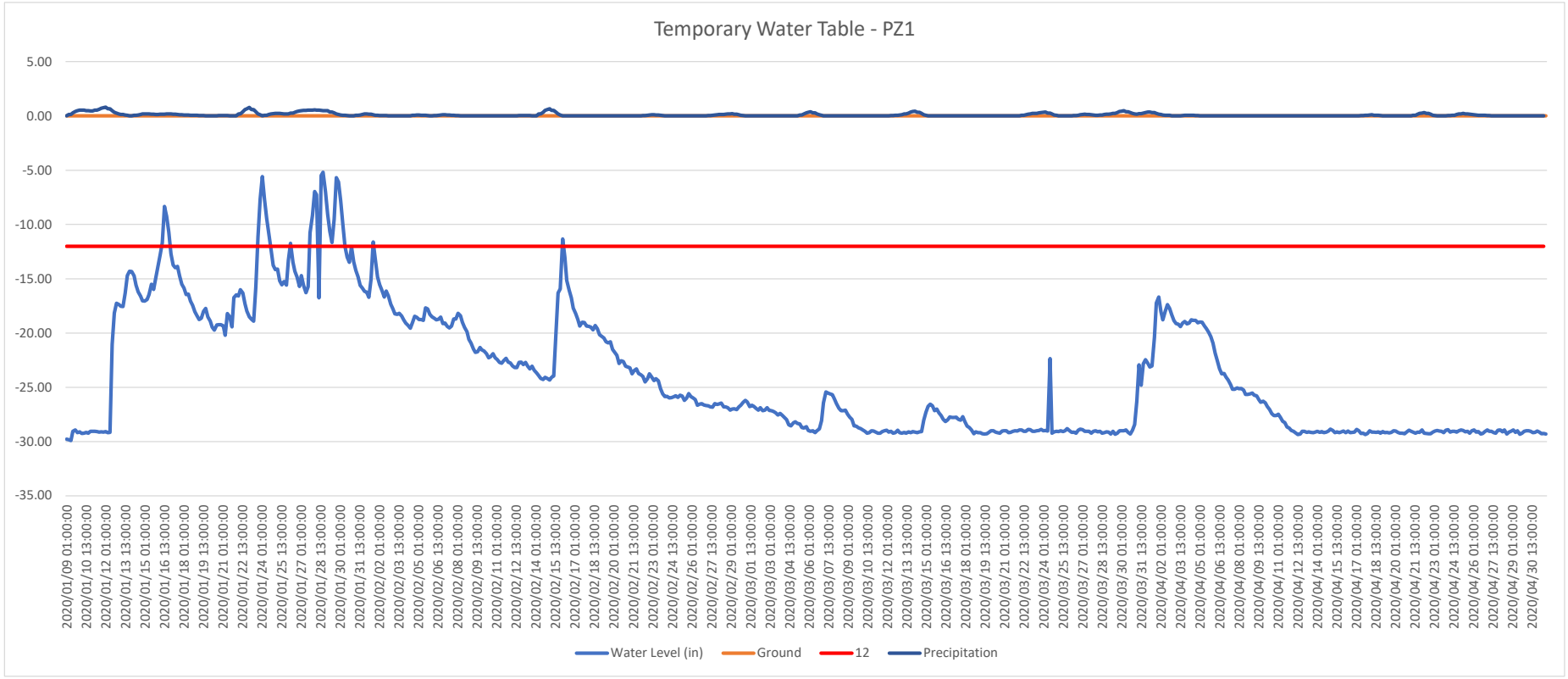
DISCLAIMER: THIS MAP WAS PREPARED FOR ASSESSMENT PURPOSES ONLY

Marion County OREGON — Assessors Office Cartography Dept

FOR ADDITIONAL MAPS VISIT OUR WEBSITE AT www.co.marion.or.us

PLOT DATE: 2/13/2020

04 1W 11A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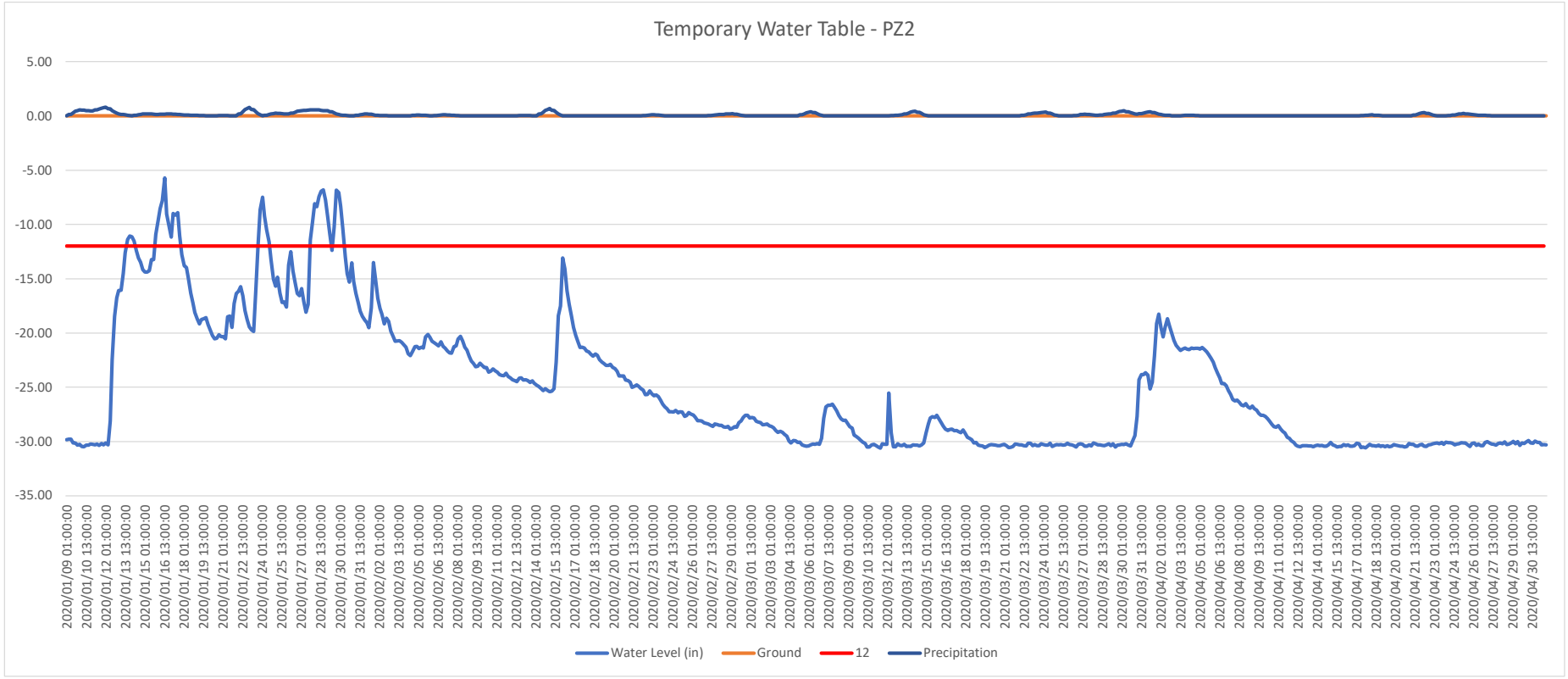
Water Level (in)
Ground
12
Precipitation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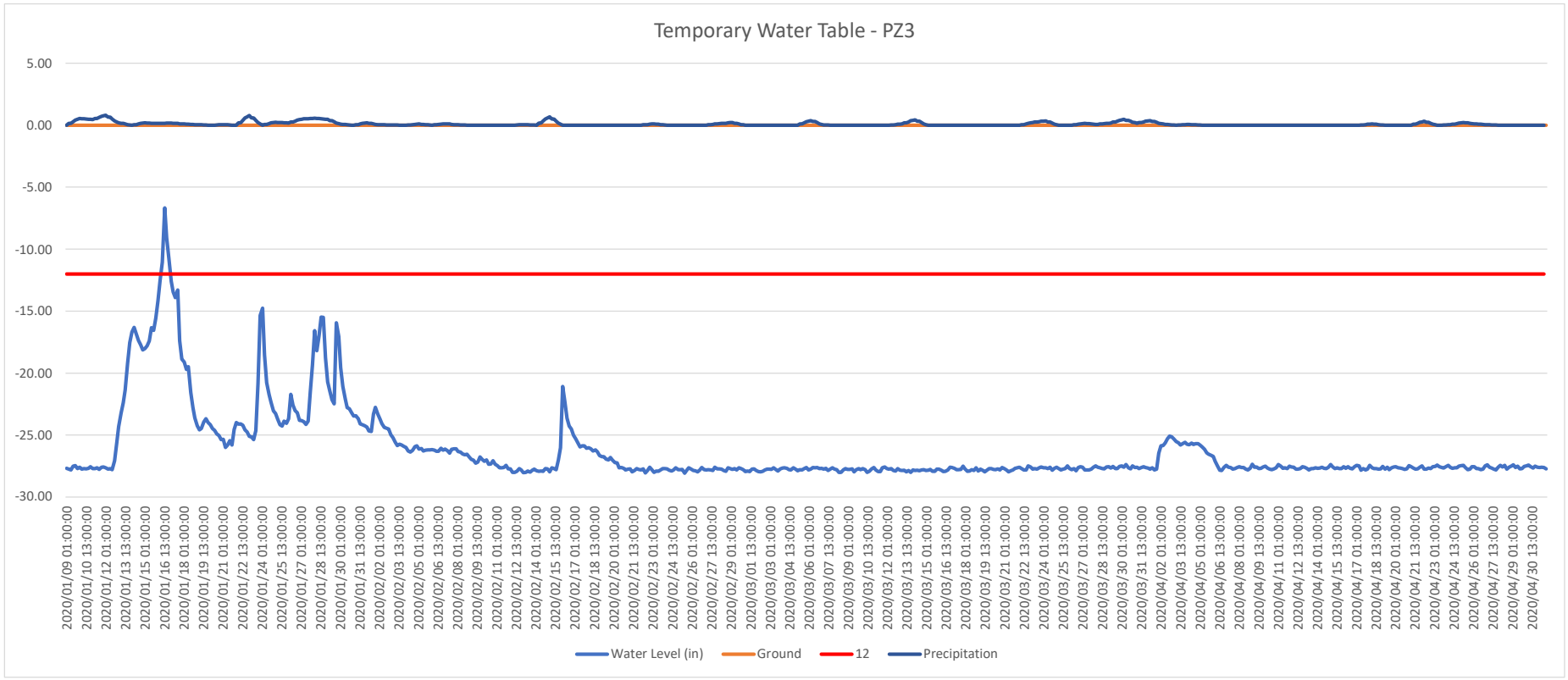
Water Level (in)
Ground
12
Precipitation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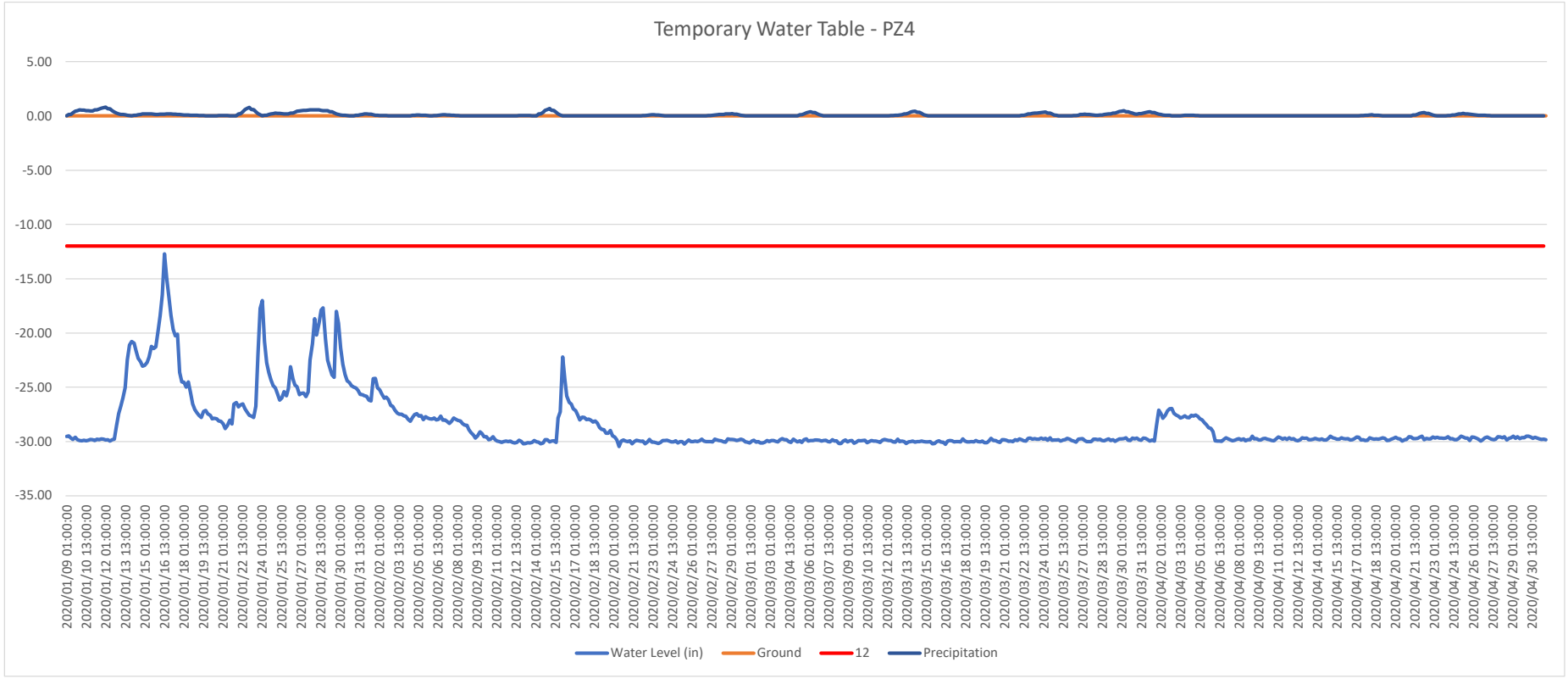
Water Level (in)
Ground
12
Precipitation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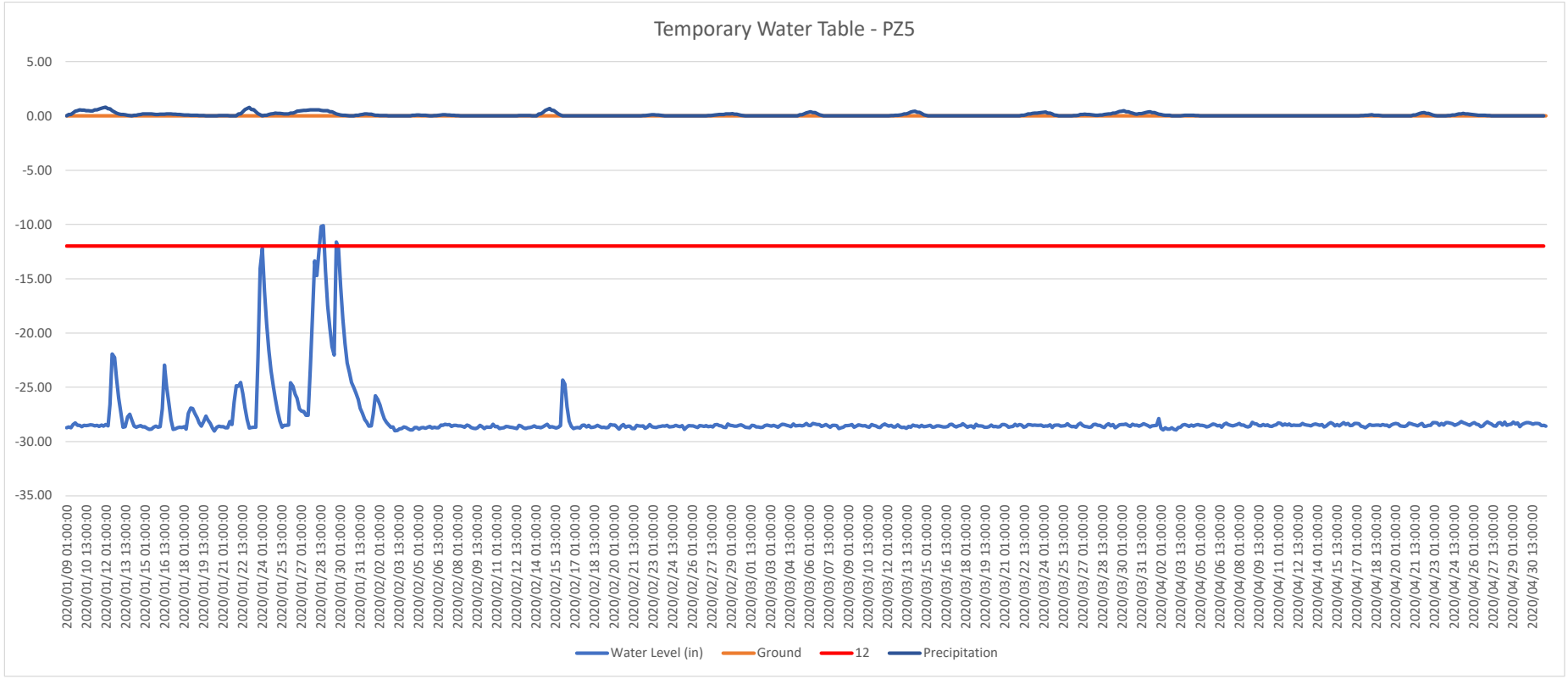
Water Level (in)
Ground
12
Precipitation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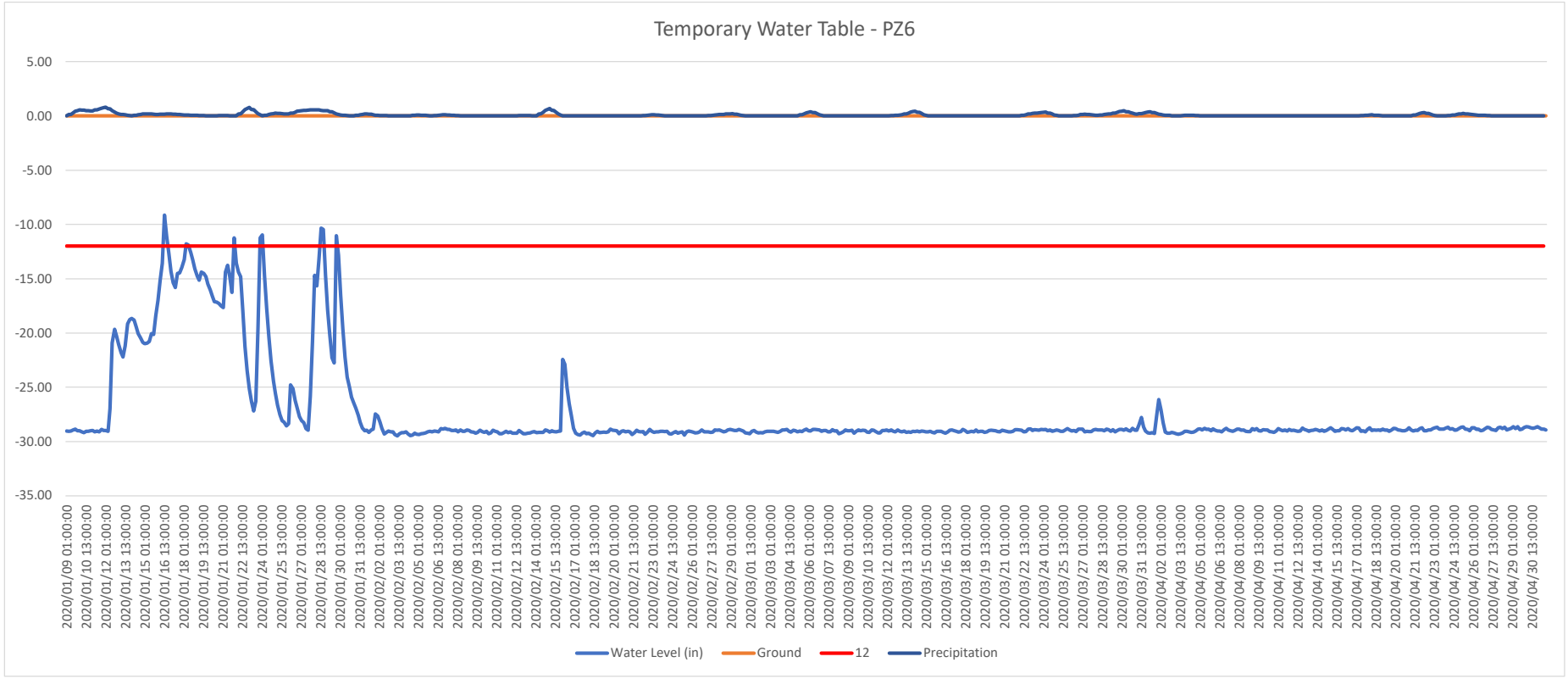
Water Level (in)
Ground
12
Precipitation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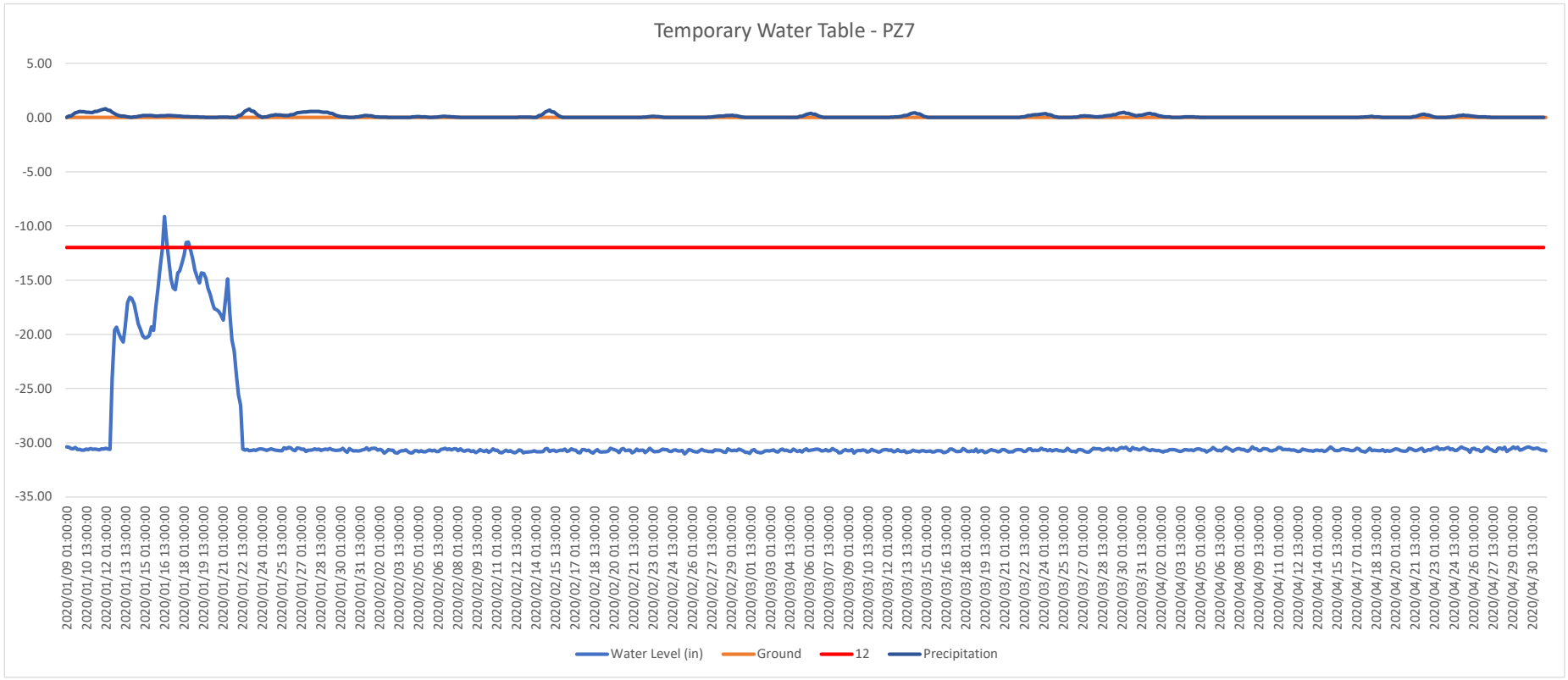
Water Level (in)
Ground
12
Precipitation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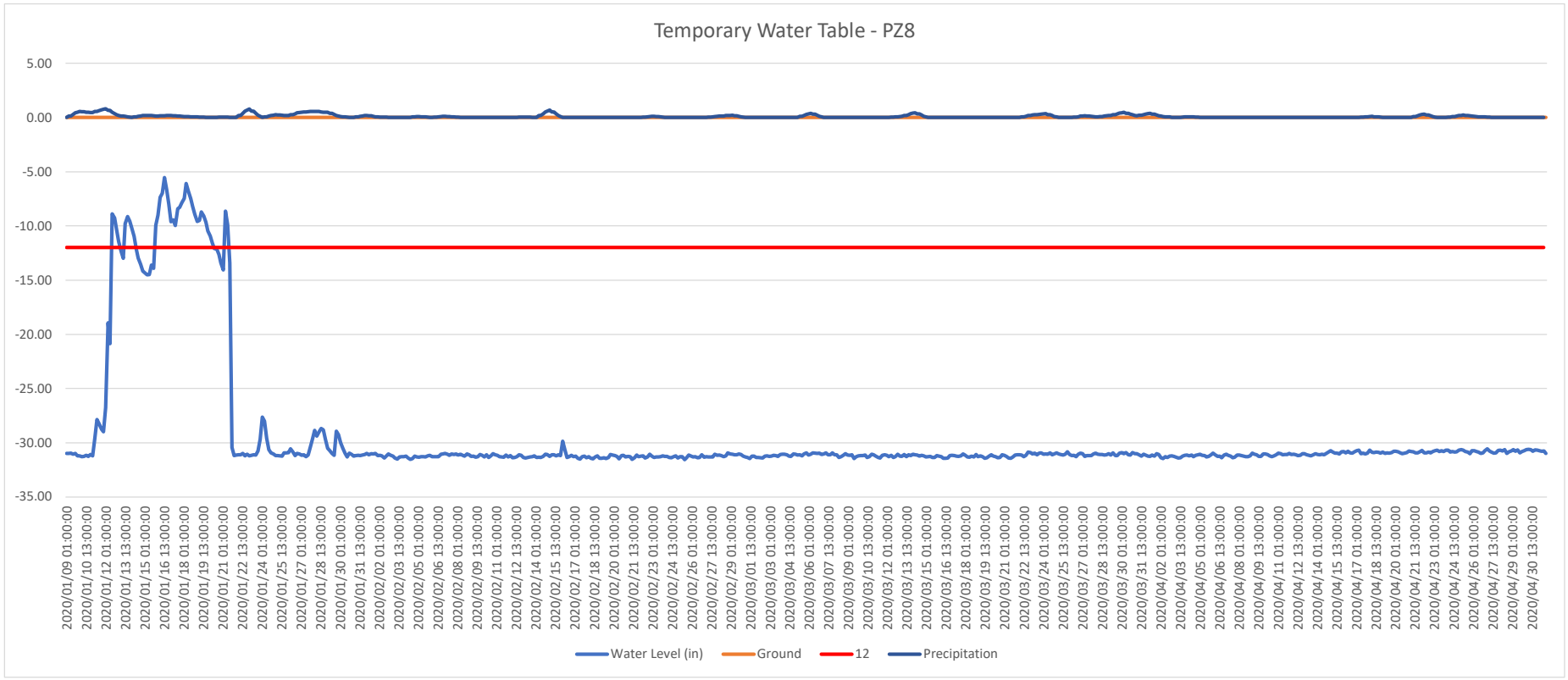
Water Level (in)
Ground
12
Precipitation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2020/01/15 01:00:00
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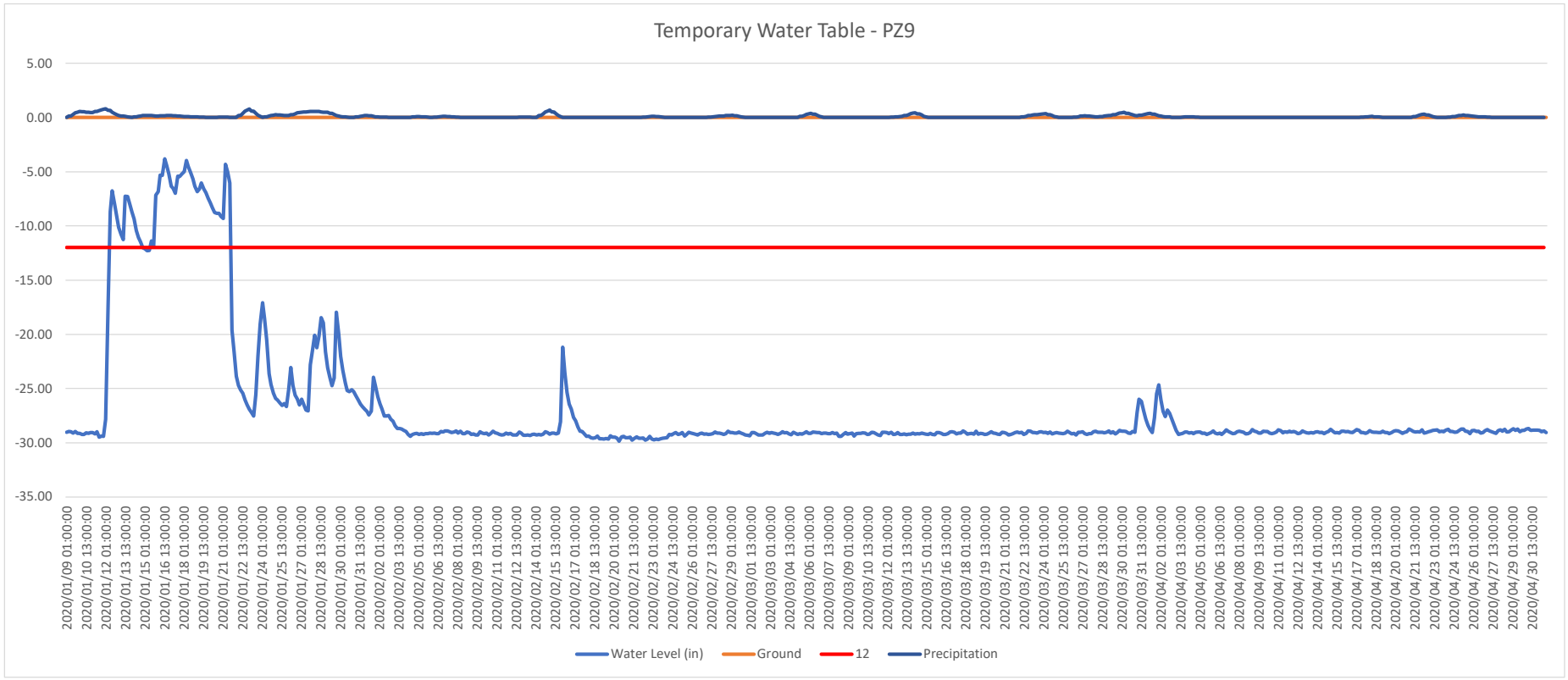
Water Level (in)
Ground
12
Precipitation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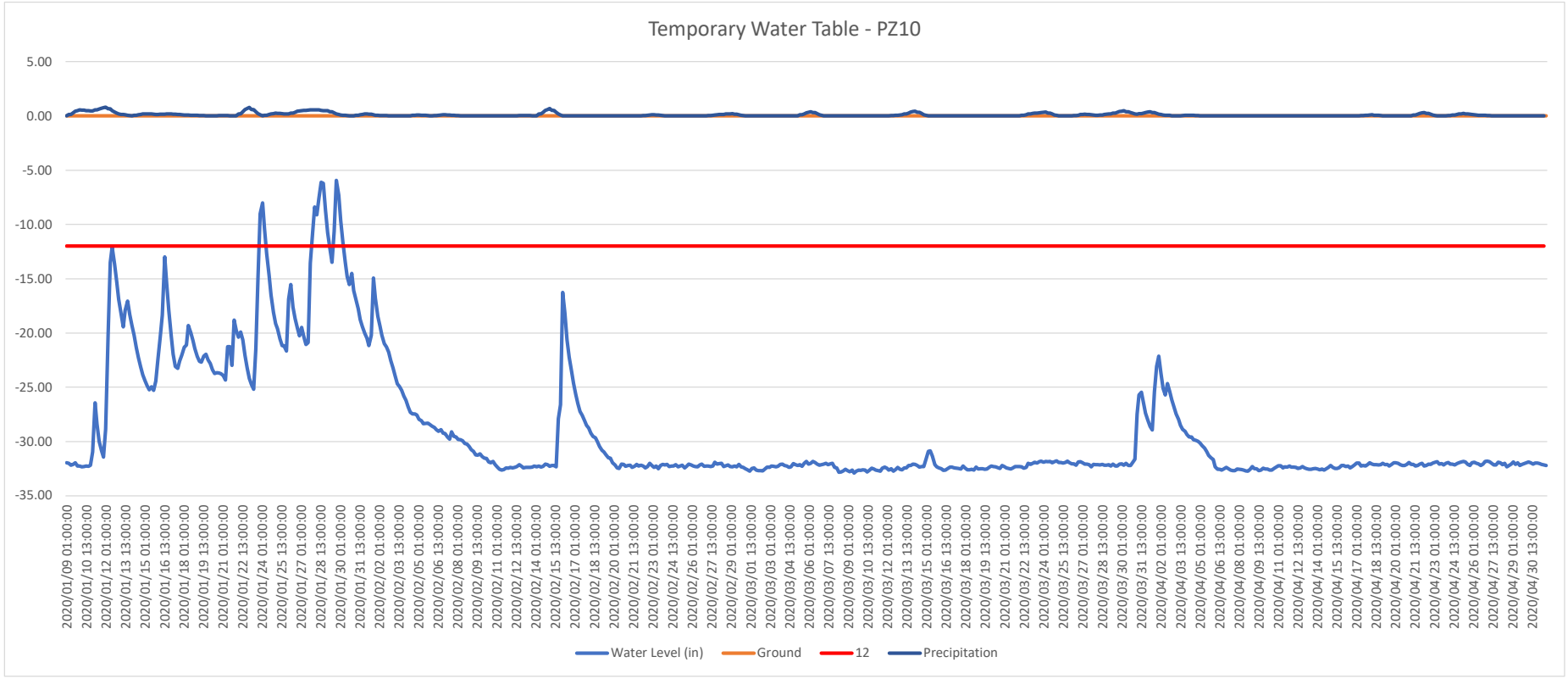
Water Level (in)
Ground
12
Precipitation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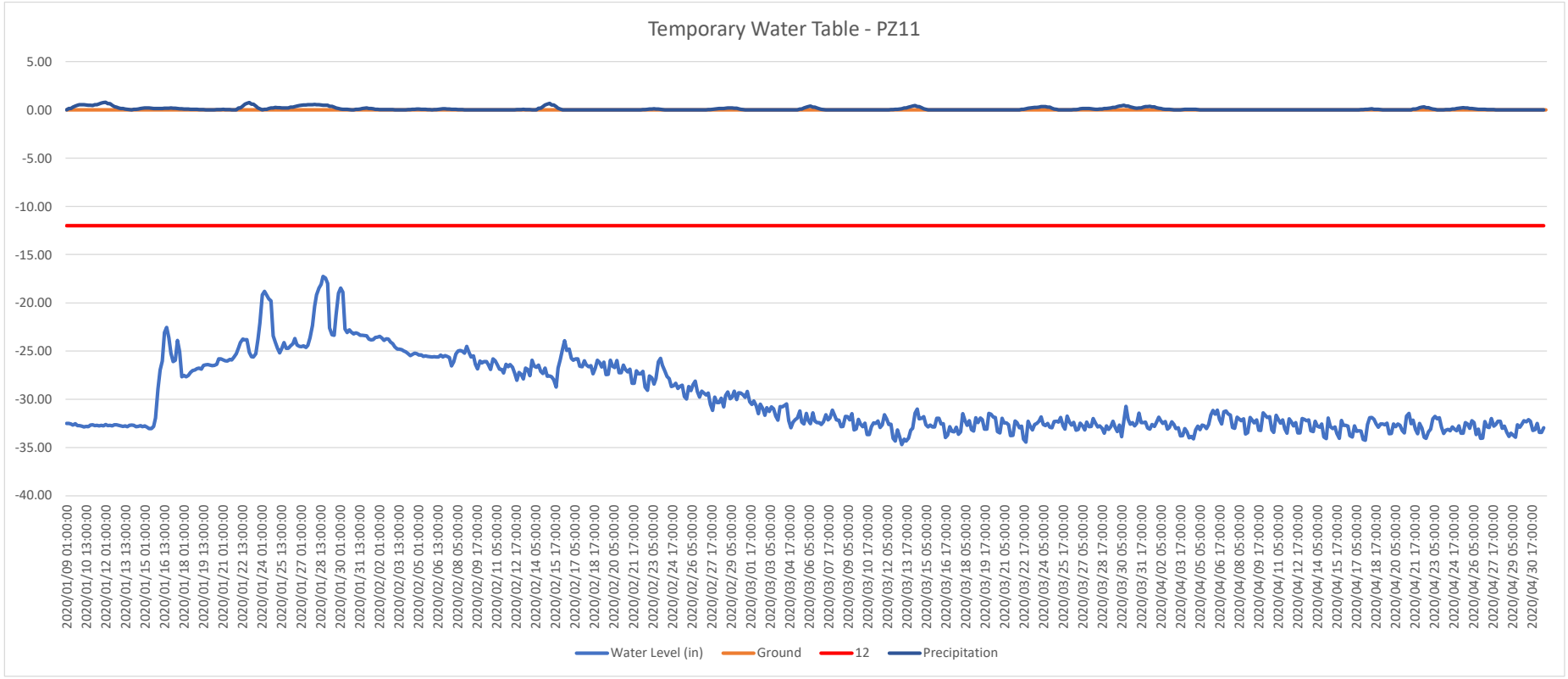
Water Level (in)
Ground
12
Precipitation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2020/01/13 13:00:00
2020/01/15 01:00:00
2020/01/16 13:00:00
2020/01/18 01:00:00
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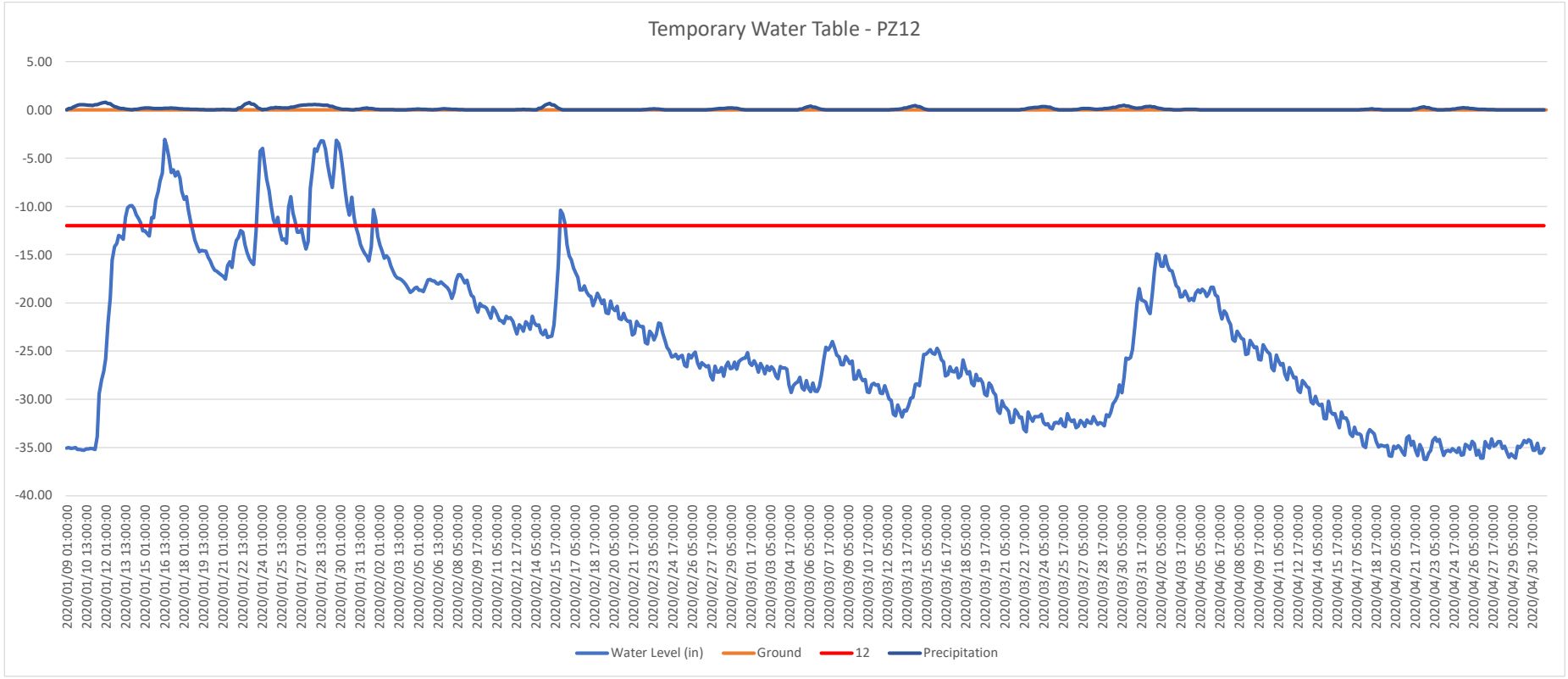
2020/04/30 17:00:00
Water Level (in)
Ground
12
Precipitation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2020/04/27 17:00:00
2020/04/29 05:00:00
2020/04/30 17:00:00
Water Level (in)
Ground
12
Precipitation

Technology Sheet

Baro-Diver – DI800

Actual size

Technical Specifications

Length	4.33 in
Diameter	0.87 in
Weight	3.67 oz
Memory	72,000 measurements with backup; continuous and fixed length memory
Wetted parts	
housing	stainless steel (316L)
o-rings	Viton ®
pressure sensor	piezo resistive ceramic (Al_2O_3) with thermal compensation
cap	Nylon PA6 30% glass fiber
nose cone	ABS
Battery life	up to 10 years (dependent on usage)
Sample interval	½ second to 99 hours
Sample method	fixed interval
Communication	RS232

Pressure

Part number	**DI 800**	
Range	4.9	ftH_2O
Accuracy⁺	± 0.2	inH_2O
Resolution	0.01	inH_2O

Temperature

Range	-4 to 176 °F
Calibrated	14 to 122 °F
Accuracy⁺	± 0.18 °F
Resolution	0.018 °F

⁺ typical

M = membrane
Dimensions in mm

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Climatological Data for AURORA STATE AP, OR - January 2020

Date	Max Temperature	Min Temperature	Avg Temperature	GDD Base 40	GDD Base 50	Precipitation	Snowfall	Snow Depth
2020-01-01	55	47	51.0	11	1	0.09	M	M
2020-01-02	51	43	47.0	7	0	0.00	M	M
2020-01-03	62	45	53.5	14	4	0.16	M	M
2020-01-04	50	40	45.0	5	0	0.29	M	M
2020-01-05	50	42	46.0	6	0	0.21	M	M
2020-01-06	52	45	48.5	9	0	0.44	M	M
2020-01-07	56	46	51.0	11	1	0.24	M	M
2020-01-08	47	38	42.5	3	0	0.15	M	M
2020-01-09	42	33	37.5	0	0	T	M	M
2020-01-10	47	37	42.0	2	0	0.55	M	M
2020-01-11	46	42	44.0	4	0	0.45	M	M
2020-01-12	46	38	42.0	2	0	0.80	M	M
2020-01-13	40	37	38.5	0	0	0.19	M	M
2020-01-14	42	32	37.0	0	0	T	M	M
2020-01-15	49	27	38.0	0	0	0.19	M	M
2020-01-16	43	29	36.0	0	0	0.14	M	M
2020-01-17	43	30	36.5	0	0	0.18	M	M
2020-01-18	51	40	45.5	6	0	0.09	M	M
2020-01-19	55	42	48.5	9	0	0.05	M	M
2020-01-20	48	39	43.5	4	0	0.00	M	M
2020-01-21	51	41	46.0	6	0	0.04	M	M
2020-01-22	M	M	M	M	M	M	M	M
2020-01-23	56	51	53.5	14	4	0.77	M	M
2020-01-24	57	48	52.5	13	3	0.01	M	M
2020-01-25	58	47	52.5	13	3	0.24	M	M
2020-01-26	55	46	50.5	11	1	0.18	M	M
2020-01-27	53	41	47.0	7	0	0.49	M	M
2020-01-28	53	46	49.5	10	0	0.56	M	M
2020-01-29	49	46	47.5	8	0	0.47	M	M
2020-01-30	55	41	48.0	8	0	0.08	M	M
2020-01-31	62	54	58.0	18	8	0.00	M	M
Average|Sum	50.8	41.1	46.0	201	25	7.06	M	M

Climatological Data for AURORA STATE AP, OR - February 2020

Date	Max Temperature	Min Temperature	Avg Temperature	GDD Base 40	GDD Base 50	Precipitation	Snowfall	Snow Depth
2020-02-01	58	41	49.5	10	0	0.19	M	M
2020-02-02	46	31	38.5	0	0	0.03	M	M
2020-02-03	47	30	38.5	0	0	0.02	M	M
2020-02-04	42	27	34.5	0	0	0.00	M	M
2020-02-05	52	42	47.0	7	0	0.09	M	M
2020-02-06	57	49	53.0	13	3	0.01	M	M
2020-02-07	54	44	49.0	9	0	0.11	M	M
2020-02-08	51	38	44.5	5	0	0.03	M	M
2020-02-09	47	34	40.5	1	0	0.00	M	M
2020-02-10	51	34	42.5	3	0	0.00	M	M
2020-02-11	44	31	37.5	0	0	0.00	M	M
2020-02-12	53	33	43.0	3	0	0.00	M	M
2020-02-13	44	33	38.5	0	0	0.04	M	M
2020-02-14	50	39	44.5	5	0	0.01	M	M
2020-02-15	47	42	44.5	5	0	0.67	M	M
2020-02-16	51	37	44.0	4	0	T	M	M
2020-02-17	51	33	42.0	2	0	0.00	M	M
2020-02-18	54	33	43.5	4	0	0.00	M	M
2020-02-19	61	32	46.5	7	0	0.00	M	M
2020-02-20	56	28	42.0	2	0	0.00	M	M
2020-02-21	57	29	43.0	3	0	0.00	M	M
2020-02-22	58	31	44.5	5	0	0.00	M	M
2020-02-23	51	42	46.5	7	0	0.11	M	M
2020-02-24	49	34	41.5	2	0	0.00	M	M
2020-02-25	55	32	43.5	4	0	0.00	M	M
2020-02-26	58	40	49.0	9	0	0.00	M	M
2020-02-27	64	33	48.5	9	0	0.00	M	M
2020-02-28	56	32	44.0	4	0	0.12	M	M
2020-02-29	47	31	39.0	0	0	0.21	M	M
Average|Sum	52.1	35.0	43.6	123	3	1.64	M	M

Climatological Data for AURORA STATE AP, OR - March 2020

Date	Max Temperature	Min Temperature	Avg Temperature	GDD Base 40	GDD Base 50	Precipitation	Snowfall	Snow Depth
2020-03-01	49	32	40.5	1	0	T	M	M
2020-03-02	50	39	44.5	5	0	T	M	M
2020-03-03	60	47	53.5	14	4	T	M	M
2020-03-04	57	40	48.5	9	0	0.00	M	M
2020-03-05	59	34	46.5	7	0	0.00	M	M
2020-03-06	48	41	44.5	5	0	0.38	M	M
2020-03-07	49	36	42.5	3	0	0.02	M	M
2020-03-08	52	32	42.0	2	0	0.00	M	M
2020-03-09	57	29	43.0	3	0	0.00	M	M
2020-03-10	61	29	45.0	5	0	0.00	M	M
2020-03-11	57	36	46.5	7	0	0.00	M	M
2020-03-12	56	31	43.5	4	0	0.00	M	M
2020-03-13	41	34	37.5	0	0	0.10	M	M
2020-03-14	44	33	38.5	0	0	0.44	M	M
2020-03-15	48	33	40.5	1	0	0.00	M	M
2020-03-16	61	34	47.5	8	0	0.00	M	M
2020-03-17	59	36	47.5	8	0	0.00	M	M
2020-03-18	59	36	47.5	8	0	0.00	M	M
2020-03-19	63	34	48.5	9	0	0.00	M	M
2020-03-20	68	37	52.5	13	3	0.00	M	M
2020-03-21	60	37	48.5	9	0	0.00	M	M
2020-03-22	63	32	47.5	8	0	0.00	M	M
2020-03-23	51	43	47.0	7	0	0.22	M	M
2020-03-24	50	38	44.0	4	0	0.35	M	M
2020-03-25	53	37	45.0	5	0	T	M	M
2020-03-26	51	35	43.0	3	0	0.00	M	M
2020-03-27	51	38	44.5	5	0	0.15	M	M
2020-03-28	53	46	49.5	10	0	0.06	M	M
2020-03-29	59	48	53.5	14	4	0.18	M	M
2020-03-30	51	43	47.0	7	0	0.47	M	M
2020-03-31	52	40	46.0	6	0	0.16	M	M
Average|Sum	54.6	36.8	45.7	190	11	2.53	M	M

Climatological Data for AURORA STATE AP, OR - April 2020

Date	Max Temperature	Min Temperature	Avg Temperature	GDD Base 40	GDD Base 50	Precipitation	Snowfall	Snow Depth
2020-04-01	48	39	43.5	4	0	0.37	M	M
2020-04-02	52	36	44.0	4	0	0.09	M	M
2020-04-03	50	34	42.0	2	0	T	M	M
2020-04-04	52	37	44.5	5	0	0.07	M	M
2020-04-05	64	42	53.0	13	3	0.01	M	M
2020-04-06	62	41	51.5	12	2	0.00	M	M
2020-04-07	62	40	51.0	11	1	0.00	M	M
2020-04-08	74	36	55.0	15	5	0.00	M	M
2020-04-09	79	48	63.5	24	14	0.00	M	M
2020-04-10	71	41	56.0	16	6	0.00	M	M
2020-04-11	64	43	53.5	14	4	0.00	M	M
2020-04-12	66	36	51.0	11	1	0.00	M	M
2020-04-13	68	36	52.0	12	2	0.00	M	M
2020-04-14	69	37	53.0	13	3	0.00	M	M
2020-04-15	64	43	53.5	14	4	0.00	M	M
2020-04-16	71	43	57.0	17	7	0.00	M	M
2020-04-17	76	43	59.5	20	10	0.00	M	M
2020-04-18	53	45	49.0	9	0	0.10	M	M
2020-04-19	63	42	52.5	13	3	0.00	M	M
2020-04-20	72	40	56.0	16	6	0.00	M	M
2020-04-21	62	45	53.5	14	4	0.00	M	M
2020-04-22	60	47	53.5	14	4	0.31	M	M
2020-04-23	62	49	55.5	16	6	0.00	M	M
2020-04-24	63	50	56.5	17	7	0.03	M	M
2020-04-25	67	44	55.5	16	6	0.22	M	M
2020-04-26	68	39	53.5	14	4	0.09	M	M
2020-04-27	68	49	58.5	19	9	0.03	M	M
2020-04-28	72	50	61.0	21	11	0.00	M	M
2020-04-29	71	52	61.5	22	12	T	M	M
2020-04-30	65	46	55.5	16	6	0.00	M	M
Average|Sum	64.6	42.4	53.5	414	140	1.32	M	M

Climatological Data for AURORA STATE AP, OR - May 2020

Date	Max Temperature	Min Temperature	Avg Temperature	GDD Base 40	GDD Base 50	Precipitation	Snowfall	Snow Depth
2020-05-01	62	41	51.5	12	2	0.07	M	M
2020-05-02	57	43	50.0	10	0	0.49	M	M
2020-05-03	60	43	51.5	12	2	0.06	M	M
2020-05-04	70	39	54.5	15	5	0.01	M	M
2020-05-05	73	49	61.0	21	11	0.01	M	M
2020-05-06	64	46	55.0	15	5	0.13	M	M
2020-05-07	75	41	58.0	18	8	0.00	M	M
2020-05-08	85	57	71.0	31	21	0.00	M	M
2020-05-09	87	62	74.5	35	25	0.00	M	M
2020-05-10	88	54	71.0	31	21	0.00	M	M
2020-05-11	70	50	60.0	20	10	0.13	M	M
2020-05-12	63	49	56.0	16	6	0.25	M	M
2020-05-13	63	49	56.0	16	6	0.04	M	M
2020-05-14	57	50	53.5	14	4	0.68	M	M
2020-05-15	69	51	60.0	20	10	0.01	M	M
2020-05-16	69	54	61.5	22	12	0.16	M	M
2020-05-17	69	50	59.5	20	10	T	M	M
2020-05-18	60	52	56.0	16	6	0.39	M	M
2020-05-19	63	49	56.0	16	6	T	M	M
2020-05-20	61	51	56.0	16	6	0.02	M	M
2020-05-21	60	48	54.0	14	4	0.02	M	M
2020-05-22	62	45	53.5	14	4	0.03	M	M
2020-05-23	64	47	55.5	16	6	0.00	M	M
2020-05-24	74	48	61.0	21	11	0.00	M	M
2020-05-25	69	53	61.0	21	11	0.02	M	M
2020-05-26	75	56	65.5	26	16	0.00	M	M
2020-05-27	85	49	67.0	27	17	0.00	M	M
2020-05-28	92	55	73.5	34	24	0.00	M	M
2020-05-29	86	55	70.5	31	21	0.00	M	M
2020-05-30	62	53	57.5	18	8	0.30	M	M
2020-05-31	66	51	58.5	19	9	0.00	M	M
Average|Sum	69.7	49.7	59.7	617	307	2.82	M	M

Climatological Data for AURORA STATE AP, OR - June 2020

Date	Max Temperature	Min Temperature	Avg Temperature	GDD Base 40	GDD Base 50	Precipitation	Snowfall	Snow Depth
2020-06-01	73	44	58.5	19	9	0.00	M	M
2020-06-02	79	49	64.0	24	14	0.00	M	M
2020-06-03	76	51	63.5	24	14	0.00	M	M
2020-06-04	74	50	62.0	22	12	0.00	M	M
2020-06-05	70	52	61.0	21	11	0.00	M	M
2020-06-06	61	49	55.0	15	5	0.26	M	M
2020-06-07	62	48	55.0	15	5	0.21	M	M
2020-06-08	65	52	58.5	19	9	0.20	M	M
2020-06-09	66	51	58.5	19	9	0.42	M	M
2020-06-10	78	59	68.5	29	19	T	M	M
2020-06-11	76	58	67.0	27	17	0.04	M	M
2020-06-12	59	54	56.5	17	7	0.13	M	M
2020-06-13	60	51	55.5	16	6	0.58	M	M
2020-06-14	68	49	58.5	19	9	0.04	M	M
2020-06-15	64	52	58.0	18	8	0.84	M	M
2020-06-16	64	52	58.0	18	8	0.24	M	M
2020-06-17	M	M	M	M	M	M	M	M
2020-06-18	M	M	M	M	M	M	M	M
2020-06-19	M	M	M	M	M	M	M	M
2020-06-20	M	M	M	M	M	M	M	M
2020-06-21	M	M	M	M	M	M	M	M
2020-06-22	M	M	M	M	M	M	M	M
2020-06-23	M	M	M	M	M	M	M	M
2020-06-24	M	M	M	M	M	M	M	M
2020-06-25	M	M	M	M	M	M	M	M
2020-06-26	M	M	M	M	M	M	M	M
2020-06-27	M	M	M	M	M	M	M	M
2020-06-28	M	M	M	M	M	M	M	M
2020-06-29	M	M	M	M	M	M	M	M
2020-06-30	M	M	M	M	M	M	M	M
Average|Sum	68.4	51.3	59.9	322	162	2.96	M	M

AgACIS

Month	Total Precipitation Normal (inches)
January	5.87
February	4.75
March	4.23
April	3.13
May	2.36
June	2.02
July	0.68
August	0.66
September	1.73
October	3.23
November	6.63
December	6.58
Annual	41.87

Station Information

Station name:	AURORA STATE AP
State:	OR
County:	(FIPS 41047)
Station ids:	94281 (WBAN)UAO (FAA)3S2 (FAA)KUAO (ICAO)USW00094281 (GHCN)
Latitude:	45.2486 degrees
Longitude:	-122.7686 degrees
Elevation:	196 feet
Available date ranges:	Max Temperature 1997-06-01 - 2020-05-12 Min Temperature 1997-06-01 - 2020-05-12 Precipitation 1998-04-01 - 2020-05-12 Snowfall 2009-08-01 - 2018-12-12 Snow Depth 1998-07-16 - 2018-10-10

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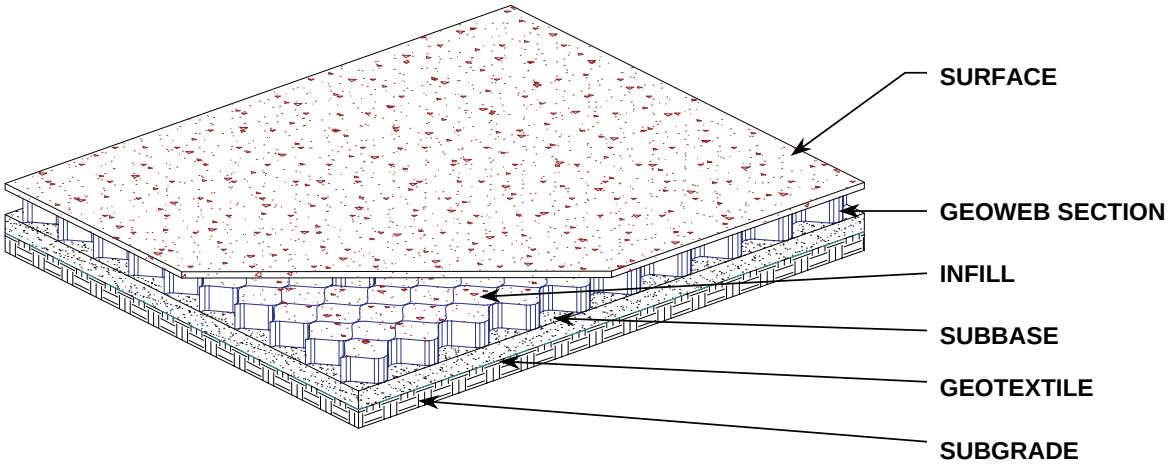
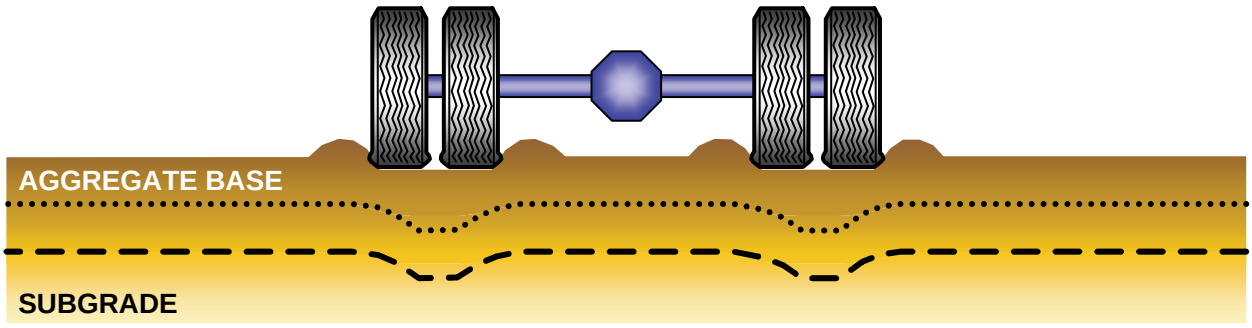
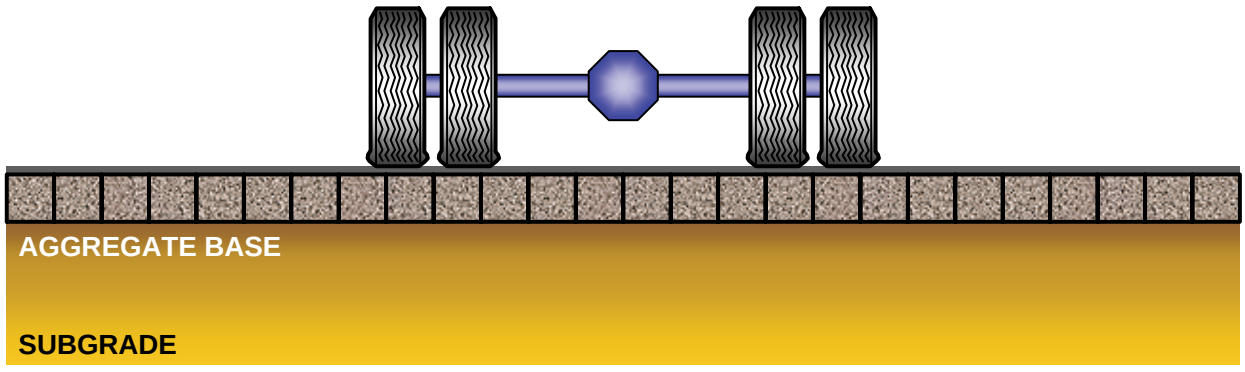
GEOWEB® LOAD SUPPORT SYSTEM TECHNICAL OVERVIEW





UNCONFINED GRANULAR PAVEMENT SYSTEM



THE GEOWEB GRANULAR PAVEMENT SYSTEM

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GEOWEB® LOAD SUPPORT SYSTEM TECHNICAL OVERVIEW

Introduction

Natural aggregate / soil construction materials for road base and other load support applications are inherently unstable compared to other construction materials such as steel and reinforced concrete. This is because they are comprised of discrete particles of varying sizes that can roll, or slide, over one another. They have relatively low shear resistance and will eventually fail as a result of single or multiple load applications. However, this *weak link* property also makes these natural construction materials easily workable relative to stockpiling, transporting and placing over large areas or long roadways.

Asphalt cement and Portland cement are commonly used to improve the stability of aggregate materials to make them suitable for the wearing course of load support structures. In addition, most load support structures also require a good base and/or subbase layer to distribute surface loads over the subgrade. Unbound aggregate materials are ideal for this purpose because they are easy to place, are flexible and improve the ride quality of the structure. However, because of their inherent weakness, road builders have long sought new ways to increase the long-term stability of unbound aggregate materials. Many products have been developed and tested to bind together or reinforce aggregate materials but often with limited success.

Fine and uniformly graded sands best exemplify the inherent weakness of granular materials. Desert sands and dry beach sands cannot support channelized traffic loading without significant rutting occurring due to localized shear failure of the near surface material. For this reason, the U.S. Army Corps of Engineers, Waterways Experiment Station, began a research project in the mid 1970's to investigate methods for rapid construction of sand roads for beach landings and desert operations. In order to achieve surface stability without the requirement for chemical additives, mixing and curing time, three-dimensional cellular confinement of loose sands was determined to be the most practical alternative. Through field trials and experimentation, the optimum cell depth to diameter ratio was determined to be approximately 1.0 for heavy military and civilian wheel loads. In the late 1970's Presto Products Company developed the Geoweb cellular confinement system, based on the Corps of Engineers research, as a commercial product to stabilize unbound aggregate materials. The Geoweb system consists of an assembly of polyethylene sheet strips connected in a series of off-set, full-depth ultrasonic welded seams, aligned perpendicular to the longitudinal axis of the strips. When expanded, the interconnected strips form the walls of the cellular confinement structure into which granular fill materials can be placed. Various cell depths have been developed to satisfy load and subgrade strength design criteria based on optimum cell to diameter ratios. Recent improvements to the Geoweb system include surface texturization and cell wall perforations for improved frictional resistance and lateral drainage.

Examples of Geoweb Load-Support System Applications

- Granular Access Roads
- Grass Access Roads
- Porous Pavements
- Pavement Subbases
- Parking Lots
- Storage Yards
- Intermodal and Port Facilities
- Boat Ramps / Low Level Crossings
- Retaining Wall Spread Footings
- Foundation Mattresses
- Trench Invert Stabilization
- Stabilized Drainage Layer

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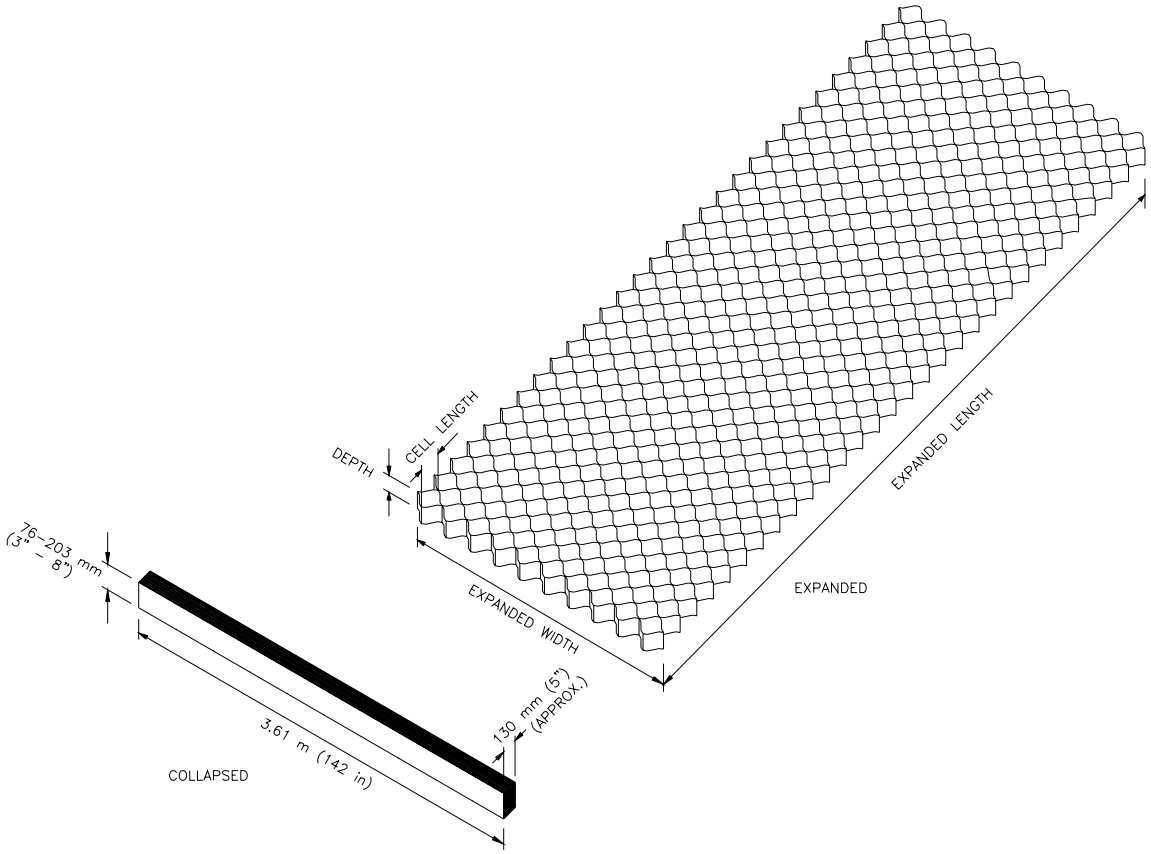

Figure 1 Typical Geoweb Sections

Features and Benefits of the Geoweb Cellular Confinement System

The Geoweb cellular confinement system improves the load-deformation performance of granular infill materials due to the hoop strength of individual cells, the passive resistance of infill material in adjacent cells and vertical stress transfer to adjoining cells. When compared to 2-dimensional sheet reinforcement materials, the stiffness of the 3-dimensional Geoweb system is significantly greater and does not require initial deformation to support the design load.

The Geoweb cellular confinement system dramatically increases the shear resistance of granular infill materials allowing the use of lower quality aggregates (e.g. sand, gravel) to carry concentrated loads that would otherwise require crushed stone or bituminous mixes to prevent localized, near-surface, shear failure. The cellular structure also distributes concentrated loads to surrounding cells thus reducing the stress on the subgrade directly beneath the load and the required total thickness of the structure.

The Geoweb load support system can offer several advantages over conventional solutions and alternative systems. When very soft soils and/or heavy loads are a factor, the system can reduce costs by reducing the required section thickness. Where aggregate materials are expensive or unavailable, the system can reduce costs by incorporating locally available materials. Since Geoweb sections are very compact for shipping and reduce total thickness requirements, a small quantity can be used to replace truckloads of imported aggregate that may have to be hauled over long distances. Finally, when extended pavement life and/or low maintenance requirements are desired, the Geoweb system can ensure that the integrity of granular infill materials will be maintained indefinitely.

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Identifying Load Support Problems and Geoweb Solutions

Load support design problems most commonly arise when:

- soft subgrade soils are encountered,
- surface soils are unstable, (i.e. good quality aggregates are locally unavailable or uneconomical) or,
- there are aesthetic and/or environmental consideration.

To identify load support problems where Geoweb cellular confinement should be considered, the following questions should be asked.

Soft Subgrades Problems

Are there any constraints on undercutting or designing a thick structure? If yes, consider the Geoweb cellular confinement system to reduce the section thickness.

Is it impossible to build a stable foundation mattress below the load structure because of a very soft, unstable subgrade condition? If yes, consider the Geoweb cellular confinement system, with a geotextile underlayer, to bridge over the soft soil and support construction equipment while using a minimum thickness of cover material.

Conventional, non-Geoweb solutions to soft subgrades problems, may include:

- excavation of the soft soil and replacement with imported fill (usually granular),
- chemical stabilization of the subgrade soil, or
- design of a thick, multi-layered structure which may include high quality aggregate materials, asphaltic concrete and/or Portland cement concrete.

Thick pavement structures and/or deep excavation may not always be possible due to existing curbs and buried utilities in existing roads.

Surface Stability Problems

Do the locally available soils (e.g. sands and gravels) have adequate shear strength to be used as a wearing surface for a temporary or low-volume access road? If not, confinement of the local materials in the Geoweb system should be weighed against the cost of importing higher quality aggregate materials.

Will aggregate degradation and lateral spreading of the pavement base course result in rutting and premature failure of the pavement structure? If the subgrade is relatively competent, deformation and rutting of the base course is likely to be the cause of maintenance problems and reduce the potential life of the pavement structure. Using the Geoweb system to confine the base course will totally restrict lateral movement that causes rutting and will minimize abrasion and wear on the aggregate infill material.

Few, if any, conventional solutions exist for this problem.

Aesthetic / Environmental Problems

Would a grass surfaced, low volume access road for maintenance vehicles be more aesthetically pleasing than a gravel or asphalt concrete surfaced pavement? If yes, the Geoweb cellular confinement system infilled with an aggregate/topsoil mix and vegetated is an attractive solution.

Is a porous pavement required for groundwater regeneration? If yes, the Geoweb cellular confinement system infilled with porous stone should definitely be considered. However, without confinement, porous aggregates are inherently unstable as surface materials.

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Geoweb Load Support Systems - The Key Components

Textured Geoweb system

Engineered surface-textured polyethylene strips used in manufacturing Geoweb sections improve the frictional interaction between the Geoweb cell walls and granular infill materials. The increase in cell-wall / infill-interface friction provides structural benefits in certain Geoweb applications.

In load support applications, the higher cell wall/infill interface friction increases the resistance to vertical deformation of the infill soil relative to the cellular structure. Therefore, a more efficient transfer of vertical stress is provided to the surrounding cells. The result is a further reduction in vertical stress on the subgrade compared to a smooth walled geocell. For certain combinations of wheel loads and infill material properties, the surface texture makes it possible to further reduce the total required thickness of granular pavement over smooth-walled geocells.

Results of small and large scale shear box tests on sand and stone materials with textured Geoweb materials have demonstrated that Peak Coefficient Ratios (i.e. peak interface friction coefficient of textured Geoweb sections divided by the peak interface friction coefficient of granular infill soil in-isolation) varied from 0.63 (crushed stone materials) to 0.81 (coarse sand materials) compared to 0.64 (crushed stone materials) and 0.61 (coarse sand materials) with smooth Geoweb materials. Note that texturization does not increase the interface friction with some crushed stone infills. The Peak Coefficient Ratio should not be confused with the Peak Friction Angle Ratio defined in the section titled Geoweb Cell Wall/Infill Friction Angle Ratio

Perforated Geoweb system

Similar tests using sand and stone materials with the perforated Geoweb material demonstrated that the interface frictional characteristics are similar, or in some cases better, than those with surface textured Geoweb cells. Specifically, the Peak Coefficient Ratios of perforated Geoweb materials with crushed stone and coarse sand infills were found to be 0.75 and 0.89 respectively.

The latter test results indicate that perforated cell walls can be as effective as textured cell walls in increasing the interface friction. Therefore, the structural capacity of the perforated Geoweb load support system with certain sand/gravel infills is more effective than the textured Geoweb system. Since perforations also offer the advantage of lateral drainage, which is particularly useful over impermeable subgrades, the perforated Geoweb system is the recommended choice for many pavement applications. Refer to Table 1 for an illustration of the significance of the performance advantage using textured and perforated cell wall type.

Infill materials

Infill materials for Geoweb load support applications should always be predominately granular with a maximum particle size of 50 mm (2 in). For best performance, the fines fraction (i.e. material passing the #200 sieve - 75 μm) should not be greater than 10%. Soils with greater than 10% fines have low permeability and lose strength dramatically when they become wet. Pure granular materials are not affected by moisture fluctuations but are not as stable as granular materials with 5% - 10% fines. A small fraction of fines will increase stability by reducing the voids ratio and binding the soil.

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The Geoweb cellular confinement system is effective in increasing the stability of lower quality granular infill materials such as poorly graded sands and gravels. With cellular confinement, poor quality granular infills can be used as the surface or near-surface material of access roads where driving speeds are relatively slow and ride quality is not a major concern. Higher quality aggregates are recommended for granular surfaced pavements where traffic speeds are higher and a smoother riding surface is required. Good quality aggregates typically include well graded crushed stones or gravels with a maximum particle size of 40 mm (1.5 in) and less than 8%, by weight, passing the #200 sieve. For long-term durability, the coarse fraction of the aggregate should have a Los Angeles Abrasion test wear less than 50%. The fines fraction (i.e. passing the #200 sieve) should not be greater than two-thirds of the fraction passing the #40 sieve and the fraction passing the #40 sieve should have a liquid limit no greater than 25%. The plasticity index should be less than 6%.

Table 1 Total Thickness of Coarse Sand / Gravel Base Including Geoweb Section

Subgrade CBR	Wheel Load		Smooth Cell	Textured Cell	Perforated Cell	Unconfined Gravel
%	kN	(lbf)	Relative Total Thickness of Road Base			
0.2	27	(6,000)	32%	28%	27%	100%
	53	(12,000)	59%	25%	25%	100%
	111	(25,000)	72%	23%	23%	100%
	222	(50,000)	80%	22%	22%	100%
0.5	27	(6,000)	46%	40%	40%	100%
	53	(12,000)	43%	38%	37%	100%
	111	(25,000)	40%	35%	34%	100%
	222	(50,000)	38%	33%	32%	100%
1.0	27	(6,000)	58%	54%	54%	100%
	53	(12,000)	55%	49%	48%	100%
	111	(25,000)	52%	45%	44%	100%
	222	(50,000)	49%	43%	42%	100%
2.0	27	(6,000)	81%	81%	81%	100%
	53	(12,000)	65%	58%	58%	100%
	111	(25,000)	59%	52%	51%	100%
	222	(50,000)	60%	52%	51%	100%

NOTE: **This table is based on theoretical methodologies outlined herein. Values are for comparative purposes only and are not a substitute for project specific design.**

Geotextile underlayer

When the Geoweb section is to be placed directly above a fine-grained or cohesive soil subgrade, a nonwoven geotextile is typically recommended for separation of the native soil and the granular infill. Separation is important to prevent contamination and loss of shear strength of the granular infill and to prevent punching or migration of the infill material into the subgrade. With a geotextile underlayer, the infill material is totally confined on all sides and at the bottom of individual cells.

When specific designs require a granular subbase below the Geoweb section, a woven or nonwoven geotextile may be recommended for separation as well as temporary load support during placement of the subbase layer. If the subbase is a well-compacted granular material, a geotextile separator is not typically required between the subbase and Geoweb infill.

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Surface materials

In order to prevent trafficking directly on top of the Geoweb cell walls, it is generally recommended to place a minimum 50 mm (2 in) of granular cover (i.e. overtopping) above the Geoweb cell walls. The surface material should be dense-graded crushed stone that is resistant to surface rutting. If traffic volumes are high, a bituminous surface treatment can increase the stability of the riding surface.

If an asphalt concrete base or surface layer is to be placed over the infilled Geoweb base, the depth of granular cover above the cell walls should be at least 25 mm (1 in) to allow for minor consolidation of the infill material and to insulate the polyethylene from direct contact with the hot mix asphalt concrete.

Design Considerations and Methods

There is no single design method that encompasses the full range of Geoweb load support applications. A theoretical design method, based on empirically derived design methods for unpaved roads over soft soils, has been developed for the Geoweb granular pavement system. Design methods for flexible pavements, spread footings, and granular pavements with unstable infill soils have yet to be developed. However, it was this latter function for which Geoweb was originally invented and developed and has proven effective, particularly with sand infill materials.

Recent results of large scale triaxial compression testing of the Geoweb cell infilled with granular materials demonstrate that the Geoweb system imparts an apparent cohesion of approximately 150 kPa (3000 psf) to the confined material. This effective cohesion is in addition to the natural frictional shear strength of the granular material. Presto Geosystems is currently using this information to develop bearing-capacity design procedures for Geoweb load support structures that takes into account the additional shear strength provided by the apparent cohesion. These design procedures will apply to large spread footing and granular pavement applications with poor-quality infill materials.

A discussion of currently available design procedures follows for Geoweb granular pavement systems and the design approaches used for other Geoweb load support applications.

Flexible Pavements

Conventional flexible pavement design methods (e.g. AASHTO, Asphalt Institute, Caltrans, etc.) are all based on empirical data collected from either full-scale road tests or ongoing testing and monitoring of pavement performance within various geographical areas. Structural values of conventional road construction materials (e.g. crushed stone, gravel, asphalt concrete, etc.) have been determined by federal and local agencies based on years of in-service performance history. While many new materials (e.g. stabilizers, geosynthetics, etc.) have been introduced in recent years to enhance the structural value of conventional construction materials, it is difficult and can take several years to obtain structural values for these components to use with existing design methods. For this reason, there are no agency-accepted structural values or equivalencies that can be used with current pavement design methods for the Geoweb system.

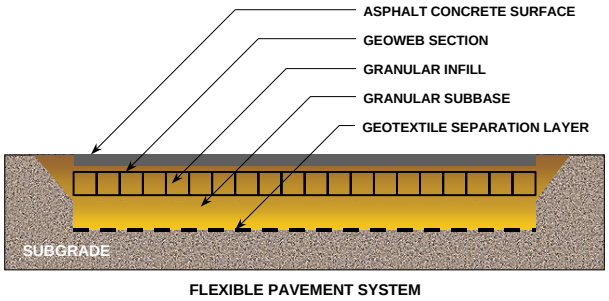

Figure 2 Flexible Pavement Detail

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By combining conventional pavement design methods with a theoretical method for determining the structural equivalency of a confined pavement layer, it is possible to design pavement structures that incorporate the Geoweb system.

Granular Pavements

Design of Geoweb confined granular pavements (e.g. access roads) over soft soils is relatively straight forward and has been well documented for general design purposes. Refer to the Design Parameters – Granular Pavements and Design Calculations Granular Pavements sections of this document for specific details about the required design input data and the design calculations.

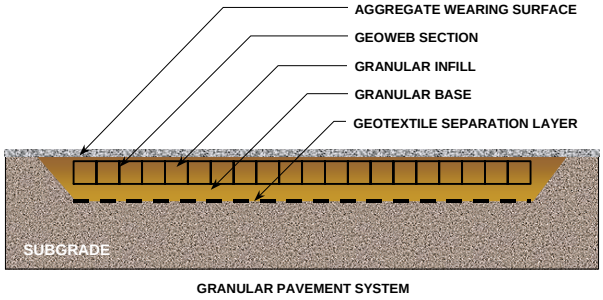

Figure 3 Granular Pavement Detail

Spread Footings

Geoweb spread footings may be considered for a wide range of load support applications such as building footings, buried pipes and segmental retaining walls. They may also be considered for a variety of soil problems such as low bearing capacity, settlement and inadequate shear resistance of near surface foundation soils. Footing loads may be relatively large or small with respect to individual cell or section size of Geoweb spread footings. Due to the versatility of the Geoweb cellular confinement system, the function and design method may change with varying combinations of application, problem and footing loads. In some cases the governing design factor may be:

- the overall shear resistance of the Geoweb spread footing,
- the redistribution of stresses within individual Geoweb cells or
- the increase in bearing area provided by a Geoweb spread footing.

The design approach used for granular pavement structures can also be used for design of Geoweb spread footings with relatively small rigid footing loads by modifying the design criteria for bearing capacity from local shear failure mode to general shear failure mode. For conventional bearing capacity and settlement calculations of larger footing loads, the recommended effective bearing area of a Geoweb mattress should extend no more than 500 mm (18 in) beyond the edges of the rigid footing. In most cases, this will provide a significant decrease in the calculated bearing pressure without compromising the basic assumption that the Geoweb mattress will be effectively rigid.

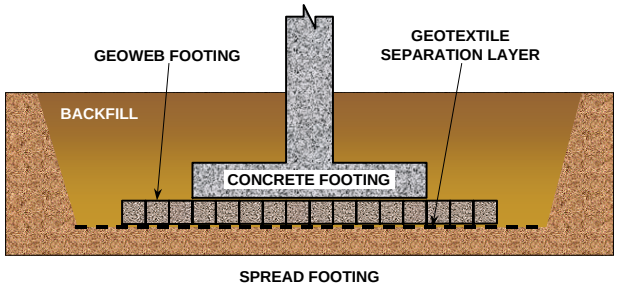

Figure 4 Spread Footing Detail

As stated above, development of a design method for Geoweb spread footings, which will take into account the effective cohesion of the cellular structure, is currently underway.

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Design Parameters - Granular Pavements

The following information and input parameters are required for design of the Geoweb load support system for granular pavements.

Wheel Load

The design wheel load is the heaviest single or dual wheel load that the granular pavement will be required to support over the proposed life of the structure.

Tire Pressure

The tire pressure is the tire inflation pressure of the design wheel load and is approximately equal to the ground contact pressure. An input value is required for determination of the effective contact radius of the design wheel load.

Bearing Capacity Coefficient

Bearing capacity coefficients are mathematically or empirically derived coefficients used within standard equations for determination of the bearing capacity of a soil. For unpaved roads over soft cohesive soils, the US Forest Service and others have developed bearing capacity coefficients for determination of the bearing capacity of soils subjected to dynamic loading wherein punching (local) shear failure is more prevalent than general shear failure. The US Forest Service developed the following bearing coefficients for unpaved haul roads for two broad ranges of traffic loading.

$N_c = 2.8$ High traffic with little rutting (i.e. > 1000, < 10000)

$N_c = 3.3$ Low traffic with significant rutting (i.e. < 1000)

Depth to Top of Geoweb section

The depth of placement of the Geoweb layer influences the distribution of stresses through the system and has a significant effect on the design. Since vertical stresses are higher near the surface, optimum performance and maximum thickness reduction are obtained by placing the Geoweb as close to the surface as possible. However, in order to protect the top of the Geoweb cell walls, a 25 mm - 50 mm (1 in - 2 in) aggregate wearing surface is typically recommended.

Subgrade Strength

There are several laboratory and field test methods available to determine the strength of subgrade soils for design purposes. The calculations require soil strength to be expressed in terms of shear strength or cohesion. Shear strength can be determined in the field by the vane shear test or in the laboratory by the shear box or triaxial compression tests. Soil strength is also commonly determined by the Standard Penetration Test and the California Bearing Ratio (CBR) test. For cohesive soils, shear strength of a soil can be estimated from the standard penetration resistance (N) or the California Bearing Ratio (CBR). In the absence of field or laboratory test data, the strength of the subgrade soil can be estimated by it's consistency (see the Field Identification section of Table 4). When estimating a soil's strength by it's consistency, the soil sample should be taken from a test pit which is deep enough to ensure it's properties have not been affected by changing surface conditions (e.g. rain water, hot dry weather, etc.).

Brief descriptions of the most common test methods for determining the strength of subgrade soils are given below.

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California Bearing Ratio (CBR) Test

The California Bearing Ratio test is an index test used to determine the relative strength of a soil compared to a standard high-quality crushed stone material. The test specimen is prepared by compacting a sample of the soil, in multiple lifts, into a 6 inch diameter cylinder, applying a surcharge in the form of circular plates to approximate the confining stress of the final pavement on the soil and soaking the entire sample for a period of 4 days. The test consists of loading the soil sample with a 3 square inch (1935 square mm) circular piston, through holes in the surcharge plates, at a rate of 0.10 inch (2.54 mm)/minute up to a maximum of 0.5 inches (13 mm). The CBR value is the ratio of the unit load at 0.10 inch (2.54 mm) or 0.20 inch (5.04 mm) to that of the standard crushed stone material at the same depth of penetration (whichever is higher). The unit loads are given in Table 2.

Table 2 Unit Loads for Standard Crushed Stone Material

0.1 inch penetration	1000 psi
0.2 inch penetration	1500 psi
0.3 inch penetration	1900 psi
0.4 inch penetration	2300 psi
0.5 inch penetration	2600 psi

Standard Penetration Test

The standard penetration test provides an indication of the density, and the angle of internal friction of cohesionless soils and the shear strength of cohesive soils. The tests consists of driving a split spoon sampler, equipped with a cutting shoe and attached to the end of a drill rod, into a soil by dropping a 140 lb (63.6 kg) hammer a distance of 30 inches (0.76 m). A split spoon sampler is a thick-walled steel tube, split lengthwise, used to obtain undisturbed samples of soil from drill holes. The number of blows required for each 6 inches (150 mm) of penetration of the split spoon sampler is recorded. The standard penetration resistance is the sum of the blows for the second and third increments of 6 inches (150 mm) and is termed N in blows/ft (blows/300 mm).

Shear Strength Tests

The shear strength of a soil is the stress at which the soil fails in shear. It can be calculated by dividing the shear force at which a soil fails by the cross-sectional area of shear or, if the cohesion and angle of internal friction are known, by the general Coulomb equation.

$$s = c + \sigma \tan \phi$$

where c is the soil's cohesion (i.e. interparticle attraction) expressed in terms of force per unit area

σ is the overburden or surcharge pressure in terms of force per unit area

ϕ is the soil's angle of internal friction (i.e. resistance to interparticle slip) in degrees

Granular soils do not have cohesion and therefore shear strength is governed by overburden pressure that explains why granular pavement surface materials are inherently unstable. Undrained cohesive soils (e.g. soft and saturated clays) do not have internal friction and therefore shear strength is governed by cohesion that can vary with moisture content. Drained cohesive soils can have both cohesion and internal friction.

The shear strength of granular soils can be measured in a laboratory by the shear box test. Cohesion and the angle of internal friction of cohesive soils can be measured in a laboratory for drained and undrained conditions by triaxial compression tests. In the field, shear strength can be measured by the field vane shear test. Refer to a textbook on soil mechanics or geotechnical engineering for more information about the shear strength of soils and test methods.

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Angle of Internal Friction - Geoweb Infill Material

The angle of internal friction of a cohesionless granular soil can be determined by measuring the maximum shear stress at failure over a range of normal stresses (i.e. confining pressures) and plotting the results on a graph. The angle formed by the best-fit straight line through the origin and the horizontal axis is a close approximation of the angle of internal friction. See Figure 5. For compacted granular materials, the angle of internal friction is typically within a range of 30° to 40°. The higher the quality of the granular material (e.g. angularity, gradation, hardness, etc.) the higher the angle of internal friction.

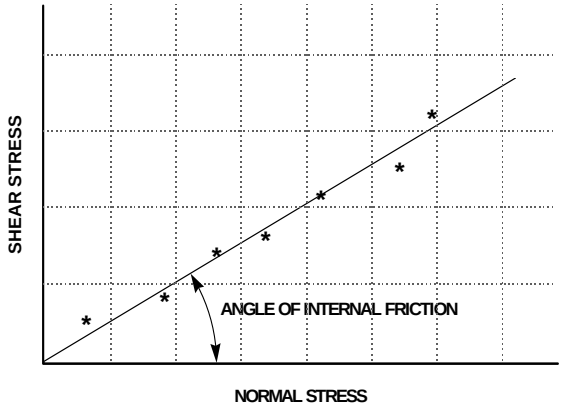

Figure 5 Angle of Internal Friction

Geoweb Cell Wall/Infill Friction Angle Ratio

The Geoweb cell wall/infill material friction angle ratio is the ratio of angle of shearing resistance between the infill material and the Geoweb cell wall over the peak friction angle of the infill soil in-isolation. It will vary depending upon the gradation and particle angularity of the infill material and the roughness of the cell wall or the size and spacing of perforations in the cell wall.

Shear box tests have been carried out to determine angles of shearing resistance between standard Geoweb cell wall treatments and typical granular materials. The results were expressed in terms of peak friction angle ratios (or Geoweb Cell Wall/Infill Friction Angle Ratio), where Peak Friction Angle Ratio is defined as the angle of shearing resistance between the granular infill and the Geoweb cell wall divided by the peak friction angle of the infill material in-isolation. Geoweb Cell Wall/Infill Friction Ratios for standard cell wall treatments and typical compacted granular materials are given in Table 3. The values presented in Table 3 are used to develop the relationships in Table 1 and base thickness in Table 5.

Table 3 Recommended Peak Friction Angle Ratio

Granular Infill Material	Cell Wall Type	$r = \delta/\phi$
Coarse Sand / Gravel	Smooth	0.71
	Textured	0.88
	Textured - Perforated	0.90
#40 Silica Sand	Smooth	0.78
	Textured	0.90
	Textured - Perforated	0.90
Crushed Stone	Smooth	0.72
	Textured	0.72
	Textured - Perforated	0.83

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Design Calculations Granular Pavements

Illustrated here are the design procedures and calculations for determining aggregate thickness requirements for granular-surfaced pavements (e.g. access, utility and haul roads) both with and without the Geoweb cellular confinement system. Empirically derived bearing capacity coefficients are first used to determine the maximum allowable stress on a subgrade with either known or estimated shear strength. The maximum allowable stress is that stress which would cause local punching / shear failure of the subgrade under sustained loading conditions. Since granular pavement loads are transient, the effective strength of the soil is typically higher than it would be under static loading. Therefore, the maximum allowable stress is the limiting stress for design purposes. Boussinesq theory is then used to determine the required depth of granular cover beneath the design wheel load to ensure that the maximum allowable stress is not exceeded. The calculations outlined herein are intended for low volume roads where minor deformations are tolerable or for design of pavement subbase layers over soft soils. They are not intended for design of flexible pavement structures with paved surfaces. The calculations are only valid for granular pavement design over cohesive subgrade soils with CBR values less than 5.

Variable Names

c_u	Subgrade shear strength
N_c	Bearing capacity coefficient - based on design traffic - see below
P	Design wheel load
p	Contact pressure
r	Geoweb cell wall/Infill peak friction angle ratio
δ	Angle of shear resistance between the granular infill and Geoweb cell wall
ϕ	Angle of internal friction of the Geoweb infill material
z_t	Depth from surface to top of Geoweb cell walls
z_b	Depth from surface to bottom of Geoweb cell walls

Calculations

Determine the subgrade shear strength. Refer to Table 4 if the subgrade strength is reported in terms of Standard Penetration Resistance, CBR or by Field Identification.

Determine the maximum allowable stress on the subgrade, q_a $\quad q_a = N_c c_u$

where $N_C = 2.8$ (High Traffic, Low Rutting - from U.S. Forest Service guidelines)

$N_C = 3.3$ Low Traffic, High Rutting - from U.S. Forest Service guidelines)

Determine the required thickness of granular pavement, z_U, without the Geoweb cellular confinement system using the following equation (Boussinesq equation for estimating vertical stress at a given depth below a circular load re-written to calculate the depth of cover above a given vertical stress, q_a).

$$z_U = \frac{R}{\sqrt{\frac{1}{\left(1 - \frac{q_a}{p}\right)^{2/3}} - 1}}$$

where R = Radius of loaded area (i.e. effective radius of single or dual tires)

$$R = \sqrt{\frac{P}{p\pi}}$$

Determine the required thickness of granular pavement, z_G, with the Geoweb cellular confinement system.

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Table 4 Correlation of Subgrade Soil Strength Parameters for Cohesive (Fine-Grained) Soils

California Bearing Ratio CBR (%)	Undrained Shear Strength c_u kPa (psi)	Standard Penetration Resistance SPT (blows/ft)	Field Identification
< 0.4	< 11.7 (1.7)	< 2	Very soft (extruded between fingers when squeezed)
0.4 - 0.8	11.7 - 24.1 (1.7) - (3.5)	2 - 4	Soft (molded by light finger pressure)
0.8 - 1.6	24.1 - 47.6 (3.5) - (6.9)	4 - 8	Medium (molded by strong finger pressure)
1.6 - 3.2	47.6 - 95.8 (6.9) - (13.9)	8 - 15	Stiff (readily indented by thumb but penetrated with great effort)
3.2 - 6.4	95.8 - 191 (13.9) - (27.7)	15 - 30	Very stiff (readily indented by thumbnail)
> 6.4	> 191 (27.7)	> 30	Hard (indented with difficulty by thumbnail)

The total required thickness of granular pavement with the Geoweb cellular confinement system is a function of the Geoweb cell depth, the depth of placement below the applied load, the wheel load and tire pressure and the infill material properties. Surface stress (i.e. wheel load contact pressure) is distributed both vertically and horizontally through the Geoweb cellular structure. Horizontal stresses, in turn, are converted into vertical resisting stresses along the cell walls thus reducing the total vertical stress directly beneath the center of the loaded area. The total resisting stress provided by the Geoweb cell structure is calculated and added to the maximum allowable stress on the subgrade for determination of the total required thickness of granular pavement with the Geoweb cellular confinement system.

The first step is to select the Geoweb section placement depth, z_t within the granular pavement structure. Since vertical stresses are higher near the surface, optimum performance and maximum thickness reduction are obtained by placing the Geoweb as close to the surface as possible. However, to protect the top of the Geoweb cell walls, a 25 mm to 50 mm (1 in to 2 in) aggregate wearing surface is typically recommended.

After selecting a trial depth of placement, calculate the vertical stress, σ_{vt}, at the top of the Geoweb section using the following equation.

$$\sigma_{vt} = p\left[1 - \left(\frac{1}{1+\left(\frac{R}{z_t}\right)^2}\right)^{3/2}\right]$$

Next, calculate the vertical stress, σ_{vb}, at the bottom of the Geoweb section. The bottom depth, z_b, is the top depth, z_t, plus the thickness (or depth) of the Geoweb section.

$$\sigma_{vb} = p\left[1 - \left(\frac{1}{1+\left(\frac{R}{z_b}\right)^2}\right)^{3/2}\right]$$

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Calculate the horizontal stress at the top, σ_{ht}, and bottom, σ_{hb}, of the Geoweb section using the following equations.

$$\sigma_h = K_a \sigma_v$$

where K_a is the coefficient of active earth pressure.

$$K_a = \tan^2\left(45 - \phi/2\right)$$

Horizontal stress at the top of the Geoweb section, σ_{ht}

$$\sigma_{ht} = K_a \sigma_{vt}$$

Horizontal stress at the bottom of the Geoweb section, σ_{hb}.

$$\sigma_{hb} = K_a \sigma_{vb}$$

The average horizontal stress on the Geoweb cell walls is then determined as follows.

$$\sigma_{avge} = \frac{\left(\sigma_{ht} + \sigma_{hb}\right)}{2}$$

Next, calculate the reduction in stress, σ_r, directly beneath the center of the loaded area due to stress transfer to the Geoweb cell walls using the following equation.

$$\sigma_r = 2\left(\frac{H}{D}\right)\sigma_{avge}\ \tan\delta$$

where H = Geoweb cell depth in mm (in)

D = Effective Geoweb cell diameter = 190 mm (7.5 in)

δ = Angle of shearing resistance between granular infill material and Geoweb cell walls.

$\delta = r\phi$ (obtain test data or estimate r from Table 3)

Determine the design allowable stress, q_G, on the subgrade with the Geoweb cellular confinement system using the following equation.

$$q_G = q_a + \sigma_r$$

Determine the total required thickness of granular pavement, z_G, with the Geoweb cellular confinement system.

$$z_G = \frac{R}{\sqrt{\frac{1}{\left(1 - \frac{q_G}{p}\right)^{2/3}} - 1}}$$

If the total required thickness is greater than the surface thickness (i.e. depth to the top of the Geoweb section); in addition, the depth of the Geoweb section, a subbase layer is required. The thickness of the subbase layer must be equal to the total required thickness minus the surface thickness and the Geoweb section depth.

Using the equations presented herein, Table 5 gives base/subbase thickness requirements vs. cell wall type for the Geoweb load support system, under the following load condition:

- 203 mm (8 in) depth of Geoweb section,
- crushed stone infill,
- 38 degree friction angle,
- 690 kPa (100 psi) tire pressure,
- 25 mm (1 in) depth of cover over the Geoweb section,
- 2.8 bearing capacity coefficient.

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Table 5 Total Thickness of Coarse Sand / Gravel Base Including Geoweb Section

Subgrade CBR	Wheel Load		Smooth r = 0.71		Textured r = 0.88		Textured - Perforated r = 0.90		Unconfined Stone	
%	kN	(lbf)	mm	(in)	mm	(in)	mm	(in)	mm	(in)
0.2	**27**	**(6,000)**	277	(10.9)	241	(9.5)	236	(9.3)	876	(34.5)
	53	**(12,000)**	366	(14.4)	315	(12.4)	310	(12.2)	1240	(48.8)
	111	**(25,000)**	490	(19.3)	419	(16.5)	411	(16.2)	1788	(70.4)
	222	**(50,000)**	655	(25.8)	556	(21.9)	546	(21.5)	2527	(99.5)
0.5	**27**	**(6,000)**	251	(9.9)	221	(8.7)	218	(8.6)	546	(21.5)
	53	**(12,000)**	335	(13.2)	292	(11.5)	287	(11.3)	772	(30.4)
	111	**(25,000)**	450	(17.7)	389	(15.3)	384	(15.1)	1113	(43.8)
	222	**(50,000)**	605	(23.8)	518	(20.4)	511	(20.1)	1575	(62.0)
1.0	**27**	**(6,000)**	218	(8.6)	203	(8.0)	203	(8.0)	376	(14.8)
	53	**(12,000)**	292	(11.5)	257	(10.1)	254	(10.0)	531	(20.9)
	111	**(25,000)**	396	(15.6)	345	(13.6)	340	(13.4)	767	(30.2)
	222	**(50,000)**	536	(21.1)	465	(18.3)	457	(18.0)	1085	(42.7)
2.0	**27**	**(6,000)**	203	(8.0)	203	(8.0)	203	(8.0)	251	(9.9)
	53	**(12,000)**	231	(9.1)	206	(8.1)	203	(8.0)	353	(13.9)
	111	**(25,000)**	315	(12.4)	279	(11.0)	274	(10.8)	536	(21.1)
	222	**(50,000)**	429	(16.9)	376	(14.8)	368	(14.5)	721	(28.4)

NOTE: The above wheel load values are from either single or dual wheels. For axle loads multiply by 2. **This table is based on theoretical methodologies outlined herein. Values are for comparative purposes only and are not a substitute for project specific design.**

Available Tools & Services

Presto and Presto's authorized distributors and representatives offer assistance to anyone interested in evaluating, designing, building or purchasing a **Geoweb Load Support System**. You may access these services by calling 800-548-3424 or 920-738-1707. In addition to working directly with you, the following design and construction resources are available for your use with the **Geoweb Load Support System**.

Design	Material and CSI-format Specifications, System Components Guideline, Request for Project Evaluation, AutoCAD® Drawings, SPECMaker® Specification Development Tool, Technical Resources Library CD, videos
Construction	Installation Guidelines, SPECMaker® Specification Development Tool, Technical Resources Library CD, videos

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10. Webster, S. L., *Investigation of Beach Sand Trafficability Enhancement Using Sand-Grid Confinement and Membrane Reinforcement Concepts*, Report GL-79-20 (1). U.S. Army Engineer Waterways Experiment Station, Vicksburg, MS, Nov. 1979
11. Webster, S. L. and Alford, S. J., *Investigation of Construction Concepts for Pavements Across Soft Ground*, Report S-78-6. Geotechnical Laboratory, U.S. Army Engineer Waterways Experiment Station, Vicksburg, MS, July 1978
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13. Yoder, E.J. and Witczak, M.W, Principles of Pavement Design, Second Edition, John Wiley & Sons, Inc., 1975

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Gulfstream FLIGHT OPS
Operations Briefing

Pavement Weight Bearing Capacity (ACN/PCN)

05202020
Scope: All Aircraft
Briefing Owner: Flight Operations

The information contained herein is advisory only in nature.

All Aircraft | Pavement Weight Bearing Capacity

Executive Summary

If you have a question regarding Airport Classification Number (ACN) and Pavement Classification Number (PCN), reference the following sources:

- **Mid Cabin Aircraft**: QRH: Supplemental Data
- **GIV & GV**: QRH : Performance -> Landing Planning
- **G450/G550/G650**: Performance Handbook -> Landing Planning
- **GVII-G500/G600** : Operating Manual >Supplemental Data

Once you have established your aircraft classification number, Gulfstream recommends you contact your flight plan provider as well as the appropriate airport authority/manager for an updated accurate advertised Pavement Classification Number as well as the latest assessment of permissible movement areas.

The PCN is calculated using the verbiage "unrestricted operations." While it has obviously a calculation of pavement strength, it also is derived to extend the life of the runway environment. While PCNs are published for repeated use, a one-time event (one takeoff/one landing) should be acceptable with the appropriate authorizations. *Caution must be given as PCN does not usually apply to taxiways or ramps and only within 50 feet of runway centerline*. When ACN/PCN is close, make sure to inquire from the airport manager about all movement areas, paying particular attention to the taxiways and ramp areas due to the runway PCN not always guaranteeing the taxiways.

All Aircraft | Pavement Weight Bearing Capacity

Executive Summary (continued)

Keep in mind that even when obtaining the airport manager's approval for an exemption for operation, stay alert to the fact that the real concern is the weight bearing capability of the ramp and taxiways, as it is undoubtedly lower than the runway surface itself. Even with an exemption, tight turns and prolonged duration on the ramp would not help the situation.

If the airport you are operating into has a small number PCN, it may be prudent to acquire a copy of the engineering runway analysis, as well as an explanation as to why the PCN is valued so low. While the average PCN may be acceptable in many cases, some airport movement areas may contain weaker pavement, and as such a smaller PCN is published.

Your flight plan provider and the airport authority will also be able to help you establish confirmed prior aircraft type operated into and out of that particular airfield and whether operators are using surrounding airports for tech stop purposes to add additional fuel for the departure enabling lighter weights at the lower PCN airfield. Heavier weight aircraft historical value and confirming known design value for the runway from the airport manager will assist in making the decision. If there is any doubt, conservatism should always trump and operation should be avoided.

If you still require assistance, please forward your question via the submit your question in the appropriate aircraft section and our team of pilot advocates will be happy to provide further guidance to your situation.

Gulfstream

All Aircraft | Pavement Weight Bearing Capacity

Background Briefing

This briefing addresses the two most common forms of pavement weight bearing capacity metrics. A brief, top-level overview of weight bearing capacity is discussed. Where to find such data and how to conduct a pavement analysis follows. Additional factors are discussed at the conclusion.

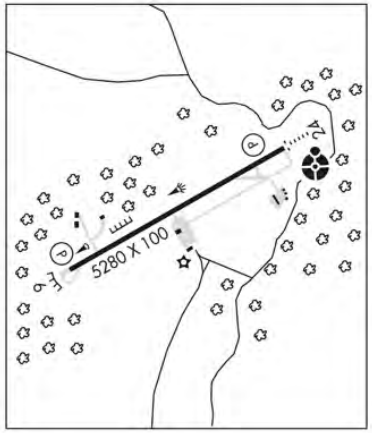
What are the two most common ways to determine pavement weight bearing capacity?

- **Wheel Weight Bearing Limits (commonly used in the United States).**
- **ACN/PCN (ICAO Standard)**

All Aircraft | Pavement Weight Bearing Capacity

WISE

LONESOME PINE (LNP)(KLNP) 3 NE UTC–5(–4DT) N36°59.25′ W82°31.80′ — CINCINNATI
2684 B **FUEL** 100LL, JET A NOTAM FILE LNP — H–9B, 12H, L–26H
RWY 06–24: H5280X100 (ASPH–GRVD) S–42, D–55, 2D–100 MIRL — IAP
0.3% up NE
RWY 06: REIL. PAPI(P2L)—GA 3.0° TCH 34′. Trees.
RWY 24: ODALS (NSTD) REIL. PAPI(P2R)—GA 3.0° TCH 36′. Trees.
AIRPORT REMARKS: Attended Mon–Sat 1400–2300Z‡, unattended Sun. $50 after hrs fee for fuel 276–328–9089. Wildlife on invof arpt. Rwy 06–24—three inch gradual dip starting 2000 ft from thld Rwy 24 continuing for 300 ft. Rwy 24 NSTD ODALS, 5 lgt configuration. ACTIVATE MIRL Rwy 06–24, ODALS Rwy 24 and REIL Rwy 06 and Rwy 24—CTAF.
AIRPORT MANAGER: 276-328-5300
WEATHER DATA SOURCES: AWOS–3 118.6 (276) 328–3727.
COMMUNICATIONS: CTAF/UNICOM 123.0
Ⓡ **INDIANAPOLIS CENTER APP/DEP CON** 126.57
RADIO AIDS TO NAVIGATION: NOTAM FILE DCA.
GLADE SPRING (L) VOR/DME 110.2 GZG Chan 39 N36°49.51′ W82°04.74′ 296° 23.8 NM to fld. 4200/2W. **HIWAS.**
VOR portion unusable:
351°–004° byd 15 NM blo 8,000′
ILS/DME 110.7 I–OWN Chan 44 Rwy 24. LOC/DME unmonitored when arpt unatndd.



CURRENT	NEW	NEW DESCRIPTION
S	S	Single wheel type landing gear (DC3), (C47), (F15), etc.
D	D	Dual wheel type landing gear (BE1900), (B737), (A319), etc.
T	D	Dual wheel type landing gear (P3, C9).
ST	2S	Two single wheels in tandem type landing gear (C130).
TRT	2T	Two triple wheels in tandem type landing gear (C17), etc.
DT	2D	Two dual wheels in tandem type landing gear (B707), etc.
TT	2D	Two dual wheels in tandem type landing gear (B757, KC135).
SBTT	2D/D1	Two dual wheels in tandem/dual wheel body gear type landing gear (KC10).
None	2D/2D1	Two dual wheels in tandem/two dual wheels in tandem body gear type landing gear (A340–600).
DDT	2D/2D2	Two dual wheels in tandem/two dual wheels in double tandem body gear type landing gear (B747, E4).
TTT	3D	Three dual wheels in tandem type landing gear (B777), etc.
TT	D2	Dual wheel gear two struts per side main gear type landing gear (B52).
TDT	C5	Complex dual wheel and quadruple wheel combination landing gear (C5).

FAA Airport/Facility Directory Front Matter

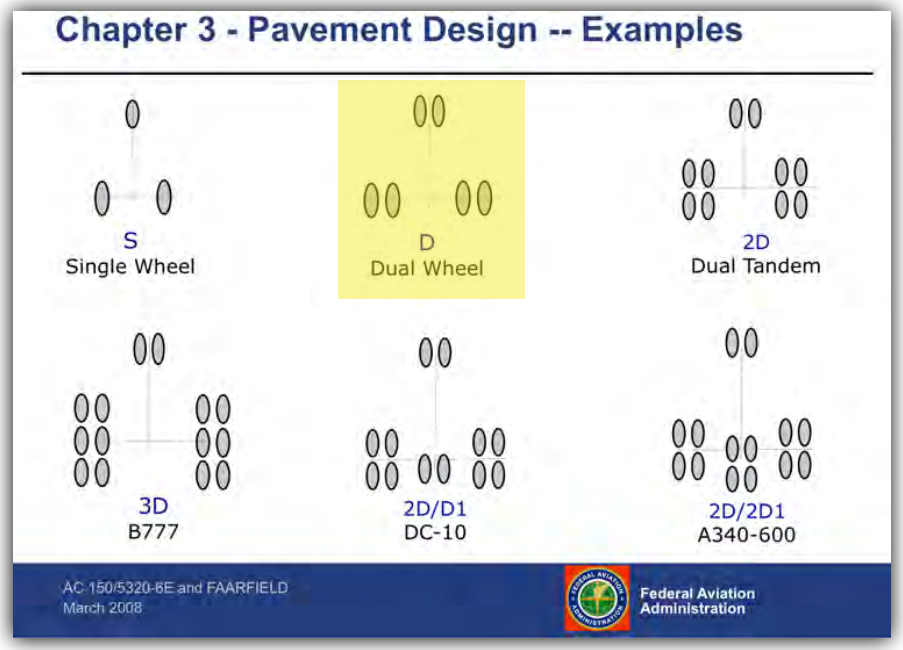
Wheel Weight Bearing Limits

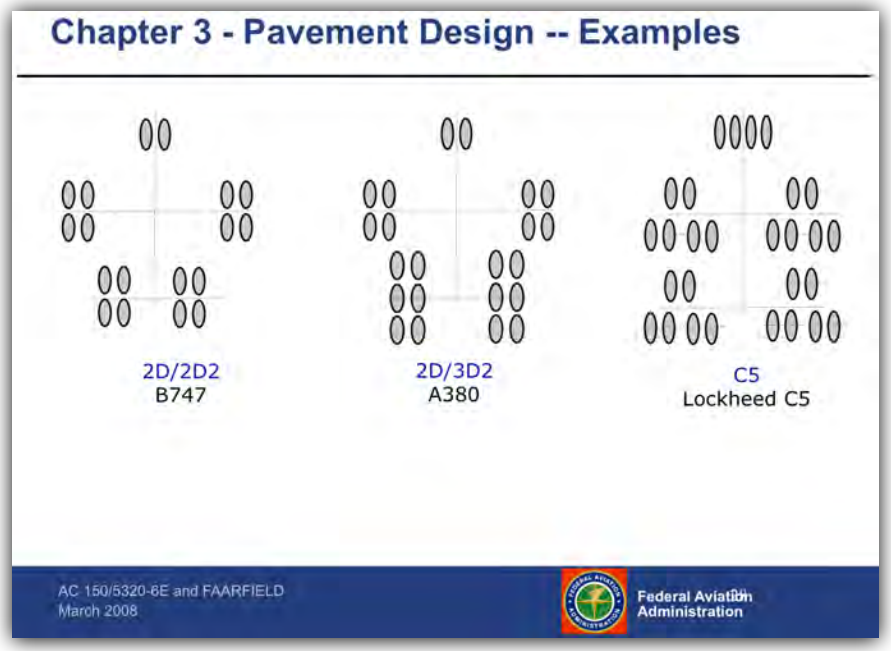
- **FAA Wheel Weight Bearing Limits specify a maximum aircraft weight based on the number of wheels that the aircraft rests upon.**
- **This data is available in the Airport/Facility Directory.**
- **Add “000” to the numerical figure.**
- **It is imperative to emphasize that, per the FAA, this is based on total aircraft weight, *not weight per wheel.***

Gulfstream

All Aircraft | Pavement Weight Bearing Capacity

Graphical Wheel Description (Examples)





All Aircraft | Pavement Weight Bearing Capacity

EAST HAMPTON (HTO)(KHTO) 3 W UTC–5(–4DT) N40°57.57′ W72°15.10′ — NEW YORK COPTER L–33C, 34I IAP

55 B S4 **FUEL** 100LL, JET A TPA—See Remarks NOTAM FILE HTO

RWY 10–28: H4255X100 (ASPH–GRVD) S–60 MIRL 0.6% up W

RWY 10: REIL. PAPI(P2L)—GA 3.3° TCH 49′. Trees.

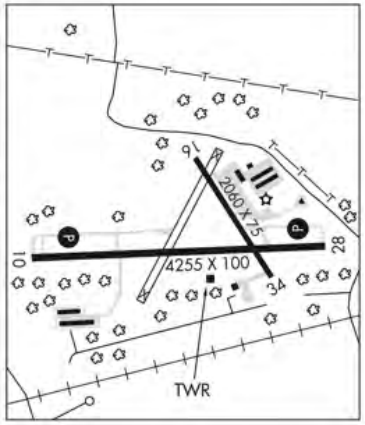
RWY 28: REIL. PAPI(P2R)—GA 3.0° TCH 54′. Pole.

RWY 16–34: H2060X75 (ASPH) S–8 0.6% up NW

RWY 16: Road.

RWY 34: Trees.

AIRPORT REMARKS: Attended continuously. Deer on and invof arpt. Rwy 16–34 cracked with vegetation growing through, standing water. NS ABTMT procedures in effect ctc arpt management for details at 631–537–1130. TPA—1000, jets—1500. Rwy 10 VGSI and RNAV glidepath not coincident. Ctl twr opr at arpt from May 23 thru Sept 14 (other times by NOTAM.) ACTIVATE MIRL Rwy 10–28, PAPI Rwy 10, PAPI Rwy 28, REIL Rwy 10, REIL Rwy 28—CTAF (PAPI and REIL 7 clicks CTAF). Ldg fee for all tran acft to include touch and go ops.



AIRPORT MANAGER: 631-537-1130

COMMUNICATIONS: CTAF 125.225

HAMPTON RCO 122.1R 113.6T 122.6 (NEW YORK RADIO)

Ⓡ **NEW YORK APP/DEP CON** 125.975 **CLNC DEL** 118.95

TOWER 125.225 (1200–0100Z‡) **GND CON** 121.9

AIRSPACE: CLASS D svc 1200–0100Z‡ other times CLASS G.

RADIO AIDS TO NAVIGATION: NOTAM FILE HTO.

HAMPTON (H) VORTAC 113.6 HTO Chan 83 N40°55.14′ W72°19.00′ 064° 3.8 NM to fld. 22/13W. **HIWAS.**

HIWAS OTS indef

DME portion unusable:

280°–325° byd 35 NM blo 1,700′

325°–355° byd 30 NM blo 2,000′

TACAN AZIMUTH unusable:

280°–325° byd 35 NM blo 1,700′

325°–355° byd 30 NM blo 2,000′

VOR unusable:

055°–100° byd 22 NM

221°–231° blo 6,000′

What if the A/FD only includes information pertaining to a single-wheel gear configuration?

- **Call the airport auhtority. They may have additional information.**
- **Most Gulfstream aircraft have a "Equivalent Single Wheel Loading (ESWL)" table. The G280 may have this information in the near future.**

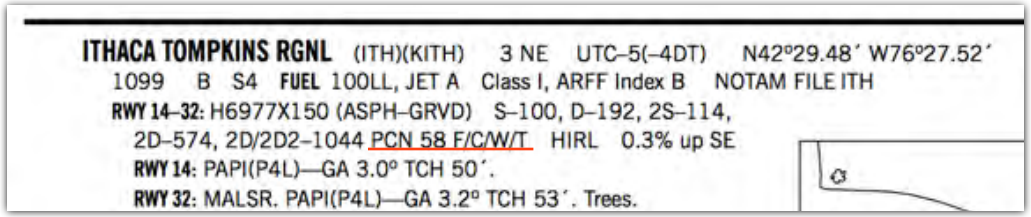
Performance Handbook Gulfstream G450

G450 Equivalent Single Wheel Loading (ESWL)

OM 06-05-90

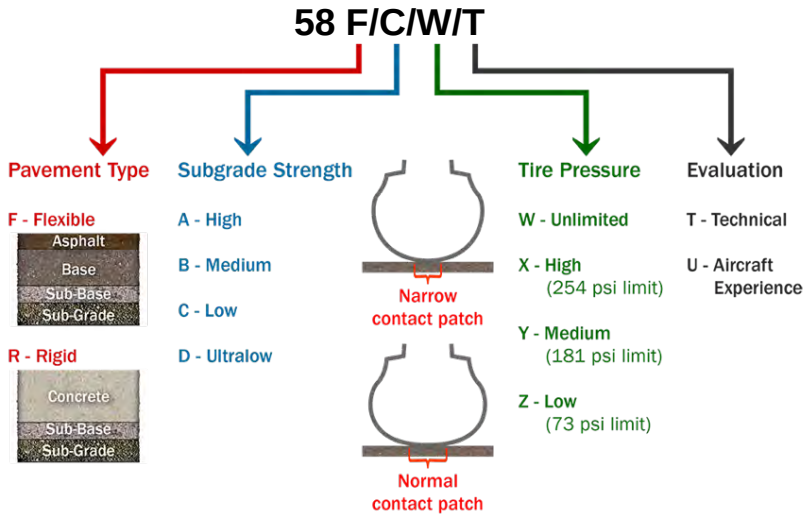
Gulfstream

All Aircraft | Pavement Weight Bearing Capacity



ITHACA TOMPKINS RGNL (ITH)(KITH) 3 NE UTC–5(–4DT) N42°29.48′ W76°27.52′
1099 B S4 **FUEL** 100LL, JET A Class I, ARFF Index B NOTAM FILE ITH
RWY 14–32: H6977X150 (ASPH–GRVD) S–100, D–192, 2S–114,
2D–574, 2D/2D2–1044 PCN 58 F/C/W/T HIRL 0.3% up SE
RWY 14: PAPI(P4L)—GA 3.0° TCH 50′.
RWY 32: MALSR. PAPI(P4L)—GA 3.2° TCH 53′. Trees.

FAA Airport/Facility Directory



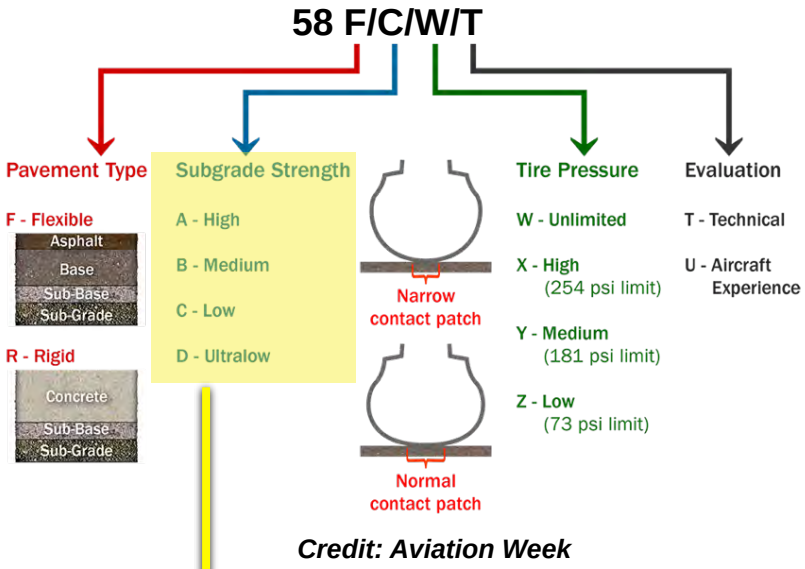
Credit: Aviation Week

What is PCN?

- **Pavement Classification Number (PCN)**: Single unique number to express the load-carrying capacity of a pavement, without specifying a particular airplane or pavement structure.

- As shown in the graphic, tire pressure also affects the amount of force applied to a given portion of the pavement. This will be addressed later.

All Aircraft | Pavement Weight Bearing Capacity



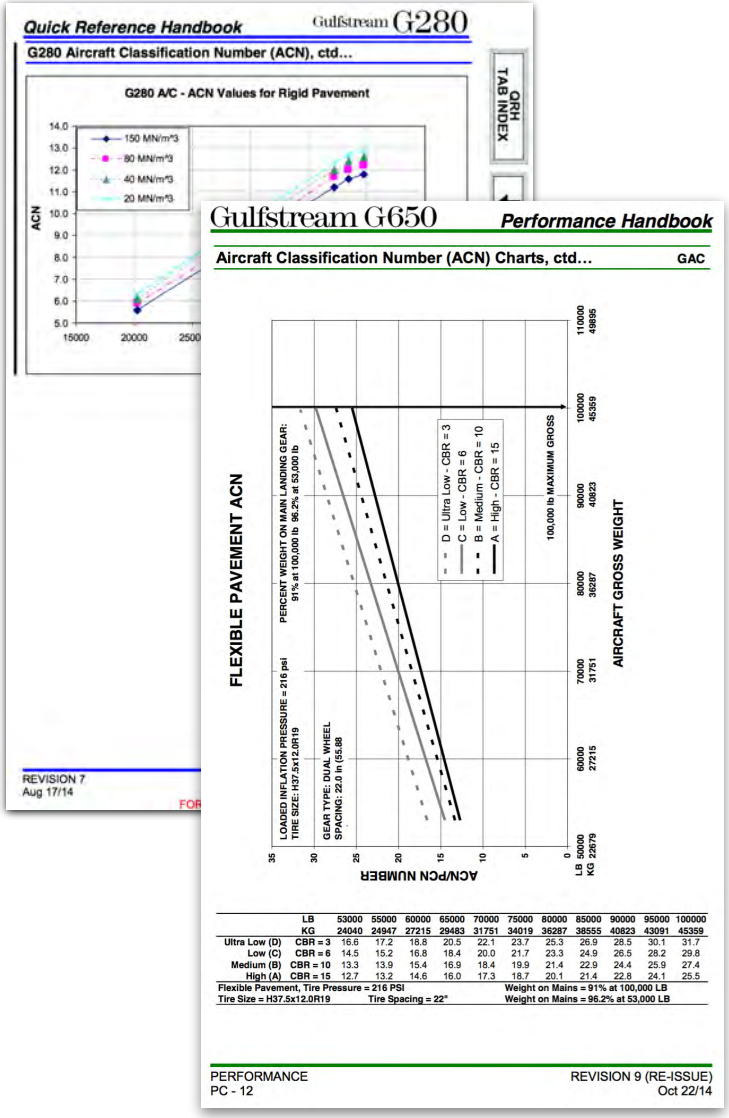
Credit: Aviation Week

What is PCN (continued)?

- Subgrade strength can be translated into **California Bearing Ratio** (CBR), which is the ICAO-preferred unit.
- It can also be translated into a K-value.
- Many of these terms are present in Gulfstream performance guidance.

Subgrade Strength	CBR Value	K-Value
A	15	150
B	10	80
C	6	40
D	3	20

All Aircraft | Pavement Weight Bearing Capacity



	LB	53000	55000	60000	65000	70000	75000	80000	85000	90000	95000	100000
	KG	24040	24947	27215	29483	31751	34019	36287	38555	40823	43091	45359
Ultra Low (D)	CBR = 3	16.6	17.2	18.8	20.5	22.1	23.7	25.3	26.9	28.5	30.1	31.7
Low (C)	CBR = 6	14.5	15.2	16.8	18.4	20.0	21.7	23.3	24.9	26.5	28.2	29.8
Medium (B)	CBR = 10	13.3	13.9	15.4	16.9	18.4	19.9	21.4	22.9	24.4	25.9	27.4
High (A)	CBR = 15	12.7	13.2	14.6	16.0	17.3	18.7	20.1	21.4	22.8	24.1	25.5

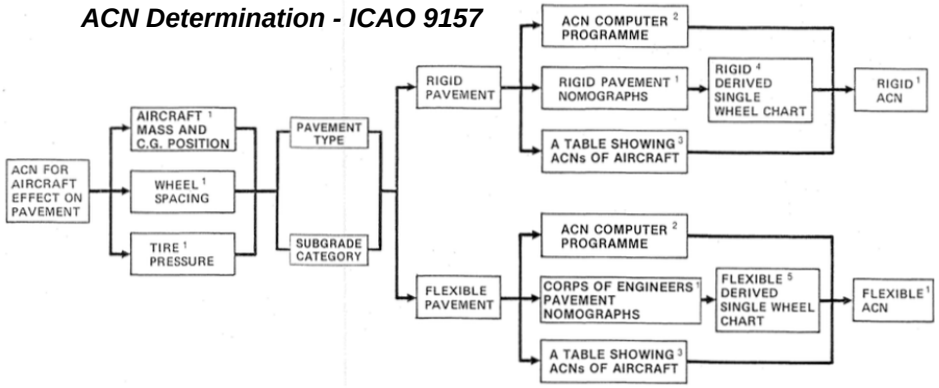
Flexible Pavement, Tire Pressure = 216 PSI — Weight on Mains = 91% at 100,000 LB
Tire Size = H37.5x12.0R19 — Tire Spacing = 22" — Weight on Mains = 96.2% at 53,000 LB

What is ACN?

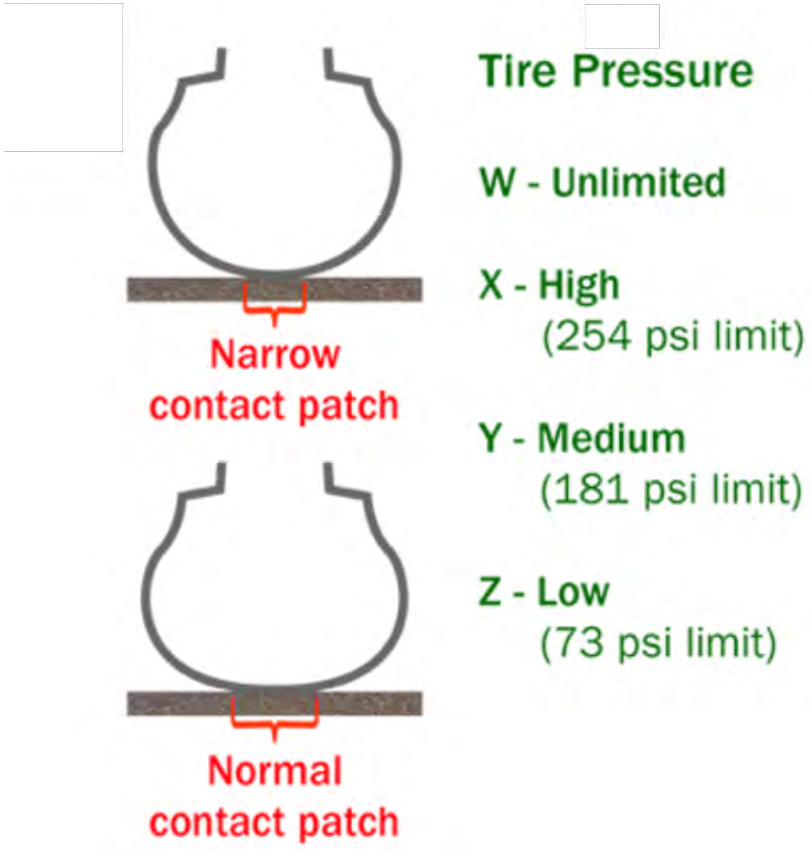
- **Aircraft Classification Number (ACN)**: Single unique number to express effect of an individual airplane on *different pavements*.

Generally, ACN must be less than or equal to PCN. Exceptions are discussed in the executive summary.

ACN Determination - ICAO 9157



All Aircraft | Pavement Weight Bearing Capacity

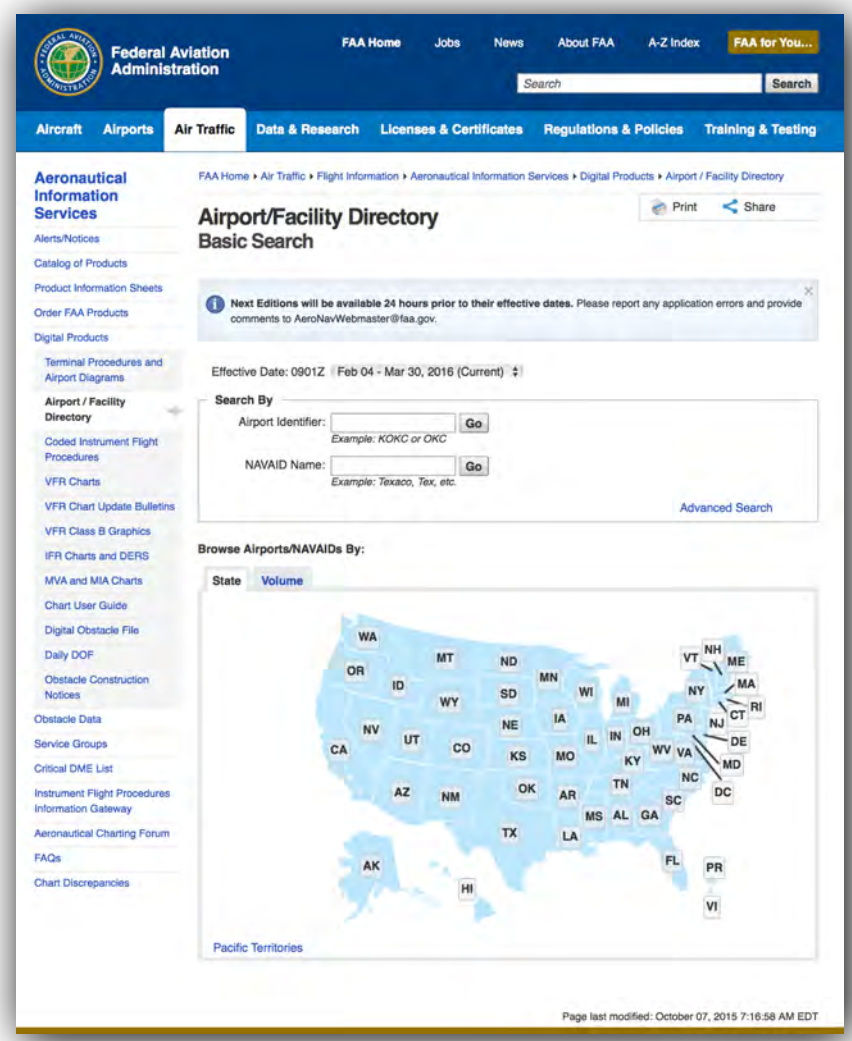


Tire Pressure

- **Tire pressure effects effects the amount of contact a wheel has with a surface, thereby affecting how much weight a given amount of pavement is exposed to. Maximum pressure limits are assigned to pavement to ensure that a minimum amount of contact is provided.**
- **The codes and numbers in the graphic to the left are updated to reflect new ICAO standards, whereas the codes/numbers in Gulfstream publications reflect older standards (including a "very low" rating).**
- ***Due to further aircraft weight restrictions when lowering tire pressures, lowering tire pressure is not a recommended method for normal operations to meet a desired PCN and will not be addressed in this briefing.***

Gulfstream

All Aircraft | Pavement Weight Bearing Capacity



Click image to access website

Where can I access PCN/Runway Weight Bearing information for US Airports?

- **The Airport/Facility Directory (A/FD) is a good source for this information.**

All Aircraft | Pavement Weight Bearing Capacity

JEPPESEN
A BOEING COMPANY

AC-U-KWIK®

Where can I find PCN/Runway Weight Bearing information for International Airports?

Examples include:

- **The Jeppesen Airport Directory, much like the FAA A/FD, contains PCN information.**
- **AC-U-KWIK also contains this data.**
- **NOTE: if wheel weight bearing capacity is listed in lieu of PCN for international airports, weights may be *per wheel*, not total aircraft weight (opposite of FAA numbers).**

Gulfstream

All Aircraft | Pavement Weight Bearing Capacity

MID CABIN (G280) EXAMPLE

Quick Reference Handbook — Gulfstream G280

G280 Aircraft Classification Number (ACN)

Aircraft Classification Number (ACN) is a number expressing the relative effect of an aircraft on a pavement for a specified subgrade category. ACN values are calculated for both flexible and rigid pavement. If the aircraft gross weight and runway subgrade strength are known, the ACN value can be determined from the charts on the following pages.

General Data:

Main Tire Size: 26 x 6.6R14
Main Tire Pressure: 203 psi (loaded), 195 psi (unloaded)
Main Gear Wheels Configuration: Dual Wheel
Main Wheel spacing: 375 mm
Percent Load on Gear Legs: See the attached tables. This input varies with the A/C weight, as the Aft C.G. is not constant. This is why the curves showing the ACN versus A/C weight are not linear.

Flexible Pavement - ACN

Aircraft Weight (lb) C.G. Location (%mac) % Reaction on MLG		Subgrade			
		High (CBR 15)	Medium (CBR 10)	Low (CBR 6)	Ultra Low (CBR 3)
Max Ramp Weight	39750 36.7%mac 90.0%	9.6	10.3	11.4	12.3
	38400 40.4% mac 92.0%	9.5	10.1	11.2	12.1
	37200 41.4%mac 92.4%	9.2	9.8	10.8	11.7
	28000 45.6%mac 94.0%	6.7	7.0	7.8	8.7
Min Operating Weight	20300 45.6%mac 94.2%	4.6	4.8	5.2	6.0

REVISION 7
Aug 17/14

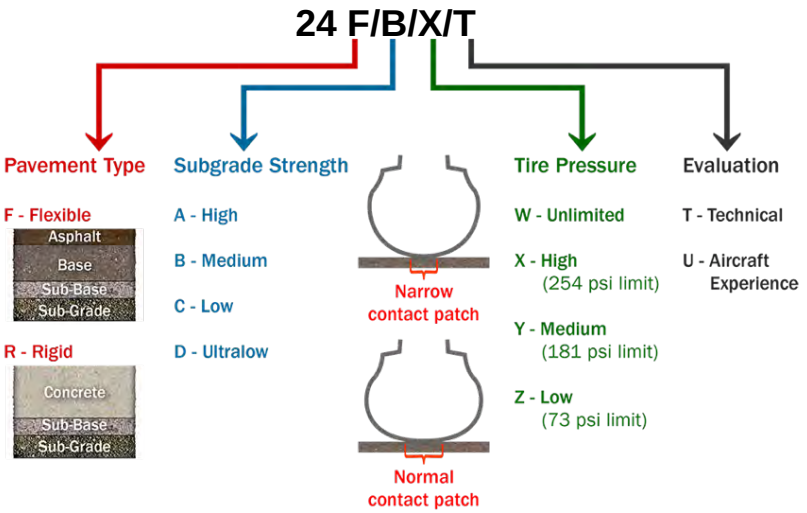
SUPPLEMENTAL DATA
Page S- 21

FOR TRAINING PURPOSES ONLY

QRH TAB INDEX | BACK | FORWARD | PAGE UP | PAGE DOWN | CB | EVAC.

Example: Lake Placid, NY

- PCN: 24 F/B/X/T



Credit: Aviation Week

Note that the %MAC is at its rearward extreme, thereby placing the most weight possible on the main gear (92.4%). This is the most limiting condition. All Gulfstream ACNs are determined using this conservative methodology.

Entire weight band acceptable for PCN

Gulfstream

All Aircraft | Pavement Weight Bearing Capacity

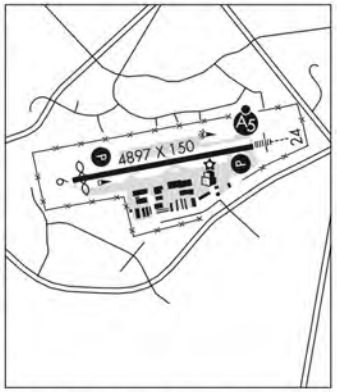
LARGE CABIN (G650) EXAMPLE - PCN

CARLSBAD

MC CLELLAN–PALOMAR (CRQ)(KCRQ) 3 SE UTC–8(–7DT) N33°07.70′ W117°16.81′ LOS ANGELES L–4H IAP, AD
331 B S4 **FUEL** 100LL, JET A OX 3, 4 TPA—See Remarks Class I, ARFF Index A
NOTAM FILE CRQ

RWY 06–24: H4897X150 (ASPH–GRVD) S–60, D–80, 2S–102, 2D–110
PCN 33 F/D/X/T HIRL
RWY 06: PAPI(P4L)—GA 3.0° TCH 35′. Thld dsplcd 297′.
RWY 24: MALSR. REIL. PAPI(P4L)—GA 3.2° TCH 54′. Rgt tfc.

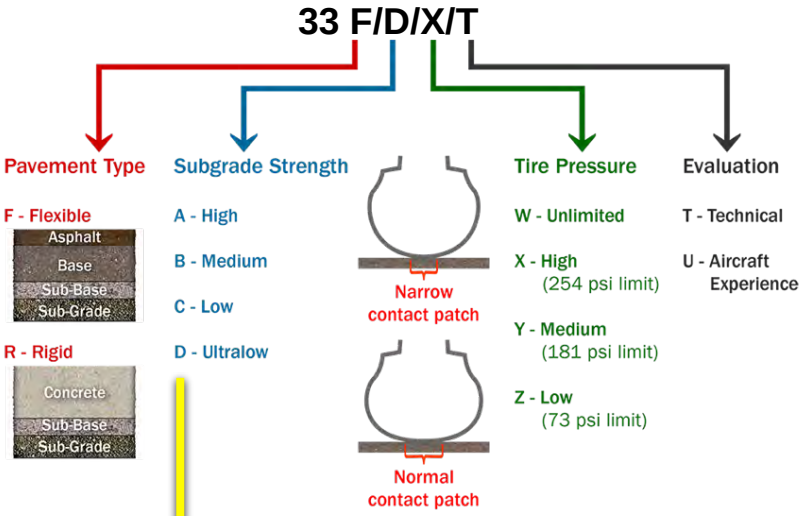
RUNWAY DECLARED DISTANCE INFORMATION
RWY 06: TORA–4897 TODA–4897 ASDA–4897 LDA–4600
RWY 24: TORA–4897 TODA–4897 ASDA–4897 LDA–4897



AIRPORT REMARKS: Attended 1500–0600Z‡. Rwy 24 hard to see two hrs prior to SS. Do not mistake S twy as rwy. Extensive bird activity in vicinity especially in spring. P–lines 2 miles W & SW. CLOSED to air carrier ops with more than 9 passenger seats from 0630Z‡ to 1400Z‡ except by PPR call arpt manager 760–431–4646. PPR for all military acft call arpt manager 760–431–4646. TPA—1003(672) helicopters, 1503(1172) small acft, 2003(1672) large acft. Rwy 06–24 south VFR tfc pattern clsd 0600–1500Z‡. No jet acft training due to noise abatement and traffic congestion. Multiple apchs by large acft (including large helicopters) not authorized. All acft multiple practice apch and ldgs discourage 0600–1500Z‡. Voluntary curfew, jets 0600–1500Z‡, props 0800–1400Z‡, emerg, lifeguard and law enforcement excepted. RVR touchdown Rwy 24 avbl. Rwy 24 is calm wind rwy. Arpt has noise abatement procedures ctc arpt manager 760–431–4646. Request jets fly the ILS apch. North side ramp limited to 12,500 lbs. Limited transient tie down space on public ramp. When twr clsd ACTIVATE HIRL Rwy 06–24, PAPI Rwy 06 and Rwy 24, REIL Rwy 24, MALSR Rwy 24—CTAF. U.S. Customs User Fee Arpt, ctc 877–848–7766.
AIRPORT MANAGER: 760-966-3272
WEATHER DATA SOURCES: ASOS (760) 930–0864 LAWRS.
COMMUNICATIONS: CTAF 118.6 **ATIS** 120.15 (760–438–2117)
OCEANSIDE RCO 115.3 T 122.1R (SAN DIEGO RADIO)
Ⓡ **SOCAL APP/DEP CON** 127.3
TOWER 118.6 (1500–0600Z‡) **GND CON** 121.8
CLNC DEL 134.85 For clnc del when ATCT clsd call SOCAL APP (800) 448–3724.
AIRSPACE: CLASS D svc 1500–0600Z‡ other times CLASS G.
RADIO AIDS TO NAVIGATION: NOTAM FILE CRQ.
OCEANSIDE (H) VORTAC 115.3 OCN Chan 100 N33°14.44′ W117°25.06′ 119° 9.7 NM to fld. 52/15E.
VOR portion unusable:
227°–265° byd 20 NM
ILS/DME 108.7 I–CRQ Chan 24 Rwy 24. Unmonitored when ATCT clsd. Autopilot coupled approaches na below 960′ MSL.

Example: Carlsbad, CA

- PCN: 33 F/D/X/T



Credit: Aviation Week

Subgrade Strength	CBR Value	K-Value
D	3	20

Gulfstream

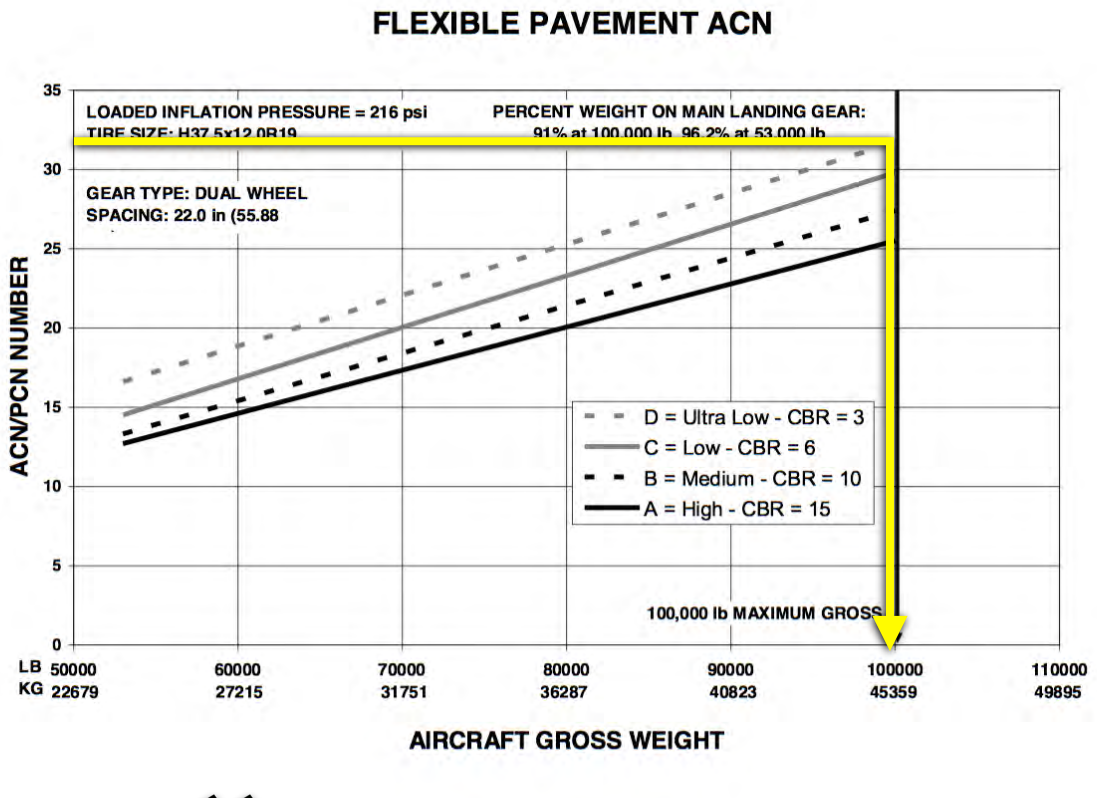
Rev 0.0 | For Reference Only - Not FAA Approved/Use in Conjunction with AFM

All Aircraft | Pavement Weight Bearing Capacity

LARGE CABIN (G650) EXAMPLE - PCN

	LB	53000	55000	60000	65000	70000	75000	80000	85000	90000	95000	100000
	KG	24040	24947	27215	29483	31751	34019	36287	38555	40823	43091	45359
Ultra Low (D)	CBR = 3	16.6	17.2	18.8	20.5	22.1	23.7	25.3	26.9	28.5	30.1	31.7
Low (C)	CBR = 6	14.5	15.2	16.8	18.4	20.0	21.7	23.3	24.9	26.5	28.2	29.8
Medium (B)	CBR = 10	13.3	13.9	15.4	16.9	18.4	19.9	21.4	22.9	24.4	25.9	27.4
High (A)	CBR = 15	12.7	13.2	14.6	16.0	17.3	18.7	20.1	21.4	22.8	24.1	25.5

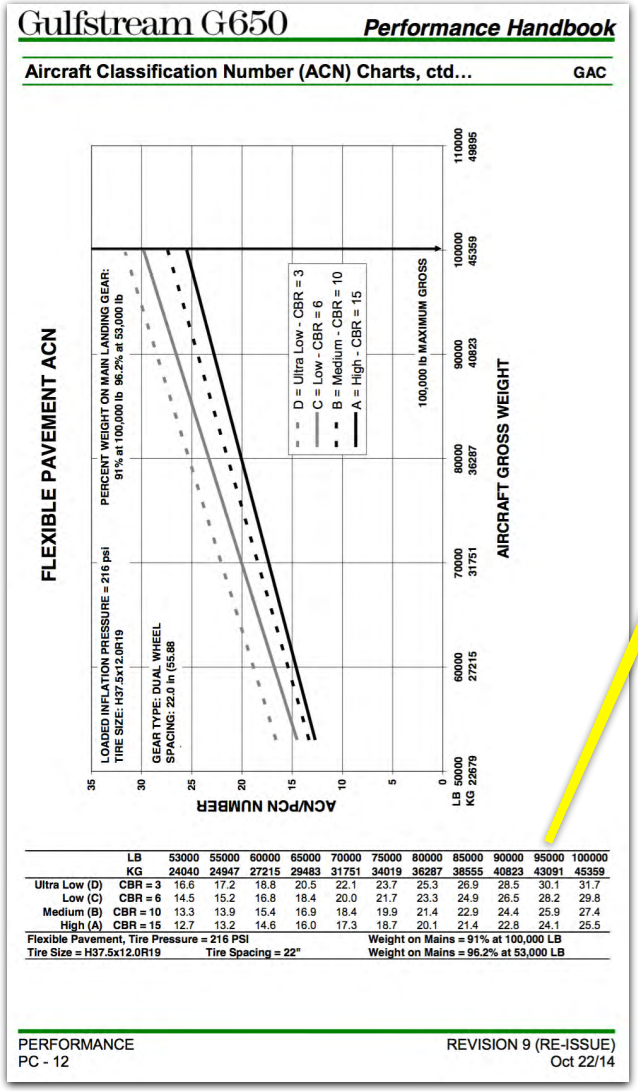
Flexible Pavement, Tire Pressure = 216 PSI — Weight on Mains = 91% at 100,000 LB
Tire Size = H37.5x12.0R19 — Tire Spacing = 22" — Weight on Mains = 96.2% at 53,000 LB



Entire weight band acceptable for PCN

All Aircraft | Pavement Weight Bearing Capacity

LARGE CABIN (G650) EXAMPLE - PCN



Gulfstream G650 **Performance Handbook**

Aircraft Classification Number (ACN) Charts, ctd... GAC

	LB	53000	55000	60000	65000	70000	75000	80000	85000	90000	95000	100000
	KG	24040	24947	27215	29483	31751	34019	36287	38555	40823	43091	45359
Ultra Low (D)	CBR = 3	16.6	17.2	18.8	20.5	22.1	23.7	25.3	26.9	28.5	30.1	31.7
Low (C)	CBR = 6	14.5	15.2	16.8	18.4	20.0	21.7	23.3	24.9	26.5	28.2	29.8
Medium (B)	CBR = 10	13.3	13.9	15.4	16.9	18.4	19.9	21.4	22.9	24.4	25.9	27.4
High (A)	CBR = 15	12.7	13.2	14.6	16.0	17.3	18.7	20.1	21.4	22.8	24.1	25.5

Flexible Pavement, Tire Pressure = 216 PSI — Weight on Mains = 91% at 100,000 LB
Tire Size = H37.5x12.0R19 — Tire Spacing = 22" — Weight on Mains = 96.2% at 53,000 LB

PERFORMANCE
PC - 12

REVISION 9 (RE-ISSUE)
Oct 22/14

	LB	53000	55000	60000	65000	70000	75000	80000	85000	90000	95000	100000
	KG	24040	24947	27215	29483	31751	34019	36287	38555	40823	43091	45359
Ultra Low (D)	CBR = 3	16.6	17.2	18.8	20.5	22.1	23.7	25.3	26.9	28.5	30.1	31.7
Low (C)	CBR = 6	14.5	15.2	16.8	18.4	20.0	21.7	23.3	24.9	26.5	28.2	29.8
Medium (B)	CBR = 10	13.3	13.9	15.4	16.9	18.4	19.9	21.4	22.9	24.4	25.9	27.4
High (A)	CBR = 15	12.7	13.2	14.6	16.0	17.3	18.7	20.1	21.4	22.8	24.1	25.5

Flexible Pavement, Tire Pressure = 216 PSI — Weight on Mains = 91% at 100,000 LB
Tire Size = H37.5x12.0R19 — Tire Spacing = 22" — Weight on Mains = 96.2% at 53,000 LB

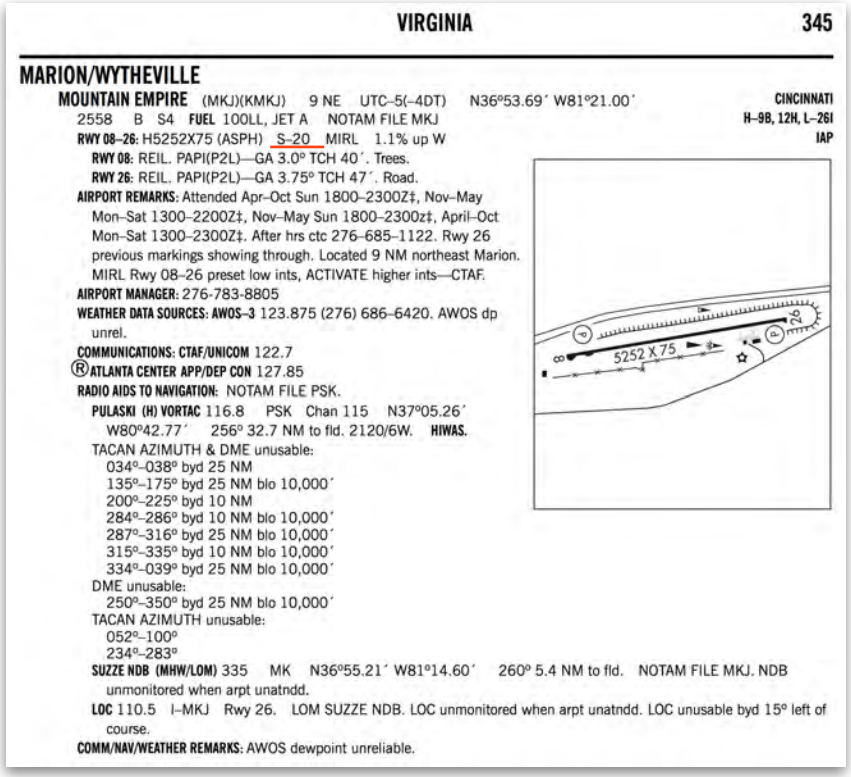
PERFORMANCE
PC - 12

REVISION 9 (RE-ISSUE)
Oct 22/14

- As an alternative to consulting the line graph, the tables provided at the bottom of the page can be used to interpolate and find more accurate values.

All Aircraft | Pavement Weight Bearing Capacity

LARGE CABIN (G550) EXAMPLE - ESWL



VIRGINIA 345

MARION/WYTHEVILLE

MOUNTAIN EMPIRE (MKJ)(KMKJ) 9 NE UTC–5(–4DT) N36°53.69′ W81°21.00′ CINCINNATI
2558 B S4 **FUEL** 100LL, JET A NOTAM FILE MKJ H–9B, 12H, L–26I IAP
RWY 08–26: H5252X75 (ASPH) S-20 MIRL 1.1% up W
RWY 08: REIL. PAPI(P2L)—GA 3.0° TCH 40′. Trees.
RWY 26: REIL. PAPI(P2L)—GA 3.75° TCH 47′. Road.
AIRPORT REMARKS: Attended Apr–Oct Sun 1800–2300Z‡, Nov–May Mon–Sat 1300–2200Z‡, Nov–May Sun 1800–2300z‡, April–Oct Mon–Sat 1300–2300Z‡. After hrs ctc 276–685–1122. Rwy 26 previous markings showing through. Located 9 NM northeast Marion. MIRL Rwy 08–26 preset low ints, ACTIVATE higher ints—CTAF.
AIRPORT MANAGER: 276-783-8805
WEATHER DATA SOURCES: AWOS–3 123.875 (276) 686–6420. AWOS dp unrel.
COMMUNICATIONS: CTAF/UNICOM 122.7
Ⓡ **ATLANTA CENTER APP/DEP CON** 127.85
RADIO AIDS TO NAVIGATION: NOTAM FILE PSK.
PULASKI (H) VORTAC 116.8 PSK Chan 115 N37°05.26′ W80°42.77′ 256° 32.7 NM to fld. 2120/6W. **HIWAS.**
TACAN AZIMUTH & DME unusable:
034°–038° byd 25 NM
135°–175° byd 25 NM blo 10,000′
200°–225° byd 10 NM
284°–286° byd 10 NM blo 10,000′
287°–316° byd 25 NM blo 10,000′
315°–335° byd 10 NM blo 10,000′
334°–039° byd 25 NM blo 10,000′
DME unusable:
250°–350° byd 25 NM blo 10,000′
TACAN AZIMUTH unusable:
052°–100°
234°–283°
SUZZE NDB (MHW/LOM) 335 MK N36°55.21′ W81°14.60′ 260° 5.4 NM to fld. NOTAM FILE MKJ. NDB unmonitored when arpt unatndd.
LOC 110.5 I–MKJ Rwy 26. LOM SUZZE NDB. LOC unmonitored when arpt unatndd. LOC unusable byd 15° left of course.
COMM/NAV/WEATHER REMARKS: AWOS dewpoint unreliable.

(55,000lbs) x (0.9)x(0.5)/(1.25) =

19,800lbs Equivalent Single Wheel Loading

Example: Mountain Empire, VA

- FAA Wheel Weight Bearing Limit: S-20
- Landing weight: 55,000lbs.

Performance Handbook Gulfstream G550

Equivalent Single Wheel Loading (ESWL) GV-GER-1212

1. **Introduction:**

   One consideration in operating Gulfstream aircraft is the strength of runway and taxiway pavements in relation to aircraft operating weight. This can limit operational weights in some airports. One common method of evaluating an aircraft for a given runway is the Equivalent Single Wheel Loading (ESWL). ESWL accounts for the extra tire flotation for multi-wheel landing gear struts such as the dual wheel struts used on the Gulfstream aircraft. This section provides information on how to compute ESWL for the G550 and G500 airplanes.

2. **G550 and G500 Main Landing Gear Parameters:**

Max Ramp Weight (pounds)	MLG Tire Size (inches)	Tire Spacing (inches)	Max Tire Pressure (psi)	Reduction Factor -	Maximum ESWL (pounds)
91,400	35 X 11.0	18.5	198	1.25	32,904

   The reduction factor in the table above assumes a rigid pavement with a radius of equivalent stiffness of 40 inches, roughly equivalent to a 13.5 inch thick concrete slab. Thinner pavements would give higher reduction factors, so the factors presented are conservative.

3. **ESWL Computation for Lower Operating Weights:**

   ESWL can be computed for lower operating weights as follows:
   ESWL = (Gross Weight) x (0.9) x (0.5) / (Reduction Factor)

Gulfstream

Gulfstream FLIGHT OPS

Operations Briefing

9750 SW Nimbus Avenue
Beaverton, OR 97008-7172
p | 503-641-3478 f | 503-644-8034

September 16, 2019

Century West Engineering Corporation
5331 SW Macadam Avenue, Suite 287
Portland, OR 97239

Attention: James Kirby, PE
Senior Project Manager

SUBJECT: Pavement Classification Number (PCN) Evaluation of Runway 17-35
Aurora State Airport (UAO)
Aurora, Oregon

As requested, GRI conducted a pavement evaluation at Aurora State Airport (UAO) in support of the Oregon Department of Aviation (ODA) to develop a pavement classification number (PCN) for Runway 17-35.

PROJECT DESCRIPTION

Our work included review of relevant ODA records for Runway 17-35, falling weight deflectometer (FWD) testing, core explorations, and engineering analyses in accordance with Federal Aviation Administration (FAA) Advisory Circular 150/5335-5C, *Standardized Method of Reporting Airport Pavement Strength – PCN*. According to the FAA, the PCN is a number that expresses the load-carrying capacity of a pavement for unrestricted operations. We determined the PCN using the Technical Evaluation Method specified in Advisory Circular 150/5335-5C.

BACKGROUND

Based on information provided in the ODA pavement evaluation/maintenance management program report prepared by Pavement Consultant Inc. in 2018, a 4,100-ft-long segment on the north end of the runway was first constructed in 1943 and in 1993, a 900-ft-long extension was built to the south. The last major rehabilitation on the runway was conducted in 2005 and generally consisted of a 2- to 3-in. overlay.

The current Airport Master Record, FAA Form 5010, lists the gross weight limit for a single-wheel, main-gear aircraft and a dual-wheel, main-gear aircraft at 30,000 and 45,000 lbs, respectively. UAO currently does not have an established PCN.

FIELD WORK

Site Reconnaissance

A visual pavement reconnaissance was performed by GRI engineers on August 12, 2019, to assess the general surface condition of the pavements within the project and to identify core exploration locations.

Falling Weight Deflectometer Tests

GRI conducted FWD testing on August 20, 2019, along the full length of the runway. The testing was conducted in accordance with FAA Advisory Circular 150/5370-11b, *Use of Nondestructive Testing in the Evaluation of Airport Pavements,* using our KUAB 2m Model 150 FWD device.

FWD testing was completed along test lines located at 7 ft west and 12 ft east of the runway centerline. The tests were spaced at approximately 200-ft intervals within the runway keel section. The approximate locations of the test lines are shown on Figure 1.

The FWD test procedures are described in Appendix A. The data were normalized to a 30,000-lb load basis and the FWD deflection data are shown in Table 1A.

We also reviewed the load-response data measured by the FWD to provide a preliminary understanding of the overall stiffness of the pavement structure. Although this information does not provide information about the stiffness of individual soil and pavement layers, it does provide a quick assessment of the overall stiffness of the pavement system to gauge the variability of pavement stiffness within a particular pavement facility. Impact stiffness modulus (ISM) is inversely proportional to deflection and is therefore a direct measurement of the combined stiffness, or resistance to deflection induced by FWD loading, of the pavement and subgrade soils. As such, it is usually a relative measure of the pavement's ability to support loads, i.e., high ISM modulus values usually correspond to high pavement strength and vice versa. The profile of relative pavement strength along the two FWD test lines, as measured by resistance to deflection under FWD loading, is plotted for each FWD test location on Figure 4A. Additional discussion regarding ISM is provided in Appendix A.

Coring Explorations

General. On August 20, 2019, GRI conducted three core explorations, all of which were located over cracks. The approximate locations of the explorations are shown on the Site Plan, Figure 1. Details of our field investigations are further discussed in Appendix A of this report and the core explorations are summarized in Table 1.

Table 1: SUMMARY OF CORING EXPLORATION RESULTS

Core No.	FWD Test No.	Test Line	Station	Asphalt Concrete Thickness, in.	Aggregate Base Thickness, in.	Drilled Over a Crack?	Depth of Crack, in.
B-1	26	7 ft west	56+81	8.75	15.00	Yes	2.50
B-2	16	7 ft west	39+51	9.00	15.00	Yes	3.25
B-3	32	12 ft east	19+41	9.00	15.00	Yes	2.50

Existing Pavement Conditions

Overall, the pavement surface of Runway 17-35 appears to be in good condition. The primary distresses observed on the runway are low- to medium-severity longitudinal cracking, primarily at paving-panel joints or along the centerline; low-severity weathering; and isolated low-severity alligator cracking within the gear paths.

Since the alligator cracking within the gear paths (noted above) is a load-associated distress, in our opinion, it warranted further investigation and we therefore conducted the three core explorations in areas of alligator cracking on the runway. As shown in Table 1 and the photo logs on Figures 1A through 3A in Appendix A, the cracking is top down and extends to a depth of 2.5 in. in cores B-1 and B-3 and to a depth of 3.25 in. in B-2. These types of cracks may be induced by excessive shear stresses imposed by aircraft wheel loads at the runway surface and can typically be repaired by milling to the depth of cracking and overlaying. In our opinion, pavement exhibiting this type of distress should be rehabilitated when the cracking progresses to the point that spalling begins to occur and therefore represents a significant Foreign Object Damage (FOD) potential. The core samples also exhibit delamination (separation of asphalt concrete [AC] layers) at a depth of 2.5 and 3.25 in. in cores B-2 and B-3, respectively. The depth of delamination generally agrees with the thickness of the 2005 overlay.

DESIGN PROCEDURES AND ANALYSIS

Traffic Loading

Century West Engineering Corporation (CWE) provided an estimate of the aircraft traffic-volume data consisting of the number of operations (i.e., either an arrival or departure) for Runway 17-35 in 2018 from the FAA Traffic Flow Management System Counts (TFMSC). Our traffic-loading estimate is based on an annual growth rate of 1.58% per year, which is based on the aviation forecasts provided in the current master plan for UAO (WHPacific, 2012).

The COMFAA 3.0 software used to compute the PCN has inputs for each aircraft type (in the mix), which include the type of aircraft, gross weight, and number of annual departures over a 20-year period. The program does not take into account the annual growth rate, so we calculated the total departures from 2020 to 2040 to determine the equivalent annual number of departures for the analysis. The aircraft mix and annual number of departures we input into COMFAA are provided in Table 2.

Table 2: RUNWAY 17-35: AIRCRAFT TYPES AND DEPARTURE VOLUMES

Aircraft Type	Maximum Takeoff Weight, lbs	Design Aircraft for COMFAA	2018 Annual Operations	2040 Annual Operations	Values Entered into COMFAA	
					Equivalent Airplane	Annual # of Departures
Bombardier Global Express	92,500	Gulfstream G-V	50	61	Gulfstream G-V	64
Gulfstream G600	91,600	Gulfstream G-V	2	3		
Gulfstream V	76,850	Gulfstream G-IV	2	3	Gulfstream G-IV	7
Gulfstream IV	73,200	Gulfstream G-IV	2	3		
Dassault Falcon 900	45,503	Falcon-900	68	83	Falcon-900	83
Bombardier Challenger 600	45,100	Challenger CL-604	58	70	Challenger CL-604	176
Bombardier Challenger 300	38,850	Challenger CL-604	88	106		
Dassault Falcon 2000	41,000	Falcon-2000	34	42	Falcon-2000	42
Dassault Falcon 50	37,480	Falcon-50	276	332	Falcon-50	424
Dassault Falcon 20	28,650	Falcon-50	76	92		
Cessna Citation 750	36,600	Citation X	104	126	Citation X	292

Aircraft Type	Maximum Takeoff Weight, lbs	Design Aircraft for COMFAA	2018 Annual Operations	2040 Annual Operations	Values Entered into COMFAA	
					Equivalent Airplane	Annual # of Departures
Cessna Citation 680	30,775	Citation X	138	167		
Hawker 800	28,000	Hawker-800	34	42	Hawker-800	42
Gulfstream G150	26,100	D-35	80	97	D-35	97
Astra 1125	24,650	D-30	96	117	D-30	117
Cessna Citation 650	22,000	Citation VI/VII	98	119	Citation VI/VII	119
Learjet 60	23,500	Learjet-55	30	36		
Learjet 55	21,500	Learjet-55	4	6	Learjet-55	57
Learjet 75	21,500	Learjet-55	12	15		
Learjet 45	20,500	Learjet-35A/65A	110	133		
Learjet 35	18,000	Learjet-35A/65A	8	10	Learjet-35A/65A	254
Learjet 31	15,500	Learjet-35A/65A	92	111		
Cessna Citation 560	20,000	Citation 550B	704	847	Citation 550B	1,102
Cessna Citation 550	13,300	Citation 550B	212	255		
Phenom 300/ Embraer 300	17,968	D-25	56	68	D-25	68
		Total Operations:	**2,434**			**2,944**

Backcalculation Analysis of FWD Test Data

The elastic moduli of the subgrade soil at the boring locations were backcalculated from the FWD test data. The average minus-one standard deviation subgrade moduli for each analysis unit (design modulus) are shown at the bottom of the backcalculation analysis results in Table 2A in Appendix A.

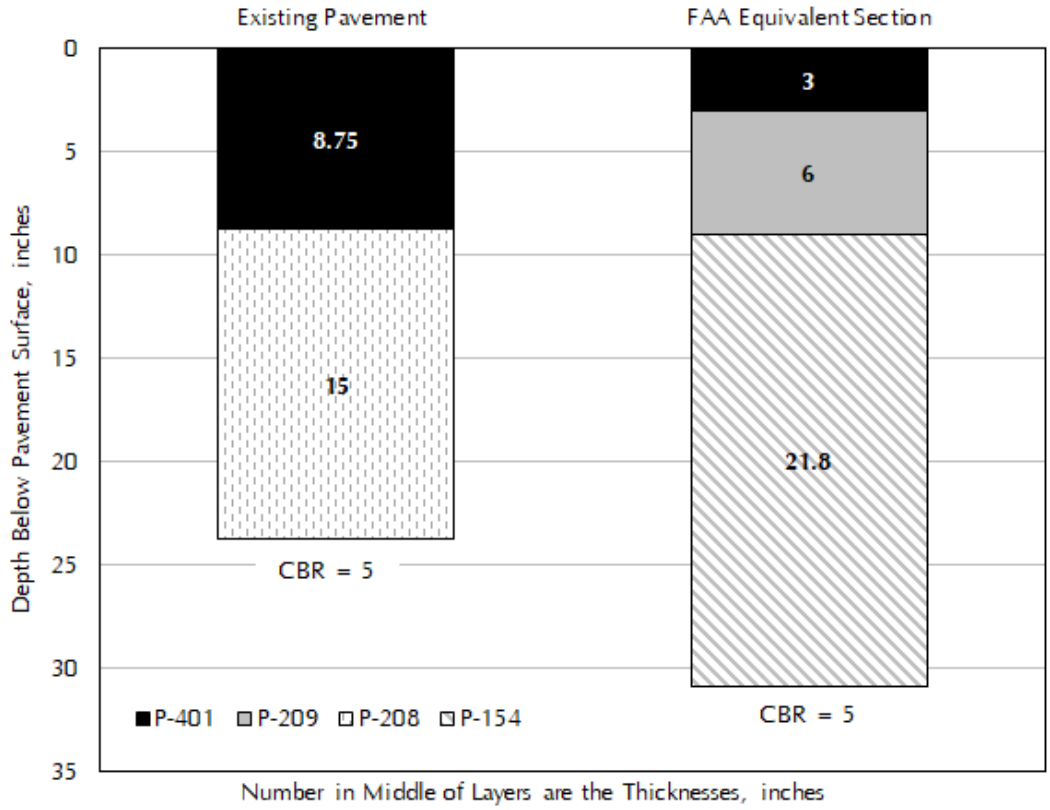
PAVEMENT CLASSIFICATION NUMBER (PCN) CALCULATIONS

As requested by the ODA, we calculated the PCN for Runway 17-35 for each aircraft in the fleet mix based on the critical pavement-layer thickness and subgrade-support characteristics developed herein. The California bearing ratio (CBR) used in the PCN analysis is based on the backcalculated design modulus from Analysis Unit 2 in Table 2A in Appendix A and was calculated using the typical correlation between CBR and Resilient Modulus (M_r) and the correlation adopted by the FAA in Advisory Circular 150/5320-6F, *Airport Pavement Design and Evaluation*, which is represented by the following:

$$CBR = M_r / 1{,}500$$

The analysis was conducted using the FAA's Support Spreadsheet, COMFAA 3.0. The pavement-layer thicknesses were converted into an equivalent pavement section using the appropriate subgrade-support code and the default values for the conversion factors given in Advisory Circular 150/5335-5C. Based on our analysis, the equivalent pavement section is also shown on the following figure.

EQUIVALENT PAVEMENT SECTION FOR RUNWAY 17-35



Results of the PCN computations summarized in Table 3 are based on the departure traffic provided by CWE. For Runway 17-35, we recommend publishing the PCN value shown in Table 3. The corresponding PCN elements of the runway are summarized in Form 5010 (Table 1B) in Appendix B.

Table 3: RECOMMENDED UPDATES TO FAA FORM 5010 FOR UAO RUNWAY 17-35

		Aircraft Gross Weight, thousands lbs	
Runway	**PCN**	**Single Wheel Main Gear**	**Dual Wheel Main Gear**
17-35	40/F/C/X/T	102	145

Our recommended single-wheel, main-gear and dual-wheel, main-gear aircraft gross weights are 102,000 and 143,000 lbs, respectively. The increase in wheel-load capacity (as compared to the current Airport Master Record, FAA Form 5010) is likely due to the increased structural capacity related to the 2005 overlay. Additional discussion regarding the PCN methodology and reporting is provided in Appendix B.

LIMITATIONS

This pavement report has been prepared for use by the Oregon Department of Aviation and Century West Engineering Corporation and should not be relied upon by any other entity without the written permission of an authorized representative. The scope is limited to the specific project and location described herein, and our description of the project represents our understanding of the significant aspects of the project relevant to the analysis of the pavements at the time of publication.

PCN system is only intended as a method that airport operators can use to evaluate acceptable operations of aircraft. It is not intended as a pavement design or pavement evaluation procedure, nor does it restrict or replace the methodology used to design or evaluate a pavement structure.

Our work has been performed in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing under similar conditions in the locale. The results and conclusions submitted in this report are based on the data obtained from our sources of information discussed in this report. No other warranty, expressed or implied, is made.

Please contact the undersigned if you have any questions regarding this report or any other pavement considerations associated with this project.

Submitted for GRI,

Renews 12/2020

Michael J. Maloney, PE
Principal

Lindsi A. Hammond, PE
Associate

This document has been submitted electronically.

References

WHPacific, Inc., 2012, Aurora State Airport, Airport Master Plan Update.

Pavement Consultants Inc., 2018, 2018 Pavement Evaluation / Maintenance Management Program: Aurora State Airport.

PAVEMENT CORE COMPLETED BY GRI
(AUGUST 20, 2019)

FWD TESTING COMPLETED BY GRI
(AUGUST 20, 2019)

SITE PLAN FROM GOOGLE EARTH (IMAGE DATE JULY 2018)

North

0 600 1,200 FT

GRI

CENTURY WEST ENGINEERING CORPORATION
AURORA STATE AIRPORT – RUNWAY 17-35 PCN EVALUATION

SITE PLAN

SEP. 2019 JOB NO. 6289 FIG. 1

APPENDIX A

Field Explorations and FWD Data

APPENDIX A

FIELD EXPLORATIONS AND FWD DATA

FIELD EXPLORATIONS

Existing pavement and subsurface conditions on Runway 17-35 were investigated by GRI on August 20, 2019, with three core explorations, designated B-1 through B-3. The approximate locations of the explorations are shown on the Site Plan, Figure 1. The field exploration and laboratory programs completed for this project are described below.

Pavement Core Explorations

The pavement was cored at each exploration location to assist in evaluation of the type of cracking and/or the thickness and condition of the asphalt concrete (AC). The pavement was cored using an electric drill owned and operated by GRI. Photographs of the core locations and core samples are shown on Figures 1A through 3A. Below the AC, we excavated to a maximum total depth of 24 in. below ground surface to observe the condition of the aggregate base (AB) and subgrade, if encountered. The subgrade was not encountered during our explorations and the AB was classified as silty sandy gravel ranging from angular to rounded and up to 1 to 1.5 in. in diameter.

FWD DATA

Falling weight deflectometer (FWD) tests were conducted by GRI on August 20, 2019, using our KUAB Model 150 FWD. The annual reference calibration for the FWD was accomplished in October 2019 at the KUAB manufacturing facility in Savoy, Illinois.

The FWD testing on Runway 17-35 was accomplished along test lines located at 7 ft west and 12 ft east of the runway centerline. The tests were completed at approximately 200-ft intervals within the keel section of the runway.

General

Geodetic coordinates of all test locations were measured from GPS signal using a submeter-capable Trimble™ GPS receiver with the antenna mounted on the FWD above the load plate.

The FWD load is generated by a two-mass/two-buffer, falling-weight system that produces a nearly haversine-shaped load-pulse waveform. The buffer and weight combination used for these tests produces a load rise time of approximately 14 milliseconds with an equivalent haversine frequency of approximately 32 Hz. The load pulse was applied to the pavement surface through a 450-mm-diameter (8.86-in.-radius), four-part, segmented plate designed to apply uniform surface pressure distribution despite irregularities in the pavement surface. Air temperature and pavement surface temperature (the latter measured by infrared thermometer) were recorded for each test.

Test Data

The average deflections from the two nominal 32,000-lb impact loads were linearly normalized to a 30-kip (30,000-lb) load basis and are tabulated in Table 1A of this appendix. The measurement units for the test

data are distance in feet, deflections in mil units (1 mil = 0.001 in.), load in pounds, sensor distance in inches, load plate radius in inches, and temperature in degrees Fahrenheit.

Impact Stiffness Modulus (ISM)

The Impact Stiffness Modulus (ISM) shown in units of kips per square inch (ksi) is the composite stiffness, or dynamic plate bearing modulus, of all the materials beneath the pavement/roadway surface. It is computed using the Boussinesq formula for surface deflection beneath the center of a uniformly loaded circular area on a linear-elastic half space, with a Poisson's ratio of 0.50. The surface deflection measured at the center of the FWD load plate (D0) was used to compute the surface modulus. The magnitude of the ISM is inversely proportional to deflection and comparable to the elastic modulus. The difference between the pavement ISM and elastic modulus is that the elastic modulus represents the elastic load-deformation response of an individual pavement layer or the subgrade soil, whereas the pavement ISM represents the composite elastic load-deformation response of all materials (pavement layers and subgrade soil) below the pavement surface. Therefore, the ISM (as computed from the deflection measured beneath the FWD load plate) cannot be taken as representative of the elastic modulus of any single pavement layer or the subgrade soil. However, since it is a measurement of the combined stiffness of the pavement structure and subgrade soil, it is often useful for evaluation of variation in pavement stiffness and for assessment of relative pavement strength. Plots of the ISMs are shown on Figure 4A.

Table 1A - FWD NORMALIZED DEFLECTION TEST DATA
RUNWAY 17-35: AURORA STATE AIRPORT (UAO)

Test Section: RW 17-35
Start Point: North edge of runway, 10+00
Test Date: 8/20/2019
Test File: 6289-Aurora Airport.fwd
Load Plate Radius, in: 8.86
Sensor Distance, in: 0 12 18 24 36 48 60 72

Deflections Normalized to 30000 lbf Basis

Test No.	Test Station	Test Line	Core	D 1, mils	D 2, mils	D 3, mils	D 4, mils	D 5, mils	D 6, mils	D 7, mils	D 8, mils	Surface Temp., °F	Time	Surface Modulus, Ksi	ISM, kips/in	Comments
1	10+50	7' w		28.54	24.85	21.17	18.56	13.73	10.05	7.37	5.54	68	1:24:59	57	1,051	7' west
2	12+50	7' w		25.28	20.28	16.82	14.62	10.56	7.81	5.80	4.50	71	1:26:36	64	1,187	
3	14+49	7' w		30.42	25.52	21.55	18.73	13.50	9.84	7.24	5.55	71	1:27:52	53	986	
4	16+51	7' w		29.35	24.82	20.94	18.25	13.29	9.74	7.15	5.47	71	1:29:09	55	1,022	
5	18+50	7' w		24.65	20.46	17.12	14.81	10.62	7.71	5.71	4.47	71	1:30:14	66	1,217	
6	20+56	7' w		27.93	22.60	18.54	15.81	11.05	7.98	5.87	4.66	71	1:31:20	58	1,074	
7	22+50	7' w		25.72	21.22	17.71	15.34	11.10	8.13	6.06	4.70	71	1:32:26	63	1,166	
8	24+51	7' w		26.54	21.58	17.98	15.18	10.67	7.71	5.71	4.47	71	1:33:33	61	1,130	
9	26+53	7' w		26.28	20.74	17.15	14.64	10.47	7.67	5.83	4.64	70	1:34:39	62	1,142	
10	28+55	7' w		26.82	22.10	18.49	15.98	11.58	8.49	6.34	4.95	71	1:35:42	60	1,119	
11	30+54	7' w		26.27	21.60	18.22	15.84	11.70	8.66	6.45	4.96	71	1:37:01	62	1,142	
12	32+54	7' w		30.95	25.88	21.81	19.07	13.97	10.26	7.67	5.78	71	1:38:07	52	969	
13	34+52	7' w		36.96	27.64	22.18	18.81	13.26	9.67	7.12	5.56	71	1:39:22	44	812	
14	36+57	7' w		32.41	26.67	22.42	19.26	13.87	10.02	7.26	5.44	70	1:40:28	50	926	
15	38+52	7' w		28.76	23.55	19.60	16.84	12.06	8.67	6.34	4.88	70	1:41:38	56	1,043	
16	39+51	7' w	B-2	34.09	27.13	22.55	19.48	14.13	10.46	7.65	5.72	70	1:43:21	47	880	B-2
17	40+51	7' w		27.27	22.43	18.67	16.13	11.60	8.44	6.11	4.75	70	1:44:29	59	1,100	
18	42+51	7' w		31.58	25.74	21.56	18.44	13.11	9.35	6.80	5.10	70	1:45:38	51	950	
19	44+51	7' w		29.21	23.02	18.77	15.98	11.24	7.90	5.76	4.52	70	1:46:46	55	1,027	
20	46+50	7' w		29.41	23.54	19.35	16.44	11.40	7.92	5.78	4.50	70	1:47:53	55	1,020	
21	48+52	7' w		28.25	23.01	19.08	16.26	11.38	8.17	6.06	4.66	70	1:49:02	57	1,062	
22	50+52	7' w		39.77	29.04	22.94	19.04	12.53	8.69	6.21	4.86	70	1:50:10	41	754	
23	52+50	7' w		34.37	27.28	22.48	18.86	12.83	8.94	6.47	5.08	70	1:51:20	47	873	
24	54+51	7' w		44.23	34.59	27.53	22.75	14.74	9.70	6.77	5.20	69	1:52:33	37	678	
25	56+40	7' w		37.32	28.83	22.75	18.62	11.88	7.81	5.61	4.42	67	1:53:49	43	804	
26	56+81	7' w	B-1	35.88	28.79	23.20	19.31	12.57	8.38	5.79	4.55	70	1:55:03	45	836	B-1
27	58+50	7' w		35.45	27.78	22.05	18.05	11.74	7.82	5.60	4.34	65	1:56:22	46	846	5875=s end end 7' west
28	11+50	12' e		25.22	21.35	18.22	15.93	11.88	8.90	6.66	5.09	68	2:05:27	64	1,190	12' east
29	13+50	12' e		30.01	25.29	21.29	18.67	13.66	10.11	7.43	5.70	70	2:07:03	54	1,000	
30	15+51	12' e		30.03	25.22	21.26	18.42	13.46	9.89	7.28	5.64	70	2:08:15	54	999	
31	17+53	12' e		28.42	22.94	19.00	16.27	11.53	8.38	6.20	4.83	70	2:09:28	57	1,056	
32	19+41	12' e	B-3	34.02	25.85	20.87	17.26	11.79	8.33	6.13	4.74	70	2:13:56	48	882	B-3
33	21+50	12' e		21.06	17.31	14.42	12.49	9.07	6.79	5.19	4.17	70	2:16:05	77	1,425	
34	23+52	12' e		25.55	21.01	17.53	15.14	11.13	8.27	6.23	4.95	70	2:17:18	63	1,174	
35	25+52	12' e		21.98	17.91	15.02	13.04	9.69	7.31	5.60	4.43	69	2:18:26	74	1,365	
36	27+51	12' e		26.27	20.79	16.87	14.33	10.21	7.48	5.62	4.44	69	2:19:33	62	1,142	
37	29+50	12' e		34.66	28.16	23.24	19.76	13.95	10.10	7.48	5.79	69	2:20:42	47	866	

Table 1A - FWD NORMALIZED DEFLECTION TEST DATA
RUNWAY 17-35: AURORA STATE AIRPORT (UAO)

Deflections Normalized to 30000 lbf Basis

Test No.	Test Station	Test Line	Core	D 1, mils	D 2, mils	D 3, mils	D 4, mils	D 5, mils	D 6, mils	D 7, mils	D 8, mils	Surface Temp., °F	Time	Surface Modulus, Ksi	ISM, kips/in	Comments
38	31+52	12' e		27.24	22.35	18.84	16.39	12.19	9.20	6.99	5.47	69	2:21:52	59	1,101	
39	33+49	12' e		26.34	21.87	18.38	15.90	11.64	8.78	6.71	5.25	69	2:23:00	61	1,139	
40	35+53	12' e		24.64	20.22	16.91	14.67	10.73	8.01	6.08	4.83	69	2:24:09	66	1,218	
41	37+51	12' e		29.65	24.86	20.96	18.32	13.45	9.99	7.38	5.60	69	2:25:16	55	1,012	
42	39+50	12' e		25.27	21.38	17.99	15.86	11.68	8.77	6.56	5.13	69	2:26:26	64	1,187	
43	41+51	12' e		25.80	21.67	18.35	15.90	11.67	8.62	6.43	4.94	69	2:27:34	63	1,163	
44	43+50	12' e		27.58	23.19	19.57	17.18	12.51	9.22	6.76	5.14	69	2:28:38	59	1,088	
45	45+51	12' e		26.22	21.41	17.71	15.13	10.72	7.77	5.72	4.51	69	2:29:48	62	1,144	
46	47+54	12' e		28.02	22.49	18.48	15.60	10.83	7.75	5.68	4.46	69	2:30:56	58	1,071	
47	49+51	12' e		27.34	22.44	18.36	15.67	11.04	7.94	5.90	4.62	69	2:32:04	59	1,097	
48	51+53	12' e		30.35	24.69	20.12	17.00	11.60	8.11	5.96	4.66	69	2:33:11	53	988	
49	53+55	12' e		31.95	26.02	21.17	17.69	11.99	8.46	6.17	4.85	69	2:34:18	51	939	
50	55+50	12' e		36.26	28.03	22.28	18.48	12.16	8.34	6.04	4.75	69	2:35:31	45	827	
51	57+51	12' e		32.67	26.40	21.38	17.62	11.50	7.75	5.50	4.31	67	2:36:47	49	918	5878=s end end 12' east

Table 2A - BACKCALCULATION ANALYSIS SUMMARY
RUNWAY 17-35: AURORA STATE AIRPORT (UAO)

Runway 17-35: Aurora State Airport (UAO)
Based on FWD Testing Conducted: 8/20/2019
Start Station: North edge of runway, 10+00

FWD Test #	Test Station	Test Line	Core Exploration	Analysis Unit	D0, mils	AC Thickness, inches	AB Thickness, inches	Subgrade Modulus, psi
1	10+50	7' w		1	28.54	9.00	15.00	10,402
2	12+50	7' w		1	25.28	9.00	15.00	15,441
3	14+49	7' w		1	30.42	9.00	15.00	11,553
4	16+51	7' w		1	29.35	9.00	15.00	11,570
5	18+50	7' w		1	24.65	9.00	15.00	12,902
6	20+56	7' w		1	27.93	9.00	15.00	11,768
7	22+50	7' w		1	25.72	9.00	15.00	14,630
8	24+51	7' w		1	26.54	9.00	15.00	12,567
9	26+53	7' w		1	26.28	9.00	15.00	15,004
10	28+55	7' w		1	26.82	9.00	15.00	14,486
11	30+54	7' w		1	26.27	9.00	15.00	13,228
12	32+54	7' w		1	30.95	9.00	15.00	10,155
13	34+52	7' w		1	36.96	9.00	15.00	9,847
14	36+57	7' w		1	32.41	9.00	15.00	10,365
15	38+52	7' w		1	28.76	9.00	15.00	10,556
16	39+51	7' w	B-2	1	34.09	9.00	15.00	9,726
17	40+51	7' w		1	27.27	9.00	15.00	10,489
18	42+51	7' w		1	31.58	9.00	15.00	11,108
19	44+51	7' w		1	29.21	9.00	15.00	11,314
20	46+50	7' w		1	29.41	9.00	15.00	11,087
21	48+52	7' w		1	28.25	9.00	15.00	14,129
22	50+52	7' w		2	39.77	8.75	15.00	8,814
23	52+50	7' w		2	34.37	8.75	15.00	9,367
24	54+51	7' w		2	44.23	8.75	15.00	6,713
25	56+40	7' w		2	37.32	8.75	15.00	9,796
26	56+81	7' w	B-1	2	35.88	8.75	15.00	7,615
27	58+50	7' w		2	35.45	8.75	15.00	9,512
28	11+50	12' e		1	25.22	9.00	15.00	12,541
29	13+50	12' e		1	30.01	9.00	15.00	11,399
30	15+51	12' e		1	30.03	9.00	15.00	9,781
31	17+53	12' e		1	28.42	9.00	15.00	11,645
32	19+41	12' e	B-3	1	34.02	9.00	15.00	10,977
33	21+50	12' e		1	21.06	9.00	15.00	17,720
34	23+52	12' e		1	25.55	9.00	15.00	13,364
35	25+52	12' e		1	21.98	9.00	15.00	14,811
36	27+51	12' e		1	26.27	9.00	15.00	14,236
37	29+50	12' e		1	34.66	9.00	15.00	11,837
38	31+52	12' e		1	27.24	9.00	15.00	10,942
39	33+49	12' e		1	26.34	9.00	15.00	11,421
40	35+53	12' e		1	24.64	9.00	15.00	14,477
41	37+51	12' e		1	29.65	9.00	15.00	10,835
42	39+50	12' e		1	25.27	9.00	15.00	11,501
43	41+51	12' e		1	25.80	9.00	15.00	13,236
44	43+50	12' e		1	27.58	9.00	15.00	11,913

Table 2A - BACKCALCULATION ANALYSIS SUMMARY
RUNWAY 17-35: AURORA STATE AIRPORT (UAO)

FWD Test #	Test Station	Test Line	Core Exploration	Analysis Unit	D0, mils	AC Thickness, inches	AB Thickness, inches	Subgrade Modulus, psi
45	45+51	12' e		1	26.22	9.00	15.00	12,250
46	47+54	12' e		1	28.02	9.00	15.00	11,825
47	49+51	12' e		1	27.34	9.00	15.00	12,606
48	51+53	12' e		2	30.35	8.75	15.00	11,238
49	53+55	12' e		2	31.95	8.75	15.00	10,326
50	55+50	12' e		2	36.26	8.75	15.00	9,761
51	57+51	12' e		2	32.67	8.75	15.00	9,341

Statistical Summary

Structural Unit#	From Sta	To Sta	PAVER PMP Unit	Average D0, mils	Average AC Thickness, in.	Average AB Thickness, in.	Average Subgrade Modulus, psi
1	0+00	49+51	R17AU-01	28.10	9.00	15.00	12,235
2	0+00	58+50	R17AU-02	35.83	8.75	15.00	9,248

Design Subgrade Resilient Modulus

Structural Unit #	From	To	PAVER PMP Unit	Average Subgrade Modulus, psi	Standard Deviation, psi	Average Subgrade – Standard Deviation, psi	CBR, Mr (psi)/1500
1	10+50	49+51	R17AU-01	12,235	1,800	10,435	7
2	50+52	58+50	R17AU-02	9,248	1,294	7,955	5

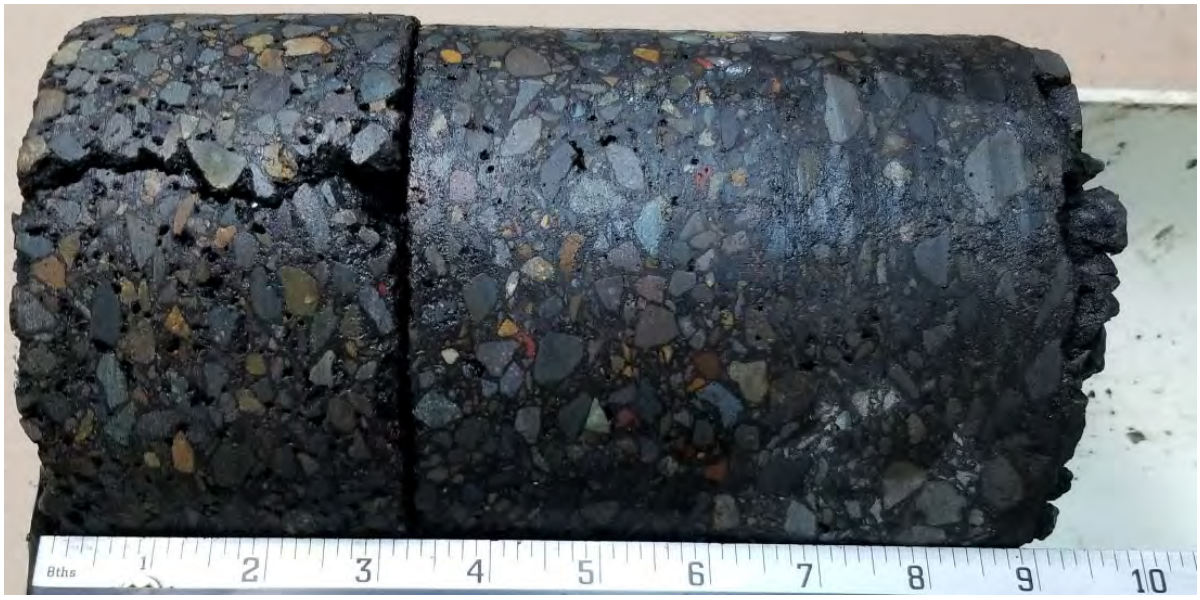
Core B-1 (RW 17-35 8′ West of Centerline, Station 56+81, FWD 26)

B-1 (Pavement Core Sample, 8.75 in.)

GRI

PAVEMENT CORE PHOTOGRAPHS

Core B-2 (RW 17-35 8′ West of Centerline, Station 39+51, FWD 16)



B-2 (Pavement Core Sample, 9.0 in.)

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PAVEMENT CORE PHOTOGRAPHS

SEP. 2019 JOB NO. 6289 FIG. 2A

Core B-3 (RW 17-35 12′ East of Centerline, Station 19+41, FWD 32)

B-3 (Pavement Core Sample, 9.0 in.)

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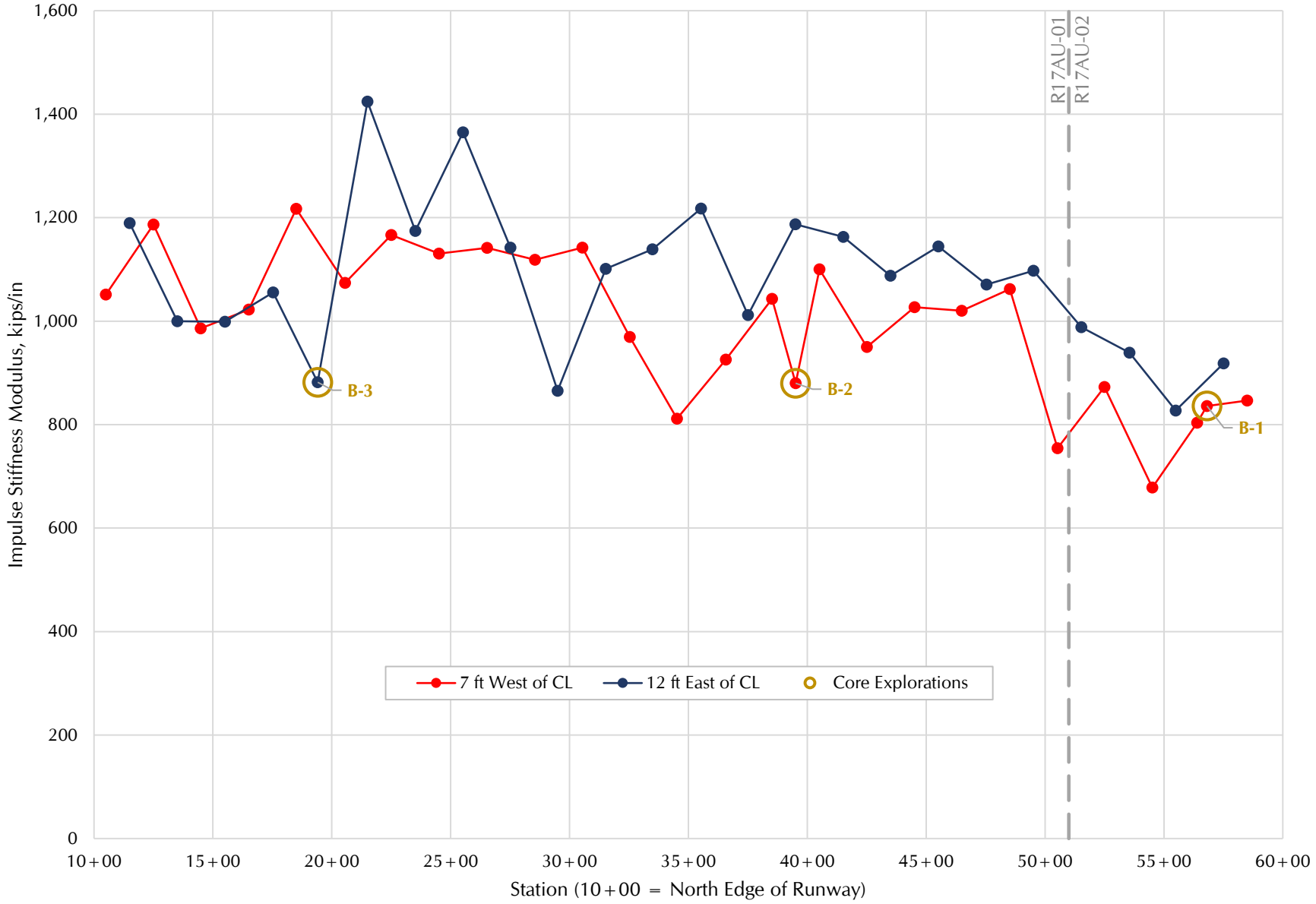
PAVEMENT CORE PHOTOGRAPHS

SEP. 2019 JOB NO. 6289 FIG. 3A



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IMPULSE STIFFNESS MODULUS

SEP. 2019 JOB NO. 6289 FIG. 4A

APPENDIX B

Pavement Classification Number Analysis

APPENDIX B

PAVEMENT CLASSIFICATION NUMBER ANALYSIS

BACKGROUND

In 2014, the FAA instituted a requirement that Part 139-certified airports be assigned pavement classification number (PCN) data. The PCN is required because the United States is a member state of the International Civil Aviation Organization (ICAO), the international regulatory body for air traffic. ICAO adopted the Aircraft Classification Number (ACN)-Pavement Classification Number (ACN-PCN) method to allow any airport a standardized method for reporting the effect of aircraft that use the facility, as well as the load-carrying capacity of the pavement (ICAO, 1999).

The ACN is a number that expresses the relative effect of an aircraft at a given configuration on a pavement structure for a specified standard subgrade strength. Conversely, the PCN is defined as a number that expresses the load-carrying capacity of a pavement for unrestricted operations. Therefore, the ACN-PCN system is structured so that a pavement with a particular PCN value can support unlimited repetitions of an aircraft that has an ACN equal to or less than the pavement's PCN value.

In the ACN/PCN method, the PCN, pavement type, subgrade strength category, tire pressure category, and evaluation method are all reported together. A code system has been implemented to allow an abbreviated presentation of the necessary information. The pavement type is abbreviated "R" for rigid (portland cement concrete [PCC]) and "F" for flexible (AC) pavements. Four subgrade categories, A, B, C, and D, indicate high, medium, low, and ultra-low subgrade strengths, respectively. The four tire-pressure categories, W, X, Y, and Z, indicate high, medium, low, and very low tire pressures, respectively. The evaluation methods are T for a technical evaluation and U for an evaluation based on the type and weight of the aircraft that commonly use the airfield. For example, the PCN code 90/F/C/W/T indicates that the PCN number is 90, that the pavement is flexible, that there is a low-strength subgrade, that high-pressure tires are allowed, and that a technical evaluation was performed to determine the PCN rating.

METHODOLOGY

As noted above, the pavement strength evaluation was accomplished in accordance with the Technical Method described in Advisory Circular 150/5335-5C. To complete the analysis, the following information was used for Runway 17-35:

> **Aircraft Traffic Volume:** The traffic volume estimate was provided by Century West Engineering Corporation in terms of operations for Runway 17-35. The COMFAA 3.0 program includes a library of standard aircraft types, and we used the default gear weight for each aircraft in the aircraft fleet mix.
>
> **Pavement Structure:** As noted earlier herein, the pavement thickness and subgrade support characteristics were estimated based on the FWD backcalculation results and core explorations.

The results of our PCN analysis are summarized in Form 5010 – Airport Master Record (Table 1B) and presented on Figure 1B of this appendix.

Reference

ICAO, 1999, Aerodrome standards – aerodrome design and operations, Annex 14, Third Edition.

Table 1B - FORM 5010 AIRPORT MASTER RECORD

- ( ) A Flexible Category (CBR 15)
- ( ) B Flexible Category (CBR 10)
- (•) C Flexible Category (CBR 6)
- ( ) D Flexible Category (CBR 3)

TIRE PRESSURE

- ( ) W Unlimited
- (•) X 254 psi
- ( ) Y 145 psi
- ( ) Z 73 psi

METHOD USED

- ( ) Using Aircraft
- (•) Technical

Project info

Aurora State Airport

- ( ) A Rigid Category (k 552 pci)
- ( ) B Rigid Category (k 295 pci)
- ( ) C Rigid Category (k 147 pci)
- ( ) D Rigid Category (k 74 pci)

AIRCRAFT GEAR TYPE IN TRAFFIC MIX

- [x] S (single wheel gear)
- [x] D (dual wheel gear)
- [ ] 2D (dual tandem wheel gear)
- [ ] 3D (triple tandem wheel gear) e.g B-777
- [ ] DDT or W/B (tandem gear under wing AND tandem gear under body) e.g. B-747, A-340-600, A-380

Airport LOC-ID	UAO
Pavement ID	RW 17-35

Enter PCN 40

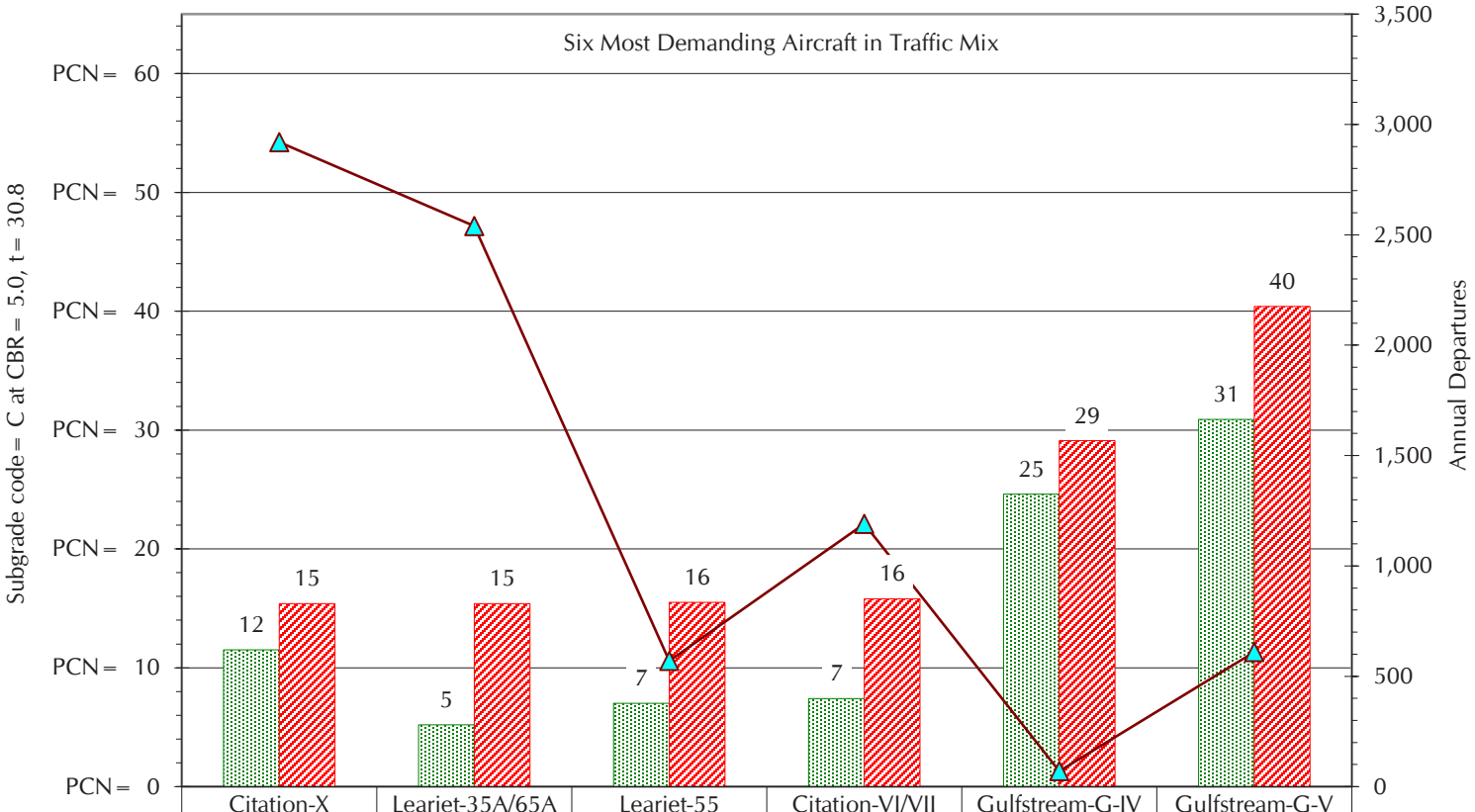
IF 3D or W/B Gear Checked, #38 = PCN
Please Add Data Element #38 Remark

Form 5010 Data Element	Gross Weight and PCN
#35 S gear	102
#36 D gear	143
#37 DT gear	
#38 DDT gear	
#39 PCN	40/F/C/X/T

3D	
2D/2D2	
2D/3D2W	
2D/3D2B	

Report Minimum Gross Weight

Airport LOC-ID	Pavement ID	#35 S GW	#36 D GW	#37 DT GW	#38 DDT GW	#39 PCN
UAO	17-35	102	143			40/F/C/X/T



	Citation-X	Learjet-35A/65A	Learjet-55	Citation-VI/VII	Gulfstream-G-IV	Gulfstream-G-V
1. Aircraft ACN at traffic mix GW	11.5	5.2	7.0	7.4	24.6	30.9
2. Calculated PCN at CDF max. GW	15.4	15.4	15.5	15.8	29.1	40.4
3. Annual Departures from traffic mix	2,920	2,540	570	1,190	70	610

GRI

PAVEMENT CLASSIFICATION CHART

SEP. 2019 JOB NO. 6289 FIG. 1B

HD AVIATION & SOUTHEND AIRPARK

T.4S, R.1W, SEC. 2D & 11A, T.L. 200, 203, 400, 401, 1600
14401 KEIL ROAD N.E.
AURORA, OREGON 97002

PLAN APPROVED

Date 6/22/05 Signed
* with changes noted herein

REGISTERED ENVIRONMENTAL HEALTH SPECIALIST
STATE OF OREGON
Robert F. Sweeney
#0206202513
Expires 30Sep05

INSTALLER: TBA

LICENSE #: TBA

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Project Description

Proposed expansion of existing wastewater treatment facility for a regional airport.
System design = 10,000 GPD.
Residential strength waste flows to eight new Septic Tanks and three new 2-compartment Septic/Dosing Tanks. Effluent flows by gravity from the Septic Tanks to five new Dosing Tanks. Three existing Dosing Septic Tanks will be converted to Sewage Lift Stations, pumping to a new 3000-gallon Co-mingle Tank with effluent filter and then to a 3000-gallon Dosing Tank. Accumulated sludges to be removed by a licensed Sewage Disposal Service.

Effluent is pumped from the Dosing Tanks and Septic/Dosing Tanks to a new 3000-gallon Co-mingle Tank and new 3000-gallon Recirculation Tank that is to be intertied to existing 2x3000-gallon Recirculation Tanks. The Recirculation Tanks will dose two AX-100 Recirculating Textile Filters.

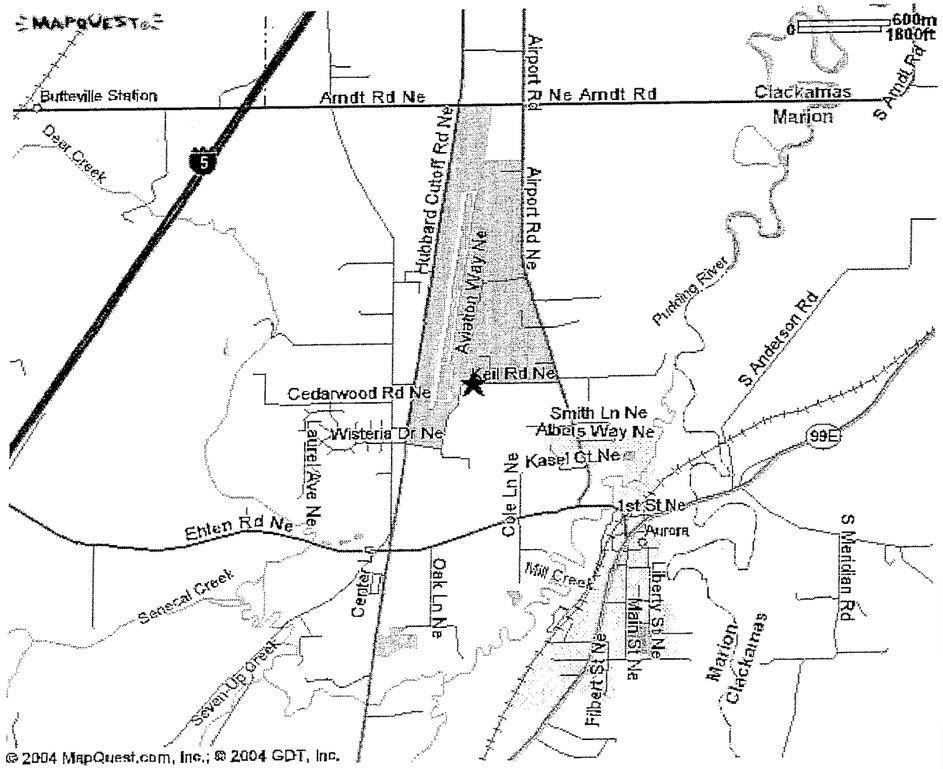
Final disposal via an existing Dosing Tank will be retrofitted with new pumping systems. The existing drainfield size to be doubled to 3000 lft by using the previously identified reserve area. Existing drainfield laterals to be removed and replaced. New Distribution System is detailed in this design. New reserve area will be located west of present drainfield.

Existing Recirculating Gravel Filter to be disassembled and removed. Used gravel media will be deposited in empty NW corner of Tax Lot 400.
Site is served by a private water well.

Site and Soils (Profile Details, Pg. 4)

Amity Silt Loam
Slope 0 – 2%
Reference: Existing File / Permit No.: DEQ110707

VICINITY MAP



PAGE 1
11 JAN 2005
SCALE: NONE

H.D. AVIATION & SOUTHEND AIRPARK
T.4S, R.1W, SEC. 2D & 11A, T.L. 200, 203, 400, 401, 1600
COVER SHEET

CHECKED BY:
DRAWN BY:

Environmental Management Systems Inc.
4080 SE International Way, Ste.B112
Milwaukie, OREGON 97222
OR (503)353-9691 WA (360)735-1109
FAX (503)353-9695

CHECK OFF	
	GENERAL STANDARDS
	All w ork and material shall conform w ith OAR 340 Div. 71 & 73 approved design permit, and appropriate law s. Permits relating (but not limited) to plumbing, electrical, and grading must be coordinated w ith the on-site system installer and designer.
	Minor modifications to accommodate stumps, boulders or other unforeseen obstacles may be needed. Major modification cannot be performed w ithout re-design and regulatory approval.
	If the installation contractor (installer) notes any conflicts w ith applicable State and/or local law s, rules or requirements, he shall request a clarification before ordering or installing affected materials or w ork. This may include and is not limited to such factors as: land-use regulations, grading ordinances, erosion control districts, hauling limits, typographical errors, etc.
	Installer is to obtain copies of all necessary permits, authorizations, licenses etc. prior to initiating construction, including that specialty w ork designated to a subcontractor w hich is directly or indirectly related to the system construction.
	Installer shall request and obtain utility locates by a qualified service for all potential underground utilities before excavation w ork commences.
	Installer shall maintain any and all survey monuments, w hich are affected by w ork and activities, related to the projects. Monuments, if damaged by the installer, shall be reset by a licensed surveyor at the installer's expense.
	All materials and equipment shall be of the type, model and brand listed for the manufacturers specified, unless otherw ise authorized by the system designer. Substitution of materials and equipment shall receive pre-authorization and the contractor/installer w ill be responsible for providing performance and operating data.
	Installer shall prepare, maintain and provide, at completion of the project, draw ings detailing the construction "as-built" and shall provide the ow ner & designer w ith the manufacturer's current specification and operating data on all equipment installed prior to final payment to the installer.
	TANK (S)
	Grout: Grout w atertight using hydraulic-adhesive type cement or grout material. Grout interior and exterior.
	Seal all joints and seams w ith manufacturer-approved sealants.
	Odor proof: Seal riser lid to contact w ith closed cell plastic foam sheet, or single-side adhesive neoprene foam tape.
	All tanks must be Traffic Rated.
	Tanks must be fitted w ith manhole covers in steel rings set in pavement minimum 2" above the tank risers.
	Riser: Tank must be equipped w ith a w atertight riser, w ith minimum 18" inside diameter, w ith tank access brought to or above finish grade. Riser seams must be grouted interior and exterior.
	Knockouts: Perforations and unused knockouts must be grouted.
	Watertight: Tank must be subject to overnight test for w atertightness prior to calling for inspection. Fill to a maximum 2" into riser. Mark w ater level, initials, time and date.
	PUMP (S)
	Air-lock hole: Install a 5/32" diameter hole in discharge pipe below off level and below check level.
	Disconnect: Provide a quick disconnect of non-corrosive material w ithin 12" of riser top. Position to allow for removal of pump and pump screen for annual maintenance.
	Isolate valve: Provide a gate or ball valve w ithin 12" of riser top, on discharge side of disconnect. Position to allow for removal of pump and pump screen for annual maintenance.
	Flush transport pipe and check for equal distribution from splitters, valves, and/or distribution box.
	Float control assembly: Float controls must be connected to a separate stand pipe, not discharge line, w hich is serviceable and accessible.
	Pump screen: Provide a corrosion-resistant screen w ith minimum tw elve sq. ft. surface area, w ith maximum 1/8" openings, surrounding pump extending above maximum effluent level.
	Trace w ire: Provide an electrically continuous 18 gauge, green-jacketed copper w ire in trench for the full length of all transport lines, accessible at the source end.
	ELECTRICAL COMPONENTS
	Wiring of pumps and controls shall be performed by a licensed electrician under the auspices of a permit secured from the local jurisdiction. For details of electrical system, pump controls, floats, and the level of the float settings see the manufacturer's instructions and approved design.
	Splicing of w ires at the splice box inside the tank risers shall be done using the heat shrink connectors provided by the manufacturer or w ith an approved w atertight electrical connector nut.
	Wiring from the splice box to the source or the control panel shall be protected in UL approved PVC conduit, constructed w atertight. Pump line voltage shall have w ater proof insulation such as THW, THWN, or HHW. Wire for all connections shall be 14 gauge w ire or larger.
	"Seal offs" shall be installed betw een the splice box and the pow er source or control panel, either in the horizontal just outside the riser or in the vertical just below the control panel or per connection. "Seal offs" shall be installed to manufacturer's specifications and shall be equal to or better than the follow ing: Appleton EYF seal off box, PVC terminal adapters (threaded), Killark sealing compound, Killark packing fiber.
	Wiring shall be color coded or numbered and the schedule w ritten inside the control panel or on the w iring diagram.
	Upon completion, the apparatus shall be tested for operation and correctness. Available voltage, pump run voltage and pump run amperage shall be measured and recorded inside the control panel.
	The w iring diagram shall be retained on site (preferably in control panel enclosure) and any as-built notes or comments entered, initialed, and dated.
	CONTROL PANEL (S)
	The electrician shall label the control panel or electrical panel w ith his business name and the permit number and date of installation.
	Control panel shall be installed per manufacturer's instructions; alarm shall be audible from the living/w orking space. Pump and alarm must be on separate circuits. Location of panels to be based on electrical access.
	The control panel for all pumps must have the capability to record the number of alarms, pump events and override events, if applicable.
	Use a padlock or other locking device to prevent unauthorized access to the control panel. Panel to be installed on 4" X 4" post, NOT on w all.
	Panel shall be in accordance w ith NEMA 4X rating. Panel enclosure shall meet NEMA 4X requirements.
	OTHER
	Setbacks: Maintain required setbacks.
	COLLECTION SYSTEM
	Plumbing permit required
	DISTRIBUTION AND TRANSPORT LINES
	Pressure piping: Must meet or exceed Class 200 PVC, (ASTM 2241), or class 160 for pipes greater than an inch in diameter.
	Road crossing: Sleeve transport pipe in Sch. 40 PVC, installed a minimum of 18" below grade, and bedded in ¾ minus to the surface.
	All w ork and materials shall conform w ith Chapter 246-272 WAC, approved design permit, and appropriate law s. Permits relating (but not limited) to plumbing, electrical, and grading must be coordinated w ith the on-site system installer and designer.

REGISTERED ENVIRONMENTAL HEALTH SPECIALIST
STATE OF OREGON
Robert F. Sweeney
#02062025 13
Expires 2005

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11 JAN 2005

SCALE: NONE

H.D. AVIATION & SOUTHEND AIRPARK

T.4S, R.1W, SEC. 2D & 11A, T.L. 200, 203, 400, 401, 1600

CONSTRUCTION SPECIFICATIONS

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Table 1: Maximum Daily Design Flow

	Source					Gallons Per Day
HD AVIATION	Existing Building 1	55	occupants @	15	gpd	825
	Existing Building 2	63	occupants @	15	gpd	945
	Existing Building 3	25	occupants @	15	gpd	375
	Future Building 4	6	occupants @	15	gpd	90
	Future Building 5	5	occupants @	15	gpd	75
	Future Building 6	7	occupants @	15	gpd	105
	Future Building 7	11	occupants @	15	gpd	165
	Future Building 8	10	occupants @	15	gpd	150
	Future Building 9	6	occupants @	15	gpd	90
SOUTHEND AIRPARK	Future Building A	32	occupants @	15	gpd	480
		7	occupants @	75	gpd	525
	Existing Building B	3	occupants @	15	gpd	45
	Existing Building C	15	occupants @	15	gpd	225
	Existing Building D	9	occupants @	15	gpd	135
		6	occupants @	75	gpd	450
	Future Building E	3	occupants @	15	gpd	45
	Existing Building F	3	occupants @	15	gpd	45
	Future Building G	12	occupants @	15	gpd	180
	Future Building H	12	occupants @	15	gpd	180
	Existing Building I	21	occupants @	15	gpd	315
	Existing Building J	13	occupants @	15	gpd	195
	Future Building K	33	occupants @	15	gpd	495
	Future Building L	34	occupants @	15	gpd	510
		7	occupants @	75	gpd	525
	Future Building M	7	occupants @	15	gpd	105
	Future Building N	15	occupants @	15	gpd	225
	Projected Peak Flow					**7500**
	Design Flow Max					**10000**

Table 2: Capacity for Existing Drainfield

Effluent Quality	Gallons Per Day	Loading Rate
Advantex Effluent	5000	45 lft / 150 gpd

Table 3: Capacity for New Drainfield

Effluent Quality	Gallons Per Day	Loading Rate
Advantex Effluent	5000	45 lft / 150 gpd

Table 4: Effluent Quality Expectations

Parameter	Not to Exceed
BOD	20 mg/L
TSS	20 mg/L
TN	30 mg/L

System Components-HD Aviation

	Tank #	Volume (gal)	Dose Schedule	Pump Type	# of Pumps	Pump Model	Pump Size	Gal/min
Pump Stations	S1	3000	Timed	Solids Handling	2	PSE4011	4/10 hp	10
	S2	3000	Timed	Solids Handling	2	PSE4011	4/10 hp	10
	S3	1500	Demand	Solids Handling	2	PSE4011	4/10 hp	10
Septic Tanks	S5	1000	na	na	na	na	na	na
	S6	3000	na	na	na	na	na	na
	S10	3000	na	na	na	na	na	na
	S12	1500	na	na	na	na	na	na
	S13	1500	na	na	na	na	na	na
	S14	1000	na	na	na	na	na	na
	S15	1000	na	na	na	na	na	na
	S16	1000	na	na	na	na	na	na
Septic/Dosing Tanks	S4	1500	Demand	Turbine	2	P100511	1/2 hp	10
	S7	1500	Demand	Turbine	2	P100511	1/2 hp	10
	S8	1500	Demand	Submersible	1	Myers	1/2 hp	10
	S9	1500	Demand	Turbine	2	P100511	1/2 hp	10
	S11	1500	Demand	Turbine	2	P100511	1/2 hp	10
Dosing Tanks	D1	2000	Timed	Turbine	2	P100511	1/2 hp	10
	D2	1000	Timed	Turbine	2	P100511	1/2 hp	10
	D3	1500	Timed	Turbine	2	P100511	1/2 hp	10
	D4	1000	Timed	Turbine	2	P100511	1/2 hp	10
	D5	1000	Timed	Turbine	2	P100511	1/2 hp	10
	D6	1000	Timed	Turbine	2	P100511	1/2 hp	10
	D7	3000	Timed	Turbine	2	P501512	1-1/2 hp	50
Recirculation Tanks	R3	3000	Timed	Turbine	2	P500712	3/4 hp **	50

Primary Septic Tankage Volume = 25,500 gallons

Total Tankage Volume = 47,500 gallons

*** Pumps to be upgraded to size and model determined and verified by RTF Manufacturer (Orenco).*

Recirculating Textile Filter	Max. Design Capacity =	10,000gpd
	Projected Peak Flow =	7500 gpd
	Projected Average Daily Flow =	3750 gpd
	Pod Surface Area =	100 sqft.
	Number of pods =	2
	Recirculation Rate =	4 to 1
	Acutal Flow (w/ Recirc.) =	15000 gpd
	Design Hydraulic Loading =	50 gal/sqft/day
	Design Recirculation Loading =	250 gal/sqft/day

Distribution Components

Quantity	Component
1	OSI-Hydrotek V6602 Automatic Distribution Valve (RTF Pod Distribution)
1	OSI-Hydrotek V6606 Automatic Distribution Valve (Drainfield Distribution)

Pressure Distribution Drainfield	Max. Design Capacity =	10,000gpd
	Projected Peak Flow =	7500 gpd
	Projected Average flow =	3750 gpd
	Design Hydraulic Loading Rate =	45 Lft./ 150gpd

REGISTERED ENVIRONMENTAL HEALTH SPECIALIST
STATE OF OREGON
Robert F. Sweeney
#0206202513
Expires 30 Sept 05

PAGE 3

11 JAN 2005

SCALE: NONE

H.D. AVIATION & SOUTHEND AIRPARK

T.4S, R.1W, SEC. 2D & 11A, T.L. 200, 203, 400, 401, 1600

DESIGN DATA TABLE

CHECKED BY:

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OR (503)353-9691 WA (360)735-1109
FAX (503)353-9695

ENVIRONMENTAL MANAGEMENT SYSTEMS Inc. - ON-SITE SEWAGE TREATMENT SITE EVALUATION DATA

4080 SE International Way, Suite #B-112, Milwaukie, OR 97222-8867 (503) 353-9691 fax: (503) 353-9695 (Vancouver, WA 360-735-1109)

APPLICANT: HD AVIATION — PREVIOUS EVALUATIONS: Y / N | ID# :

ADDRESS OF SITE: 1400 KEIL RD, AURORA, OR 97002 — Sub Division:

LEGAL DESCRIPTION: TOWNSHIP: 2S RANGE: 1W SECTION: 2, 11 PARCEL/TAX LOT: 800 — other:

SOIL PROFILES: DRAINFIELD AREA - EAST SET OF HOLES

TEST HOLE	DEPTH (IN)	TEXTURE	Redoximorphic Features: MATRIX COLOR	Oxidized COLOR	Reduced Color	Coarse Fragments	ROOTS	STRUCTURE & Other Comments:	APPL. RATE w/ Pretreatment
#1 NE	0" - 8"	gSiL	7.5YR 3/3	--	--	--	mf	sbk	45 LPf/150g
	8" - 16"	SiCL	7.5YR 3/2	--	--	--	cf	Faint Mottles / sbk	45 LPf/150g
	16" - 36"	SiCL	7.5YR 4/2	7.5YR 4/6	7.5YR 3/2	--	ff	Distinct Mottles / abk	50 LPf/150g
Slope= 2% E	36" - 64"	SiCL	7.5YR 2.5/2	7.5YR 4/6	7.5YR 3/2	--	vff	Somew hat Massive	50 LPf/150g
#2 NW	0" - 13"	gSiL	7.5YR 3/3	--	--	--	mf	sbk	45 LPf/150g
	13" - 18"	SiCL	7.5YR 3/2	--	--	--	cf	Faint Mottles / sbk	45 LPf/150g
	18" - 40"	gSiCL	7.5YR 4/2	7.5YR 4/6	7.5YR 3/2	--	ff	Distinct Mottles / abk	50 LPf/150g
Slope= 2% E	40" - 76"	SiCL	7.5YR 2.5/2	7.5YR 4/6	7.5YR 3/2	--	vff	Somew hat Massive	50 LPf/150g
#3 SE	0" - 10"	gSiL	7.5YR 3/3	--	--	--	mf	sbk	45 LPf/150g
	10" - 30"	gSiCL	7.5YR 3/2	7.5YR 4/6	7.5YR 3/2	--	ff	Distinct Mottles / abk	50 LPf/150g
	30" - 62"	SiCL	7.5YR 2.5/1	7.5YR 4/6	7.5YR 3/2	--	vff	Somew hat Massive	50 LPf/150g
Slope= 2% E	62" - 66"	SiCL	7.5YR 3/2	--	--	--	--	Massive	75 LPf/150g
#4 SW	0" - 14"	gSiL	7.5YR 3/3	--	--	--	mf	sbk	45 LPf/150g
	14" - 30"	gSiCL	7.5YR 3/2	7.5YR 4/6	7.5YR 3/2	--	ff	Distinct Mottles / abk	50 LPf/150g
	30" - 48"	SiCL	7.5YR 4/2	7.5YR 4/6	7.5YR 3/2	--	vff	Somew hat Massive	50 LPf/150g
Slope= 2% E	48" - 66"	SiCL	7.5YR 3/2	--	--	--	--	Massive	75 LPf/150g

WEATHER CONDITIONS: (X) CLEAR ( ) CLOUDY ( ) PRECIPITATION ( ) EXTREME DRYNESS ( ) OTHER:

LANDFORMS: ( ) FLOODPLAIN (X) TERRACE (X) UPLAND ( ) SIDESLOPE ( ) OPEN ( ) OTHER:

VEGETATION: (X) PASTURED ( ) FORESTED (X) CLEARED ( ) WETLAND ( ) OTHER:

MAJOR LIMITING FACTOR(S): (X) WATER TABLE / (X) SOIL SUITABILITY / ( ) SET BACKS / ( ) LOT SIZE

SOIL TYPE: SiL / SiCL PROPOSED SYSTEM: RGF to Pressure Drainfield

ADDITIONAL COMMENTS: Soil Pits Observed with Randy Trox, RS of DEQ-Western Region.

EFFECTIVE SOIL DEPTH ~ 30-48" OTHER: SURFACE LAYERS INCLUDE OLD FILL FROM AIRSTRIP CONSTRUCTION.

Soil Survey Mapping: Marion County Sheet #6= Amity Silt Loam

EVALUATOR'S NAME: ROBERT F. SWEENEY, RS — EVALUATORS SIGNATURE: R Sweeney — DATE: 14 July 1999

ENVIRONMENTAL MANAGEMENT SYSTEMS Inc. - ON-SITE SEWAGE TREATMENT SITE EVALUATION DATA

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APPLICANT: HD AVIATION — PREVIOUS EVALUATIONS: Y / N | ID# :

ADDRESS OF SITE: 1400 KEIL RD, AURORA, OR 97002 — Sub Division:

LEGAL DESCRIPTION: TOWNSHIP: 2S RANGE: 1W SECTION: 2, 11 PARCEL/TAX LOT: 800 — other:

SOIL PROFILES: DRAINFIELD AREA - WEST SET OF HOLES

TEST HOLE	DEPTH (IN)	TEXTURE	Redoximorphic Features: MATRIX COLOR	Oxidized COLOR	Reduced Color	Coarse Fragments	ROOTS	STRUCTURE & Other Comments:	APPL. RATE w/ Pretreatment
#1 SW	0" - 10"	SiL	7.5YR 3/3	--	--	--	mf	sbk	45 LPf/150g
	10" - 21"	SiL	7.5YR 3/2	--	--	--	cf	abk	45 LPf/150g
	21" - 25"	gSiL	7.5YR 3/2	7.5YR 4/6	7.5YR 3/2	--	ff	Distinct Mottles	50 LPf/150g
Slope= 1% W	25" - 60"	SiCL	7.5YR 4/2	7.5YR 4/6	7.5YR 3/2	--	vff	Somew hat Massive	50 LPf/150g
#2 SE	0" - 15"	SiL	7.5YR 3/3	--	--	--	mf	sbk	45 LPf/150g
	15" - 19"	gSiL	7.5YR 3/2	--	--	--	cf	sbk	45 LPf/150g
	19" - 28"	SiCL	7.5YR 3/2	7.5YR 4/6	7.5YR 3/2	--	ff	Distinct Mottles	50 LPf/150g
Slope= 1% W	28" - 60"	SiCL	7.5YR 4/2	7.5YR 4/6	7.5YR 3/2	--	vff	Somew hat Massive	50 LPf/150g
#3 NE	0" - 15"	SiL	7.5YR 3/3	--	--	--	mf	sbk	45 LPf/150g
	15" - 20"	gSiL	7.5YR 3/2	7.5YR 4/6	7.5YR 3/2	--	ff	Distinct Mottles / abk	50 LPf/150g
	20" - 60"	SiCL	7.5YR 4/2	7.5YR 4/6	7.5YR 3/2	--	vff	Somew hat Massive	50 LPf/150g
Slope= 1% W									
#4 NW	0" - 16"	SiL	7.5YR 3/3	--	--	--	mf	abk	45 LPf/150g
	16" - 22"	gSiL	7.5YR 3/2	7.5YR 4/6	7.5YR 3/2	--	ff	Distinct Mottles / abk	50 LPf/150g
	22" - 60"	SiCL	7.5YR 4/2	7.5YR 4/6	7.5YR 3/2	--	vff	Somew hat Massive	50 LPf/150g
Slope= 1% W									

WEATHER CONDITIONS: (X) CLEAR ( ) CLOUDY ( ) PRECIPITATION ( ) EXTREME DRYNESS ( ) OTHER:

LANDFORMS: ( ) FLOODPLAIN (X) TERRACE (X) UPLAND ( ) SIDESLOPE ( ) OPEN ( ) OTHER:

VEGETATION: (X) PASTURED ( ) FORESTED (X) CLEARED ( ) WETLAND ( ) OTHER:

MAJOR LIMITING FACTOR(S): (X) WATER TABLE / (X) SOIL SUITABILITY / ( ) SET BACKS / ( ) LOT SIZE

SOIL TYPE: SiL / SiCL PROPOSED SYSTEM: RGF to Pressure Drainfield

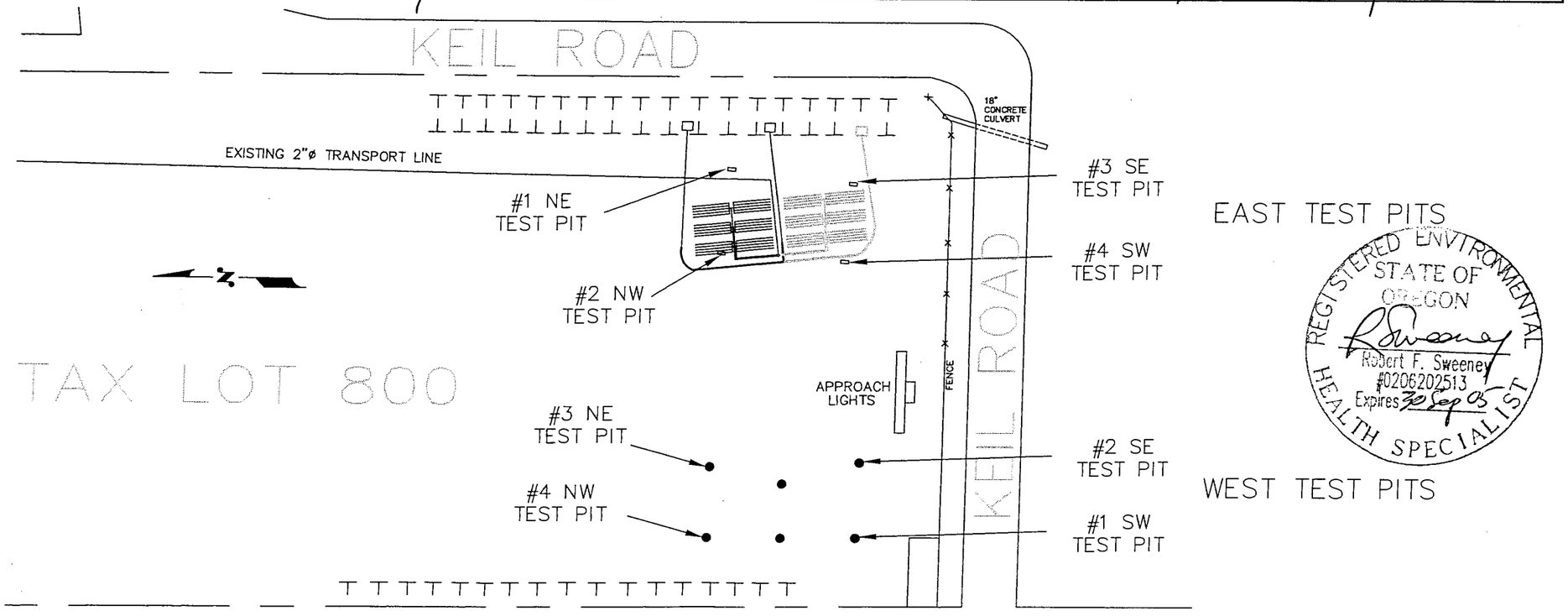
ADDITIONAL COMMENTS: Soil Pits Observed with Randy Trox, RS of DEQ-Western Region.

EFFECTIVE SOIL DEPTH ~ 20-25" OTHER: SURFACE LAYERS INCLUDE OLD FILL FROM AIRSTRIP CONSTRUCTION.

Soil Survey Mapping: Marion County Sheet #6= Amity Silt Loam

Center Test Pits Similar to Corners w / Redox Features starting at >15 inches below ground surface

EVALUATOR'S NAME: ROBERT F. SWEENEY, RS — EVALUATORS SIGNATURE: R Sweeney — DATE: 14 July 1999



REGISTERED ENVIRONMENTAL HEALTH SPECIALIST
STATE OF OREGON
Robert F. Sweeney
#020620513
Expires 30 Sep 05

PAGE 4

11 JAN 2005

SCALE: NONE

H.D. AVIATION & SOUTHEND AIRPARK

T.4S, R.1W, SEC. 2D & 11A, T.L. 200, 203, 400, 401, 1600

SOIL EVALUATIONS

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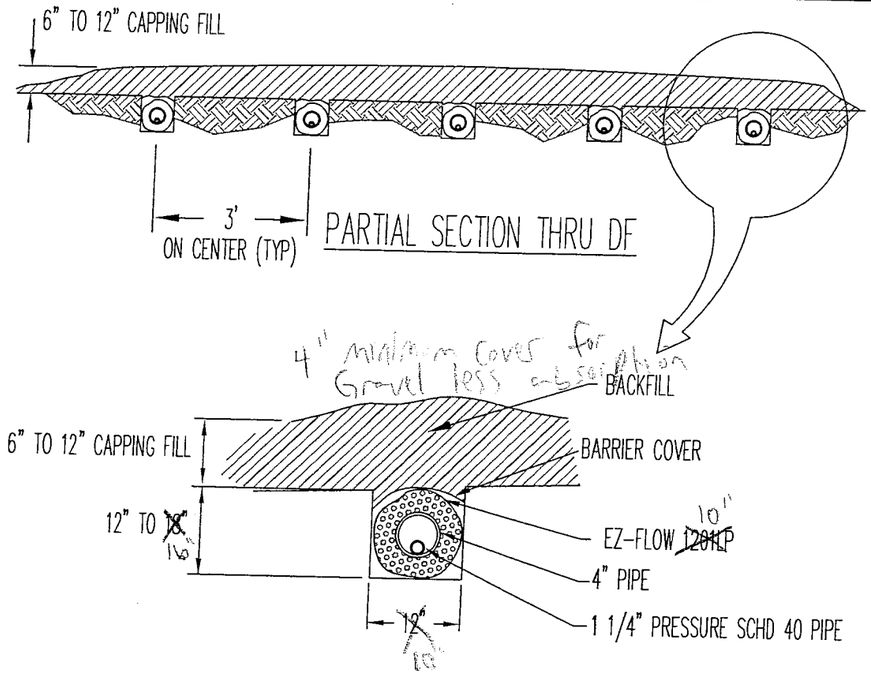
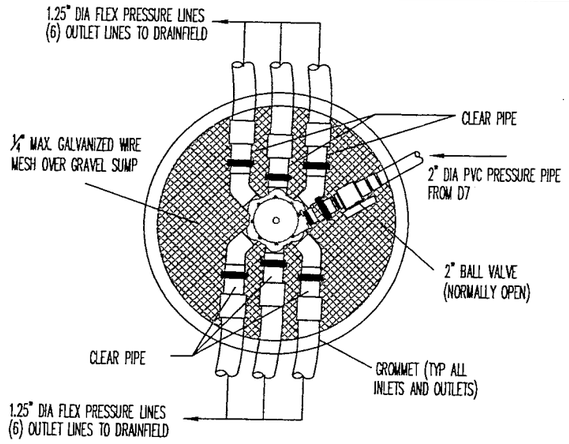
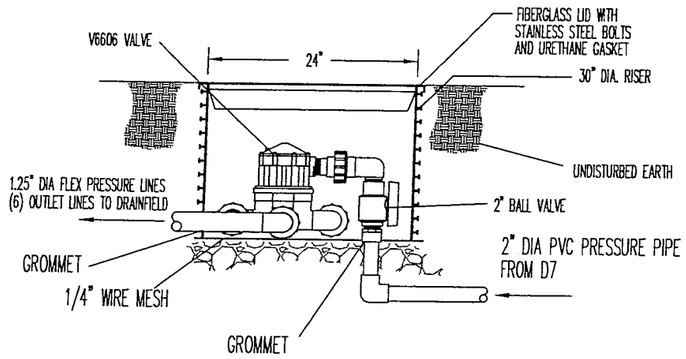
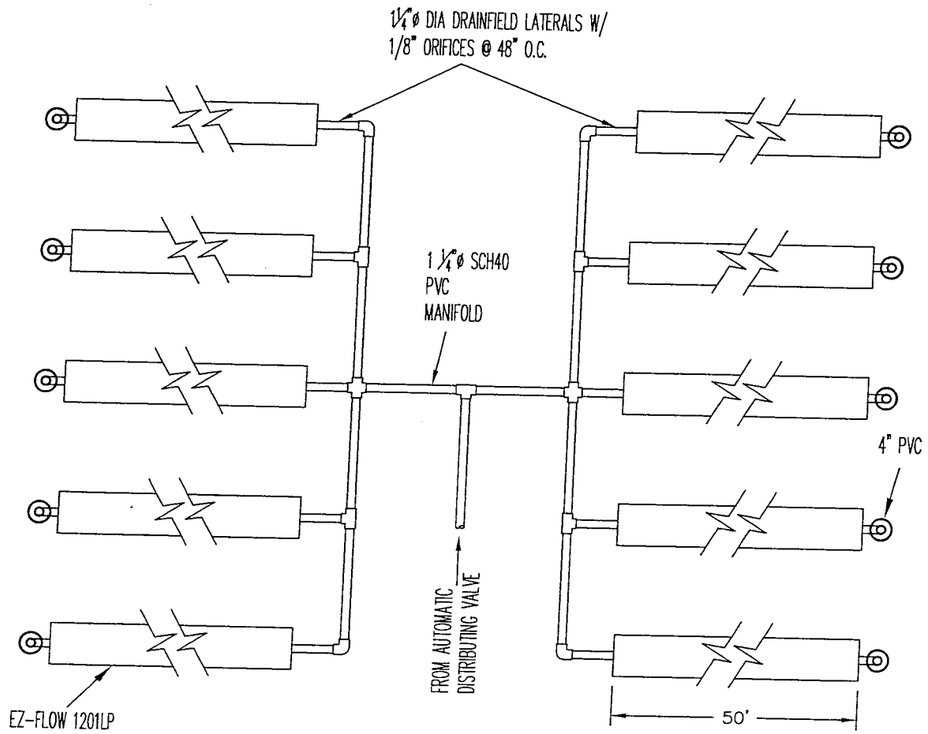


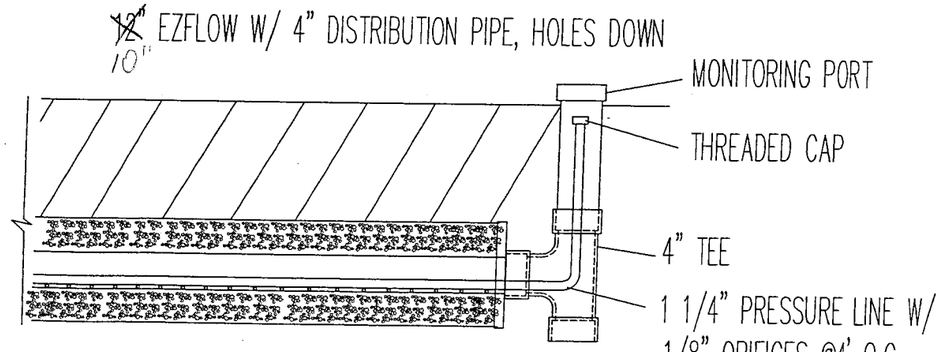




V6606 DISTRIBUTING VALVE



DRAINFIELD CELL



MONITORING PORT @ END OF EACH LINE

REGISTERED ENVIRONMENTAL HEALTH SPECIALIST
STATE OF OREGON
Robert F. Sweeney
#0206202513
Expires 30Sep05

H.D. AVIATION & SOUTHEND AIRPARK
T.4S, R.1W, SEC. 2D & 11A, T.L. 200, 203, 400, 401, 1600
DRAINFIELD DETAILS-1
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KEIL ROAD

EXISTING RIP RAP

EXISTING GWI OUTFALL TO BE DISCONNECTED

18" CONCRETE CULVERT

NEW RIP RAP

EXISTING 2"øPVC TRANSPORT LINE

#1 NE TEST PIT

#3 SE TEST PIT

Solid pipe starts here

EXISTING 1'x3' GWI

#4 SW TEST PIT

#2 NW TEST PIT

NEW V6606

CONNECT NEW 1'X3' GWI TO EXISTING GWI. DISCONNECT CURRENT SOUTH OUTFALL AND REROUTE SOUTH OF NEW DRAINFIELD CELLS

RESERVE DRAINFIELD AREA

APPROACH LIGHTS

FENCE

KEIL ROAD

#3 NE TEST PIT

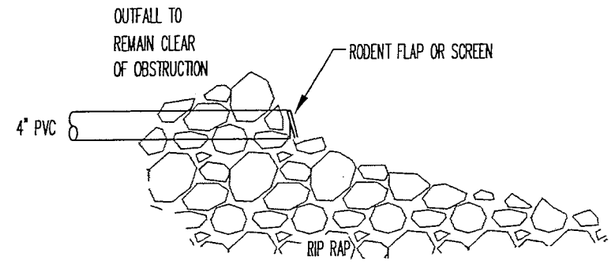
#4 NW TEST PIT

#2 SE TEST PIT

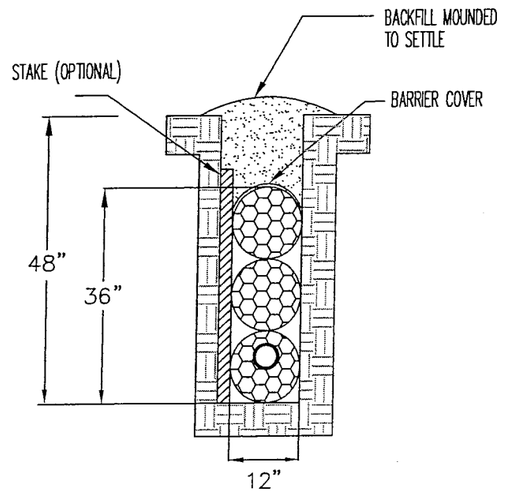
#1 SW TEST PIT

STATE HIGHWAY 164

REGISTERED ENVIRONMENTAL HEALTH SPECIALIST
STATE OF OREGON
Robert F. Sweeney
#0206202513
Expires 30Sep05



RIP RAP DETAIL



GWI DETAIL

PAGE 24

11 JAN 2005

SCALE: NONE

H.D. AVIATION & SOUTHEND AIRPARK

T.4S, R.1W, SEC. 2D & 11A, T.L. 200, 203, 400, 401, 1600

DRAINFIELD DETAILS-2

CHECKED BY:

DRAWN BY:

Environmental Management Systems Inc.
4080 SE International Way, Ste.B112
Milwaukie, OREGON 97222
OR (503)353-9691 WA (360)735-1109
FAX (503)353-9695

Exhibit 2

faegre@earthlink.net

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Monday, February 7, 2022 8:06 AM
To: 'Helbling, Tony'; 'Aron Faegre'; 'Michelle DaRosa'
Cc: STANSBURY Betty; 'Ted Millar'; 'Martha Meeker'
Subject: RE: HDSE drainfield expansion area at UAO

Hi all, I've pasted the questions and request for additional information from our consultants below.

Thanks for getting the response back from NV5 and Aron. We have looked through what was sent over and still have questions and information needed. We also still need a copy of the report that opens & displays all the figures (this was stated as included but it was not one of the attachments). Since other questions are focused on details of the proposed improvements we have not received, we have responded to NV5's answers in that area in orange below:

- Materials/Construction Proposed
  - o What materials specification is to be used (ODOT, proprietary, etc.) for the aggregate?
    Per the GeoWeb Manufacturer the infill material should consist of one third pulverized topsoil and two thirds crushed aggregate. The aggregate portion should be crushed rock that has a particle size range from 0.375 to 1.0 inches with a D50 of 0.5 inches and a 30 percent void space. The engineered fill should lightly be compacted to allow vegetation growth.

    What are the assumed properties of these materials if there are not more specifics as to what might be used? What is "light compaction"? Is there a minimum void space requirement that should be met? Performance spec for infiltration?

  - o What compaction specifications and test methods are proposed to achieve the proposed Geoweb strengths?
    After the cells have been filled the prepared ground surface should be proofrolled with a fully loaded dump truck. Some rutting and deflection is acceptable considering that the FAA specifies the upper 4-inches of subgrade consist loose uncompacted soil over 12-inches of compacted subgrade.

    Again, what is the density intended for these layers? We are not analyzing the rest of the RSA and we need to know how much rutting or deflection is being assumed to be "acceptable". We are concerned with what is being proposed and whether it can support aircraft and vehicle loading.

  - o What compaction specifications and test methods are proposed for soil layers to be placed along with the Geoweb?
    The only other soil that will be placed is the washed gravel or drain rock in the drainage trenches. We recommend only light compaction of this material until it is well keyed. Even at this level of compaction we believe its load bearing characteristics will be superior to the soil that exists in the RSA. Over compacting this material will inhibit its drainage characteristics

    What are the assumed properties of these materials if there are not more specifics as to what might be used? What is "light compaction"? Is there a minimum void space requirement that should be met? Performance spec for infiltration? What load bearing characteristics will these yield? Will these layers retain their characteristics when the grass is mowed or a vehicle passes over the top of them?

o What subgrade compaction specifications and test methods are proposed for the expanded drain field areas?

See our response to the two prior questions.

Same.

o What materials are proposed for use in the rest of the elements of the drain field system (pipes, manifolds, perf spec., etc.)?

To be addressed by others. [[Note: Attachment 6 added by Aron Faegre to this memo for providing this information to Tony Beach.]

Attachment Six does not provide enough detail about the weight rating for proposed elements (structures/pipes/manifolds/etc) or even the proposed cross section in any of the different areas with the geoweb installed. The 2005 design also does not address grading in the proposed drainfield area, but shows a "capping fill" which would not meet RSA grading standards. Please provide a detailed design that includes structure weight ratings and grading plans that meet FAA RSA grading standards. Also, please provide proposed typical sections showing the pipes/structures/geoweb/etc.. Include layer depths, typical surface grades, and detail where the proposed sections will intersect proposed drain field structures/drainage elements.

Please let me know if you have any questions about the above, and we look forward to your response,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, February 1, 2022 4:36 PM
To: Helbling, Tony <helbling@wilsonconst.com>; Aron Faegre <faegre@earthlink.net>; 'Michelle DaRosa' <mdarosa@landandcondolaw.com>
Cc: STANSBURY Betty <Betty.STANSBURY@odav.oregon.gov>; 'Ted Millar' <tmillar@tlmholdingsllc.com>; 'Martha Meeker' <meekerma92@msn.com>
Subject: RE: HDSE drainfield expansion area at UAO

Hi Tony, I did check in with our consultants and they said they need some additional information. I pressed them earlier today, they are putting together their clarifying questions and I will forward them as soon as I receive them.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Helbling, Tony <helbling@wilsonconst.com>
Sent: Tuesday, February 1, 2022 3:56 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Aron Faegre <faegre@earthlink.net>; 'Michelle DaRosa' <mdarosa@landandcondolaw.com>

Cc: STANSBURY Betty <Betty.STANSBURY@odav.oregon.gov>; 'Ted Millar' <tmillar@tlmholdingsllc.com>; 'Martha Meeker' <meekerma92@msn.com>
Subject: RE: HDSE drainfield expansion area at UAO

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Tony,

We're two weeks out since last update – could you please poke the consultants and get info to us?

Tony Helbling
Logistics Manager
Wilson Construction Company
1190 NW 3rd Ave
Canby, OR 97013
Cell: 503-519-6059
Office: 503-263-6882
helbling@wilsonconst.com
www.wilsonconst.com

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 18, 2022 2:05 PM
To: Aron Faegre <faegre@earthlink.net>; 'Michelle DaRosa' <mdarosa@landandcondolaw.com>; Helbling, Tony <helbling@wilsonconst.com>
Cc: STANSBURY Betty <Betty.STANSBURY@odav.oregon.gov>; 'Ted Millar' <tmillar@tlmholdingsllc.com>; 'Martha Meeker' <meekerma92@msn.com>
Subject: RE: HDSE drainfield expansion area at UAO

Hi Aron, Happy New Year.

Our consultants are still reviewing the information you provided. I will get an update and see if your geotech consultants can provide any assistance.

I'll keep you updated as soon as I get more information, thanks for your patience!

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Aron Faegre <faegre@earthlink.net>
Sent: Monday, January 17, 2022 12:23 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; 'Michelle DaRosa' <mdarosa@landandcondolaw.com>; 'Tony Helbling' <helbling@wilsonconst.com>
Cc: STANSBURY Betty <Betty.STANSBURY@odav.oregon.gov>; 'Ted Millar' <tmillar@tlmholdingsllc.com>; 'Martha Meeker' <meekerma92@msn.com>
Subject: RE: HDSE drainfield expansion area at UAO

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hi Tony,

Hope your holidays went well.

Would it help to have our geotech consultant meet with your geotech consultant to get this resolved? We have provided detailed information for each of your questions, showing that the runway safety area complies with FAA standards. The standards acknowledge that utility systems can be in runway safety areas, and this is an important utility system for the airport.

Aron

Aron Faegre, AIA, PE, ASLA
Aron Faegre Architect
13200 Fielding Road
Lake Oswego, Oregon 97034
503-880-1469
faegre@earthlink.net
www.faegre.org

From: Aron Faegre <faegre@earthlink.net>
Sent: Tuesday, December 21, 2021 4:14 PM
To: 'BEACH Anthony' <Anthony.BEACH@aviation.state.or.us>; 'Michelle DaRosa' <mdarosa@landandcondolaw.com>; 'Tony Helbling' <helbling@wilsonconst.com>
Cc: 'STANSBURY Betty' <Betty.STANSBURY@aviation.state.or.us>; 'Ted Millar' <tmillar@tlmholdingsllc.com>; 'Martha Meeker (MeekerMA92@msn.com)' <meekerma92@msn.com>
Subject: RE: HDSE drainfield expansion area at UAO

Hi Tony

One last thing. I should have added a note to your question about whether infiltration testing was done. The testing for a drainfield is quite different than for normal stormwater infiltration testing. In fact, too rapid of an infiltration requires a more complicated septic drainfield piping design. Our septic processing system and drainfield designs are approved directly through State of Oregon DEQ.

Aron

Aron Faegre, AIA, PE, ASLA
Aron Faegre Architect
13200 Fielding Road
Lake Oswego, Oregon 97034
503-880-1469
faegre@earthlink.net
www.faegre.org

From: Aron Faegre <faegre@earthlink.net>
Sent: Tuesday, December 21, 2021 3:07 PM
To: 'BEACH Anthony' <Anthony.BEACH@aviation.state.or.us>; 'Michelle DaRosa' <mdarosa@landandcondolaw.com>;

'Tony Helbling' <helbling@wilsonconst.com>
Cc: 'STANSBURY Betty' <Betty.STANSBURY@aviation.state.or.us>; 'Ted Millar' <tmillar@tlmholdingsllc.com>; 'Martha Meeker (MeekerMA92@msn.com)' <meekerma92@msn.com>
Subject: RE: HDSE drainfield expansion area at UAO

Hi Tony,

Attached are the answers to your detailed questions. Does this provide the information you need to approve our proposal?

Aron

Aron Faegre, AIA, PE, ASLA
Aron Faegre Architect
13200 Fielding Road
Lake Oswego, Oregon 97034
503-880-1469
faegre@earthlink.net
www.faegre.org

From: BEACH Anthony <Anthony.BEACH@aviation.state.or.us>
Sent: Thursday, December 9, 2021 4:20 PM
To: Michelle DaRosa <mdarosa@landandcondolaw.com>; Tony Helbling <helbling@wilsonconst.com>
Cc: STANSBURY Betty <Betty.STANSBURY@aviation.state.or.us>; Ted Millar <tmillar@tlmholdingsllc.com>; Aron Faegre - Aron Faegre & Associates (faegre@earthlink.net) <faegre@earthlink.net>; Martha Meeker (MeekerMA92@msn.com) <meekerma92@msn.com>
Subject: RE: HDSE drainfield expansion area at UAO

Hi Michelle, thank you for your patience as we look into the information you have provided.

Our consultants have taken a first pass through the report along with their Geotech GRI, and they came up with the following list of questions/clarifications/additional information needed:

GRI requests the additional data listed below based on reviewing the November 8, 2021 report "Report of Geotechnical Engineering Services: Aurora State Airport Septic Drain Field Improvements for HDSE Sewer System." [*HDSE drainfield expansion Geotech Study AronFA-2-01-110821-geor.pdf*]

- Field Data Collection
    - Date of soil sampling
    - Were any logs prepared to describe the bulk sampling results?
    - Was a sieve analysis and/or Atterberg Limits test performed to validate the Silt visual classification?
    - Was infiltration testing performed? If not, why?

- As-builts or other construction documents pertaining to the existing drain field

- Report references
    - Geoweb design procedure
    - Provide addition discussion on how the 6-inch geoweb, with 2/3 aggregate and 1/3 topsoil, replaces 12 inches of compacted soil.
    - Equivalent Single Wheel Load source
    - Source identifying the critical aircraft type

- Report figures
    - Figure A-1: graphic does not show up in the provided pdf
    - Figure A-2: graphic does not show up in the provided pdf

- "Such stringent compaction is not permitted in the soil cover of drain fields"
    - Where does this statement come from?

In addition to the list above, we will also need specifics on the proposed Geoweb reinforced drain field construction.

- Materials/Construction Proposed
    - What materials specification is to be used (ODOT, proprietary, etc.) for the aggregate?
    - What compaction specifications and test methods are proposed to achieve the proposed Geoweb strengths?
    - What compaction specifications and test methods are proposed for soil layers to be placed along with the Geoweb?
    - What subgrade compaction specifications and test methods are proposed for the expanded drain field areas?
    - What materials are proposed for use in the rest of the elements of the drain field system (pipes, manifolds, perf spec., etc.)?

Could you please provide this information so I may forward it to our consultants for review?

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Michelle DaRosa <mdarosa@landandcondolaw.com>
Sent: Monday, November 15, 2021 3:51 PM
To: BEACH Anthony <Anthony.BEACH@aviation.state.or.us>; Tony Helbling <helbling@wilsonconst.com>
Cc: STANSBURY Betty <Betty.STANSBURY@aviation.state.or.us>; Ted Millar <tmillar@tlmholdingsllc.com>; Aron Faegre - Aron Faegre & Associates (faegre@earthlink.net) <faegre@earthlink.net>; Martha Meeker (MeekerMA92@msn.com) <meekerma92@msn.com>
Subject: RE: HDSE drainfield expansion area at UAO

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Re-sending to include Ms. Martha Meeker.

Michelle D. Da Rosa
Attorney at Law
205 SE Spokane Street, Suite 300
Portland, OR 97202
Office: (503) 220-2891
Direct: (971) 600-6307
www.landandcondolaw.com

From: Michelle DaRosa
Sent: Monday, November 15, 2021 3:25 PM
To: Tony Beach (anthony.beach@aviation.state.or.us) <Anthony.BEACH@aviation.state.or.us>; Tony Helbling <helbling@wilsonconst.com>
Cc: Betty Stansbury (betty.stansbury@aviation.state.or.us) <Betty.STANSBURY@aviation.state.or.us>; Ted Millar <tmillar@tlmholdingsllc.com>; Aron Faegre - Aron Faegre & Associates (faegre@earthlink.net) <faegre@earthlink.net>
Subject: FW: HDSE drainfield expansion area at UAO

Dear Betty and Anthony,

This missive from me, in my capacity as the attorney for TLM Holdings LLC and from Tony Helbling, as a director of HDSE Sewer System Owners Association and Chairperson of the Southend Corporate Airpark Condominium Owners Association, requests that you (i) rescind your denial of HDSE's plans to expand the HDSE drainfield on UAO property, (ii) retract ODA's stated intention to not renew HDSE's drainfield lease in 2024, and (iii) issue an approval of the expansion plans as previously submitted earlier this year. The attached study and our explanations below respond to the concerns ODA cited as the reason for its decisions.

The denial of the proposed expansion was sent to me in the email from Anthony dated July 30, 2021 in the email string below. ODA's expansion denial and threat to terminate the drainfield located on the Aurora State Airport that serves HDSE users (all buildings at Southend) sent concerned shock-waves through the Southend Airpark community because of the vital importance of the drainfield to the HDSE Sewer System, and the HDSE Sewer System to the continued operation of all of the property at Southend. The threat to "not renew" was made notwithstanding that the Non-Commercial Site Lease provides HDSE with two 5-year options and that the Utility Easement recorded as Instrument No. 2020-00001957 on January 13, 2020 is perpetual.

The attached geotechnical study by NV5 (formerly known as GeoDesign), dated November 8, 2021 demonstrates through detailed soil analysis that the drainfield areas already are likely capable "under dry conditions, of supporting snow removal equipment, aircraft rescue and fire-fighting equipment, and the occasional passage of aircraft without causing damage to the aircraft" [AC 150/5300-13A, p. 61]. The area is also free of objects, is drained by grading and a perimeter drain system to avoid accumulation of water, and has no ruts, humps, depressions or other surface variations, as required by the FAA's design standards for RSA's.

We propose resolution of this issue by:

a. Making no changes to the existing drainfields as they have been in the RSA for around 20 years now, with no problems occurring, and the gravel filled drainfield trenches already demonstrating regular supporting of tractors for mowing and thus physically demonstrating meeting the RSA vehicle support requirements.

b. For the new expansion drainfields use the addition of the 6 inch geo-fabric in the top layer, which then results in gaining of 95% compaction (in fact with a 1.5 safety factor bearing capacity over that).

In addition, we note as mitigating factors that:

- To promote the functionality of Aurora Airport as a resiliency resource following a major earthquake, the septic system will allow the airport to seamlessly continue operation following an earthquake, whereas those airports relying on urban sanitary systems will generally require from one month to a year to become functional after the earthquake – thus the HDSE's septic system is an advantage to promote at Aurora Airport.

- The existing and proposed drainfields are approximately 150 feet or more to the side of the runway centerline, and thus they are areas that are least likely to be needed for emergency use.

- Many existing areas of the RSA do not currently meet the 95% compaction requirement (as shown in the geotech study).

Sincerely yours,

Tony Helbling
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www.landandcondolaw.com

From: BEACH Anthony <Anthony.BEACH@aviation.state.or.us>
Sent: Friday, July 30, 2021 10:20 AM
To: Michelle DaRosa <mdarosa@landandcondolaw.com>
Subject: RE: HDSE drainfield expansion area at UAO

Good morning Ms. DaRosa,

I am writing to follow up on your request for 103,104 square feet of additional drain field and reserve area lease space at the Aurora State Airport. We understand your client, HDSE Sewer System Owners Association, already has 61,375 square feet of premises leased for a drain field, reserve area, and piping. We are also aware that the existing lease was entered into with a general understanding that additional space would be needed, and that additional space would be made available by the Oregon Department of Aviation. Though both drain field use and leasing within Runway Safety Areas are unusual in my experience, I have been working to honor that arrangement with the intent of accommodating the expansion.

In initiating the Pen and Ink change to our Airport Layout Plan for this expansion, some concerns were raised by the FAA regarding compatibility of drain fields and Runway Safety Areas (RSA). The RSA enhances the safety of aircraft which undershoot, overrun, or veer off the runway, and it provides greater accessibility for firefighting and rescue equipment during such incidents. There are four requirements that our RSAs must meet, those include being:

1. cleared and graded and have no potentially hazardous ruts, humps, depressions, or other surface variations;
2. drained by grading or storm sewers to prevent water accumulation;
3. capable, under dry conditions, of supporting snow removal equipment, Aircraft Rescue and Fire Fighting (ARFF) equipment, and the occasional passage of aircraft without causing damage to the aircraft; and
4. free of objects, except for objects that need to be located in the RSA because of their function…

To address these concerns we closely evaluated the information you provided, and we analyzed what impacts, if any, a drain field would have on meeting the RSA's design standards. What we have found is that generally leach field soils are not compacted to the densities needed to support vehicle loads. The effluent from the waste stream has to be able to move into the pores of the soil around the drain tiles for the leach field to function. This increases the moisture content of the soils and further reduces their ability to support loads. At best, we are concerned that vehicle loading (including mowers) will reduce the porosity of the leach field soil (resulting in slower infiltration over time) or, at worst, cause damage to the shallow drain tiles and manifolds resulting in surface failures. It is our conclusion that drain fields in the RSA present a potential hazard to aircraft forced to roll out in the RSA. They are especially hazardous for heavier aircraft or those with higher tire pressures.

Due to the decreased soil strength and increased water accumulation caused by a drain field's function, we are unable to expand your client's drain field and reserve areas. Further, because the existing drain field and reserve area are not compatible within the RSA, we will not be able to renew the lease once the current term expires August 30th, 2024. At that time, all pipes and associated equipment will need to be removed by the Lessee, and the site will need to be returned to its original condition.

I am sorry I don't have a better answer for you, please let me know if you have any questions,

Anthony Beach, C.M., ACE
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
M-F 7:30am – 4pm

OFFICE 503-378-2523 **CELL** 503-302-5455
EMAIL Anthony.Beach@aviation.state.or.us
3040 25TH STREET SE, SALEM, OR 97302
WWW.OREGON.GOV/AVIATION

Exhibit 3

faegre@earthlink.net

Subject:	UAO HDSE Drainfield Discussion
Location:	Microsoft Teams Meeting
Start:	Wed 2/16/2022 10:00 AM
End:	Wed 2/16/2022 11:00 AM
Recurrence:	(none)
Meeting Status:	Accepted
Organizer:	BEACH Anthony

Hi all, let's get together and talk about the HDSE Drainfield at UAO. This is the only time that works for us, CWE, and GRI. We could push this meeting to start at 11am same day, otherwise we'd need to find sometime the following week. Let me know if this doesn't work for all of you.

Link is below.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

Microsoft Teams meeting

Join on your computer or mobile app
Click here to join the meeting

Or call in (audio only)

+1 971-277-1965,,945506483# United States, Portland

Phone Conference ID: 945 506 483#
Find a local number | Reset PIN

Learn More | Meeting options

Exhibit 4

faegre@earthlink.net

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, February 16, 2022 12:56 PM
To: STANSBURY Betty; 'James Kirby'; Helbling, Tony; Ted Millar (tmillar@southendairpark.com); Aron Faegre
Cc: PECK Heather; Ted Millar; Lindsi Hammond; Wes Spang; Wes Spang
Subject: UAO HDSE Drainfield Discussion

Hi everyone,

Thanks again for meeting today and going over the details we'll need to see for us to agree to keeping the existing drainfield, and leasing additional land for a new drainfield in our Runway Safety Area (RSA). Here's a quick recap.

Conditions we need the RSA to meet

1. Advisory Circular Standards
    a. cleared and graded and have no potentially hazardous ruts, humps, depressions, or other surface variations;
    b. drained by grading or storm sewers to prevent water accumulation;
    c. capable, under dry conditions, of supporting snow removal equipment, Aircraft Rescue and Fire Fighting (ARFF) equipment, and the occasional passage of aircraft without causing damage to the aircraft; and
    d. free of objects, except for objects that need to be located in the RSA because of their function
2. We further discussed the practical requirements for drainfields in the RSA:
    a. Supporting weight of Critical Design Aircraft, emergency response vehicles, and maintenance vehicles with regular mowing without compromising the drainfield's function
    b. Remaining clear of objects (signs, vents, posts), and wildlife attractants
    c. Minimal/no impacts to aircraft operations for serviceability (no equipment or potentially hazardous ruts, humps, depressions, or other surface variations in the RSA to service/repair the drainfield)
    d. Runway extension – no potential to reduce the lifespan of airport infrastructure (runway/taxiway pavement, subbase erosion, etc.)

We need the above demonstrated in detail in stamped engineering plans that we can review before we can agree.

We also discussed HDSE's communication and coordination with ODA's consultants and subs, please continue to communicate directly with me. We will be happy to answer any questions you have while you work through design for these improvements, and to review your plans.

After the meeting we discussed a couple potential alternatives internally. Have you considered locating the drainfields on the new Aurora Airport Business Center (AABC) property, or have you tried reaching out to HTS?

Thanks again, let me know if you have any questions,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

Exhibit 5

faegre@earthlink.net

From: STANSBURY Betty <Betty.STANSBURY@odav.oregon.gov>
Sent: Thursday, May 26, 2022 2:56 PM
To: Helbling, Tony; Ted Millar; Aron Faegre
Cc: Martha Meeker; BEACH Anthony; PECK Heather
Subject: Aurora drain field update

I haven't forgotten about my IOU on the drain field paper, but there has been a couple of developments I wanted to share with you.

1) Wastewater Treatment plant – I toured the Columbia Helicopters facility on Monday, and looked at their wastewater treatment plant. It is a state of the art, 15,000 gallon per day capacity "Membrane Bio-reactor' facility, currently running about 3-5,000 gallons per day. They are willing to discuss the possibility of allowing other airport buildings onto their system, so I have asked our engineers to do a preliminary feasibility review about the potential of having the CHI treatment plant handle all of the wastewater being served by the seven on-airport drain fields. This is conceptual at this point, and I do not have any further details. There are several hurtles to get over, but it is a potential solution worth evaluating. When I asked CHI's staff if they thought it could handle 1500 people (the number you gave me for airport employment), they thought it could. (And that is before subtracting HTS, which would stay on its own system, or adding visitors, which would probably bring it back up to around 1500 total, ballpark.)

2) FAA position on drain fields in runway safety areas – I asked the FAA's Seattle Airports District Office for guidance on whether a "modification to standards" (which requires their approval) would be needed for an expansion of the drain field in the runway safety area. Their response is below. Given the limited likelihood of success, I would prefer to focus our efforts (and our engineers time) to the possibility of tying into CHI's system. However, if you still wish to pursue attempting to design a system that would meet the RSA requirements (and with the understanding that you would be responsible for the cost of permitting, construction and installation), I am still willing to review it for consideration, and will commit up to eight hours of our engineers time to review your proposal. (And the proposal to move the location to the sides of the runway (email dated May 10th) shows they are still within the runway and taxiway safety areas, so that doesn't help.) And I agree to your proposed decision date of no later than the end of September (four months from now) so I'd like to know your intentions by mid-June if possible.

FAA response to question about a mod to standards

Hi Betty:

Thank you for your question. I hope that my response is clear and concise and that it helps you as you move forward at UAO with regards to the septic fields in the RSA (and other airports in OR that might have septic (drainage) fields in RSAs).

Please reject future proposed septic (drainage) fields under Aurora State Airport's safety areas and *take action to remove existing septic drainage fields under the airport's safety areas at your earliest opportunity.*

The safety area must remain, "capable, under dry conditions, of supporting snow removal equipment, ARFF equipment, and the occasional passage of aircraft without causing major damage to the aircraft." Septic (drainage) fields risk compromising this requirement by:

- Including elements structurally incapable of supporting these loads either initially or over the length of time the drainage fields remain under the safety area;

- Supersaturating the subsurface, undermining the surrounding soil's load bearing capacity.

We allow a temporary reduction in load bearing capacity due to natural precipitation. We will not allow artificial saturation of the subsoil to compromise the safety area's load bearing capacity.

If a drainage field Engineer is somehow able to provide documented evidence that the drainage field will not compromise the safety area's load bearing capacity over the length of time the drainage fields remain under the safety area, we *may* consider it acceptable, but this would be considered a nonstandard condition and not a Modification of Standards (MOS) in this case because the drainage fields were not federally funded. In addition, we will not approve MOS requests in any case that will diminish the safety area's ability to perform its function or located within the RSA. Please keep in mind that this would be a long process that would require HQ involvement and potentially might not result in the allowance of the septic fields to remain even if the drainage field Engineer is able to shown that the drainage field would not compromise the safety area.

Luckily this issue is being brought up now as I think that finding a solution can be one of the items in the ongoing master planning effort.

Exhibit 6

REPORT OF GEOTECHNICAL ENGINEERING SERVICES

Aurora State Airport
Septic Drain Field Improvements for HDSE Sewer System
Aurora, Oregon
Project: AronFA-2-01

For
Aron Faegre and Associates
November 8, 2021

Project: AronFA-2-01

NV5

November 8, 2021

Aron Faegre and Associates
520 SW Yamhill Street, PH1
Portland, OR 97204

Attention: Aron Faegre

Report of Geotechnical Engineering Services
Aurora State Airport
Septic Drain Field Improvements for HDSE Sewer System
Aurora, Oregon
Project: AronFA-2-01

NV5 is pleased to present this report of geotechnical engineering services for subgrade improvements atop a proposed septic drain field for the HDSE sewer system in the runway safety area at the southern end of the Aurora State Airport located in Aurora, Oregon. Our services were conducted in accordance with our proposal dated August 26, 2021.

We appreciate the opportunity to be of continued service to you. Please call if you have questions regarding this report.

Sincerely,

NV5

Brett A. Shipton, P.E., G.E.
Principal Engineer

BAS:sn
Attachments
One copy submitted (via email only)
Document ID: AronFA-2-01-110821-geor.docx
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ACRONYMS AND ABBREVIATIONS

AASHTO	American Association of State Highway and Transportation Officials
ASCE	American Society of Civil Engineers
ASTM	American Society for Testing and Materials
CBR	California bearing ratio
DCP	dynamic cone penetrometer
ESWL	equivalent single wheel load
FAA	Federal Aviation Administration
pcf	pounds per cubic foot
psi	pounds per square inch

1.0 INTRODUCTION

NV5 is pleased to submit this report of geotechnical engineering services for improving the subgrade atop a future drain field located at the southern end of the runway at the Aurora State Airport located in Aurora, Oregon. The same solution could be used for the existing drain fields if needed. Figure 1 shows the site relative to existing physical features.

The proposed drain fields are located in the runway safety area (RSA). The FAA Advisory Circular AC No. 150/5300-13A states that RSA be should be capable, "under dry conditions, of supporting snow removal equipment, aircraft rescue and fire fighting . . . equipment, and the occasional passage of aircraft without causing damage to the aircraft." It also states, "Compaction of RSAs must comply with Specification P-152, Excavation, Subgrade and Embankment, found in AC 150/5370-10."

According to the FAA Airport Construction Standards (AC150/5370-10) Item P-152, the subgrade outside of paved areas must be compacted to at least 95 percent of the maximum dry density, as determined by ASTM D698. No compaction is required in the top 4 inches of the subgrade, and any soil that has become compacted from construction or other traffic in the upper 4 inches must be scarified to a loose state.

From Item P152-2.1:
Areas outside the limits of the pavement areas where the top layer of soil has become compacted by hauling or other Contractor activities shall be scarified and disked to a depth of 4 inches (100 mm), to loosen and pulverize the soil. Stones or rock fragments larger than 4 inches (100 mm) in their greatest dimension will not be permitted in the top 6 inches (150 mm) of the subgrade.

From Item P152-2.6:
"On all areas outside of the pavement areas, no compaction will be required on the top 4 inches (100 mm), which shall be prepared for a seedbed in accordance with Item T-901, T-906."

From Item P152-2.10:
The subgrade in areas outside the limits of the pavement areas shall be compacted to a depth of 12 inches (300 mm) and to a density of not less than 95 percent of the maximum density as determined by ASTM D698.

Such stringent compaction is not permitted in the soil cover of drain fields, and this study provides recommendations for preparing a subgrade in the RSA over the drain fields that is capable, under dry conditions, of supporting snow removal equipment, aircraft rescue and fire fighting equipment, and the occasional passage of aircraft without causing damage to the aircraft.

2.0 PURPOSE AND SCOPE

The purpose of our scope was to provide recommendations for improving the soil cover over the drain fields such that it is capable, under dry conditions and without rigorous compaction, of

supporting snow removal equipment, aircraft rescue and fire fighting equipment, and the occasional passage of aircraft without causing damage to the aircraft. Specifically, we have conducted the following tasks:

- Reviewed information provided to us by Aron Faegre and Associates and other available information in our files.
- Visited the site to observe the subgrade and conduct the following:
  - Collected bulk soil samples in order to establish moisture density relationships in accordance with ASTM D698
  - Measured the in situ density at the location of the proposed drain fields in general accordance with ASTM D6938, Procedure A, using a Troxler 3430 nuclear density gauge
  - Conducted DCP testing in general accordance with ASTM D6951 at the locations shown on Figure 2
- Conducted a laboratory testing program including proctor analyses in accordance with ASTM D698.
- Provided recommendations for subgrade stabilization that do not require significant compaction of the subgrade soil.
- Provided calculations showing that the subgrade atop the proposed drain fields can support emergency vehicles and occasional aircraft.
- Documented our findings, conclusions, and recommendations in this report.

3.0 SITE RECONNAISSANCE

Our site reconnaissance included collecting bulk samples to determine the moisture density relationship of the subgrade soil, conducting DCPs in order to estimate the resilient modulus of the subgrade, and measuring the in situ density of the subgrade soil. Figure 2 shows the locations of sampling and tests.

3.1 SOIL SAMPLING

Bulk soil samples were collected from the near-surface soil in the areas of the future drain fields. A moisture density relationship was determined on a combined bulk sample collected from the surface soil in the area of the proposed drain field. Groundcover at the sampling locations consisted of short grass. The vegetation was removed before sampling, and soil below a depth of 4 inches was placed in a sample bucket and transported to NV5's geotechnical laboratory in Wilsonville, Oregon, for testing. The soil was visually classified as silt in accordance with the soil classification system presented in Figure 3. A moisture density test was performed on the bulk sample in general accordance with ASTM D698. The test results are presented in Appendix A.

3.2 DCP TESTING

We performed DCP testing in general accordance with ASTM D6951 to estimate subgrade resilient modulus (M_r) at the locations shown on Figure 2. The DCP test results are presented on Appendix B. Since it is required that the upper 4 inches of the subgrade be loose, the upper 4 inches of soil was removed before testing was performed. We plotted the depth of penetration versus blow count and used the slope of the data to estimate the resilient modulus of the

subgrade. We correlated the DCP test results to resilient modulus using the methods presented in *The Structural Design of Bituminous Roads.* The computed resilient modulus was converted to CBR using the following relationship:

$CBR = M_r/1500$

Table 1 summarizes the estimated resilient moduli and corresponding CBR for the subgrade.

Table 1. DCP Test Results and Corresponding CBR

Location	Resilient Modulus (psi)	CBR (percent)
DCP-1	24,300	16.2
DCP-2	18,700	12.5
DCP-3	21,200	14.1
DCP-4	14,000	9.3
DCP-5	12,400	8.3
DCP-6	18,000	12.0
DCP-7	10,400	6.9
DCP-8	8,800	5.9

Some of the DCP tests were performed at a depth of 12 inches in order to avoid damaging the drain pipe in the existing drain field.

3.3 IN SITU DENSITY

The in situ density was measured at the locations shown on Figure 2. The density measurements were conducted in accordance with ASTM D6938, Procedure A. Since it is required that the upper 4 inches of the subgrade be loose, the tests were performed deeper than than 4 inches below ground surface. The tests were compared to the maximum dry density determined in the laboratory. Table 2 presents a summary of the in situ density measurements.

Table 2. Measured In Situ Density

Location	Measured Dry Density (pcf)	Measured Moisture Content (percent)	Relative Density ASTM D698 (percent)
D-1	97.0	8.0	92[1]
D-2	89.1	8.3	85[1]
D-3	80.0	6.9	80[2]
D-4	83.4	8.5	84[2]
D-5	109.4	19.7	103[1]
D-6	101.1	21.3	95[1]
D-7	91.1	19.5	92[2]
D-8	87.1	22.4	88[2]

1. Based on a maximum dry density of 105.4 pcf and an optimum moisture content of 18.4 percent
2. Based on maximum dry density of 99.5 pcf and an optimum moisture content of 20.5 percent

We tested the compaction at the existing drain field at locations D-4 and D-8. The other locations were taken randomly throughout the site. The varying degrees of compaction found to exist in the RSA are summarized in Table 1.

Because the FAA's intent is that fire trucks and other vehicles may operate in the RSA, it brings up the question of whether relative compaction definitively relates to the depth of a vehicle rut in the RSA. Although the compaction does not meet the FAA requirement at some locations, the estimated resilient modulus indicates that the subgrade in these areas is capable of supporting similar wheel loads as the areas in which the compaction requirement is met.

4.0 PROPOSED DRAIN FIELD

The proposed drain field consists of a series of subsurface drainage trenches that are approximately 24 inches wide and approximately 3.5 to 4 feet on center. The base of each trench is to have a minimum depth of 18 inches below the capping fill. Twelve inches of ¾- to 2½-inch washed gravel will be placed in the trench. A perforated pipe will be placed in the washed gravel through which the effluent will be drained. A maximum of 10 inches of capping fill will be placed over the trench.

5.0 SUBGRADE IMPROVEMENT

The drain fields are located in the RSA of Aurora State Airport. The FAA Advisory Circular AC No. 150/5300-13A states that the RSA should be capable, ". . . under dry conditions, of supporting snow removal equipment, aircraft rescue and fire fighting . . . equipment, and the occasional passage of aircraft without causing damage to the aircraft." It also states, "Compaction of RSAs must comply with Specification P-152, Excavation, Subgrade and Embankment, found in AC 150/5370-10, which requires that upper 4 inches of the subgrade be uncompacted and scarified to be in a loose state." The underlying 12 inches of subgrade soil should be compacted to at least 95 percent of the maximum dry density, as determined by

ASTM D698. Because a drain field will be beneath the subgrade in the RSA, it cannot be compacted to the standard required by AC 150/5370-10. It must also be capable of growing vegetation.

We have considered the following design vehicles to model emergency equipment and aircraft that may traffic the RSA:

- Emergency Vehicle: AASHTO H20 or a 16,000-pound wheel load
- Aircraft: GulfStream G550 with a gross weight of 91,000 pounds or a 30,300-pound ESWL

To accommodate design traffic, the subgrade located over the drainage trenches should be stabilized using a product such as the Presto GeoSystems Geoweb. We have determined that the GW30V Geocells will create a subgrade that can support both the AASHTO H20 and Gulfstream 550 ESWL with an adequate margin of safety. Our supporting calculations are presented in Appendix C. Table 3 summarizes the input parameters and results of our analysis.

Table 3. Subgrade Stabilization

Design Vehicle	ESWL (pounds)	Tire Pressure (psi)	CBR Beneath Geoweb (percent)	Product Specification	Bearing Capacity Safety Factor
AASHTO H20	16,000	110	5	GW30V 6-inch depth	1.5
Gulfstream 550	30,300	200	5	GW30V 8-inch depth	1.3

A 6-inch-deep cell may be sufficient if the RSA is only subject to ESWLs of 16,000 pounds, such as those of the AASHTO H20 axle load. The geoweb cells should be filled with a blend of two-thirds crushed aggregate and one-third topsoil mix. The crushed aggregate should be 3/8 to 1 inch in nominal diameter and have a D50 of 0.5 inch and a void space of 30 percent. The geoweb should extend beyond each drainage trench by a distance of at least 18 inches. The geoweb should be overfilled by at least 1 inch with the selected fill. In addition, the geoweb should be installed in accordance with the manufacturer's recommendations. A 4-inch layer of loose, uncompacted material can be placed on the improved subgrade to meet the requirement of Item P152-2.6

6.0 LIMITATIONS

We have prepared this report for use by Aron Faegre and Associates and members of the design team for the proposed project. The data and report can be used for bidding or estimating purposes, but our report, conclusions, and interpretations should not be construed as warranty of the subsurface conditions and are not applicable to other sites.

Exploration observations indicate soil conditions only at specific locations and only to the depths penetrated. They do not necessarily reflect soil strata or water level variations that may exist

between exploration locations. If subsurface conditions differing from those described are noted during the course of excavation and construction, re-evaluation will be necessary.

The scope of our services does not include services related to construction safety precautions, and our recommendations are not intended to direct the contractor's methods, techniques, sequences, or procedures, except as specifically described in our report for consideration in design.

Within the limitations of scope, schedule, and budget, our services have been executed in accordance with generally accepted practices in this area at the time our report was prepared. No warranty, express or implied, should be understood.

♦ ♦ ♦

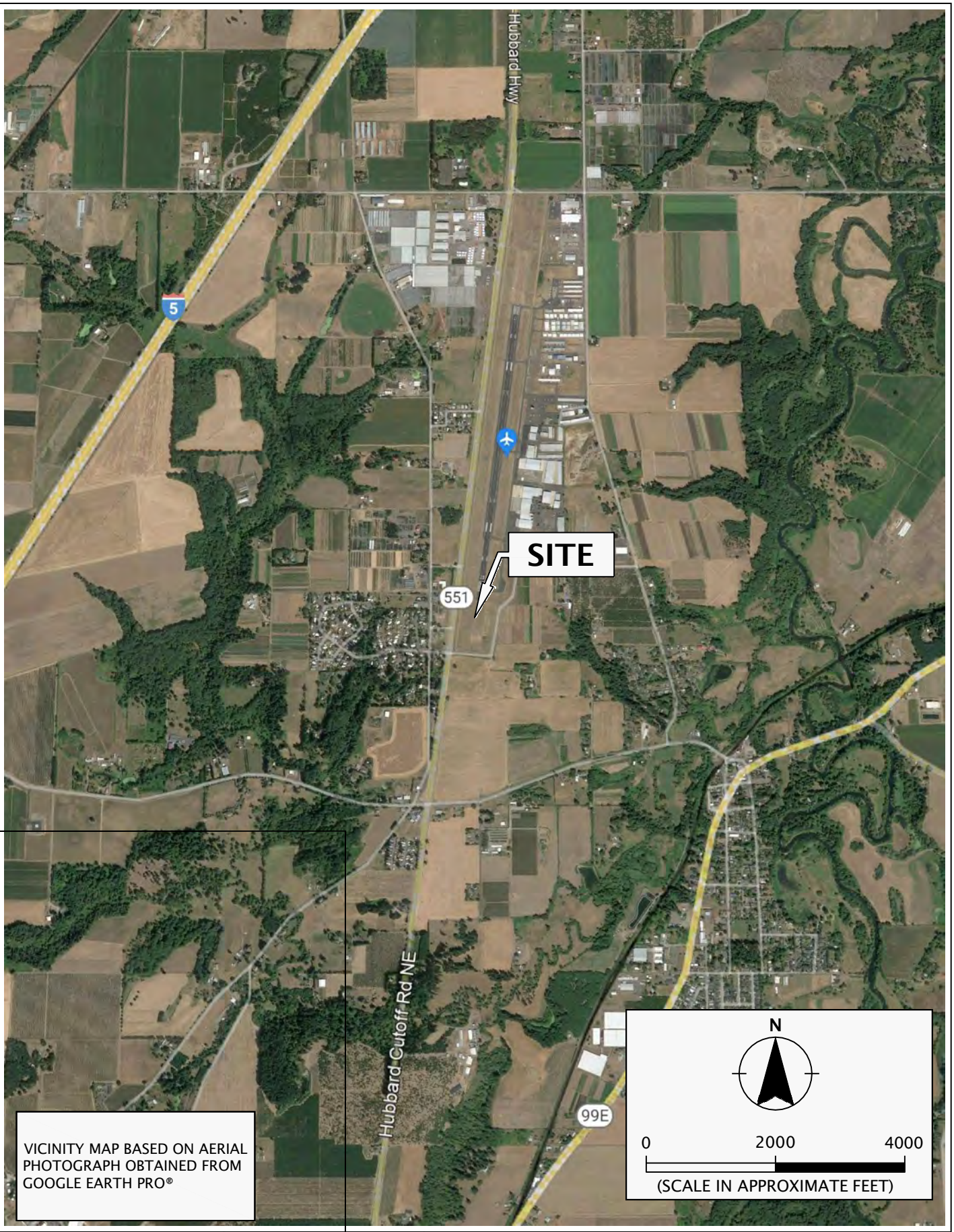
We appreciate the opportunity to be of continued service to you. Please call if you have questions concerning this report or if we can provide additional services.

Sincerely,

NV5

Brett A. Shipton, P.E., G.E.
Principal Engineer

FIGURES



VICINITY MAP BASED ON AERIAL PHOTOGRAPH OBTAINED FROM GOOGLE EARTH PRO®

NIV5	ARONFA-2-01	**VICINITY MAP**
	NOVEMBER 2021	SEPTIC DRAIN FIELD IMPROVEMENTS AURORA, OR
		FIGURE 1

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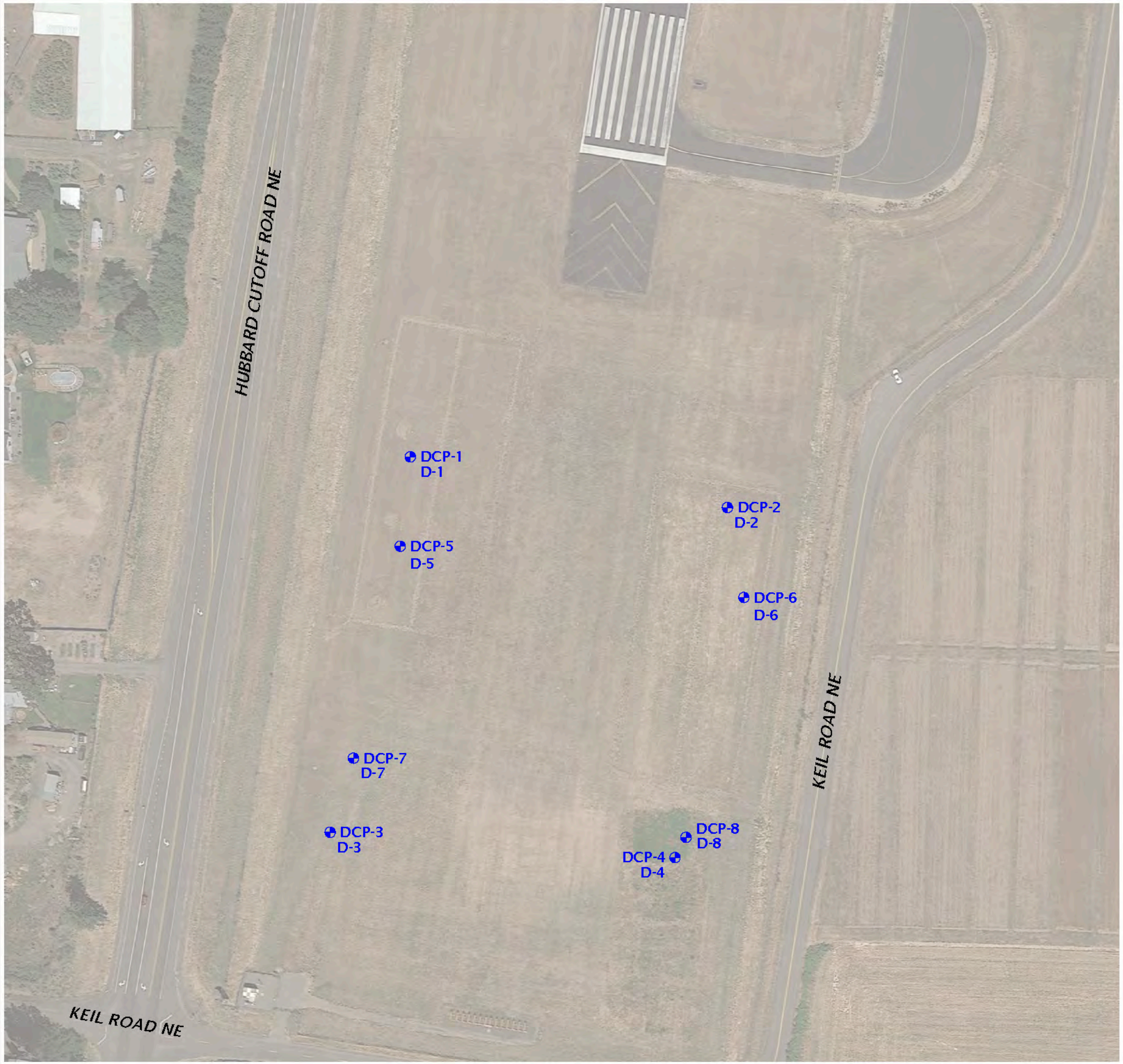
File Name: J:\A-D\AronFA\AronFA-2\AronFA-2-01\Figures\CAD\AronFA-2-01-VM01.dwg | Layout: FIGURE 1



LEGEND:

DCP-1 / D-1 — DCP TEST AND DENSITY MEASUREMENT

N

0 120 240

(SCALE IN FEET)

SITE PLAN BASED ON AERIAL PHOTOGRAPH
OBTAINED FROM GOOGLE EARTH PRO®
SEPTEMBER 14, 2021

SITE PLAN

SEPTIC DRAIN FIELD IMPROVEMENTS
AURORA, OR

FIGURE 2

ARONFA-2-01

NOVEMBER 2021

NV5

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File Name: J:\A-D\AronFA\AronFA-2\AronFA-2-01\Figures\CAD\AronFA-2-01-SP01.dwg | Layout: FIGURE 2

RELATIVE DENSITY - COARSE-GRAINED SOIL

Relative Density	Standard Penetration Test (SPT) Resistance	Dames & Moore Sampler (140-pound hammer)	Dames & Moore Sampler (300-pound hammer)
Very loose	0 – 4	0 – 11	0 – 4
Loose	4 – 10	11 – 26	4 – 10
Medium dense	10 – 30	26 – 74	10 – 30
Dense	30 – 50	74 – 120	30 – 47
Very dense	More than 50	More than 120	More than 47

CONSISTENCY - FINE-GRAINED SOIL

Consistency	Standard Penetration Test (SPT) Resistance	Dames & Moore Sampler (140-pound hammer)	Dames & Moore Sampler (300-pound hammer)	Unconfined Compressive Strength (tsf)
Very soft	Less than 2	Less than 3	Less than 2	Less than 0.25
Soft	2 – 4	3 – 6	2 – 5	0.25 – 0.50
Medium stiff	4 – 8	6 – 12	5 – 9	0.50 – 1.0
Stiff	8 – 15	12 – 25	9 – 19	1.0 – 2.0
Very stiff	15 – 30	25 – 65	19 – 31	2.0 – 4.0
Hard	More than 30	More than 65	More than 31	More than 4.0

PRIMARY SOIL DIVISIONS			GROUP SYMBOL	GROUP NAME
COARSE-GRAINED SOIL (more than 50% retained on No. 200 sieve)	GRAVEL (more than 50% of coarse fraction retained on No. 4 sieve)	CLEAN GRAVEL (< 5% fines)	GW or GP	GRAVEL
		GRAVEL WITH FINES (≥ 5% and ≤ 12% fines)	GW-GM or GP-GM	GRAVEL with silt
			GW-GC or GP-GC	GRAVEL with clay
		GRAVEL WITH FINES (> 12% fines)	GM	silty GRAVEL
			GC	clayey GRAVEL
			GC-GM	silty, clayey GRAVEL
	SAND (50% or more of coarse fraction passing No. 4 sieve)	CLEAN SAND (<5% fines)	SW or SP	SAND
		SAND WITH FINES (≥ 5% and ≤ 12% fines)	SW-SM or SP-SM	SAND with silt
			SW-SC or SP-SC	SAND with clay
		SAND WITH FINES (> 12% fines)	SM	silty SAND
			SC	clayey SAND
			SC-SM	silty, clayey SAND
FINE-GRAINED SOIL (50% or more passing No. 200 sieve)	SILT AND CLAY	Liquid limit less than 50	ML	SILT
			CL	CLAY
			CL-ML	silty CLAY
			OL	ORGANIC SILT or ORGANIC CLAY
		Liquid limit 50 or greater	MH	SILT
			CH	CLAY
			OH	ORGANIC SILT or ORGANIC CLAY
HIGHLY ORGANIC SOIL			PT	PEAT

MOISTURE CLASSIFICATION		ADDITIONAL CONSTITUENTS					
		Secondary granular components or other materials such as organics, man-made debris, etc.					
			Silt and Clay In:			Sand and Gravel In:	
Term	Field Test	Percent	Fine-Grained Soil	Coarse-Grained Soil	Percent	Fine-Grained Soil	Coarse-Grained Soil
dry	very low moisture, dry to touch						
moist	damp, without visible moisture	< 5	trace	trace	< 5	trace	trace
		5 – 12	minor	with	5 – 15	minor	minor
wet	visible free water, usually saturated	> 12	some	silty/clayey	15 – 30	with	with
					> 30	sandy/gravelly	Indicate %

NV5

SOIL CLASSIFICATION SYSTEM

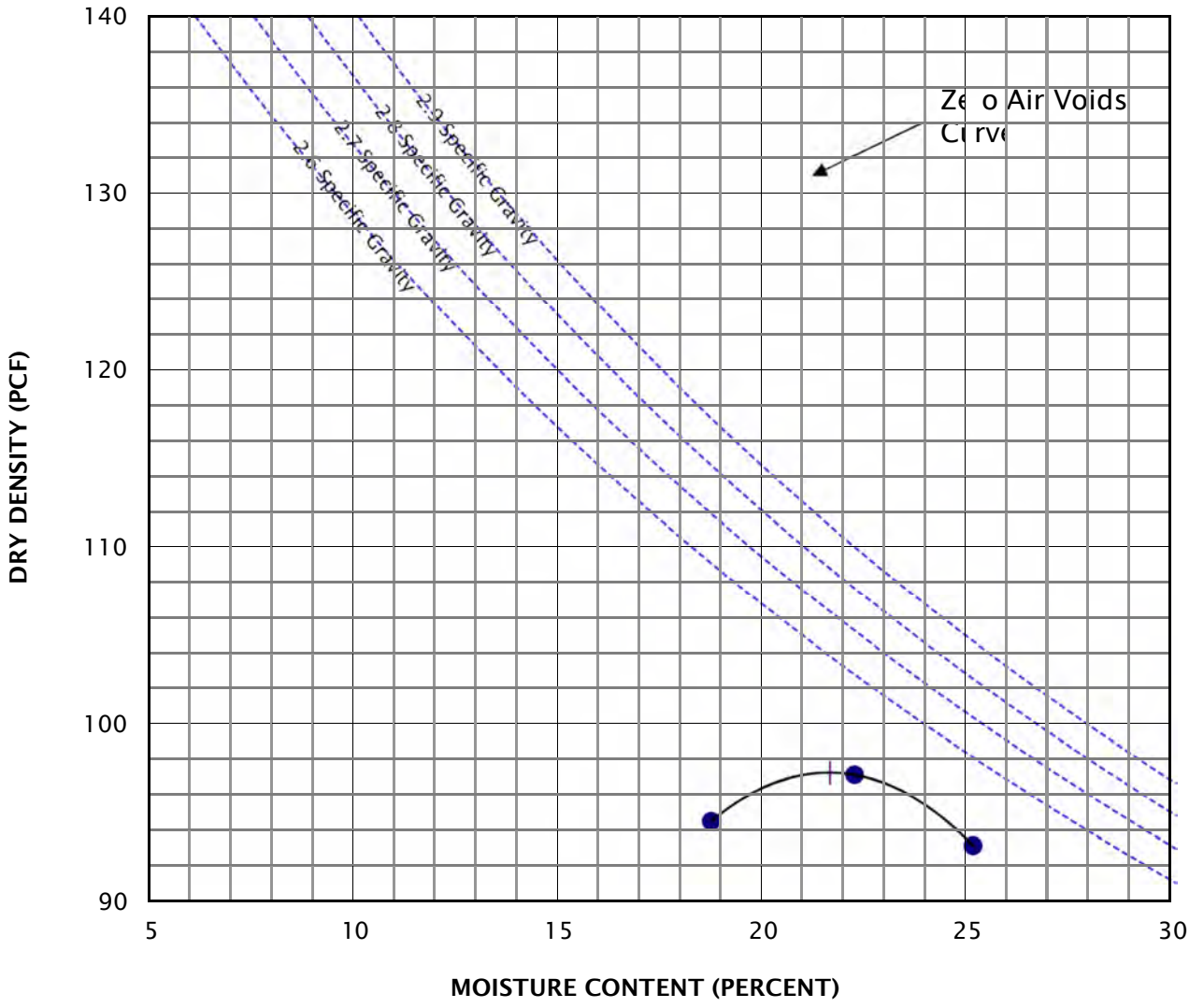
FIGURE 3

APPENDIX A

APPENDIX A

MOISTURE DENSITY RELATIONSHIP

We determined the moisture density relationship of samples collected from the near-surface soil at the location of the proposed drain field in general accordance with ASTM D698. The compaction curves for each sample are presented in this appendix.



EXPLORATION/ LOCATION	DEPTH (FEET)	SOURCE	MATERIAL DESCRIPTION
NA	NA	Onsite	Silt (ML) Existing Drain Fields

TEST RESULTS

TEST METHOD	AS RECEIVED MOISTURE CONTENT (PERCENT)	OVERSIZE (PERCENT)
Standard Proctor-ASTM D698 Method A	22.3	5.6

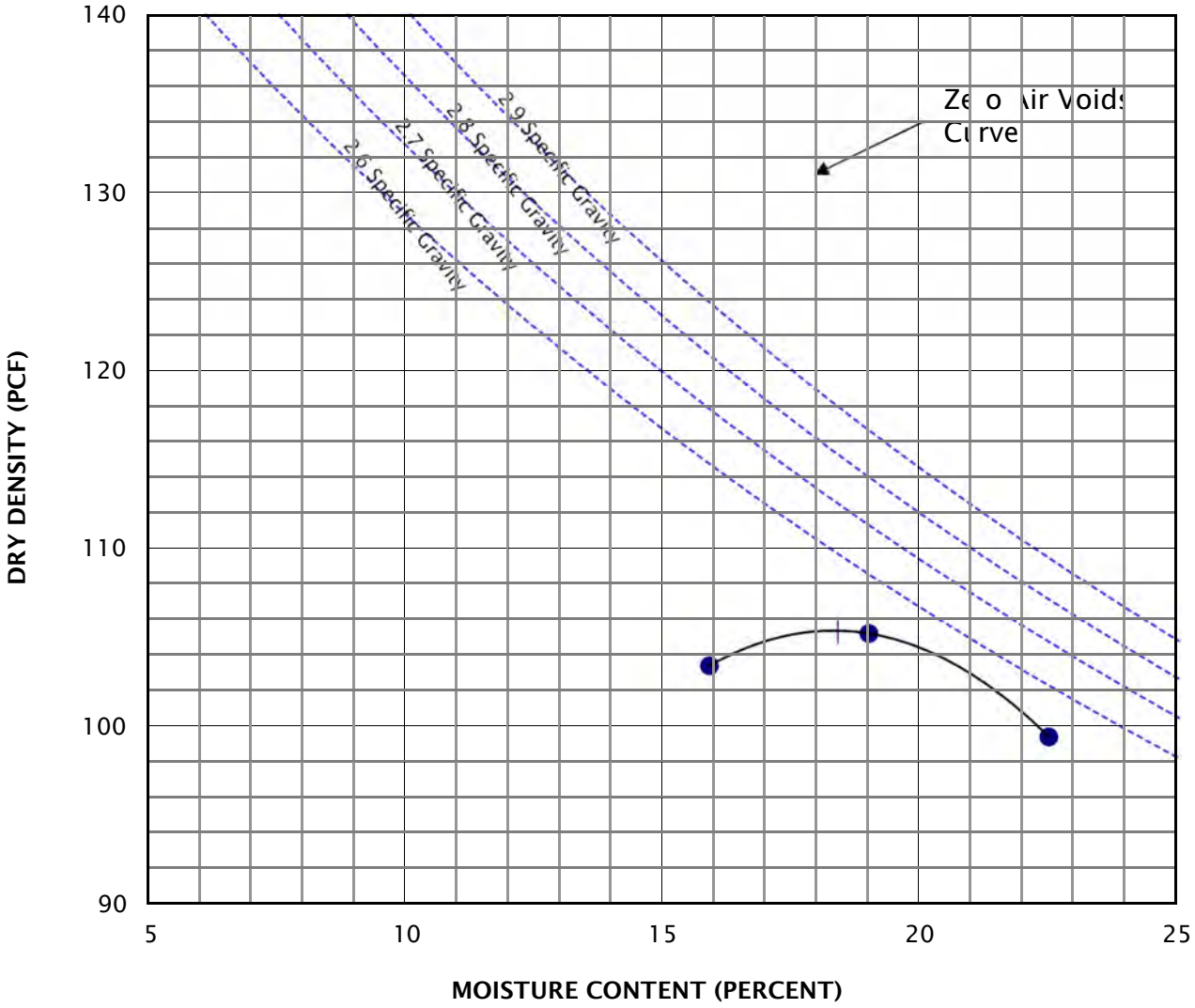
UNCORRECTED

MAXIMUM DRY DENSITY, lb/ft^3	**97.3**
OPTIMUM WATER CONTENT, %	**21.6**

OVERSIZE CORRECTION

MAXIMUM DRY DENSITY, lb/ft^3	**99.5**
OPTIMUM WATER CONTENT, %	**20.5**

NV5	ARONFA-2-01	**LABORATORY TEST (MODIFIED PROCTOR)**	
	NOVEMBER 2021	SEPTIC DRAIN FIELD IMPROVEMENTS AURORA, OR	**FIGURE A-1**



EXPLORATION/ LOCATION	DEPTH (FEET)	SOURCE	MATERIAL DESCRIPTION
NA	NA	Onsite	Silt (ML) Proposed Drain Fields

TEST RESULTS

TEST METHOD	AS RECEIVED MOISTURE CONTENT (PERCENT)	OVERSIZE (PERCENT)
Standard Proctor-ASTM D698 Method A	19.0	0.1

UNCORRECTED

MAXIMUM DRY DENSITY, lb/ft^3	**105.4**
OPTIMUM WATER CONTENT, %	**18.4**

OVERSIZE CORRECTION

MAXIMUM DRY DENSITY, lb/ft^3	**NA**
OPTIMUM WATER CONTENT, %	**NA**

NV5	ARONFA-2-01	**LABORATORY TEST (STANDARD PROCTOR)**	
	NOVEMBER 2021	SEPTIC DRAIN FIELD IMPROVEMENTS AURORA, OR	**FIGURE A-2**

APPENDIX B

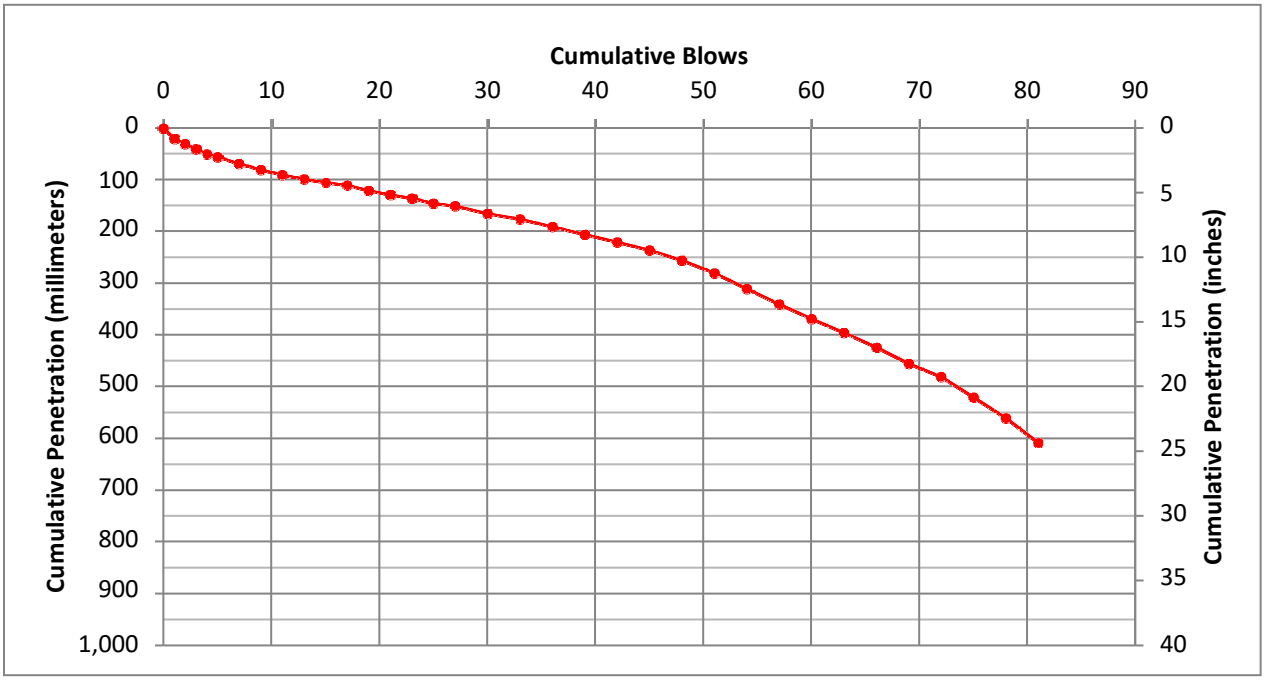
APPENDIX B

DCP TESTING

We performed DCP testing at the locations shown in Figure 2. The tests were performed in general accordance with ASTM D6951. We correlated the DCP test results to resilient modulus using the methods presented in *The Structural Design of Bituminous Roads.* The results of each test are presented in this appendix.

DYNAMIC CONE PENETROMETER RESULTS - DCP 1

Layer	Soil Type	Hammer weight =	17.6 pounds
		Slope (mm/blow)	M_R (psi)
1	Soil not CL, CBR < 10 or not CH	6.9	24,300
2	---	---	---
3	---	---	---



$M_R = 96658 \times S^{-0.7168}$; soil not CL, CBR < 10 or not CH

$M_R = 469673 \times S^{-1.28}$; CL soil, CBR < 10

$M_R = 108206 \times S^{-0.64}$; CH soil

M_R = resilient modulus (pounds per square inch)

S = slope (millimeters per blow); multiplied by two (2) if 10-pound hammer is used

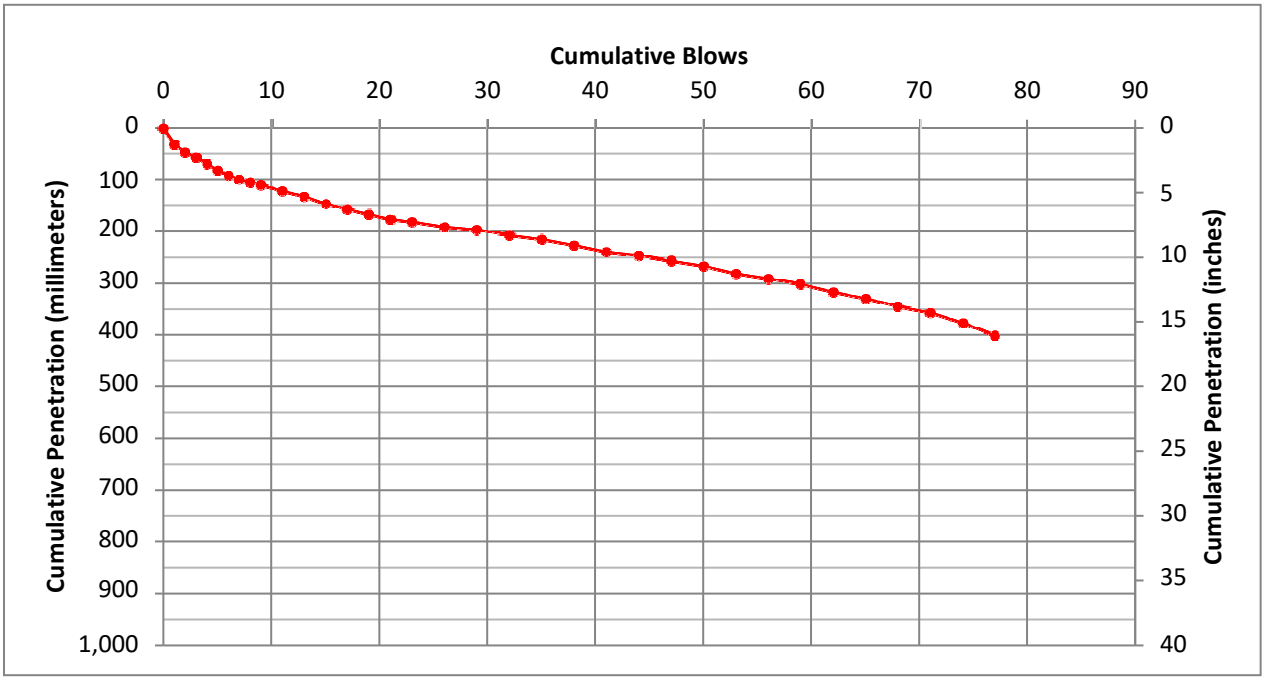
References:

ASTM D 6951, Standard Test Method for Use of the Dynamic Cone Penetrometer in Shallow Pavement Applications.

W.D. Powell, J.F. Foster, H.C. Mayhew, and M.E. Nunn, "The Structural Design of Bituminous Roads," TRRL Laboratory Report 1132, Transport and Road Research Laboratory, Department of Transport, United Kindgom, 1984.

DYNAMIC CONE PENETROMETER RESULTS - DCP 2

Layer	Soil Type	Hammer weight =	17.6 pounds
		Slope (mm/blow)	M_R (psi)
1	Soil not CL, CBR < 10 or not CH	9.9	18,700
2	---	---	---
3	---	---	---



$M_R = 96658 \times S^{-0.7168}$; soil not CL, CBR < 10 or not CH

$M_R = 469673 \times S^{-1.28}$; CL soil, CBR < 10

$M_R = 108206 \times S^{-0.64}$; CH soil

M_R = resilient modulus (pounds per square inch)

S = slope (millimeters per blow); multiplied by two (2) if 10-pound hammer is used

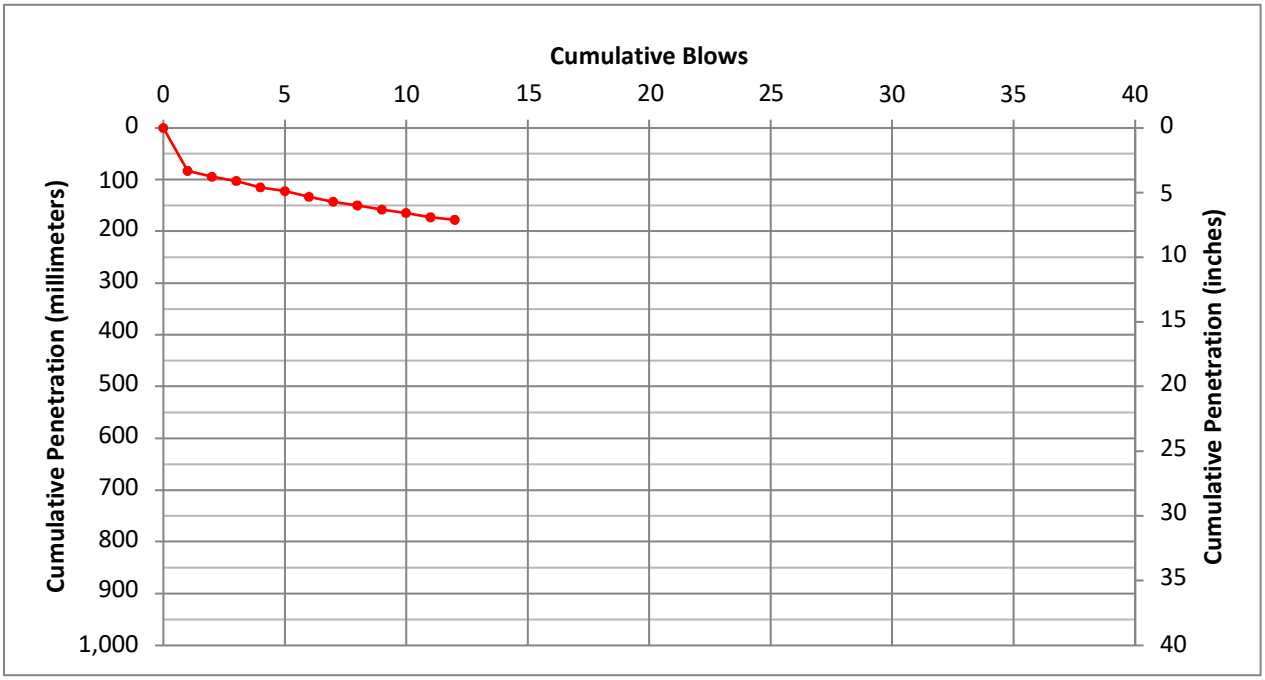
References:

ASTM D 6951, Standard Test Method for Use of the Dynamic Cone Penetrometer in Shallow Pavement Applications.

W.D. Powell, J.F. Foster, H.C. Mayhew, and M.E. Nunn, "The Structural Design of Bituminous Roads," TRRL Laboratory Report 1132, Transport and Road Research Laboratory, Department of Transport, United Kindgom, 1984.

DYNAMIC CONE PENETROMETER RESULTS - DCP 3

Layer	Soil Type	Hammer weight =	17.6 pounds
		Slope (mm/blow)	M_R (psi)
1	Soil not CL, CBR < 10 or not CH	8.3	21,200
2	---	---	---
3	---	---	---



$M_R = 96658 \times S^{-0.7168}$; soil not CL, CBR < 10 or not CH

$M_R = 469673 \times S^{-1.28}$; CL soil, CBR < 10

$M_R = 108206 \times S^{-0.64}$; CH soil

M_R = resilient modulus (pounds per square inch)

S = slope (millimeters per blow); multiplied by two (2) if 10-pound hammer is used

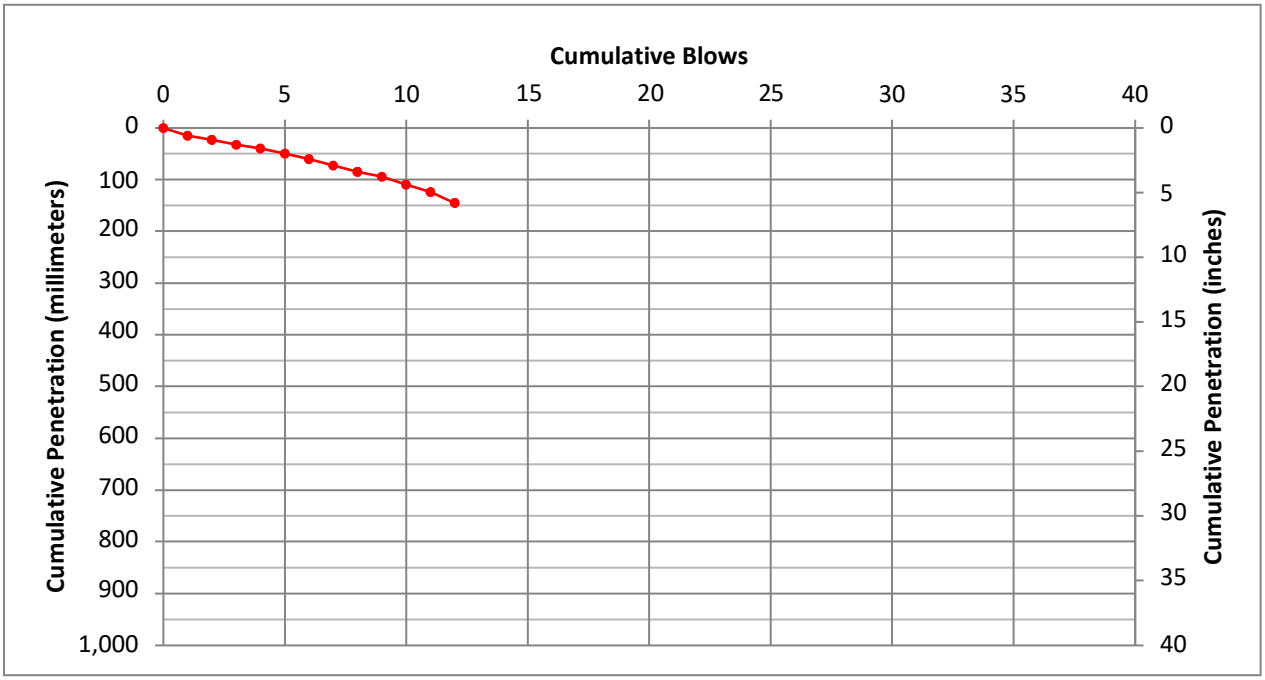
References:

ASTM D 6951, Standard Test Method for Use of the Dynamic Cone Penetrometer in Shallow Pavement Applications.

W.D. Powell, J.F. Foster, H.C. Mayhew, and M.E. Nunn, "The Structural Design of Bituminous Roads," TRRL Laboratory Report 1132, Transport and Road Research Laboratory, Department of Transport, United Kindgom, 1984.

DYNAMIC CONE PENETROMETER RESULTS - DCP 4

Layer	Soil Type	Hammer weight =	17.6 pounds
		Slope (mm/blow)	M_R (psi)
1	Soil not CL, CBR < 10 or not CH	14.8	14,000
2	---	---	---
3	---	---	---



$M_R = 96658 \times S^{-0.7168}$; soil not CL, CBR < 10 or not CH

$M_R = 469673 \times S^{-1.28}$; CL soil, CBR < 10

$M_R = 108206 \times S^{-0.64}$; CH soil

M_R = resilient modulus (pounds per square inch)

S = slope (millimeters per blow); multiplied by two (2) if 10-pound hammer is used

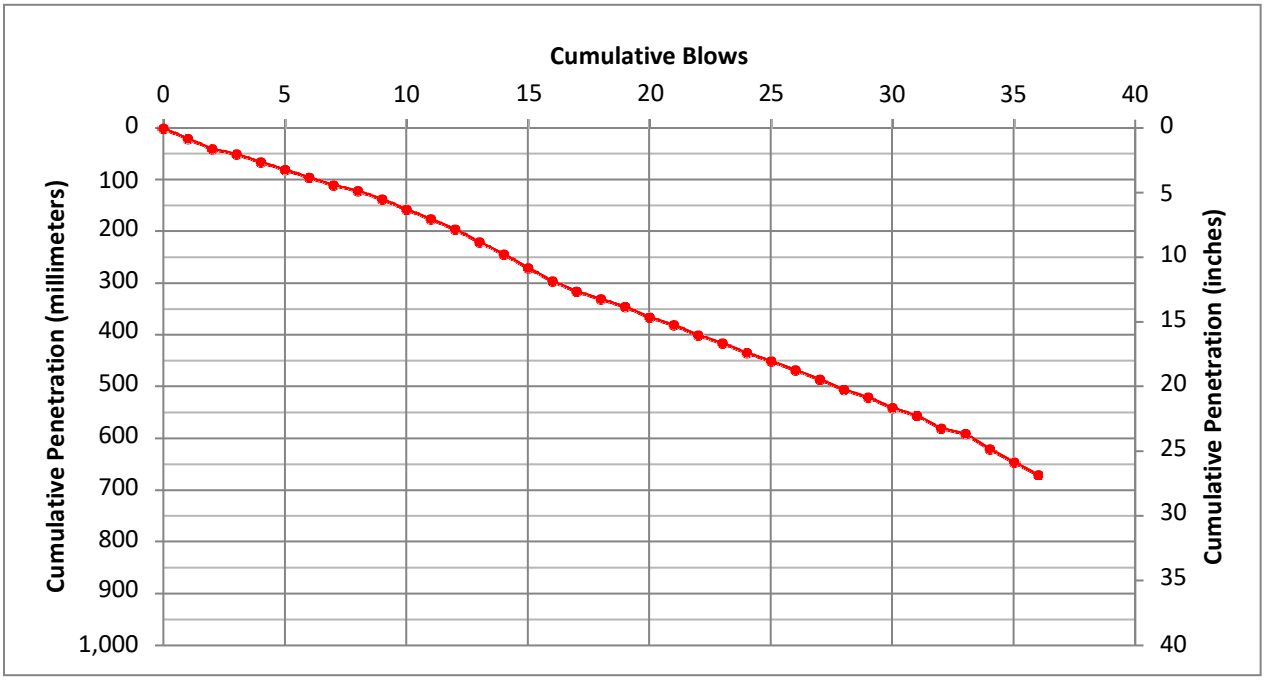
References:

ASTM D 6951, Standard Test Method for Use of the Dynamic Cone Penetrometer in Shallow Pavement Applications.

W.D. Powell, J.F. Foster, H.C. Mayhew, and M.E. Nunn, "The Structural Design of Bituminous Roads," TRRL Laboratory Report 1132, Transport and Road Research Laboratory, Department of Transport, United Kindgom, 1984.

DYNAMIC CONE PENETROMETER RESULTS - DCP 5

Layer	Soil Type	Hammer weight =	17.6 pounds
		Slope (mm/blow)	M_R (psi)
1	Soil not CL, CBR < 10 or not CH	17.6	12,400
2	---	---	---
3	---	---	---



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$M_R = 108206 \times S^{-0.64}$; CH soil

M_R = resilient modulus (pounds per square inch)

S = slope (millimeters per blow); multiplied by two (2) if 10-pound hammer is used

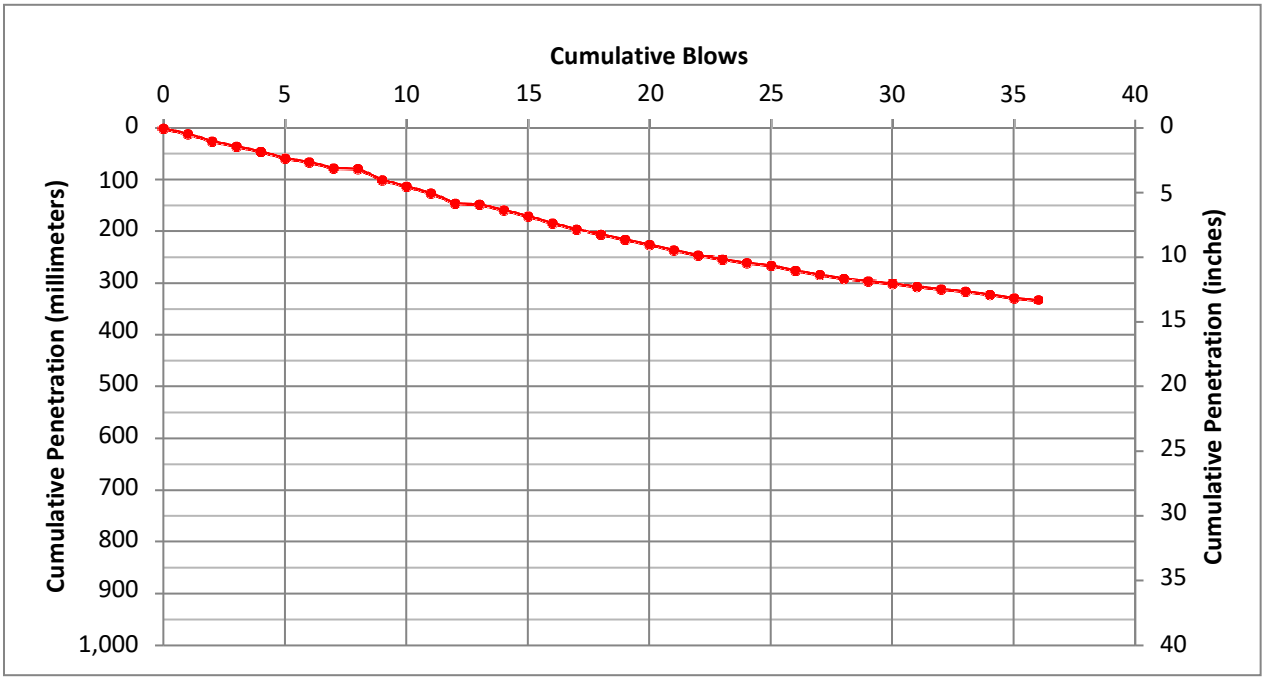
References:

ASTM D 6951, Standard Test Method for Use of the Dynamic Cone Penetrometer in Shallow Pavement Applications.

W.D. Powell, J.F. Foster, H.C. Mayhew, and M.E. Nunn, "The Structural Design of Bituminous Roads," TRRL Laboratory Report 1132, Transport and Road Research Laboratory, Department of Transport, United Kindgom, 1984.

DYNAMIC CONE PENETROMETER RESULTS - DCP 6

Layer	Soil Type	Hammer weight =	17.6 pounds
		Slope (mm/blow)	M_R (psi)
1	Soil not CL, CBR < 10 or not CH	10.4	18,000
2	---	---	---
3	---	---	---



$M_R = 96658 \times S^{-0.7168}$; soil not CL, CBR < 10 or not CH

$M_R = 469673 \times S^{-1.28}$; CL soil, CBR < 10

$M_R = 108206 \times S^{-0.64}$; CH soil

M_R = resilient modulus (pounds per square inch)

S = slope (millimeters per blow); multiplied by two (2) if 10-pound hammer is used

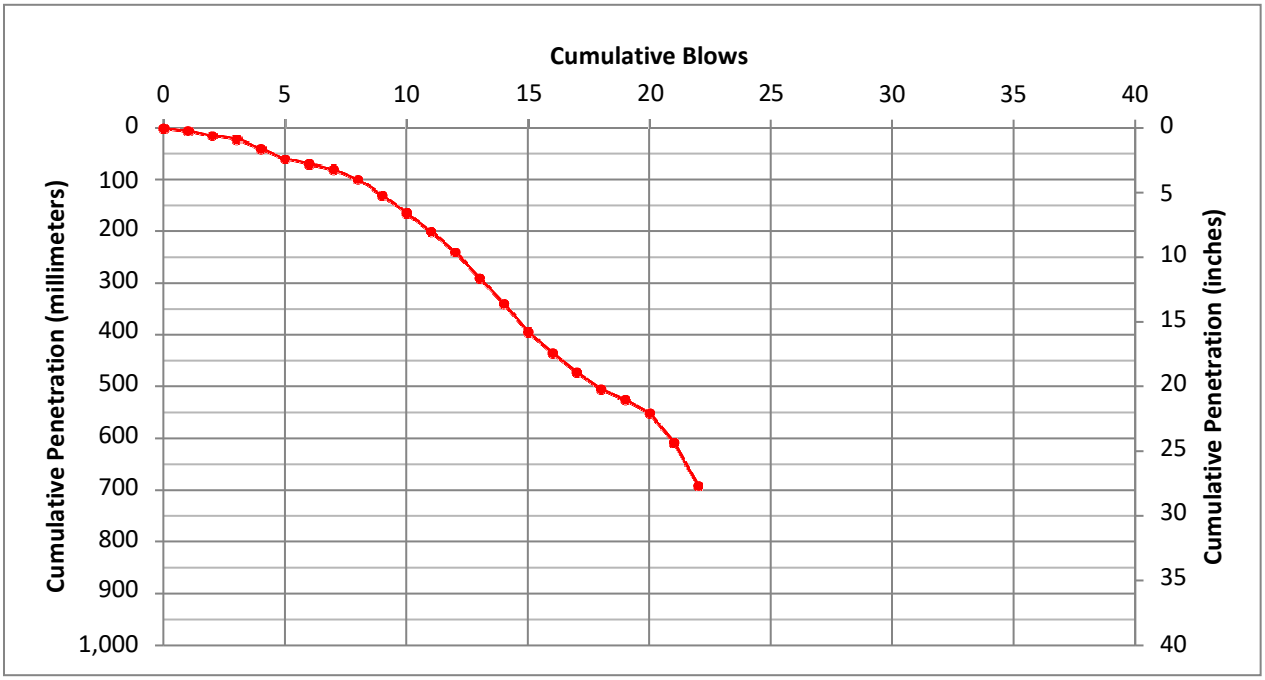
References:

ASTM D 6951, Standard Test Method for Use of the Dynamic Cone Penetrometer in Shallow Pavement Applications.

W.D. Powell, J.F. Foster, H.C. Mayhew, and M.E. Nunn, "The Structural Design of Bituminous Roads," TRRL Laboratory Report 1132, Transport and Road Research Laboratory, Department of Transport, United Kindgom, 1984.

DYNAMIC CONE PENETROMETER RESULTS - DCP 7

Layer	Soil Type	Hammer weight =	17.6 pounds
		Slope (mm/blow)	M_R (psi)
1	Soil not CL, CBR < 10 or not CH	22.5	10,400
2	---	---	---
3	---	---	---



$M_R = 96658 \times S^{-0.7168}$; soil not CL, CBR < 10 or not CH

$M_R = 469673 \times S^{-1.28}$; CL soil, CBR < 10

$M_R = 108206 \times S^{-0.64}$; CH soil

M_R = resilient modulus (pounds per square inch)

S = slope (millimeters per blow); multiplied by two (2) if 10-pound hammer is used

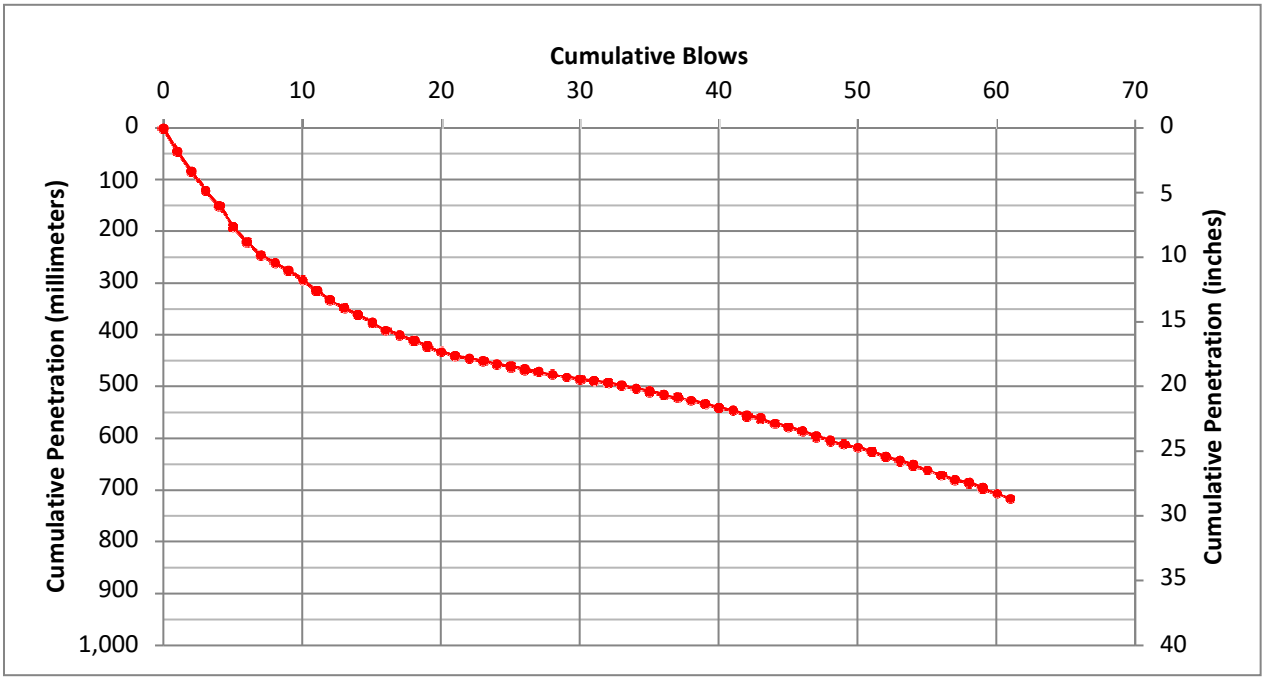
References:

ASTM D 6951, Standard Test Method for Use of the Dynamic Cone Penetrometer in Shallow Pavement Applications.

W.D. Powell, J.F. Foster, H.C. Mayhew, and M.E. Nunn, "The Structural Design of Bituminous Roads," TRRL Laboratory Report 1132, Transport and Road Research Laboratory, Department of Transport, United Kindgom, 1984.

DYNAMIC CONE PENETROMETER RESULTS - DCP 8

Layer	Soil Type	Hammer weight =	17.6 pounds
		Slope (mm/blow)	M_R (psi)
1	Soil not CL, CBR < 10 or not CH	28.1	8,800
2	---	---	---
3	---	---	---



$M_R = 96658 \times S^{-0.7168}$; soil not CL, CBR < 10 or not CH

$M_R = 469673 \times S^{-1.28}$; CL soil, CBR < 10

$M_R = 108206 \times S^{-0.64}$; CH soil

M_R = resilient modulus (pounds per square inch)

S = slope (millimeters per blow); multiplied by two (2) if 10-pound hammer is used

References:

ASTM D 6951, Standard Test Method for Use of the Dynamic Cone Penetrometer in Shallow Pavement Applications.

W.D. Powell, J.F. Foster, H.C. Mayhew, and M.E. Nunn, "The Structural Design of Bituminous Roads," TRRL Laboratory Report 1132, Transport and Road Research Laboratory, Department of Transport, United Kindgom, 1984.

APPENDIX C

APPENDIX C

DESIGN CALCULATIONS

This appendix presents our deign calculations for the use of Presto GeoSystems Geoweb for subgrade improvement.

AASHTO H20

CBR (%)	5
Cu (psi) from table 4.	21.7
Nc (low traffic, high rutting)	3.3
P (lb)	16000
p (psi)	100
r - see GW30V spec sheet	0.95
δ (deg)	26.6
Φ	28
Zt	1
Zb	7
H (in.)geoweb depth	6
D (in.)effective cell diam.	9.5

Variable Names

c_u	Subgrade shear strength
N_c	Bearing capacity coefficient - based on design traffic - see below
P	Design wheel load
p	Contact pressure
r	Geoweb cell wall/Infill peak friction angle ratio
δ	Angle of shear resistance between the granular infill and Geoweb cell wall
ϕ	Angle of internal friction of the Geoweb infill material
z_t	Depth from surface to top of Geoweb cell walls
z_b	Depth from surface to bottom of Geoweb cell walls

Table 4 Correlation of Subgrade Soil Strength Parameters for Cohesive (Fine-Grained) Soils

California Bearing Ratio CBR (%)	Undrained Shear Strength c_u, kPa (psi)	Standard Penetration Resistance SPT (blows/ft)	Field Identification
< 0.4	< 11.7 (1.7)	< 2	Very soft (extruded between fingers when squeezed)
0.4 - 0.8	11.7 - 24.1 (1.7) - (3.5)	2 - 4	Soft (molded by light finger pressure)
0.8 - 1.6	24.1 - 47.6 (3.5) - (6.9)	4 - 8	Medium (molded by strong finger pressure)
1.6 - 3.2	47.6 - 95.8 (6.9) - (13.9)	8 - 15	Stiff (readily indented by thumb but penetrated with great effort)
3.2 - 6.4	95.8 - 191 (13.9) - (27.7)	15 - 30	Very stiff (readily indented by thumbnail)
> 6.4	> 191 (27.7)	> 30	Hard (indented with difficulty by thumbnail)

N_C = 2.8 (High Traffic, Low Rutting - from U.S. Forest Service guidelines)
N_C = 3.3 Low Traffic, High Rutting - from U.S. Forest Service guidelines)

max allowable stress	qa (psi)	71.61	$q_a = N_c c_u$
radius of loaded area	R	7.1	where R = Radius of loaded area (i.e. effective radius of single or dual tires) $R = \sqrt{\frac{P}{p\pi}}$
vertical stress top of geoweb	σvt	99.7	$\sigma_{vt} = p\left[1 - \left(\frac{1}{1+\left(\frac{R}{z_t}\right)^2}\right)^{3/2}\right]$
vertical stress bottom of geoweb	σvb	65.7	$\sigma_{vb} = p\left[1 - \left(\frac{1}{1+\left(\frac{R}{z_b}\right)^2}\right)^{3/2}\right]$
Active earth pressure coefficient	Ka	0.4	
horizontal stress top of geoweb	σht	36.0	$\sigma_{ht} = K_a \sigma_{vt}$
horizontal stress bottom of geoweb	σhb	23.7	$\sigma_{hb} = K_a \sigma_{vb}$
average horizontal stress	σave	29.9	$\sigma_{avge} = \frac{(\sigma_{ht} + \sigma_{hb})}{2}$
stress reduction beneath loaded area	σr	18.9	$\sigma_r = 2\left(\frac{H}{D}\right)\sigma_{avge} \tan\delta$
Allowable Stress on Subgrade		71.61	
Stress on Subgrade		46.8	
Factor of Safety		1.5 acceptable	

Gulfstream 550

CBR (%)	5
Cu (psi) from table 4.	21.7
Nc (low traffic, high rutting)	3.3
P (lb)	30333
p (psi)	200
r - see GW30V spec sheet	0.95
δ (deg)	26.6
Φ	28
Zt	1
Zb	9
H (in.)geoweb depth	8
D (in.)effective cell diam.	9.5

Variable Names

c_u	Subgrade shear strength
N_c	Bearing capacity coefficient - based on design traffic - see below
P	Design wheel load
p	Contact pressure
r	Geoweb cell wall/Infill peak friction angle ratio
δ	Angle of shear resistance between the granular infill and Geoweb cell wall
ϕ	Angle of internal friction of the Geoweb infill material
z_t	Depth from surface to top of Geoweb cell walls
z_b	Depth from surface to bottom of Geoweb cell walls

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0.8 - 1.6	24.1 - 47.6 (3.5) - (6.9)	4 - 8	Medium (molded by strong finger pressure)
1.6 - 3.2	47.6 - 95.8 (6.9) - (13.9)	8 - 15	Stiff (readily indented by thumb but penetrated with great effort)
3.2 - 6.4	95.8 - 191 (13.9) - (27.7)	15 - 30	Very stiff (readily indented by thumbnail)
> 6.4	> 191 (27.7)	> 30	Hard (indented with difficulty by thumbnail)

N_C = 2.8 (High Traffic, Low Rutting - from U.S. Forest Service guidelines)
N_C = 3.3 Low Traffic, High Rutting - from U.S. Forest Service guidelines)

max allowable stress	qa (psi)	71.61	$q_a = N_c c_u$
radius of loaded area	R	6.9	where R = Radius of loaded area (i.e. effective radius of single or dual tires) $R = \sqrt{\frac{P}{p\pi}}$
vertical stress top of geoweb	σvt	199.4	$\sigma_{vt} = p\left[1 - \left(\frac{1}{1+\left(\frac{R}{z_t}\right)^2}\right)^{3/2}\right]$
vertical stress bottom of geoweb	σvb	100.8	$\sigma_{vb} = p\left[1 - \left(\frac{1}{1+\left(\frac{R}{z_b}\right)^2}\right)^{3/2}\right]$
Active earth pressure coefficient	Ka	0.4	
horizontal stress top of geoweb	σht	72.0	$\sigma_{ht} = K_a \sigma_{vt}$
horizontal stress bottom of geoweb	σhb	36.4	$\sigma_{hb} = K_a \sigma_{vb}$
average horizontal stress	σave	54.2	$\sigma_{avge} = \frac{(\sigma_{ht} + \sigma_{hb})}{2}$
stress reduction beneath loaded area	σr	45.7	$\sigma_r = 2\left(\frac{H}{D}\right)\sigma_{avge} \tan\delta$
Allowable Stress on Subgrade		71.61	
Stress on Subgrade		55.1	
Factor of Safety		1.30 acceptable	

Equivalent Single Wheel Loading (ESWL) GV-GER-1212

1. **Introduction**:

   One consideration in operating Gulfstream aircraft is the strength of runway and taxiway pavements in relation to aircraft operating weight. This can limit operational weights in some airports. One common method of evaluating an aircraft for a given runway is the Equivalent Single Wheel Loading (ESWL). ESWL accounts for the extra tire flotation for multi-wheel landing gear struts such as the dual wheel struts used on the Gulfstream aircraft. This section provides information on how to compute ESWL for the G550 and G500 airplanes.

2. **G550 and G500 Main Landing Gear Parameters:**

Max Ramp Weight (pounds)	MLG Tire Size (inches)	Tire Spacing (inches)	Max Tire Pressure (psi)	Reduction Factor -	Maximum ESWL (pounds)
91,400	35 X 11.0	18.5	198	1.25	32,904

   The reduction factor in the table above assumes a rigid pavement with a radius of equivalent stiffness of 40 inches, roughly equivalent to a 13.5 inch thick concrete slab. Thinner pavements would give higher reduction factors, so the factors presented are conservative.

3. **ESWL Computation for Lower Operating Weights:**

   ESWL can be computed for lower operating weights as follows:
   ESWL = (Gross Weight) x (0.9) x (0.5) / (Reduction Factor)

Aircraft	Gulfstream G550
Gross Weight (lb)	91000
Reduction Factor	1.35 assume 1.35, since rutting is allowed
ESWL (lb)	30333.33
tire presure (psi)	200

PRESTO | GEOSYSTEMS
STRENGTH FROM THE GROUND UP
Since 1979

Product Specification - GEOWEB® GW30V Geocells

GENERAL

GEOWEB® product is manufactured from textured, perforated strips of high density polyethylene that are bonded together to create a network of interconnected cells. The GEOWEB® cells can be filled with soil, aggregate, concrete, pulverized debris, recycled asphalt pavement, or other infill material for geotechnical applications such as: 1) load support for unpaved and paved roads, railways, ports, heavy-duty pavements, container yard, and basal embankments stabilization; 2) retaining structures, free-standing structures, and fascia walls; and, 3) slope, channel, and geomembrane protection.

DIMENSIONS

Parameter	Units	Value
Cell Depth (Available in 5 Depths)[1]	inches (mm)	3 (75), 4 (100), 6 (150), 8 (200), 12 (300)
Cell Size (Length x Width +/- 10%)	inches (mm)	11.3 x 12.6 (287 x 320)
Expanded Section Width	No. Cells	8
	Feet (m)	Varies: 7.7 to 9.2 (2.3 to 2.8)
Expanded Section Length	No. Cells	18, 21, 25, 29, or 34
	Feet (m)	Varies: 15.4 to 35.1 (4.7 to 10.7)

STRUCTURAL INTEGRITY AND SYSTEM PERFORMANCE

Parameter	Units	Value
Minimum Short Term Seam Peel Strength	lbf/in (N/cm)	≥80 (142)
Long-Term Seam Peel Strength (standard 4-inch sample width)[2]	lb (N)	160 (710)
Internal Junction Efficiency[3]	%	≥100
Mechanical Junction Efficiency (Connection Type: ATRA Key)[3]	%	≥100
Peak Friction Angle Ratio (δ/Ø)[4]	Unitless	0.95

MATERIAL PROPERTIES

Parameter	Test Method	Units	Value
Polymer Density	ASTM D1505 or D792	g/cm³	0.935 - 0.965
Carbon Black Content[5]	ASTM D1603	%	1.5 - 2.0
Sheet Thickness Prior to Texture	ASTM D5199	mm (mil)	1.27 (50), -5% +10%
Sheet Thickness After Texture	ASTM D5199	mm (mil)	1.52 (60), -5% +10%
Texture Type/Shape	—	—	Rhomboidal
Texture Density	—	indentations/cm²	22 - 31

DURABILITY

Parameter	Test Method	Units	Value
Environmental Stress Crack Resistance	ASTM D1693	hrs	>5,000
Resistance to Oxidation[6]	EN ISO 13438	yrs	≥50
Resistance to Weathering[7]	EN 12224	%	100

Notes:

1) 12-inch cell depth available in 21-cell panel length only.

2) A 100-mm (4.0 in.) wide seam sample shall support a 72.5 kg (160 lb) load for a period of 7 days minimum in a a temperature-controlled environment undergoing a temperature change on a 10 hour cycle from ambient room to 54° C (130° F). Ambient room temperature is per ASTM E 41.

3) Junction efficiency determined as a percentage of junction performance (EN ISO 13426-1) to perforated strip performance (EN ISO 10319).

4) Typical design value for clean granular infill material (i.e. - coarse sand or crushed aggregate). Consult with manufacturer to confirm value for other types of infill materials.

5) Standard black HDPE strips. For tan/green GEOWEB, hindered amine light stabilizer (HALS) content will be 2.0% by weight of carrier.

6) Predicted to be durable for a minimum of 50 years in natural soil with a pH between 4 and 9 and at a soil temperature ≤ 25°C.

7) 100% of original tensile strength retained following exposure to intense UV radiation and accelerated weathering in accordance with EN 12224.

UK CA 0338 | 21 CE 1213 | 21
ISO 9001:2015 Certified

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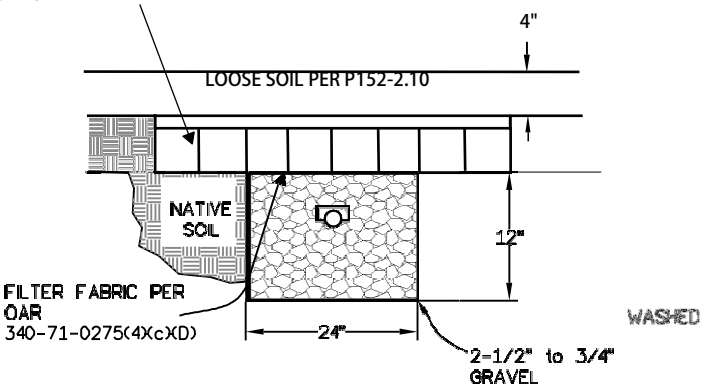
GW30V GEOCELLS
FILLED WITH 2/3 CRUSHED AGGREGATE
AMD 1/3 TOPSOIL MIX OVERFILL BY 1"
EXTEND BEYOND TRENCH BY 2 CELL
WIDTHS



TYPICAL DETAIL (NOT TO SCALE)

NV5

Delivering Solutions
Improving Lives

Exhibit 7

ENVIRONMENTAL
MANAGEMENT
SYSTEMS, INC.

OR 503-353-9691
FAX 503-353-9695
WA 360-735-1109
www.envmgtsys.com
4080 SE International Way
Suite B-112
Milwaukie, OR 97222

25 February 2025

Aron Faegre, AIA, PE

13200 Fielding Road

Lake Oswego, Oregon 97034

RE: Suitability of Proposed Modifications to the Onsite Wastewater Treatment System Drainfield at Aurora State Airport

Dear Mr. Faegre,

I am writing in response to your request regarding the proposed modifications to the onsite wastewater treatment (septic) system drainfield serving HDSE at the Aurora State Airport. Specifically, the inquiry concerns whether the addition of geotextile grid reinforcement over the existing drainfield—intended to enhance support for emergency vehicle access while maintaining compliance with wastewater treatment regulations—meets the requirements set forth by the Oregon Department of Environmental Quality (DEQ).

As a professional with over 47 years of direct experience in onsite wastewater treatment system design and regulatory compliance, I have been continuously involved in the design, installation, and oversight of this specific wastewater system since the initial feasibility evaluation in 1999. I personally conducted the original soil assessment in coordination with DEQ and have overseen all subsequent system modifications, each of which received DEQ approval.

At no time during my 25 years of direct involvement with this site has the drainfield posed any risk to safety, wastewater performance, or compliance. In response to concerns regarding the placement of a drainfield near an active airfield, I have recommended the installation of Presto GeoSystems' Geoweb system. This geotextile cellular confinement system is designed to improve load distribution while protecting the drainfield's function, making it well-suited for incidental vehicle travel, including emergency response access.

Regulatory Compliance and Engineering Considerations

Under **Oregon Administrative Rule 340-071-0520**, large onsite wastewater treatment systems must comply with specific design and impact assessment requirements, including:

- **Impact Analysis**: Any system modifications must be accompanied by a written assessment of potential impacts on public health and water quality, prepared by a qualified professional as specified in ORS 672.535. The NV5 geotechnical report satisfies this requirement by demonstrating compliance with DEQ design standards.
- **Structural Integrity**: DEQ regulations require a minimum of six inches of soil cover over drainfield trenches, with additional cover allowed where engineering supports such design. There is no regulatory limit on maximum cover depth, provided system function is maintained.
- **Load-Bearing Design**: The proposed geotextile grid reinforcement includes a blend of 3/8-inch to 1-inch nominal crushed aggregate to distribute loads in accordance with **AASHTO H20 and Gulfstream ESWL standards**, ensuring adequate safety margins for incidental vehicular travel.
- **Permeability & Drainage Protection**: The selected geoweb design includes a **D50 grain size of 0.5 inches** with an approximate **30% void space**, preventing compaction while facilitating proper aeration and infiltration within the drainfield. The system would extend laterally beyond each drainage trench to mitigate concentrated loading effects.
- **Surface Preparation**: Following manufacturer specifications, the geoweb would be covered with at least **one inch of selected fill** to support vegetative cover, and a **4-inch layer of loose, uncompacted soil** will be applied to satisfy **FAA Item P-152-2.6** seedbed requirements.

Conclusion

Based on my expertise and long-term familiarity with this system, the proposed modifications meet DEQ requirements for drainfields while aligning with FAA safety guidelines for runway safety areas. The use of geotextile grid reinforcement offers a sound engineering solution that enhances load distribution without compromising wastewater treatment performance.

I am a **Registered Environmental Health Specialist** in Oregon and Nevada and a **Professional Onsite Wastewater Treatment System Designer** in Washington. My experience includes serving as **President of the Washington On-Site Sewage**

Association, a **Board Member of the Oregon Onsite Wastewater Association**, and a **Technical Practices Committee Member for the National Onsite Wastewater Recycling Association (NOWRA)**. My **resume and aviation specific addendum** is attached for reference.

If you require further clarification or supporting documentation, please do not hesitate to contact me at 503-313-3942.

Sincerely,

Robert F. Sweeney, MS, REHS

President

Environmental Management Systems, Inc.

ENVIRONMENTAL
MANAGEMENT
SYSTEMS, INC.

503-353-9691
503-353-9695
360-735-1109
www.envmgtsys.com
4080 SE International Way
Suite B-112
Milwaukie, OR 97222

Robert F. Sweeney, MS, REHS

February 2025

SUMMARY

47 years, providing expertise in Public Health & Environmental Protection programs, ranging in scope from Disaster Preparedness, Epidemiology, Food Protection, Water Quality, Solid Waste Management, Public Health Education, Erosion and Sediment Control, Wastewater Treatment System Design, Wetlands Delineation, Water System Evaluations, Environmental Assessments, Biological Assessments, Treatment System Maintenance and Performance Monitoring.

CERTIFICATIONS

Registered Environmental Health Specialist (Sanitarian), Nevada & Oregon.
OR REHS #EH-S-202513 since June 1977. Nevada REHS #807 since Feb 2024
Professional Onsite Wastewater Treatment System Designer, Washington. Department of Licensing #5100154 since July 2001.
Wetlands Delineation & Management Training, RCET, Inc./ USACE 2001
Wetlands Rating System, Washington Department of Ecology, 2008
Streamflow Duration Assessment Method, USEPA / USACE / ODSL 2009
Certified Erosion & Sediment Control Lead, WA#23320 Feb2007

EXPERIENCE

Consulting Firm Principal – 1997-Present. President of Environmental Management Systems, Inc. EMS specializes in assisting property owners to achieve their development due diligence, environmental design and regulatory compliance goals. Areas of performance include: On-Site Waste-Water Treatment, Site & Soils Evaluation, Wetland Delineation & Mitigation, Drainage and a wide range of environmental consulting services. Focus is on: Site Evaluation, Soil Profiling, Design of Treatment Systems, Inspection, Certification and Performance Monitoring. Over the past 26+ years the firm has completed over 3,000 projects, ranging from Environmental Site Assessments, Geologic Hazard Studies, Wastewater Treatment Systems treating from 250 to over 75,000 gallons/day. System designs include innovative technology such as subsurface drip-fields, textile filters, aerobic treatment units, sequence batch reactors and telemetry. Conducted Evaluation of status of Local Health Department Disaster / Bio-Terrorism Preparedness and Capabilities. Environmental Health Specialists, Professional Soil Scientists, Engineers, Geologists, Surveyors, Biologists, Wetland Professionals and Engineering Technicians are on staff & through partner firms.

Disaster Management Program Coordinator – 1990 – June 2002 Disaster Management Program Coordinator for a Civil Affairs Brigade, US Army Reserve. (Lieutenant Colonel) Coordinated the

Disaster Preparedness Program, with teams assisting nations throughout the Pacific Rim and beyond. Developed the inter-disciplinary, civilian-military program and personally conducted training and exercises for Disaster Preparedness activities in the Marshall Islands, Palau, Bosnia, Samoa and Niue. Developed a Geographic Information System and database driven disaster management program in conjunction with US and international Civilian and Military components.

Chief Environmental Engineer - Stabilization Force, Bosnia-Herzegovina. 1997. Served as the Chief Environmental Engineer for the Civil Military Task Force. Assisted civil authorities to evaluate, plan and repair war-torn environmental infrastructure for water, sewage and solid waste facilities. Supervised teams of engineers in restoring water, sewage, housing, utilities, transportation and communication systems. Conducted Emergency Response Training for Civilian and Multi-National Military Personnel. Awarded Defense Meritorious Service Medal.

Environmental Health Program Manager 1989 to 1997 - Served 8 years as Manager of the Liquid Waste and Land-Use Department for Southwest Washington Health District, a 3-County / 12- Municipality, Regional Health District in Washington State. Developed programs for On-Site Liquid waste regulation involving Water Quality studies, Professional Development, Septic System maintenance and Low Interest Loans for repairs of failed on-site sewage disposal systems. Developed the first comprehensive On-Site Sewage System Maintenance Program for the Southwest Washington Health District, one of the first in Washington.

Environmental Health Specialist (Sanitarian) 1977 – 1989. Deschutes County Health Dept (5 yrs), Multnomah County Health Department (7 yrs): Food, Wastewater, Water, Swimming Pools, Tourist Facilities, Housing Sanitation, Solid Waste, Epidemiologic Investigations of Food-borne outbreaks. Primary author of Multnomah County's first Food Handler Test.

EDUCATION

Master Business Administration, Veteran Entrepreneurial Training & Resource Network Apr23
Command & General Staff College, US Army, 1993
Civil Affairs Officers Advanced Course, US Army, 1992
Master of Science in Management, Marylhurst University 1987
Medical Service Officers Advanced Course, US Army, 1985
Tactical Intelligence Officers Course, US Army, 1983
Certificate in Public Health, Portland State University, 1977
Bachelor of Science in General Science, Portland State University, 1977

CURRENT MEMBERSHIP AND COMMITTEES

National Onsite Wastewater Recycling Association – Board Member / Tech Practices
Oregon On-site Wastewater Association (Former Board Member)
Washington On-Site Sewage Association (President 2003-04)

PREVIOUS MEMBERSHIP AND COMMITTEES (partial)

WA Department of Health Sewage Tank Rule Revision Committee (2010)
WA Department of Health Large Onsite Sewage System Rule Committee (2010)
Clackamas County Citizens Involvement Committee (2004-2005)
METRO Technical Advisory Committee (2004-2005)
Oregon Governor's Task Force on Wastewater Re-Use Committee (May – Dec 2004)
WA Department of Licensing Working Groups on: Sewage Tank Rules & Licensing Onsite Wastewater Treatment System Designers (1996-2000)

ENVIRONMENTAL
MANAGEMENT
SYSTEMS, INC.

OR 503-353-9691
FAX 503-353-9695
WA 360-735-1109
www.envmgtsys.com
4080 SE International Way
Suite B-112
Milwaukie, OR 97222

Robert F. Sweeney, MS, REHS

February 2025

AVIATION RELATED ADDENDUM

Mr. Sweeney has been continuously involved with Safety from 1967 to present as a Water Safety Instructor, Aviation Technician & Environmental Professional in programs, including Training and Experience in Disaster Preparedness with Aviation Related Emergency Scenarios:

Consulting Firm Principal – 1997-Present. President of Environmental Management Systems, Inc. EMS specializes in assisting property owners to achieve development and wastewater treatment goals, including Airports & Aviation Related Projects as follows:

Aurora State Airport, Aurora. OR (1999 – Present)
- Van's Aircraft HD Aviation – Wastewater Treatment System New Construction
- HDSE Aviation – Wastewater Treatment System Expansion
- Columbia Aviation Association – Wastewater Treatment System -
- Helicopter Transport Systems– Wastewater Treatment System
- AABC – Wastewater Treatment System
- Wylee Condo Association – Wastewater Treatment System

Scappoose Airport, OR Hangar Addition - – Wastewater Treatment System
Private Airports - Wastewater Treatment System in Clackamas & Washington Counties

US Army Disaster Management Program Coordinator – 1990 – June 2002 Disaster Management Program Coordinator for a Civil Affairs Brigade. Lieutenant Colonel Sweeney Coordinated the Disaster Preparedness Program, with teams assisting nations throughout the Pacific Rim and beyond. Developed and personally conducted training and exercises including Emergency Preparation for Assessing: Threats, Vulnerability, Resources & Organization for Action including Aviation Crash Scenarios in the Marshall Islands, Palau, Bosnia, Samoa and Niue.

Chief Environmental Engineer - Stabilization Force, Bosnia-Herzegovina. (1997). Served as the Chief Environmental Engineer for the Civil Military Task Force. Conducted Emergency Response Training for Civilian and Multi-National Military Personnel. Awarded Defense Meritorious Service Medal.

US Navy: 1969 – 73 Petty Officer Sweeney served as an Aviation Fire Control / Electronics & Computer Technician with Training and Experience in Aviation Fuel Fire Response:

Whidbey Island Naval Air Station, WA; Annual Training in Aviation Fuel Fire Fighting (70-71).

USS Kitty Hawk Aircraft Carrier (CVA 63) – Safety Petty Officer and Team Leader for 2 Bomb Cooling Crews in Yankee Station - Gulf of Tonkin Viet Nam. (Dec 1971-Dec 72)

Outlook

Fw: ADDITIONAL AAIA TESTIMONY FOR THE AURORA AIRPORT UPDATED REFINED PREFERRED ALTERNATIVE

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2025-01-22 9:13 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 4:41 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: ADDITIONAL AAIA TESTIMONY FOR THE AURORA AIRPORT UPDATED REFINED PREFERRED ALTERNATIVE

Good afternoon, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 4:36 PM
To: faegre@earthlink.net; brandy.steffen@jla.us.com; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: 'Tony Helbling - Wilson Construction Company' <helbling@wilsonconst.com>; 'Ted Millar' <tmillar@wwpmi.com>; 'Wendie Kellington' <wk@klgpc.com>; 'Bruce Bennett - Aurora Aviation '

<bruce@auroraaviation.com>; 'Schuster, Brad' <brad.schuster@aopa.org>
Subject: RE: ADDITIONAL AAIA TESTIMONY FOR THE AURORA AIRPORT UPDATED REFINED PREFERRED ALTERNATIVE

Hi Aron, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach

OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: faegre@earthlink.net <faegre@earthlink.net>
Sent: Tuesday, January 21, 2025 3:34 PM
To: brandy.steffen@jla.us.com; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: 'Tony Helbling - Wilson Construction Company' <helbling@wilsonconst.com>; 'Ted Millar' <tmillar@wwpmi.com>; 'Wendie Kellington' <wk@klgpc.com>; 'Bruce Bennett - Aurora Aviation ' <bruce@auroraaviation.com>; 'Schuster, Brad' <brad.schuster@aopa.org>
Subject: ADDITIONAL AAIA TESTIMONY FOR THE AURORA AIRPORT UPDATED REFINED PREFERRED ALTERNATIVE

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hello Brandy, Thomas, and Tony,

Attached are the following documents to provide input on the most recent master plan alternative for Aurora Airport:

- Aurora Airport – AAIA Master Plan Requests 2025-1-21 with attachments;
- Mod Standards Aurora Airport 2025-1-21 with attachments; and
- Size of Aircraft at Aurora Airport 2025-1-21.

Please confirm receipt of these documents and that they will reach the design team and FAA.

Thanks

Aron

Aron Faegre, AIA, PE
Aron Faegre Architect
13200 Fielding Road
Lake Oswego, Oregon 97034
faegre@earthlink.net
www.faegre.org
503-880-1469

Aron Faegre, AIA, PE 13200 Fielding Road Lake Oswego Oregon 97034 503-880-1469 faegre@earthlink.net

January 21, 2025

Alex Thomas, Planning and Programs Manager
Tony Beach, State Airports Manager
Oregon Department of Aviation
Brandy Steffen, JLA
Oregon Department of Aviation
3040 25th Ste SE
Salem, OR 97602
Alex.R.Thomas@odav.oregon.gov

Re: Aurora State Airport Master Plan
AAIA Master Plan Requests

Mr. Thomas, Mr. Beach, and Ms. Steffen:

Attached is pdf drawing "AAIA Masterplan Alternative 2025-1-21" with recommendations for changes to the Aurora Airport Updated Refined Preferred Alternative from the Aurora Airport Improvement Association.

It is a drawing intended to be printed on a 22"x34" sheet, so is not readily readable on letter size print sheets. As a pdf it should be zoomed in to read the various boxes of text that explain elements.

Key things to look for on this drawing are:

- Proposed standard FAA approved EMAS on each end of the runway which would allow the drainfields to remain with no changes, and provides benefits of additional takeoff distance and reduced noise impact to neighbors;
- Proposed addition of an "Airport Boundary as required by ORS 836.616(2) and OAR 660-013-0040" which is needed per Oregon law and is best put onto the ALP so when adopted by jurisdictions it can also comply with the

land use requirements of Oregon. Note that it should show existing airport use lands as well as any lands planned for potential future inclusion in the airport, as inside this boundary line per recent court decisions.

- A sequence of three phases that can be shown on the ALP for resolution of the ROFA, so that it can be resolved in an iterative process and can be used as a reference for a MOS application;
- An internal circulation road, that is already partly constructed per what was adopted in the 2012 Master Plan; individual private property owners are noted and looking forward to teaming with ODAV to accomplish this; this also would result in ODAV taking ownership of the main entrance road leading to the control tower, in lieu of it just being an ODAV easement as exists today;
- Proposing adding private land to the main entrance road, so that when the gate is closed, cars and trucks could get turned around and not have to back out of the road; it also could provide for some parking just outside the vehicle gate and the addition of a man-gate; this additional land will allow creation of a more identifiable and symbolic main entrance to the airport and control tower, as currently visitors tend to be puzzled as to "where is the main entrance."
- A parcel of land that Bruce Bennett is prepared to sell to ODAV that helps with taxiway improvements; and
- A proposed relocation of the taxiway connector near the Atlantic FBO; this new connector would provide the easiest resolution to avoiding direct access to the runway from the taxilane, because other areas are already fixed, i.e. a) Hangar Golf-West is currently in construction and fixes that side of the access point, b) the FBO apron area is fixed in its circulation, and c) the existing taxilane coming to the juncture serves over 236,000 square feet of hangars. Potentially this project could be accomplished as a public-private partnership since it helps maintain the efficiency of the existing layout on the private side.

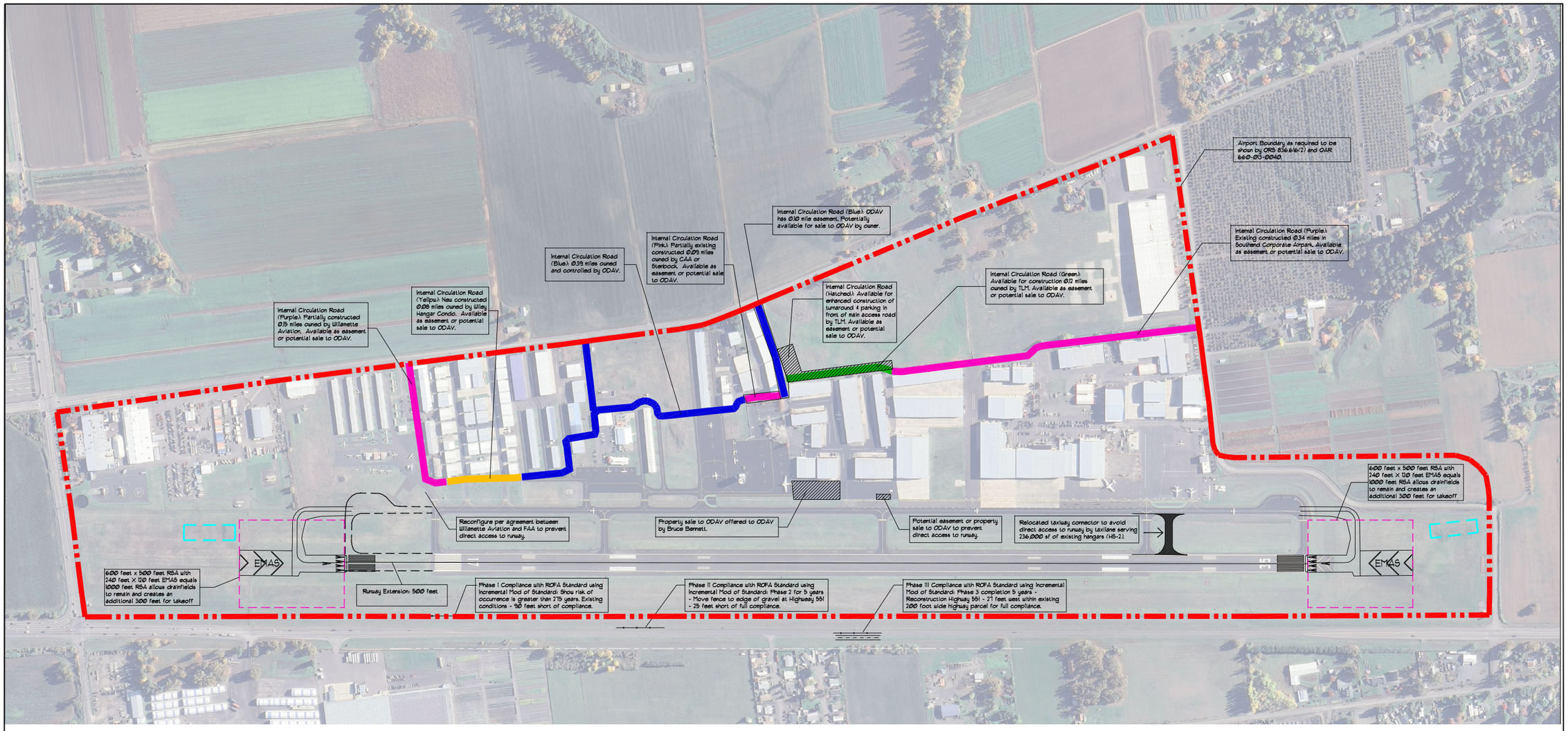
We look forward to discussing these potential revisions with you further, and considering how the private sector side can partner with ODAV to establish an outstanding airport layout plan for the future.

Respectfully submitted,

Aron Faegre, AIA, PE
Aron Faegre Airport Planning and Design

Attachments:

- AAIA proposed Master Plan revisions, January 21, 2025



1.

SITE PLAN

0 200 400 600

N

KEY

- AIRPORT BOUNDARY AS REQUIRED TO BE SHOWN PER ORS 836.616(2) AND OAR 660-013-0040
- 500 FT RUNWAY EXTENSION
- 600 FT X 500 FT RSA WITH EMAS EQUALS 1000 FT RSA
- DRAINFIELDS CAN REMAIN AS CONSTRUCTED IN SMALLER RSA USING EMAS

VERIFY SCALES

BAR IS ONE INCH ON ORIGINAL DRAWING. 0" 1"
IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY.

NO.	DATE	BY	APPR.	REVISIONS

AURORA AIRPORT IMPROVEMENT ASSOC.
PROPOSED ALTERNATIVE

DESIGNED BY:	DRAWN BY:	CHECKED BY:	SCALE:
AF	AF/TH	AF	300' = 1"

DATE: JANUARY 21, 2025
PROJECT: MP – MASTERPLAN ALT AAIA

AURORA STATE AIRPORT (UAO)

AURORA STATE AIRPORT – MASTER PLAN ALTERNATIVE AAIA

DRAWING
MP–AAIA

Aron Faegre, AIA, PE 13200 Fielding Road Lake Oswego Oregon 97034 503-880-1469 faegre@earthlink.net

January 21, 2025

Alex Thomas, Planning and Programs Manager
Tony Beach, State Airports Manager
Oregon Department of Aviation
Brandy Steffen, JLA
Oregon Department of Aviation
3040 25th Ste SE
Salem, OR 97602
Alex.R.Thomas@odav.oregon.gov

Re: Aurora State Airport Master Plan process must ACKNOWLEDGE THE FAA HQ MODIFICATION OF STANDARDS PROCESS AVAILABLE FOR ALL FEDERALLY FUNDED AIRPORTS

Mr. Thomas, Mr. Beach, and Ms. Steffen:

It is urgent that the Oregon Department of Aviation's (ODAV) proposed "Updated Refined Preferred Alternative" for the Aurora State Airport Master Plan acknowledge and use the modification of standards (MOS) process available to all federally funded airports in the United States.

The current master plan documents ignore that the MOS option is available as part of FAA's standards. It is alleged by ODAV that someone in the FAA who is local has made this directive, but no FAA staff have been willing to sign a letter saying this, so it remains hearsay. ODAV should not accept this inconsistency with national policy that should be available to all federally funded airports. It makes our own state's airports more expensive, less likely to get the safety improvements they need, less able to serve the economic development capabilities of the airports, and ultimately this hurts the state and its citizens.

<u>It must be considered unacceptable to permit Oregon and Aurora Airport to be delegated more restrictive standards – in this case complete denial of the FAA Modification of Standards process - than is in use at many airports in other states of the United States.</u>

Please review our previous letter to ODAV and the Seattle ADO (attached to this letter) concerning using the FAA's well established, and well used (by other United

States federally funded airports) modification of standards process for the resolution of the ROFA issue on the west side of the airport involving Highway 551. We have shown that the Modifications of Standards process has been used for exactly similar highway-airport conditions at other airports. We have provided ODAV with a risk analysis to be used to submit for a modification of standard, to create an iterative Modification of Standards solution to the Highway 551 issue. The attached drawing shows that the fence and highway can be dealt with in a reasonable sequence, just as modifications of standards are intended, as follows:

- Phase I is existing condition of 88 feet out of compliance, but given the risk analysis other airport projects can proceed while specific ROFA planning improvements proceed, given the exceptionally low risk of 277 years per predicted occurrence, which is much less risk than the FAA standard of 100 years as acceptable;
- Phase II is to move the existing fence west so that it is 12 feet from the edge of existing pavement on Highway 551 which reduces the ROFA amount out of compliance from 88 feet to only 27 feet (accomplished through a joint memo agreement between ODAV and ODOT since both are State of Oregon properties; note that this would reduce the risk of an occurrence to be 426 years);
- Phase III reconstruct Highway 551 west approximately 27 feet off center within the existing 200-foot wide Oregon Highway Trust Land[1] that the highway is currently centered in, and relocate the airport fence to beside a highway 12 foot wide shoulder, to create full compliance with the 400-foot separation to the airport fence (note that the same risk analysis shows this still carries a risk of occurrence at 521 years).

To provide emphasis that the Modification of Standards process is alive and well, we point out that the FAA Headquarters in March of 2023 has even made the modification of standards process easier for airports, by no longer limiting the duration of the approval to five years, and instead has recognized that this time

[1] By proposing the relocated highway stay within the 200-foot wide Oregon Highway Trust Land, ODOT can then provide a study to develop preliminary engineering study with a cost estimate for the move. There is no reason to propose moving the highway further distances, or for acquiring additional properties for the road, because there is no plan for Highway 551 to expand lanes or otherwise use more of the 200-wide existing Trust Land.

limit created an unnecessary burden for airport management. See the attached FAA Engineering Policy Memo 23-01.

The final Master Plan ALP drawing and narrative must acknowledge that all of the relevant and appropriate FAA Advisory Circulars giving direction for FAA funded airport master plans, as well as recent FAA Headquarters Engineering Policy Memo 23-01, present the option of using a Modification of Standard for the ROFA at Aurora Airport to resolve the ROFA issue in a practical, economical, and iterative process, while fully ensuring safety. The risk of occurrence in this corrective sequence goes from a predicted 277 years with existing fence location, to 426 years when the fence is moved closer to existing Highway 551, to an ultimate 521 years using the full 400-foot distance with a moved Highway 551.

Showing this risk analysis and using a Modification of Standards is essential for presenting a plan that is of reasonable cost and practical implementation for the existing Aurora Airport site.

Respectfully submitted,

Aron Faegre, AIA, PE
Aron Faegre Airport Planning and Design

Attachments:

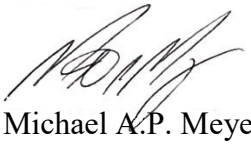
- FAA Engineering Policy Memo 23-01, March 2023 which clarifies modification of standards process.
- AAIA proposed Master Plan revisions, January 21, 2025
- Prior letter to ODAV and FAA Seattle ADO proposing use of MOS for resolution of ROFA issue on west side of airport involving Highway 551.

Federal Aviation Administration

Policy Guidance

Date: March 10, 2023

To: Airports Regional Directors
610 Branch Managers
620 Branch Managers
Airports District Office Managers

From: 
Michael A.P. Meyers, P.E.
Manager, Airports Engineering Division, AAS-100

Prepared by: Mike Rottinghaus, P.E.
Design and Construction Branch, AAS-110

Subject: Engineering Policy Memo 23-01: Sponsor Status Updates for an Existing Approved Modification of Standards

Purpose
This Engineering Policy Memo (EPM) revises the policy for duration of a Modification of Standards (MOS) approval as currently established in paragraph 8.f of FAA Order 5300.1G, *Modifications to Agency Airport Design, Construction, and Equipment Standards,* dated September 29, 2017.

Effective Period of EPM
EPM #23-01 becomes effective upon signature and remains in effect until the Office of Airport Safety and Standards (AAS) revises Order 5300.1G, *Modifications to Agency Airport Design, Construction, and Equipment Standards*.

Background
Misunderstandings related to Federal Aviation Administration (FAA) MOS approvals has resulted in confusion about the purpose and duration of approval actions. In some instances, Airport Sponsors (Sponsors) with a previously approved MOS incorrectly assumed the action represented a permanent approval. The FAA bases the approval of an MOS on factors

present at the time of the project implementation. However, such factors, which include risks to safety and opportunities to mitigate, can change over time.

Misunderstanding the purpose and applicability of an MOS may lead a Sponsor to reduce emphasis on planning and funding future projects to correct a nonstandard condition. Additionally, Sponsor personnel turnover at an airport often results in the new staff not being fully aware of previously approved MOSs or the existence of nonstandard conditions at the airport.

To counter such misunderstandings, Order 5300.1G implemented an approval duration condition: it requires resubmittal and re-approval of previously approved design MOSs every five (5) years. The intent of the MOS approval duration provision was to:

1. Maintain Sponsor awareness of the existence of previously approved MOSs.
2. Focus Sponsor attention on developing a path toward correcting nonstandard conditions through a re-evaluation process.
3. Serve as a point to re-assess whether mitigation conditions imposed by the MOS approval remain effective in maintaining an acceptable level of safety and efficiency.

Need for Policy Revision
Feedback received by AAS indicates that MOS resubmittals on a five-year frequency create an undue resource burden on Sponsors and Regional/Airport District Office (ADO) staff, with little resulting benefit. This feedback reflects a common opinion that an MOS resubmittal will not lead to immediate corrective action beyond what the normal planning process already provides.

AAS revisited the MOS policy to assess a different method of tracking and monitoring FAA-approved design MOS. As a result, AAS is revising the current MOS policy by replacing the five-year MOS re-submittal provision with a five-year status update reporting provision.

The Sponsor MOS status update will:

1. Enhance awareness of existing MOSs and associated nonstandard conditions.
2. Allow monitoring of the residual risk resulting from application of the MOS conditions to determine if additional measures are necessary.
3. Focus Sponsor attention on identifying potential opportunities to correct nonstandard conditions through appropriate capital improvement planning.

Policy Revision
This EPM revises the current MOS policy as follows:

- Replaces paragraph 8.f., Duration of an MOS Approval, (shown below) in its entirety with a new paragraph 8.f., Sponsor Actions Post MOS Approval.

- Adds a new paragraph 8.k addressing Region/ADO responsibilities after MOS approval.
- Replaces the third bullet in paragraph 9, Approval Letters, with a new bullet requiring the Sponsor to submit a status update on each approved MOS every five years.
- Revised policy language is reflected in italics in the table below.

Current Text	New Text
8. Policy ~~**f.** Duration of an MOS Approval:~~ ~~(1) MOS that are applicable to material and/or construction standards are approved for the life of the project.~~ ~~(2) All MOS associated with design standards expire no later than 5 years from the approved date. The airport must re-submit the MOS for review and approval if an extension is requested.~~ ~~(3) All MOS associated with design standards must be reviewed whenever there is an opportunity to meet standards, when situations change, or if a MOS is no longer required.~~	***8. Policy*** ***f. Sponsor Actions Post MOS Approval*** *MOS approvals will include the following provisions, as applicable, addressing actions required of Sponsors post MOS approval.* *(1) <u>All Design MOSs</u>: The Sponsor will provide a status update on the nonstandard condition every five years through the MOS tool in the web-based Airport Data and Information Portal (ADIP). The ADIP system will generate a notification email to the Sponsor and applicable FAA office 90 days before the reporting deadline and a second reminder email 30 days before the reporting deadline.* *(2) <u>Construction Method and Material MOS that Require Monitoring (Optional Condition)</u>: The Sponsor will provide a status update of the nonstandard condition every five years through the MOS tool in ADIP.* *(3) <u>All Design MOSs</u>: In conformance with Grant Assurance No. 29, Airport Layout Plan, the Sponsor will indicate the approved design standard MOS within the nonstandards table on its current airport layout plan.* *(4) To the extent practical, the Sponsor will give high priority within its capital improvement plan to funding projects that mitigate the associated nonstandard condition whenever the opportunity to meet standards becomes feasible. As applicable, the Sponsor will provide the FAA with its rationale for not identifying projects within its capital improvement plan that correct a nonstandard condition.*

Current Text	New Text
8 Policy **k.** *(New sub-paragraph)*	**8. Policy** **k.** ***Region/ADO Actions Post MOS Approval*** *The ADO office will:* *(1) Verify the Sponsor identifies approved design-MOSs as part of its airport layout plan on file. If the current ALP does not reflect an MOS, notify the Sponsor of the nonconformance with Grant Assurance No. 29.* *(2) Assess opportunities within the Sponsor's Airport Capital Improvement Plan (ACIP) to mitigate nonstandard conditions in whole or incrementally over time. Where there is a reasonable opportunity to correct a nonstandard condition, advise the airport to identify the project within its ACIP.* *(3) Review the Sponsor's MOS status updates to determine if current local conditions necessitate a new aeronautical study (e.g. SF 7460-1) to evaluate current risks associated with the nonstandard condition. This may include:* *a) Documented incidents associated with the nonstandard condition.* *b) Pilot reports of issues and concerns related to the nonstandard condition.* *c) Substantive increase in operations of aircraft larger than the critical aircraft.* *The Regional Office will:* *(1) Review the ADO's recommendation for a new aeronautical study.* *(2) Confirm or dismiss the need for an aeronautical study.* *The ADO/Region may terminate the need for future status updates only:*

Current Text	New Text
	(1) After receiving a current status report deemed satisfactory to the FAA, and *(2) Subject to one of the following reasons:* *a) The ADO/Region establishes the nonstandard condition no longer exists.* *b) The ADO/Region determines the residual risk associated with use of nonstandard pavement design or construction methods and materials will remain at an acceptable level.*
8. **l.** *(New subparagraph)*	**8 Policy** ***l. New Development*** *FAA approval of an MOS for a future project remains valid for up to five years from the date of issuance. A Sponsor will need to resubmit its request if it does not initiate the associated project within the five-year timeframe.*
9. Approval Letters. MOS approval letters must contain the following for each modification: • A reference to the standard ~~being modified~~ • Conditions associated with the MOS approval, ~~when necessary~~ • ~~The effective period of the modification~~ • A statement that ~~the modification~~ is subject to review at any time ~~if conditions originally justifying the modification changes~~, or if the FAA deems re-evaluation as being in the public's best interest.	**9. Approval Letters.** MOS approval letters must contain the following *elements* for each modification: • A reference to the standard *the Sponsor is requesting FAA to modify*. • Conditions associated with the MOS approval, *as applicable*. • *Design MOS: A provision requiring the Sponsor to provide the FAA with a status update on the approved MOS every five years through the ADIP MOS tool.* • *Select Construction Method and Materials MOS: A provision requiring the Sponsor to provide the FAA with a status update on the approved MOS every five years through the ADIP MOS tool. (The Region has the discretion to add this provision when durability and service life are a concern.)*

Current Text	New Text
	• A statement that the *nonstandard condition associated with the MOS* is subject to review at any time *there are changes to the conditions justifying the MOS* or if the FAA deems re-evaluation as being in the public's best interest.

Questions

Please contact Mike Rottinghaus, AAS-110, at (202) 267-3622 or by email at mike.rottinghaus@faa.gov if you have questions about this policy revision.

Attachment A

Status update form questions available online in ADIP and accessed via email link.
Information collection covered by ADIP PRA information collection

Status Update Form
Modification of Standards - Design

Does the nonstandard condition associated with the MOS still exist? ☐ Yes ☐ No
Provide brief explanation if response is no.

Date Stamp	Name	Response

Have you implemented applicable conditions associated with the MOS approval? ☐ Yes ☐ No.
Please provide detail on actions taken.

Date Stamp	Name	Response

Does the table for nonstandard design elements on the latest FAA approved Airport Layout Plan (ALP) reflect the approved MOS? ☐ Yes ☐ No
If no, explain planned action to correct ALP.

Date Stamp	Name	Response

Have there been any operational incidents, pilot complaints or other feedback associated with the non-standard condition? ☐ Yes ☐ No
If yes, please provide details.

Date Stamp	Name	Response

Describe actions you have taken to develop a plan to correct the non-standard condition. As applicable, identify future project opportunities and anticipated date for corrective action.

Date Stamp	Response

Certification
I declare under penalty of perjury that the foregoing is true and correct. I understand that knowingly and willfully providing false information to the federal government is a violation of 18 USC § 1001 (False Statements) and could subject me to fines, imprisonment, or both.

Status Update Form
Modification of Standards – Construction Methods and Materials

Does the pavement section addressed by the MOS remain in a serviceable condition for the safe operation of aircraft? □ Yes □ No
Describe current condition of pavement

Date Stamp	Response.

Are there any signs of significant pavement distress (e.g. Cracking, spalling, joint damage, rutting, etc.)? □ Yes □ No
If yes, please provides details.

Date Stamp	Response.

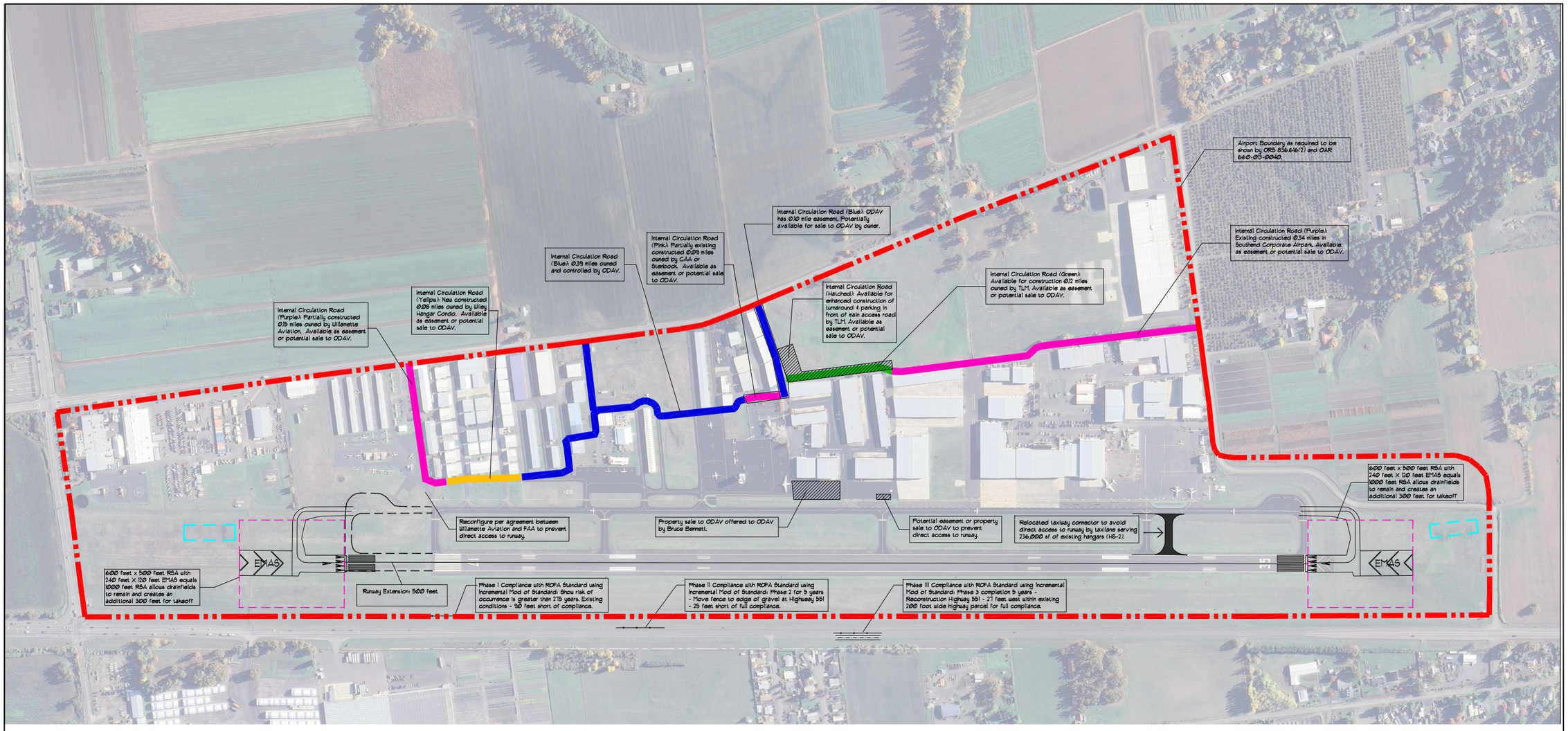
Does your pavement maintenance plan include conducting periodic pavement inspections? □ Yes □ No.
Indicate frequency of inspections and describe system for archiving inspection reports.

Date Stamp	Response.

Does your current capital improvement plan include any pavement rehabilitation or reconstruction activity associated with the pavement addressed by the MOS? □ Yes □ No
If yes, please provide details.

Date Stamp	Response.

Certification
I declare under penalty of perjury that the foregoing is true and correct. I understand that knowingly and willfully providing false information to the federal government is a violation of 18 USC § 1001 (False Statements) and could subject me to fines, imprisonment, or both.



1.

SITE PLAN

0 200 400 600

N

KEY

- AIRPORT BOUNDARY AS REQUIRED TO BE SHOWN PER ORS 836.616(2) AND OAR 660-013-0040
- 500 FT RUNWAY EXTENSION
- 600 FT X 500 FT RSA WITH EMAS EQUALS 1000 FT RSA
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VERIFY SCALES

BAR IS ONE INCH ON ORIGINAL DRAWING. 0" 1"
IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY.

NO.	DATE	BY	APPR.	REVISIONS

AURORA AIRPORT IMPROVEMENT ASSOC.
PROPOSED ALTERNATIVE

DESIGNED BY:	DRAWN BY:	CHECKED BY:	SCALE:
AF	AF/TH	AF	300' = 1"

DATE: JANUARY 21, 2025
PROJECT: MP – MASTERPLAN ALT AAIA

AURORA STATE AIRPORT (UAO)

AURORA STATE AIRPORT – MASTER PLAN ALTERNATIVE AAIA

DRAWING
MP–AAIA

Aron Faegre, AIA, PE 13200 Fielding Road Lake Oswego Oregon 97034 503-880-1469 faegre@earthlink.net

December 23, 2024

Alex Thomas, Planning and Programs Manager
Tony Beach, State Airports Manager
Oregon Department of Aviation
Brandy Steffen, JLA
Oregon Department of Aviation
3040 25th Ste SE
Salem, OR 97602
Alex.R.Thomas@odav.oregon.gov

Re: Aurora State Airport Master Plan Proposed Preferred Alternative Use of Modifications of Standards

Mr. Thomas, Mr. Beach, and Ms. Steffen:

Please share this letter with the ODAV and FAA design team, and enter it letter into the record for the Oregon Department of Aviation's (ODAV) proposed "Preferred Alternative" for the Aurora State Airport Master Plan.

We support Director Sugahara's statement that ODAV is willing to modify its Preferred Alternative for the Aurora Airport Master Plan to show a phased compliance with various standards, especially the Runway Object Free Area (ROFA). This letter is to especially remind all parties that a phased approach, iteratively working toward compliance, is completely consistent with, and part of the process for using the FAA's modification of standards process.

The FAA's directions for master planning and airport design clearly describe and allow the use of the modification of standards process, and it is appropriate that it be used for the Aurora Airport Master Planning effort. In fact, it is imminently reasonable because otherwise if the master plan describes a phased process to resolve issues of standards, for the process to be successful, it will need a modification of standards, so why wait to find out the answer? The master plan process is precisely when it should be applied for and resolved.

In service of the ODAV and FAA process to accomplish this, we have prepared a risk analysis based on FAA funded methodology, that shows a modification of

standards for the ROFA provides a completely acceptable level of safety. It shows that the risk of occurrence is that an occurrence would not occur within 275 years, which is more than twice as long as the FAA standard of acceptable risk is a 100-year period.

We should keep in mind that the actual history of mankind's successful creation of flying machines – dating to the first flight on December 17, 1903 in Kitty Hawk, North Carolina – represents a period of only 121 years. The risk analysis shows that the predicted risk to an incident at the edge of the Aurora Airport existing runway fence exceeds even this by 156 years. In the world of aviation that is many lifetimes – the FAA standards for ROFA's will have changed many times by that date.

Given that the new, incoming United States President is creating a Department of Government Efficiency that is intended to root out unreasonable use of federal funds, it will be appropriate to ensure that the final approved Aurora Airport Master Plan presents an efficient, reasonable, practical, and attainable plan of action. It cannot propose the expenditure of hundreds of millions of dollars to solve aviation issues that have an unlikely risk of happening, if at all, more than two hundred years from today. By then, it can reasonably be expected that the ROFA will be clear or some other design standard will have been imposed due to unimaginable changes in aircraft technology.

We request that the Aurora Airport Master Plan effort use the established standards that actually apply to all FAA funded master plans. It is important that the Aurora Airport planning effort be allowed the same opportunities that other airports around the United States are allowed, and not discriminated against.

Concerning when Modifications of Standards are allowed to be used, we note that the AC describing Airport Master Planning work, AC 150/5070-6B with Change 2, identifies below (yellow highlight added) that:

- The ALP should show all planned modification to the airport (they do not need to yet be approved); and

- The ALP narrative should discuss modifications to FAA Airport Design Standards (there is no prohibition to applying for the mod during the master planning work) and discuss the stages of development with sketches, which would include planned mods of design standards.

202. TYPES OF MASTER PLANNING STUDIES

c. **Airport Layout Plan Updates** – An update of the airport layout plan (ALP) drawing set should be an element of any master plan study. In fact, keeping the ALP current is a legal requirement for airports that receive Federal assistance. An update of the ALP drawing set will reflect actual or planned modifications to the airport and significant off-airport development. An accompanying ALP Narrative Report should explain and document those changes and contain at least the following elements:
1) Basic aeronautical forecasts.

2) Basis for the proposed items of development.

3) Rationale for unusual design features and/or modifications to FAA Airport Design Standards.

4) Summary of the various stages of airport development and layout sketches of the major items of development in each stage. An ALP drawing set update is an appropriate alternative to a full master plan whenever the fundamental assumptions of the previous master plan have not changed. If there have not been any major changes in airport activity or improvements that have had unanticipated consequences, a master plan update is not necessary. Another situation where only an ALP update would be appropriate is the examination of a single development item, such as runway safety area improvements. As indicated above, an ALP update will typically involve fewer elements than a full master plan study, including only the aviation demand forecasts, an assessment of facility requirements, a facility implementation and financing plan, and an airport layout plan drawing set. If additional steps are required to complete the ALP update, a full master plan study is probably a better choice.

205. MASTER PLAN REVIEW BY THE FAA

a. The recommendations contained in an airport master plan represent the views, policies and development plans of the airport sponsor and do not necessarily represent the views of the FAA. Acceptance of the master plan by the FAA does not constitute a commitment on the part of the United States to participate in any development depicted in the plan, nor does it indicate that the

proposed development is environmentally acceptable in accordance with appropriate public law. The FAA reviews all elements of the master plan to ensure that sound planning techniques have been applied. However, the FAA only approves the following elements of airport master plans:

1) ***Forecasts of Demand*** – The master plan forecast should be reviewed to ensure that the underlying assumptions and forecast methodologies are appropriate. Paragraph 704.h of this guidance should be used to determine consistency of the master plan forecast levels and the Terminal Area Forecast (TAF). Inconsistencies between the master plan forecast and TAF must be resolved, and the forecast approved, before proceeding with subsequent planning work.

2) ***Airport Layout Plan*** – All airport development at Federally-obligated airports must be done in accordance with an FAA- and sponsor-approved ALP. Furthermore, proposed development must be shown on an approved ALP to be eligible for Airport Improvement Program (AIP) funding. FAA approval of the ALP indicates that the existing facilities and proposed development depicted on the ALP conforms to the FAA airport design standards in effect at the time of the approval or that an approved modification to standard has been issued. Such approval also indicates that the FAA finds the proposed development to be safe and efficient.

801. FACILITY REQUIREMENTS - GENERAL

c. The requirements for new or expanded facilities reflect the unique circumstances of each airport, such as, but not limited to, the following:
1) Capacity shortfalls, which are commonly driven by growing demand.

2) Enhanced security requirements mandated by the Transportation Security Administration, including the flexibility to respond to changes in threat levels.

3) Updated standards developed and adopted by the FAA or other regulatory agencies, to correct existing non-standard conditions and eliminate existing modifications to standards. If there are approved modifications to standards, planners should review the reasoning that led to those adjustments. The facility requirements chapter should indicate if those deviations will continue or will be eliminated in the new master plan.

4) The airport sponsor's strategic vision for the airport. Such needs are typically associated with a sponsor's strategic business plan, mission statement, or similar plans that will require modification of the airport.

5) The outdated condition, arrangement, or functionality of existing facilities.

1008. DOCUMENTATION GUIDELINES

a. The requirements for documentation of the ALP drawing set must be determined with the airport sponsor and the reviewing agency or State agency. Documentation will typically

include a complete reduced-size set of the ALP drawing set and the accompanying text. The master plan will provide the narrative if the ALP is prepared as part of a master plan. If the ALP is prepared separately as an ALP Update, an ALP narrative is required. Then narrative will typically describe ALP development criteria and the rationale for the development shown on the ALP. Examples of these include airport reference code-related design criteria unique to specific areas of the airfield, or known or proposed modifications to FAA design standards. (See Section 202.c of this AC for further guidance on the ALP Narrative Report.)

Order 5300.1G Modifications to Agency Airport Design, Construction, and Equipment Standards

1.Purpose of this Order. This order establishes the process for the initiation, revision, coordination, and management of Modifications of Standards (MOS) applicable to airport design, construction material, and equipment projects. This order is the foundation of a web-based automated application of MOS. The automated application for submitting MOS is a step-by-step process facilitated within Airports Geographic Information System (AGIS).

2.Applicability. This order is applicable to all projects funded under the Airport Improvement Program (AIP) and Passenger Facility Charge (PFC) programs at all obligated airports, or as required to support any public approach procedure. Eligibility determinations under AIP or PFC are independent of any approval action for an MOS. New MOS requests initiated after March31, 2018, must use the automated MOS process. Manual MOS processing must follow applicable sections of this order as it applies to current regional procedures until the automated tool is accessible.

5. Definitions

e.Modification of Standards (MOS). Any deviation from, or addition to standards, applicable to airport design, material, and construction standards, or equipment projects resulting in an acceptable level of safety, useful life, lower costs, greater efficiency, or the need to accommodate an unusual local condition on a specific project through approval on a case-by-case basis.

7.Background. Laws, regulations and Airport Sponsor Grant Assurances require compliance with current FAA standards. The following provisions require an airport to meet FAA standards:

c.Obligated Airport. Title 49 U.S.C. § 47107(a)(16) and Grant Assurance No. 29, *Airport Layout Plan*, require the airport to maintain an up-to-date Airport Layout Plan (ALP) depicting existing and future airport facilities as referenced in paragraph 12.b. AC 150/5070-6, *Airport Master Plans*, establishes standards for ALPs, which includes the requirement to identify unusual design features and/or modifications to FAA Airports design standards. FAA approval of an ALP indicates the existing or proposed development depicted on the ALP conforms to FAA airport design standards or that an approved modification to standards has been issued.

12.Documentation.

a.All records pertaining to the MOS, including documents, pictures, and/or approval letters,will be maintained within the Airports GIS MOS Tool.

b.The airport must update the ALP to reflect approved modifications of airport design standards. The airport must include in the ALP a table listing the approved MOS. The table must include the approval letter dates and identify associated airspace review case numbers.

In addition, we note that AC 150/5300-13B Airport Design, Change 1, identifies below (yellow highlight added) that:

- Mods are intended for cases where an unusual local condition for a specific project maintains an acceptable level of safety, and we have prepared a draft mod (attached to this letter) for use of the project, which shows that occurrences are predicted to only occur in 275 or more years, which satisfies the FAA's standard for acceptable safety; and

- There is no established FAA prohibition from requesting the mod now, during the planning process.

1.5 **Definitions.**
60. *Modification of Standards.* Any approved deviation from published FAA standards applicable to an airport design, construction, or equipment project that is necessary to accommodate an unusual local condition for a specific project while maintaining an acceptable level of safety and performance. FAA Order 5300.1 establishes FAA policy for administering requests for modification of standards.
Chapter 2. DESIGN PRINCIPLES

2.8 **Modification of Standards.**
Site-specific conditions may make it impractical to meet all FAA design standards at an airport. The FAA considers, on a case-by-case basis, modifications to design standards that result in an acceptable level of safety and efficiency. Specific operational controls may be necessary to establish an acceptable level of safety for operation of aircraft at the airport. FAA Order 5300.1 establishes FAA policy for administering airport requests for modification of standards. See paragraphs 2.4 and 2.5.

2.8.1 The FAA views an approved modification of standards as an interim measure intended to mitigate unique site-specific conditions. Unless the FAA explicitly states otherwise in the approval action, the FAA expects airports with approved modifications to pursue ways to meet design

standards. This may occur incrementally over time or at such time it becomes practical to correct the non-standard condition.

2.8.2 The FAA will not consider any request to modify design standards associated with the following:

1. RSA dimensions
2. OFZ dimensions
3. Approach or departure surface dimensions
4. Standards established within a regulation (e.g., stopway, clearway).

2.8.3 An airport seeking FAA approval of modification to a design standard submits a request using the Modification of Standards application tool within the Airport Data and Information Portal (ADIP) at https://adip.faa.gov. The FAA relies on the following information, in part, to determine the acceptability of a modification to FAA design standards:

1. Information on the standard proposed for modification.
2. Description of proposed modification and why the airport cannot meet standards.
3. Statement addressing how modification will provide an acceptable level of safety, economy, durability, and workmanship.
4. Listing of any special operational measures necessary to accommodate the modification.

2.4 **Addressing Non-standard Airport Conditions.**
The FAA expects airport owners to address non-standard conditions through the airport planning process. The FAA acknowledges that conformance to current standards is not always practical. However, the FAA expects airports to continue to investigate mitigation measures, whether in one or multiple phases, and correct the non-standard conditions over time.
1.The FAA expects implementation of new or revised standards to occur through the planning process.
2.If there is an explicit or immediate safety deficiency for a non-standard condition, the FAA expects airport owners to prioritize the mitigation of the safety deficiency using the current standard.
3.Inconvenience does not represent an acceptable justification for non-conformance to standards.
4.Justifications based on impractical conditions do not represent a permanent justification for non-conformance to standards.

In conclusion, we request that ODAV and FAA allow Aurora Airport to use the established process of modification of standards to resolve certain issues at the airport, where they are expressly permitted, and not expressly denied as options.

The FAA's modification of standards process is wisely set up precisely for such a condition as what we find at Aurora Airport – LET'S USE IT.

Respectfully submitted,

Aron Faegre, AIA, PE
Aron Faegre Airport Planning and Design

Attachment: Proposed modification of standards risk analysis document for use at Aurora Airport
dated October 5, 2024.

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Aurora State Airport (UAO)
Proposed Modification of
Runway Object Free Area (ROFA) Design Standards

Prepared by: Aron Faegre, AIA, PE
Aron Faegre Airport Planning & Design

October 5, 2024

This memorandum provides an analysis and methodology by which a Modifications of FAA Airport Design Standards (MOS) at the Aurora State Airport (UAO), for the Runway Object Free Area (ROFA) can be justified as:

> "… resulting in an acceptable level of safety, useful life, lower costs, greater efficiency, or the need to accommodate an unusual local condition on a specific project through approval on a case-by-case basis." - FAA Order 5300.1G, page 1.

as defined and permitted under FAA Order 5300.1G Modifications to Agency Airport Design, Construction, and Equipment Standards[1].

1. BACKGROUND

The Aurora State Airport is surrounded by farm lands, near Aurora, Oregon, at the northern end of Marion County. It primarily serves aviation businesses involved with:

- emergency medical transport[2],
- aviation heavy-lift helicopter fire-fighting and power line construction companies, and for military (for which fixed wing aircraft are essential for support),[3]
- business jets for numerous major national corporations based within 10 miles,

[1] FAA Order 5300.1G Appendix A specifically gives FAA Office of Airport (ARP) and Region the authority to issue a MOS for Runway Object Free Areas. The Order can be downloaded at: https://www.faa.gov/documentLibrary/media/Order/order-5300-1G-modifications-to-standards.pdf .

[2] Regional headquarters for Life Flight Network, with bases all over Oregon, Washington, Idaho, Montana, and Nevada.

[3] Columbia Helicopters, Helicopter Transport Services, Wilson Construction, companies that work internationally with headquarters at Aurora Airport. Many of the companies have annual contracts with state and federal agencies to provide major support for fighting fires, as well as for humanitarian relief work world-wide. Some of these companies have U.S. military contracts for repair and rebuilding of military aircraft at the Aurora site. The use of the Aurora Airport runway is essential to all of these companies for rapid providing of crews, equipment, and repairs to helicopters in active service of fighting fires, moving power lines, or doing rescue, relief, or humanitarian work.

- aircraft manufacturing for the S-LSA (Special Light-Sport Aircraft) and kit-build industry[4], and
- other general aviation aircraft using the airfield for business, pilot training, and recreational flying.

There is no scheduled air service using the airport. The State of Oregon Department of Aviation (ODAV) owns, governs, and manages the public lands of the airport. Most of the business aircraft based at the airport access the runway via through-the-fence permits with ODAV.

Flights by based business jets, such as a Challenger 300, dictate that the Airport Reference Code is C-II. Due to the geometry of the existing site, the airport does not meet current FAA design standards for the ROFA, due primarily to adjacent Highway 551 to the west of the runway.

Most recently ODAV's planned solution[5] to meeting these standards ("Refined Preliminary Alternatives Summary", by Century West Engineering, dated July 31, 2024) is one of only two options:

- relocate the highway further west, (which involves acquiring both private residential and commercial properties further west), or
- relocate the runway, taxiway, and control tower east (which involves acquiring many acres of existing private property already developed with hangars, taxilanes, and aprons for aviation uses) and demolishing numerous large 40,000 square foot aviation hangars along the taxiway.

Both options have very high financial and environmental costs (probably in the greater than $100 million range), which would make them difficult to ever be implemented. If this master plan is approved as currently planned, and one of these options were not implemented, then ODAV and FAA have reported that the airport would only receive maintenance funding and no additional safety improvement funds. This would result in the airport not keeping pace with the aviation industry standards of safety. The second option (moving the runway, control tower, and demolishing hangars), If implemented, would in addition force closure of many of the major medical transport and fire-fighting facilities on the airport, and would put many of the airport's 1,500 employees out of jobs.

It is noted that in the 2012 Airport Layout Plan (ALP), approved (signed) by both ODAV

[4] Van's Aircraft www.vansaircraft.com the international leader in S-LSA produced aircraft.
[5] Refined Preliminary Alternatives Summary document dated July 31, 2024 by Century West Engineer can be downloaded at: https://publicproject.net/files/UAOAMP/uao-refined-preliminary-alternatives-summary-1-.pdf?d952c4adef .

and FAA, the airport also had the same Runway Design Code (RDC) status of C-II and listed a MOS as the solution to the non-standard ROFA limitation on the west property line. At that time there was consensus between ODAV and FAA that a MOS was a reasonable solution.

This memorandum provides the evidence to show that the 2012 ALP was a good approach to resolution of the ROFA, and that it can reasonably be continued. This report demonstrates that there is an acceptable level of safety through modifying the ROFA standard for the specific deviation to standards located on the west side of the runway.

FAA standards for different airports ROFA's vary from 250 foot width, to an 800 foot width, depending on aircraft type using the airport. As will be shown below, the primary reason justifying the modification is that the going from B-II to C-II category is just where the 500-foot required ROFA width changes to an 800-foot wide required ROFA - yet this is the same width required for all RDC category aircraft all the way to E-VI -Portland International Airport, San Francisco Airport, and every other international airport in the country. UAO will never have the larger size of aircraft those airports accommodate – Boeing 737's to Boeing 777's – so a slight reduction in width on the west side provides a level of safety appropriate for UAO, which will always serve only much smaller aircraft.

Modifications of standards for ROFA's are common at even large national airports. For example, recently several MOS were adopted at San Jose International Airport for deficiencies in the ROFA, as well as for runway-taxiway separations, and for runway object free areas[6]. It even appears that Portland International Airport (PDX) may have their airport perimeter fence, the shoulder of NE Marine Drive, and improper grading within the 400-feet area from runway centerline, at the northeast corner of the ROFA for Runway 10L.

This memorandum provides the detailed technical background and mathematically calculated justification, needed for the FAA and ODAV to again approve a MOS for the ROFA at Aurora State Airport.

2. MOS PROCESS

The process for gaining a modification of standards is provided in FAA AC 150/5300-13B Airport Design[7] in Section 2.8. It states, and we provide commentary after each paragraph as

[6] Norman Y. Mineta San Jose International Airport Runway Incursion Mitigation/Airfield Design Standards Analysis, November 27, 2017. Justification for ROFA modifications in this document were often simply the practical and cost issues of modifying major adjacent highways, similar to what is at issue in a much smaller Aurora Airport.
[7] FAA AC 150/5300-13B Airport Design Available free on line at:
https://www.faa.gov/documentLibrary/media/Advisory_Circular/AC-150-5300-13B-Airport-Design-Chg1.pdf

to acceptability:

2.8 ***Modification of Standards.***

Site-specific conditions may make it impractical to meet all FAA design standards at an airport. The FAA considers, on a case-by-case basis, modifications to design standards that result in an acceptable level of safety and efficiency. Specific operational controls may be necessary to establish an acceptable level of safety for operation of aircraft at the airport. FAA Order 5300.1 establishes FAA policy for administering airport requests for modification of standards. See paragraphs 2.4 and 2.5.

This memorandum provides this information and finds that no specific operational controls are necessary, see comments on paragraph 2.4 below.

2.8.1 The FAA views an approved modification of standards as an interim measure intended to mitigate unique site-specific conditions. Unless the FAA explicitly states otherwise in the approval action, the FAA expects airports with approved modifications to pursue ways to meet design standards. This may occur incrementally over time or at such time it becomes practical to correct the non-standard condition.

The FAA and ODAV can work with Oregon Department of Transportation on master planning future revisions to State Highway 551 so that it can be corrected "at such time it becomes practical." Also, there are potential options where ODAV and ODOT could jointly agree to relocate the airport perimeter fence closer to Highway 551, which could be an "incrementally" established improvement.

2.8.2 The FAA will not consider any request to modify design standards associated with the following:

- *RSA dimensions*
- *OFZ dimensions*
- *Approach or departure surface dimensions*
- *Standards established within a regulation (e.g., stopway, clearway).*

The ROFA is not one of these.

2.8.3 An airport seeking FAA approval of modification to a design standard submits a request using the Modification of Standards application tool within the Airport Data and Information Portal (ADIP) at https://adip.faa.gov. The FAA relies on the following information, in part, to determine the acceptability of a modification to FAA design standards:

- *Information on the standard proposed for modification.*
- *Description of proposed modification and why the airport cannot meet standards.*
- *Statement addressing how modification will provide an acceptable level of safety, economy, durability, and workmanship.*
- *Listing of any special operational measures necessary to accommodate the modification.*

This document was prepared to provide the analysis needed for ODAV to submittal for the MOS per Section 2.4.

> *2.4 Addressing Non-standard Airport Conditions.*
> *The FAA expects airport owners to address non-standard conditions through the airport planning process. The FAA acknowledges that conformance to current standards is not always practical. However, the FAA expects airports to continue to investigate mitigation measures, whether in one or multiple phases, and correct the non-standard conditions over time.*

It is important to re-emphasize the above statement, that the FAA here "acknowledges that conformance to current standards is not always practical." Further, per this paragraph, the current master planning activity is the appropriate place for this analysis and the formal establishment of a MOS for the ROFA. This report and analysis identifies intermediate steps that can be taken, such as relocating the airport perimeter fence, that will iteratively move the airport closer to compliance.

This analysis utilizes an FAA established safety analysis methodology to show that the MOS provides an acceptable level of safety. The study found no special measures needed to accommodate the modification.

3. METHODOLOGY

In 2011, the Transportation Research Board (TRB) released Airport Cooperative Research Program (ACRP) Report #51 – Risk Assessment Method to Support Modifications of Airfield Separation Standards. The ACRP is funded by the Federal Aviation Administration (FAA). Report #51 is used to support the ROFA MOS requested at Aurora State Airport.

The proposed ROFA MOS is modeled in this report in accordance with Appendix A – Risk Assessment Methodology of ACRP Report #51[8].

This report uses risk plots, along with the annual number of operations, to analyze the cumulative risks associated with Runway to Object Separations. The operations numbers at UAO are taken from the current draft Master Plan, and are numbers already approved by the FAA in a letter[9] to ODAV dated November 15, 2023 (corrected January 23, 2024). For sake of a conservative analysis, we are using the most distant forecast projects for the year 2041, which are:

- 90,231 total operations all RDC categories, of which
- 862 operations are of RDC C-II and D aircraft

[8] ACRP Report #51 – Risk Assessment Method to Support Modifications of Airfield Separation Standards is available free on line at: https://nap.nationalacademies.org/catalog/14501/risk-assessment-method-to-support-modification-of-airfield-separation-standards

[9] Federal Aviation Administration (FAA) Aurora (UAO Aviation Activity Forecast Approval Airport Improvement Program Grant Number 3-41-0004-022-2021 available at: https://publicproject.net/files/2024-01/Aurora-Airport/uao-forecast-approval-20231115-corrected-20240123.pdf?57af6c19b7

For operations involving the runway, per the methods of Report #51, the risk is analyzed based on three distinct phases of flight:

a. Landing - Airborne Phase
b. Landing - Ground Phase
c. Takeoff

The separation distance from the runway centerline to an object is used with the associated risk plot to calculate the risk of collision per operation.

The risk of collisions per operation is then analyzed along with the number of annual airport operations for the appropriate phase of flight to determine the predicted frequency of occurrence. The frequency of occurrence is used to determine the FAA likelihood level using Table A-3 from ACRP Report #51 which is shown below:

Table A-3. FAA likelihood levels (FAA, 2010).

	General	Airport Specific	ATC Operational	
			Per Facility	NAS-wide
Frequent A	Probability of occurrence per operation is equal to or greater than 1×10^{-3}	Expected to occur more than once per week or every 2,500 departures (4×10^{-4}), whichever occurs sooner	Expected to occur more than once per week	Expected to occur every 1–2 days
Probable B	Probability of occurrence per operation is less than 1×10^{-3}, but equal to or greater than 1×10^{-5}	Expected to occur about once every month or 250,000 departures (4×10^{-6}), whichever occurs sooner	Expected to occur about once every month	Expected to occur several times per month
Remote C	Probability of occurrence per operation is less than 1×10^{-5} but equal to or greater than 1×10^{-7}	Expected to occur about once every year or 2.5 million departures (4×10^{-7}), whichever occurs sooner	Expected to occur about once every 1–10 years	Expected to occur about once every few months
Extremely Remote D	Probability of occurrence per operation is less than 1×10^{-7} but equal to or greater than 1×10^{-9}	Expected to occur once every 10–100 years or 25 million departures (4×10^{-8}), whichever occurs sooner	Expected to occur about once every 10–100 years	Expected to occur about once every 3 years
Extremely Improbable E	Probability of occurrence per operation is less than 1×10^{-9}	Expected to occur less than once every 100 years	Expected to occur less than once every 100 years	Expected to occur less than once every 30 years

Note: Occurrence is defined per movement.

Source: ACRP Report #51

The key takeaway from Table A-3 is that for a specific airport, if the likelihood of incidence is less than once every 100 years it is considered a “Extremely Improbable” Class E occurrence.

A Hazard Severity Classification is then assigned based on the worst credible outcome of an incident. Since the ACRP method is based on wingtip separation, the report states that: “From the point of view of risk and based on the records of incidents and accidents,

the worst credible consequence expected for wingtip collisions of two taxiing aircraft is aircraft damage" (ACRP Report #51 page 19). A similar aircraft damage expectation would be a wingtip collision with the airport perimeter fence, which is the ROFA limitation examined in this report.

The Hazard Severity Classifications were determined in accordance with Table A-4 FAA Severity Definitions from ACRP Report #51 and are shown below:

Table A-4. FAA severity definitions (FAA, 2010).

Hazard Severity Classification				
Minimal 5	**Minor 4**	**Major 3**	**Hazardous 2**	**Catastrophic 1**
No damage to aircraft but minimal injury or discomfort of little consequence to passenger(s) or workers	- Minimal damage to aircraft; - Minor injury to passengers; - Minimal unplanned airport operations limitations (i.e. taxiway closure); - Minor incident involving the use of airport emergency procedures	- Major damage to aircraft and/or minor injury to passenger(s)/ worker(s); - Major unplanned disruption to airport operations; - Serious incident; - Deduction on the airport's ability to deal with adverse conditions	- Severe damage to aircraft and/or serious injury to passenger(s)/ worker(s); - Complete unplanned airport closure; - Major unplanned operations limitations (i.e. runway closure); - Major airport damage to equipment and facilities	- Complete loss of aircraft and/or facilities or fatal injury in passenger(s)/ worker(s); - Complete unplanned airport closure and destruction of critical facilities; - Airport facilities and equipment destroyed

Source: ACRP Report #51

Then, using both the FAA likelihood level and the Hazard Severity Classification the risk is then analyzed using Figure A-1 FAA Risk Matrix from ACRP Report #51, shown below:

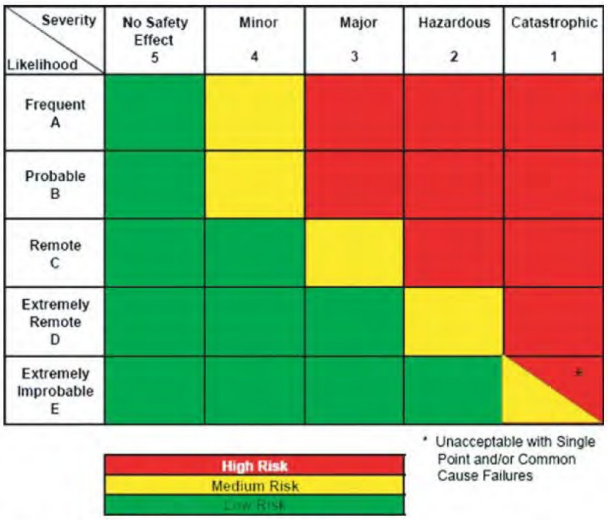


Figure A-1. FAA risk matrix (FAA, 2010).

Source: ACRP Report #51

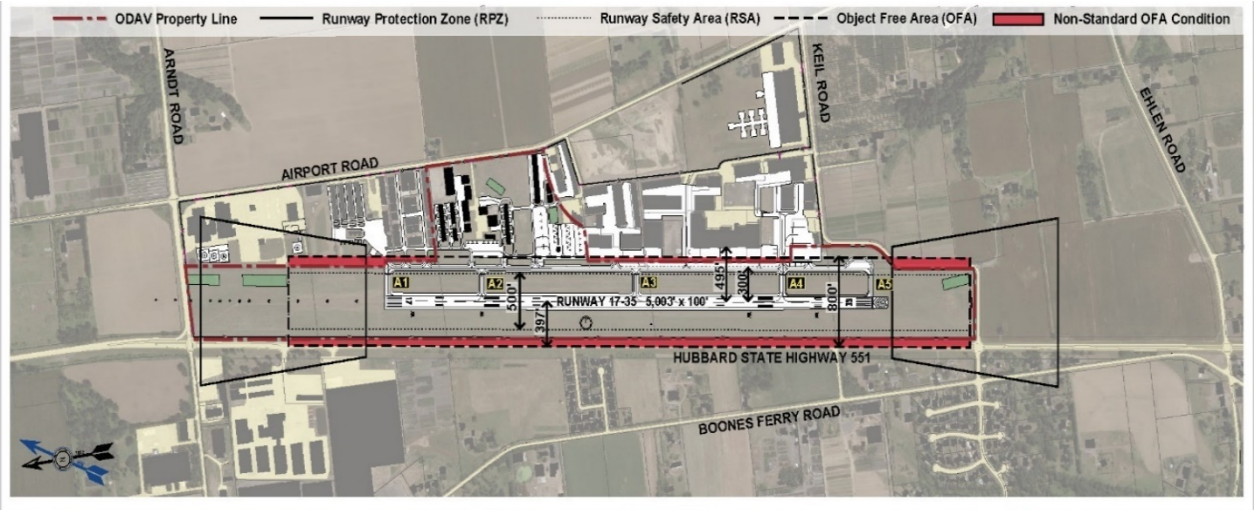
Based on Figure A-1 if the incident is Extremely Improbably (i.e. more than 100 years probability) the risk is considered “Low,” except for an incident considered catastrophic. We will use these graphs to evaluate the results from the detailed risk analysis of UAO below.

4. UAO ANALYSIS

In 2012 Master Plan and ALP established the UAO runway RDC, given existing based aircraft, as C-II, up from a B-II. The required ROFA width of a B-II runway is 500 feet centered on the runway. As it turns out, any runway of higher RDC than a B-II requires 800 feet in width. Thus, the UAO required C-II ROFA width is 800 feet centered on the runway. This 800-foot width is the standard used for aircraft ranging from a Challenger 300 business jet to the largest Boeing 777 or even the largest military aircraft. The 2012 approved ALP lists the ROFA deviation as a modification to standards, since the airport perimeter fence and Highway 551 were within the ROFA.

The UAO forecast of operations predicts that by the year 2041 there will be 90,230 annual operations at the airport, of which 862 would be an RDC above the B-II category. Thus, the 89,368 operations by B-II or lesser category clearly are operating well within ROFA safety standards, as the existing runway to road separations provide more than the 500-foot required width. It is just the 862 operations that need to be analyzed for ROFA safety relative to the required 800-foot width.

The deficiencies in the existing Runway OFA at UAO are shown in the Figure below:



UAO Figure A: Highway 551 Shown as ROFA Deviation Object
Source: Century West Engineers, Aurora State Airport Draft Airport Master Plan, Working Paper No. 1, Figure 2-15, November 2023 (Updated)

The current ROFA object deficiencies are:

d. Hubbard State Highway 551 for which the OFA penetrates 3 feet beyond the highway centerline. (368' to 377' clear width available from outer edge of highway gravel shoulder to Runway CL)
e. Perimeter Fence Inside OFA (312' clear width from Runway CL)

Potentially the airport fence could be relocated to the east edge of the 12-foot-wide gravel shoulder, since both the highway and the airport are owned by the State of Oregon. There can be an agreement between ODOT and ODAV to allow this. Relocating the fence in this way would result in a minimum width of the ROFA on the west side of the runway, to a 368-foot clearance - which would be only 32 feet out of conformance.

However, we will evaluate the ROFA for the existing conditions, and thus use the location of the airport perimeter fence as the maximum ROFA available at this time.

When analyzing the risk associated with a reduction in Runway OFA it is important to consider the purpose of the design standard. Paragraph 3.12 of Advisory Circular 150/5300-13B defines the ROFA but does not give detailed design rational behind the standard:

> *"ROFA is a clear area limited to equipment necessary for air and ground navigation, and provides wingtip protection in the event of an aircraft excursion from the runway"*

Appendix I, Paragraph I.8 of Advisory Circular 150/5300-13B provides the only available reference to the design rationale behind the Runway OFA width:

> *"The ROFA serves two principal purposes: 1. Development buffer in proximity to a runway, and 2. Wing clearance for a runway excursion event to the outer limit of the RSA.* `

Appendix I, in Section I.8.2, also clarifies that part of the "development buffer" intent is:

> *"Protection of the ROFA also reserves space for future development of a parallel taxiway that permits proper alignment of aircraft at a holding position on an entrance taxiway."*

However, for the given physical layout of UAO there can be no plan for a parallel taxiway on the west side of the runway, because of the location of Highway 551 and that there never can be hangars or other aviation uses on that side of the runway. Therefore, that leaves the only ROFA purpose for UAO as only "wingtip clearance for a runway excursion" which is precisely what this analysis provides.

Below we will analyze resolving the ROFA utilizing the risk analysis method of ACRP Report #51, for the case:

- No Change to existing ROFA conditions on West Side of Runway (Hwy 551 and Airport Perimeter Fence remain as existing) resulting in a 312-foot clearance to runway CL.

Per the methodology of ACRP Report 51, we analyze the risks for each of the takeoff and landing scenarios. For landing operations, the analysis is further divided into two parts: airborne (approach) phase and ground (landing rollout) phase. However, because the risk of veering off the runway during takeoff is so much less than for during landing, the methodology indicates that usually it is not necessary to evaluate takeoff option except if there are runways that only are used for takeoffs and not for landings. We will do that takeoff evaluation in any case, just to clearly determine what it is in the UAO context.

Since the existing runway to taxiway separation meets the current criteria for a C-II airport, for this study that analysis would seem unnecessary. However, we will include that option in this report because it provides a baseline of safety that the AC 150-5300-13B Airport Design Standards have determined is an acceptable and appropriate level of safety for a C-II airport.

Thus, for this UAO ROFA analysis separate risks are developed for each of:

1. Airborne Phase (Landing) is for instrument approaches which terminate the approach as a missed approach, and the risk is hitting another object such as hitting the airport perimeter fence or a vehicle on Highway 551 (using ACRP Report 51 Fig. 31); “the airborne risk is computed only for missed approaches” (ACRP Report 51, page 21).
2. Ground Phase (Landing Rollout) where risk is veering off the runway into the reduced width ROFA and hitting the fence or a car on Highway 551 (using ACRP Report 51 Fig 42). Figure 42 is based on the assumption that the risk is between the two wingtips of two aircraft, one aircraft on the edge of the runway and the other at the centerline of a taxiway. The ACRP makes clear that the x-axis distance on the Risk Figures are centerline of runway to centerline of taxiway because the risk is assumed aircraft to aircraft. However, the predicted risk is based on the wingtip-to-wingtip distance. When using the Risk Figures for objects (not aircraft) like a fence or road (which has no wings), half of the wingspan should be added to the distance to compensate for the wingtip-to-wingtip assumption. Thus, per Group II standards, the clearance distance used for Figure 42 should add half of 79 feet (equals 39.5 feet) of additional clearance, which would create a total of 351 feet to use in Fig. 42. The risk shown with the 312 feet and the 351 feet are each shown in figures.

3. Ground Phase (Takeoff) where risk is veering off the runway into the reduced width ROFA and hitting the fence or a car on Highway 551 (using ACRP Report 51 Fig 49).

Finally, to have more relevant data, we will also perform the risk analysis of the standard required 300-foot separation between runway centerline and taxiway centerline for a landing, which is the level of safety the AC 150/5300-13B sets for in a C-II airport:

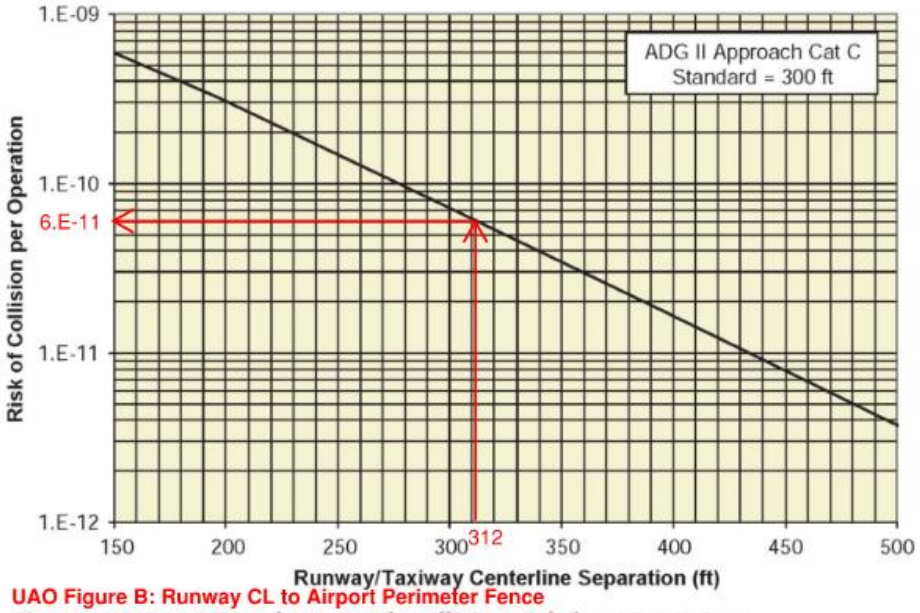
4. Ground Phase (Landing Rollout) where risk is veering off the runway into the taxiway (using ACRP Report 51 Fig 42).

This data will give us an example of an acceptable level of safety utilized in AC 150/5300-13B for a C-II airport.

5. Specific Analysis: Proposed MOS Option - No Change to Existing ROFA Conditions (312' Separation from Runway Centerline to Airport Fence)

The Perimeter Fence at the west side is located 312 feet from the runway centerline. The risks associated with leaving it there as a modification of standards, for each of the phases of flight are analyzed below:

1. Airborne Landing Phase Risk from Reduced ROFA – For a very conservative analysis we will assume that this includes all approach to landings, not just missed approaches. Using the separation of 312' and Figure AA-33 in Appendix A of ACRP Report #51, the following provides a risk level 6.0E-11 of occurrence per landing (which as an inverse, is one chance in a 16.7 trillion landings) that an aircraft gets 312' from the runway centerline. This can be seen in the figure below:

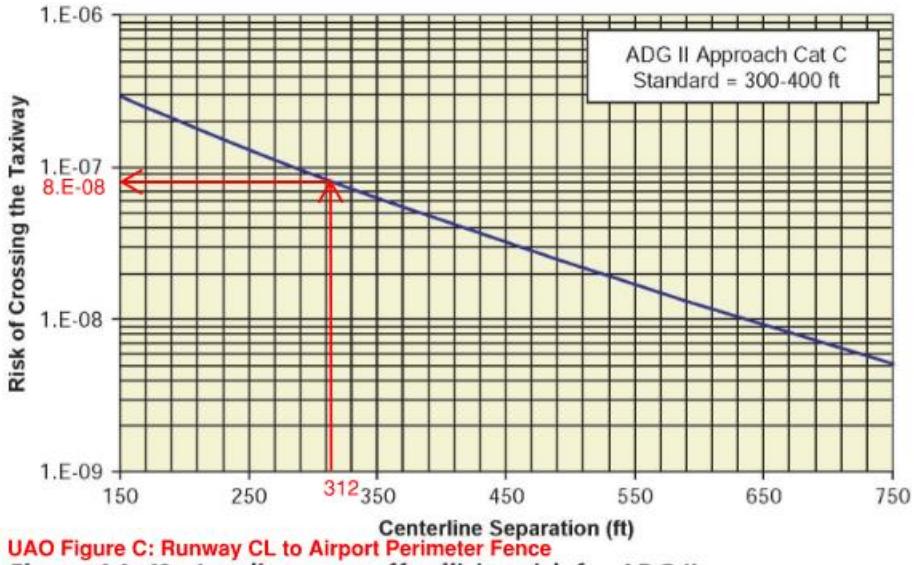


UAO Figure B: Runway CL to Airport Perimeter Fence

Figure AA-31. Missed approach collision risk for ADG II Cat I.

The current annual number of landing operations at UAO is approximately 45,115 or half of the 90,230 annual operations. As the risk is one incident in every 16.7 trillion landings, the time between occurrences is calculated as 16 trillion landings divided by 45,115 landing operations per year which equates to one incident every 369,000 years. Thus, this risk is of no significance.

2. Landing Roll Phase Risk for Reduced ROFA - Using the separation of 312' and Figure AA-43 in Appendix A of ACRP Report #51, provides a risk level 8.0E-08 or in the inverse: one chance in 12.5 million landings. This can be seen in the figure below:



UAO Figure C: Runway CL to Airport Perimeter Fence

Figure AA-42. Landing veer-off collision risk for ADG II.

As the risk is one incident in every 12.5 million landings, the rate of occurrence is calculated as 12.5 million landings divided by 45,115 landings per year which equates to one incident every 277 years.

Using the ACRP described adjustment when the object is not another aircraft and half the C-II wingspan can be added to the clearance distance, results in a separation of 351' and Figure AA-43 in Appendix A of ACRP Report #51, provides a risk level 6.0E-08 or one chance in 16.7 million landings. This can be seen in the figure below:

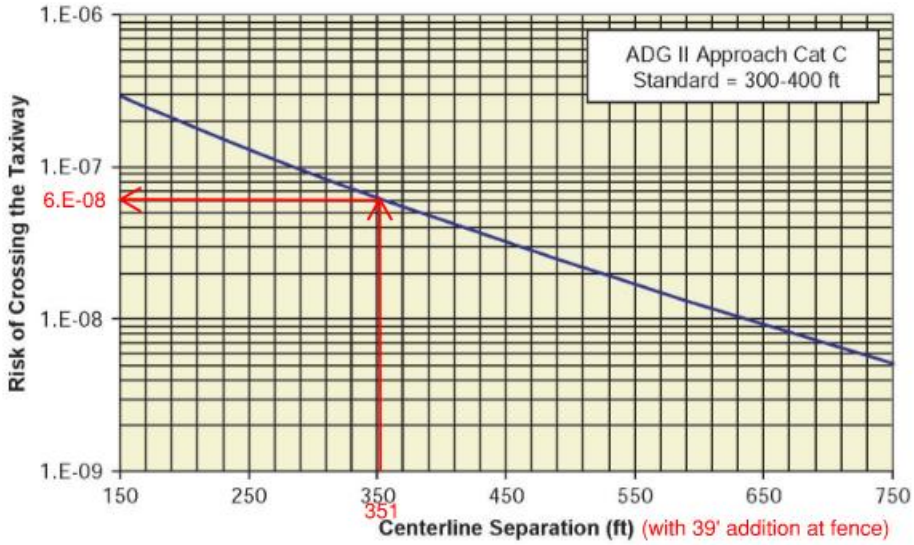
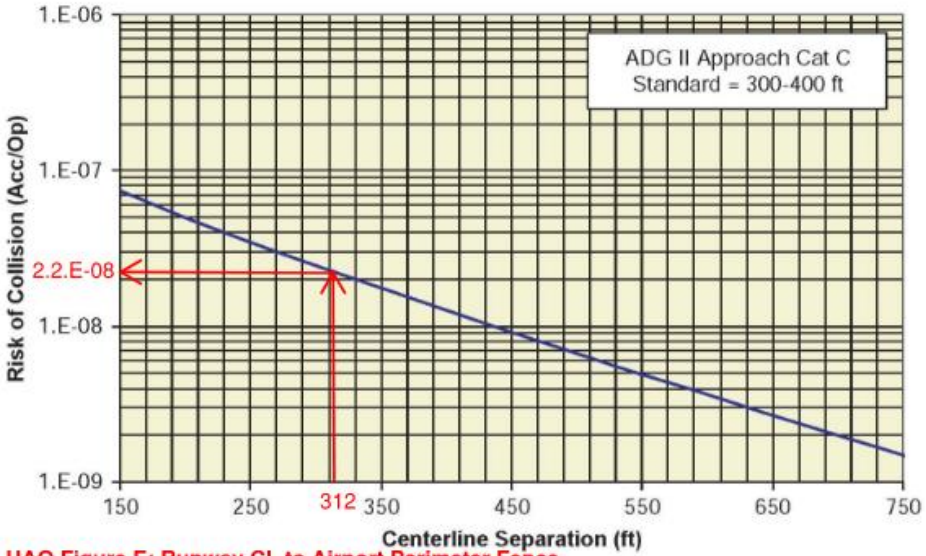


Figure AA-42. Landing veer-off collision risk for ADG II.
UAO Figure D: Runway CL to Airport Perimeter Fence Including Wingspan adjustment

As the risk is one incident in every 16.7 million landings, the rate of occurrence is calculated as 16.7 million landings divided by 45,115 landings per year which equates to one incident every 369 years.

3. Takeoff Roll Phase Risk for Reduced ROFA - Using the separation of 312' and Figure AA-49 in Appendix A of ACRP Report #51, provides a risk level 2.2E-08) or one chance in 45.5 million takeoffs. This can be seen in the figure below:

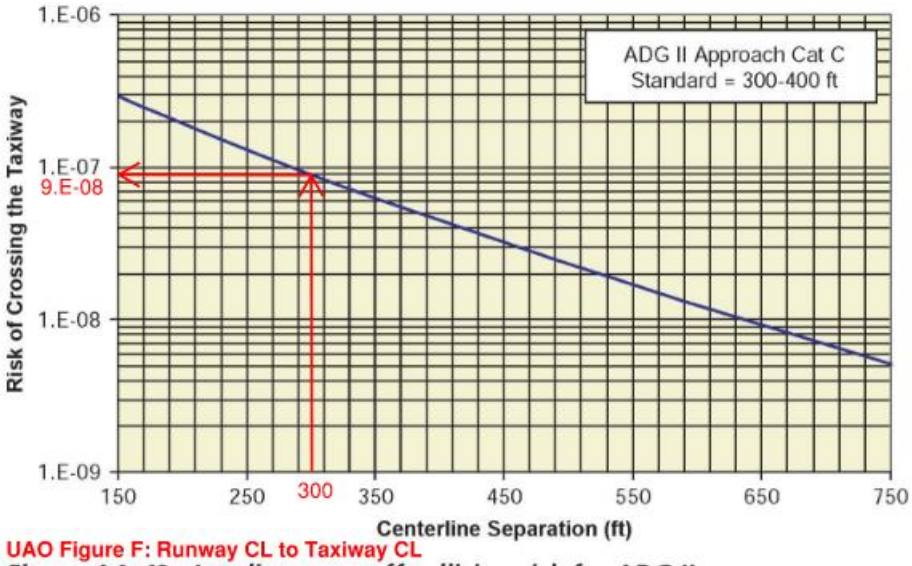


UAO Figure E: Runway CL to Airport Perimeter Fence
Figure AA-49. Takeoff veer-off collision risk for ADG II.

As the risk is one incident in every 45.5 million takeoffs, the rate of occurrence is calculated as 45.5 million takeoffs divided by 45,115 takeoffs per year which equates to one incident every 1,008) years.

Finally, as a test of the level of safety that AC 150/5300-13B considers acceptable we check what the predicted risk level is of the existing runway-taxiway separation considered appropriate[10] by FAA.

4. Landing Roll Phase Risk to Taxiway Consistent with Safety Standards of AC 150/5300-13B - Using the separation of 300' and Figure AA-43 in Appendix A of ACRP Report #51, provides a risk level 9.0E-08 or one chance in 11.1 million landings. This can be seen in the figure below:



UAO Figure F: Runway CL to Taxiway CL

Figure AA-42. Landing veer-off collision risk for ADG II.

As the risk is one incident in every 11.1 million landings, the rate of occurrence is calculated as 11.1 million landings divided by 45,115 landings per year which equates to one incident every 246 years.

[10] Note that Section 3-24 of Order 5100.38D Change 1 states that the FAA will not fund airport safety greater than that in the Airport Design standards, so the standard set by the runway-taxiway separation is a significant number. Order 5100.38D Change 1 can be downloaded for free at: https://www.faa.gov/documentLibrary/media/Order/AIP-Handbook-Order-5100-38D-Chg1.pdf

6. Conclusions

Considering the risk of each phase of flight, the risk of collision during the landing roll is the controlling factor. The Hazard Severity Classification for this type of operation would be major and the acceptable probability of occurrence is remote (1E-05) or less than once every 1-10 years. The following table summarizes the risk associated with each phase of flight:

Phase of Flight	Rate of Occurrence	Acceptable Level
Airborne Phase	Once every 369,000 years	Yes
Landing Roll Phase	Once every 277 years (or 369 years with calculation adjustment for fence object in lieu of wing object)	Yes
Takeoff Roll Phase	Once every 1,000 years	Yes

A runway to object separation of 312’ provides an acceptable level of safety as the controlling occurrence is once every 277 years (or 369 years with the adjustment for wingspan at the fence as allowed in the ACRP method). This is much less risk than the once per 100 years FAA standard shown in Table A-3 and results in a Category E “Extremely Improbable” occurrence. Further, per ACRP’s method, a wingtip to fence occurrence is considered by ACRP’s method to be a Table A-4 Minimal Severity occurrence. This combination via Figure A-1 concludes that the outcome as Low Risk.

Figure UAO F shows that the existing risk of occurrence between the existing runway and existing taxiway, which fully meets FAA standards, is one in every 246 years. This means that the risk to an occurrence at the taxiway, is much less (i.e. longer duration between events) than the FAA’s 100-year standard. The risk of collision with the perimeter fence is then even much less than that of a taxiway collision.

Finally, there is an incremental improvement option of ODAV and ODOT coming to an agreement to move the perimeter fence further west, to the east edge of the 12’ wide gravel shoulder, which would result in a 368-foot separation. If the 39.5-foot wing span correction is added at the new fence location, this results in an equivalent distance of 407 feet for use on Figure AA-42. That in turn would result in an ACRP predicted probability occurrence being once every 515 years, almost half the risk of a taxiway collision.

Given that the commercial use of aviation is itself only around 100 years old, these numbers of one predicted occurrence at the existing airport fence every 277 or 369 years, demonstrates the high level of safety that will be maintained at Aurora Airport with this MOS.

Given the regional and national importance of Aurora Airport for emergency medical, firefighting, and emergency power line moving, along with the use by local national corporations, using the MOS ensures the airport can continue to upgrade with safety improvements, and can continue to support the approximately 1,500 employees that rely on the airport for their livelihood.

This study shows definitively that the 2012 signing off on the Aurora Airport master plan and ALP with a modification of standards for the ROFA, by FAA and ODAV, was a reasonable and appropriate action to take. The same action should be taken for the current 2024 master plan work.

Author: Aron Faegre is an architect, civil engineer, physicist, and pilot who has been the lead planner and designer on over two hundred airport planning and development projects in Oregon, Washington, California, New York, and British Columbia over the past 35 years. He has a Master of Architecture from MIT and a Bachelor of Physics from Reed College.

Aron Faegre, AIA, PE 13200 Fielding Road Lake Oswego Oregon 97034 503-880-1469 faegre@earthlink.net

January 21, 2025

Alex Thomas, Planning and Programs Manager
Tony Beach, State Airports Manager
Oregon Department of Aviation
Brandy Steffen, JLA
Oregon Department of Aviation
3040 25th Ste SE
Salem, OR 97602
Alex.R.Thomas@odav.oregon.gov

Re: Aurora State Airport Master Plan process FAA approved documents Clarify that 500-foot Runway Extension is to meet safety needs of current C-II aircraft, not for larger aircraft

Mr. Thomas, Mr. Beach, and Ms. Steffen:

During the December 10, 2024 meeting during my attendance as the HTS representative, FAA staff Tim House stated that the proposed 500-foot runway extension was to allow larger aircraft to operate at the airport on a more regular basis, per the transcript below:

```
[Tim House - FAA] 18:21:11
So what you're asking us to do, you've already exceeded
the standards of C-II.
[Tim House - FAA] 18:21:16
you are operating at C-II.
[Tim House - FAA] 18:21:19
and you're asking for a further extension.
[Tim House - FAA] 18:21:22
to allow larger aircraft
[Tim House - FAA] 18:21:24
to operate on a more regular basis.
[Aron Faegre representing HTS] 18:21:27
No, I don't think they are.
[Tim House - FAA] 18:21:27
So that's why we have, what's the extra 500 foot doing?
[Aron Faegre representing HTS] 18:21:32
It's safety.
```

It is important to refer back to the prior Master Plan chapters that discussed the need for the 500-foot runway. Nowhere in the FAA approved text is there

consideration of the runway extension as "allowing larger aircraft to operate on a more regular basis."

The reason for the runway extension is simply to comply with the FAA's runway safety standards for a C-II airport – which Aurora Airport has been so designated by FAA for 12 years. The FAA approved Chapter 4 Airport Facility Requirements, and the conclusion of the discussion about required runway length, on page 4-16, states:

> **Based on local conditions, the standard methodology outlined above and in *AC 150-5325-4B*, and in coordination with FAA-SEA ADO, a runway length of 5,500 feet is identified to accommodate 100% of large airplanes (60,000 pounds or less maximum gross takeoff weight) at 60% useful load for the current 20-year planning period.**
>
> FACILITY REQUIREMENT. Consistent with FAA planning methodologies a runway length of 5,500 feet at the Aurora State Airport defines the justified runway length for the planning and analyses to be performed in Chapter 5 – Development Alternatives.

It is important recognize that the length established is not extravagant or excessive. It does not even allow the design aircraft to take off with a full load, as the assumption used in FAA Table 3-2 in AC 150-5325-4B is that on even moderately hot days (83 degrees[1]) the aircraft can take off with only 60% of its full load. If the goal was to really allow all aircraft to take off at 83 degrees with closer to a full load, the analysis would have used the other half of FAA's Table 3-2 in AC 150-5325-4B where 90% of load is assumed needed. That would have prescribed a proposed runway length at Aurora Airport of approximately 7,700 feet length. The 5,500 foot length is modest by comparison.

Also, Table 3-2 does not consider the need for "balanced field" takeoff requirements of FAR Part 135 operations which must also comply with Part 25, of which there are many of the same C-II aircraft that use Aurora Airport. These requirements are regulated and required by the FAA Flight Standards District Offices which is in charge of flight operations, as opposed to the FAA Airports District and Division Offices (ADO) which is in charge of airport design. Applying the FAA's requirements for balanced field safety standards would at these same

[1] Recent summer average high temperatures of 88°F with peak highs of 104°F, may indicate that the 83°F used in Table 3-2 is low given climate change.

temperatures, in conjunction with differing environmental conditions, generally prescribe an even longer runway length.

The additional 500 feet of runway length proposed in the master plan is modest, is designed to generally cover only 60% of C-II aircraft load capacity, and clearly is an FAA safety standard, and not an attempt to encourage or even allow the operation of larger aircraft to use Aurora Airport. Both FAA Headquarters and the Seattle ADO have already acknowledged this distinction in their approval of the Chapter 4 language quoted above.

Respectfully submitted,

Aron Faegre, AIA, PE
Aron Faegre Airport Planning and Design

Outlook

Fw: Draft Airport Layout Plan Sketch

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-02-25 10:26 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (231 KB)
LT ODAV-Draft Airport Layout Plan Sketch.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, February 25, 2025 9:32 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; STEPHENS Cathryn E <CStephens@eugene-or.gov>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Draft Airport Layout Plan Sketch

Good morning,

I am including Ms. Stephens in case she did not receive the original email and attachment.

Brandy and Samantha, please include this in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, February 25, 2025 9:30 AM
To: Darlene Ferretti <Darlene.Ferretti@jordanramis.com>
Cc: oneil@wilsonvilleoregon.gov; mayor@ci.aurora.or.us; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; AHRENS Melissa * DLCD <Melissa.AHRENS@dlcd.oregon.gov>; dlcd.director@dlcd.oregon.gov; HOWARD Gordon * DLCD <Gordon.HOWARD@dlcd.oregon.gov>; AttorneyGeneral@doj.oregon.gov; WARNER Chris * GOV

<Chris.WARNER@oregon.gov>; James D. Howsley <jamie.howsley@jordanramis.com>
Subject: RE: Draft Airport Layout Plan Sketch

Hi Ms. Ferretti,

Thank you for these comments. I see that they are addressed to our Board Chair Cathryn Stephens, but I don't see her as a recipient of this email. I will forward it to her to make sure she receives it, and I will forward it to the rest of the planning team and it will be included in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Darlene Ferretti <Darlene.Ferretti@jordanramis.com>
Sent: Tuesday, February 25, 2025 9:19 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Oregon Department of Aviation <mail.aviation@ODAV.oregon.gov>
Cc: oneil@wilsonvilleoregon.gov; mayor@ci.aurora.or.us; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; AHRENS Melissa * DLCD <Melissa.Ahrens@dlcd.oregon.gov>; dlcd.director@dlcd.oregon.gov; HOWARD Gordon * DLCD <Gordon.HOWARD@dlcd.oregon.gov>; AttorneyGeneral@doj.oregon.gov; WARNER Chris * GOV <Chris.WARNER@oregon.gov>; James D. Howsley <jamie.howsley@jordanramis.com>
Subject: Draft Airport Layout Plan Sketch

You don't often get email from darlene.ferretti@jordanramis.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Good morning,

Please find attached a letter of today's date from Mr. Howsley.

Thank you,
Darlene

Darlene Ferretti | Legal Assistant
Direct: (503) 598-5551

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February 25, 2025

VIA EMAIL ONLY

Tony Beach
State Airports Manager
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3040 25th Street SE
Salem, OR 97302
Email: Anthony.beach@odav.oregon.gov

Cathryn Stephens
Oregon Aviation Board
Oregon Department of Aviation
3040 25th Street SE
Salem, OR 97302
Email: mail.aviation@odav.oregon.gov

Re: Draft Airport Layout Plan Sketch

Dear Mr. Beach and Ms. Stephens:

Thank you for hosting the Public Advisory Committee meetings for the new Aurora State Airport Master Plan. We represent Smith Aurora, LLC which owns tax lots 1400 and 1500 on the west side of Highway 551, which are zoned Exclusive Farm Use. On these and adjacent tax lots, large greenhouses and open fields grow food crops and flowering plants for distribution throughout the Pacific Northwest. Smith is a family business which has made significant capital investments in the farm and employs 180 workers. The Master Plan would diminish Smith's ability to adequately supply its customers. Therefore, Smith does not support the current draft Airport Layout Plan in the proposed Master Plan.

The draft Airport Layout Plan sketch illustrates that a broad strip of property will be taken from Smith's property for the relocation of the highway. It is important for ODAV to understand the adverse impacts to Smith's farm operations which would result from that taking to the property, which means there is no room left for essential truck operations and the septic drain fields. Specifically, the taking will eliminate much of the truck maneuvering area and hamstring the shipping operations, and thereby increase operational costs and reduce farm income after the project is complete. It also would eliminate half of the parking for full size tractor trailers. The taking will displace the large septic field which abuts the current right-of-way. Relocation of those two uses onto other areas of the property is problematic due to the location of the existing greenhouses. Finally, the taking will displace existing fields along the southern highway frontage where crops currently grow. Those relocations will reduce the areas available for growing crops with a corresponding reduction in farm income.

ODAV should anticipate a considerable cost to cure these problems, and thus substantial severance damages for the taking. In an earlier meeting, ODAV's consultant David Miller stated that the cost estimates for acquiring property were derived using the assessor's market value. But the assessor does not measure severance damages. Thus far we have not seen any indication that severance damages for any impacted property are included in the Capital Improvement Plan cost estimate for the highway relocation (or in the costs of other property acquisitions shown on the draft plans). That financial omission must be corrected before the plan is submitted to the FAA or the Oregon Aviation Board if those decision makers are to have a realistic cost estimate. And legally speaking, adoption of

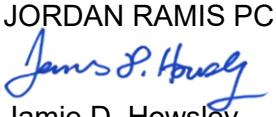
the plan by the Oregon Aviation Board must address the statewide planning goals and thus, under Goal 2, be supported by an adequate factual base. *See* OAR 660-015-0000(2). If ODAV simply disregards this testimony and the testimony of others regarding the severance damages to their properties, then any decision adopting the plan will lack substantial evidence to support it. *Columbia Pacific v. City of Portland*, 289 Or App 739, 757, 412 P3d 258, *rev den*, 363 Or 390 (2018).

Many participants in the PAC meetings have noted the very large public cost for moving the highway, especially in relation to the comparatively short runway extension and the small number of benefitted airport users. The alternative airports including Salem, McMinnville, and Hillsboro are located in cities and already have longer runways and ample areas for additional hangars, without adversely impacting Smith's farm operations. ODAV and OAB should recognize that the region has nearby alternatives for the planes that need longer runways. Under Oregon land use law, ODAV cannot expand its urban airport onto land zoned for Exclusive Farm Use when nearby airports have ample aviation facilities for the private jets that the runway extension and highway relocation are intended to serve. *See* OAR 660-004-0020(2)(b) ("Areas that do not require a new exception cannot reasonably accommodate the use.").

Thank you for your attention to this matter.

Sincerely,

JORDAN RAMIS PC



Jamie D. Howsley
Admitted in Oregon and Washington

cc: Peter Rempp, Smith Gardens, Inc.
Mayor Sean O'Neil, oneil@wilsonvilleoregon.gov
Mayor Brian Asher, mayor@ci.aurora.or.us
Kenji Sugahara, ODAV, kenji.sugahara@odav.oregon.gov
Melissa Ahrens, DLCD, melissa.ahrens@dlcd.oregon.gov
Brenda Bateman, DLCD, dlcd.director@dlcd.oregon.gov
Gordon Howard, DLCD. gordon.howard@dlcd.oregon.gov
Dan Rayfield, Attorney General, AttorneyGeneral@doj.oregon.gov
Chris Warner, Governor's Office, Chris.Warner@oregon.gov

Outlook

Re: Aurora State Airport Master Plan Website Comments - Chris Gage

From Chris Gage <noreply@jotform.com>
Date Wed 2025-01-29 10:08 AM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	Chris Gage
Comments or questions?	Legal Opposition to Aurora State Airport Master Plan Expansion Submitted to: Oregon Department of Aviation Date: 1/29/2025 Subject: Formal Objection to the Proposed Westward Expansion of Aurora State Airport Master Plan I. Introduction We the resident of the community submit this formal opposition to the proposed westward expansion of the Aurora State Airport as outlined in the Master Plan. This proposal raises significant concerns regarding adverse impacts on the local community, environmental sustainability, economic viability, and legal compliance. We urge the responsible authorities to reconsider this expansion and explore alternative solutions that do not compromise the well-being of our residents. II. Community Disruption and Quality of Life The proposed expansion threatens to disrupt the surrounding residential neighborhoods, small businesses, and agricultural lands in the following ways: Increased Noise Pollution: Expanding the airport will result in significantly increased aircraft traffic, generating noise pollution that

will negatively affect residents' quality of life, particularly for families, the elderly, and individuals with health conditions sensitive to noise exposure.

Traffic Congestion and Safety Risks: Expansion-related construction and increased airport operations will exacerbate existing traffic congestion on surrounding roads, creating additional safety hazards for motorists, cyclists, and pedestrians.

Property Devaluation: The expansion may reduce property values in the affected areas due to heightened noise levels, increased traffic, and decreased residential desirability.

III. Environmental Concerns The expansion poses serious environmental risks that conflict with Oregon's land use and environmental protection policies, including:

Impact on Farmland and Natural Habitats: The proposed expansion encroaches on agricultural lands and environmentally sensitive areas, threatening local ecosystems and wildlife habitats.

Air and Water Pollution: Increased aviation activity will lead to higher emissions of greenhouse gases and other pollutants, negatively impacting air quality. Additionally, fuel runoff and chemical contaminants pose risks to local water supplies.

Violation of Statewide Land Use Goals: Oregon's land use planning system prioritizes the preservation of agricultural land and open spaces. The proposed expansion directly contradicts these principles by repurposing rural land for aviation-related development.

IV. Economic and Financial Concerns

Unjustified Cost to Taxpayers: The expansion requires substantial public investment, yet the projected economic benefits remain uncertain. There is no clear evidence that the

expansion will generate sufficient revenue to justify the expenditure.

V. Legal and Procedural Issues

Lack of Comprehensive Community Consultation: The planning process has not adequately engaged local residents and stakeholders in meaningful discussions about the expansion's consequences.

Potential Violations of Zoning and Land Use Regulations: Expanding the airport into residential and agricultural zones may violate existing land use laws and local zoning ordinances.

Noncompliance with Federal and State Environmental Regulations: The project must undergo rigorous environmental impact assessments under the National Environmental Policy Act (NEPA) and Oregon's environmental protection laws before approval.

VI. Conclusion and Request for Action
Given these significant concerns, we strongly urge the appropriate authorities to:

Halt the approval process for the westward expansion of the Aurora State Airport.

Conduct a comprehensive environmental and economic impact study with full public transparency.

Explore alternative solutions that minimize disruption to the community while addressing aviation needs and also involve the community.

Facilitate open public hearings and community engagement to ensure all voices are heard before any further planning decisions are made.

The Aurora community stands firm in its opposition to this expansion and requests that decision-makers prioritize the health,

	safety, and well-being of local residents over corporate or commercial interests. Respectfully submitted, Chris Gage representing the Aurora Community I would like to receive email updates.
If you would like a response, please tell us the best way to contact you:	Email Phone
Email	heliaction@mac.com
Phone Number	(503) 899-9342

You can edit this submission and view all your submissions easily.

Outlook

Re: Aurora State Airport Master Plan Website Comments - Chris Gage

From Chris Gage <noreply@jotform.com>
Date Wed 2025-02-19 3:47 PM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	Chris Gage
Comments or questions?	I attended the Feb 11, 2025 meeting. I have to say I was embarrassed for the ODAV team that could not answer simple questions that were asked over and over. The ODAV representatives on the call were defensive and lacked information that was being asked. It is apparent that this being attempted to be pushed through. I am strongly opposed to this "preferred alternate plan" The cost is extremely outrageous, taking EFU land and converting it "airport reserve" is against current county law. The impacts this will have to the congestion of Wilsonville and Boone Bridge will be detrimental to the current congested issue. Be prepared to add many dollars to the budget for litigation expense from many parties. I would like to receive email updates.
If you would like a response, please tell us the best way to contact you:	Email Phone
Email	heliaction@mac.com
Phone Number	(503) 899-9342

You can edit this submission and view all your submissions easily.

Outlook

Fw: Aurora Airport expansion question

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2025-03-05 3:42 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, March 5, 2025 3:36 PM
To: Karin Grano <kgrano@msn.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Subject: RE: Aurora Airport expansion question

Hi Karin, thanks for your feedback. This correspondence will be included in the public record for the master plan, and will be available on the project website at https://publicproject.net/auroraairport

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 CELL 503-302-5455
M-F 7:30am – 4pm

-----Original Message-----
From: Karin Grano <kgrano@msn.com>
Sent: Wednesday, March 5, 2025 3:29 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Re: Aurora Airport expansion question

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hi Tony!

Thank you for your quick response. Is it okay with you if I share this information on social media if this subject raises its ugly head again? Even City of Wilsonville officials misrepresented the truth on a city flier for an upcoming open house about the airport expansion back in June 2024, claiming the runway extension would, “allow larger and heavier aircraft to land and take off with more fuel,” also saying that your main source of revenue is tax on aviation fuel, which may or may not be true, but that’s besides the point.

I just want the truth, and that doesn’t seem to be the narrative out there.

Thanks again!

Karin

> On Mar 4, 2025, at 3:57 PM, BEACH Anthony <Anthony.BEACH@odav.oregon.gov> wrote:
>
> Hi Karin, thank you for reaching out with your question.
>
> The Design Aircraft is explained in Draft Chapter 3: Aviation Activity
> Forecasts:
> https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fpubl
> icproject.net%2Ffiles%2FUAOAMP%2Faurora-state-airport-wp-1-updated-nov
> ember-2023-opt.pdf%3F37af5f0589&data=05%7C02%7CAnthony.BEACH%40odav.or
> egon.gov%7C2ea05359472446f0827e08dd5c3d823c%7C28b0d01346bc4a648d861c8a
> 31cf590d%7C0%7C0%7C638768141592543641%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0
> eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIl
> dUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=A4OB%2Bo1F2A%2B2C2u%2BSOkOk5hvNop8k2
> Ibw0e9YgLtuVs%3D&reserved=0
>
> The runway length analysis is explained in the Draft Chapter 4:
> Facility Requirements for the Aurora State Airport Master Plan:
> https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fpubl
> icproject.net%2Ffiles%2F2024-01%2FAurora-Airport%2F4-uaoairportfacilit
> yrequirements-041524.pdf%3Fa75844ce51&data=05%7C02%7CAnthony.BEACH%40o
> dav.oregon.gov%7C2ea05359472446f0827e08dd5c3d823c%7C28b0d01346bc4a648d
> 861c8a31cf590d%7C0%7C0%7C638768141592563382%7CUnknown%7CTWFpbGZsb3d8ey
> JFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFp
> bCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=ap7IBTaNWbMoCnYWu3RYndixnpI%2B
> WJwPTUe1WXpTP5I%3D&reserved=0
>
> Because the future Design Aircraft for the 20 year planning period is the same as the airports current Design Aircraft, and because the proposed 497 foot extension is needed to accommodate 100% of the forecasted fleet mix at 60% useful load as determined by FAA methodologies, the runway extension is not intended to allow bigger or heavier class of airplanes to use the airport. The runway extension is intended to accommodate the aircraft currently using the airport.
>
> Thank you,

>
> Tony Beach
> OREGON DEPARTMENT OF AVIATION
> STATE AIRPORTS MANAGER
> OFFICE 503-378-2523 CELL 503-302-5455 M-F 7:30am - 4pm
>
>
>
>
> -----Original Message-----
> From: Karin Grano <kgrano@msn.com>
> Sent: Tuesday, March 4, 2025 10:34 AM
> To: Oregon Department of Aviation <mail.aviation@ODAV.oregon.gov>
> Subject: Aurora Airport expansion question
>
> [You don't often get email from kgrano@msn.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]
>
> This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.
>
> To whom it concerns,
>
> I hear a lot of talk that the 500 foot extension to the runway at the Aurora airport will allow a bigger, heavier class of plans to utilize the airport. Lots of folks believe this, but I haven't been able to get anyone to answer that question for me.
>
> It is my understanding that the runway extension is for safety purposes and will allow for more payload (fuel). I'd really like to know the truth.
>
> Thanks for your time to respond.
>
> Best,
>
> Karin Grano
> Aurora, Oregon

Outlook

Fw: KUAO - Current Refined Preferred Alternative

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 1:10 PM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 7:38 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: KUAO - Current Refined Preferred Alternative

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 7:29 AM
To: Norm Green <nrgiii66@gmail.com>; brandy.steffen@jla.us.com
Subject: RE: KUAO - Current Refined Preferred Alternative

Hi Norm, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Norm Green <nrgiii66@gmail.com>
Sent: Sunday, January 19, 2025 10:39 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; brandy.steffen@jla.us.com
Subject: KUAO - Current Refined Preferred Alternative

You don't often get email from nrgiii66@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear Tony,

Thank you for considering us airport users' and property owners (as Columbia Aviation Association members) input and for the significant improvements in the current plan over the previous.

Please consider highlighting the importance of maintaining the septic systems and their leases, these are owned by airport tenants and located on airport property as we feel these are a critical piece of the airport infrastructure and represent major investments.

I ask that you include the 1.1 acre ODAV property purchase of the ramp space currently adjoining the south end of main UAO ramp (south of the tower) in your "priority purchase" list as this will significantly improve access to CAA as well as Pacific Coast Avionics, the main public ramp, all the mid-field hangars and Aurora Flight trainings ramp. This notable ramp and taxi-lane improvement will increase safety and flow much like the prior plan considered via a parallel taxiway and road but without displacing any hangars or the huge cost.

Thank you again for listening and your recent improvements to the plan.

Norman R. Green
Columbia Aviation Association Member

Outlook

Re: Aurora Airport - Refined Preferred Alternative comments by 01/21/25

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Fri 2025-01-10 5:00 PM
To Helbling, Tony <helbling@wilsonconst.com>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>

Hi Tony,

We posted the February meeting date to the website on Wednesday afternoon. I just sent an email today to the PAC about the meeting date and our other notice will go out next week.

I hope that helps answer your question.

Take care,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: Helbling, Tony <helbling@wilsonconst.com>
Sent: Friday, January 10, 2025 3:58 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: RE: Aurora Airport - Refined Preferred Alternative comments by 01/21/25

Good afternoon – can you tell me when PAC Meeting #9 was put up on the web site – was that today?

Tony Helbling
Logistics Manager
Wilson Construction Company
1190 NW 3rd Ave
Canby, OR 97013
Cell: 503-519-6059
Office: 503-263-6882
helbling@wilsonconst.com
www.wilsonconst.com

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Tuesday, January 07, 2025 1:22 PM
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Aurora Airport - Refined Preferred Alternative comments by 01/21/25

Good afternoon PAC members,

Thank you for attending PAC Meeting #8 and submitting your feedback on the Preferred Alternative. ODAV and the Planning Team has reviewed all feedback received and has made the following key refinements:

- Removed the proposed parallel taxilane.
- Removed the proposed vehicle service road that would require additional property acquisition.
- Depicted the priority property acquisition as the property required to meet FAA standards, based on the existing and future runway configuration. Reserve property acquisition is depicted in the event of a future willing seller and for the purpose of FAA grant funding eligibility.

The Refined Preferred Alternative maintains the improvements needed to comply with RSA, TSA, and ROFA standards. Please review the Refined Preferred Alternative Summary including the Refined Preferred Alternative figures for additional detail on the project website: https://publicproject.net/auroraairport# (on the "Resources & Documents" Page).

Please submit any comments on the Refined Preferred Alternative no later than Tuesday, January 21, 2025.

Thank you,

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com

Outlook

Fw: Thanks for visit today-

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 1:08 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

2 attachments (155 KB)
EC2501 Sunset Water Systems Award Letter.pdf; EC2501 Sunset Water Systems Summary of Award.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 10:47 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Thanks for visit today-

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 10:47 AM

To: Helbling, Tony <helbling@wilsonconst.com>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: wk@klgpc.com; tmillar@wwpmi.com; Bruce Bennett <bruce@auroraaviation.com>; Lukas Nickerson <Luke@flyaerometal.com>
Subject: RE: Thanks for visit today-

Hi Tony, thanks for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach

OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Helbling, Tony <helbling@wilsonconst.com>
Sent: Tuesday, January 21, 2025 10:15 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: wk@klgpc.com; tmillar@wwpmi.com; Bruce Bennett <bruce@auroraaviation.com>; Lukas Nickerson <Luke@flyaerometal.com>
Subject: FW: Thanks for visit today-

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Tony, Kenji and Brandy –

This needs to get into the record.

I met with Art Chaput over at Business Oregon and Kip Morris from SEDCOR yesterday. Among other things – we discussed feedback submittals for today on the refined preferred alternative.

They shared something surprising about some of the homes on the west side of HWY 551… other agencies in the state are working to spend money to protect those homes.

My sense is our Master Plan process is going to come into conflict with other state agencies and create some traps/issues with citizens caught in the middle. This whole thing is moving too fast without enough people at the table to discuss ramifications.

We are going to end up hurting people.

Tony Helbling
Logistics Manager
Wilson Construction Company
1190 NW 3rd Ave
Canby, OR 97013
Cell: 503-519-6059
Office: 503-263-6882
helbling@wilsonconst.com
www.wilsonconst.com

From: CHAPUT Arthur * BIZ <Arthur.CHAPUT@biz.oregon.gov>
Sent: Tuesday, January 21, 2025 6:45 AM
To: Helbling, Tony <helbling@wilsonconst.com>
Cc: kmorris@sedcor.com
Subject: RE: Thanks for visit today-

Tony, here is a little more information about that water system project you asked about. They have detected manganese in their water. Goal of the current project ($61,000 forgivable loan) is to do a feasibility study to see what solutions might be possible. We expect the park to come back to us for construction funding once the feasibility study is complete. The current award is federal funding from the big 2021 infrastructure bill.

Arthur Chaput
Regional Development Officer – Marion, Polk, Yamhill
Business Oregon | NEW https://www.oregon.gov/biz/
503-798-5076 mobile

From: CHAPUT Arthur * BIZ
Sent: Monday, January 20, 2025 3:44 PM
To: helbling@wilsonconst.com
Cc: kmorris@sedcor.com
Subject: Thanks for visit today-

Tony,

Thanks for having Kip and I out for a visit today. It was educational. I've cc'd Kip here so that you have his email address.

Look forward to taking you up on that offer to visit the airport.

-Arthur
503-798-5076

July 23, 2024

Donald Crouch, President
Sunset Water Systems, Inc.
14102 Piper Street NE
Aurora, OR 97002

RE: Award for Bipartisan Infrastructure Law-Emerging Contaminants Fund, Manganese Remediation Feasibility Study, Project Number EC2501, 07/22/2024

Dear Donald Crouch:

Congratulations on your successful application for the above-referenced project. Enclosed please find a summary showing the funding amount and special terms and conditions of the award. The financing contract will contain the full terms and conditions of your award and will be sent to you for proper signatures. Please note that the legal obligations for funding and for reimbursement of project expenses are subject to execution of the contract.

The project must comply with all applicable state laws, regulations and procurement requirements. As a reminder, you must provide copies of all solicitations at least 10 days before advertising, and all draft contracts at least 10 days before signing.

We encourage you to offer appropriate media opportunities to help build public awareness of your project's purposes and benefits. Please notify us of any event celebrating your project. As always, we are available to answer questions that may arise during the implementation of your project. If you need assistance, please contact me at 503-551-0957, or via email to tawni.bean@biz.oregon.gov.

Sincerely,

Tawni Bean

Tawni Bean, Regional Project Manager
Business Oregon

c: Janet Griffin, Secretary
Arthur Chaput, Regional Development Officer
Adam DeSemple, OHA
Gregg Baird, Emerging Contaminants Specialist, OHA
Representative Rick Lewis
Senator Fred Girod

SUMMARY OF AWARD

Project Number: EC2501 **Date of Award:** 07/22/2024

Recipient: Sunset Water Systems

Project Name: Manganese Remediation Feasibility Study

Source of Funding (Grant/Loan/Forgivable Loan)	Award Amount
OBDD – BIL-EC – Forgivable Loan, Taxable	**$61,250**
Total	**$61,250**

General Description of Loan	
Interest Rate	**1.00%**
Maximum Term	**10 Years**

Approved Project Description
The Recipient will procure an Oregon Licensed Engineer to prepare a feasibility study to evaluate the feasibility of alternatives to address manganese located in the water system. The feasibility study must include the following elements: • Analysis of project feasibility (e.g. engineering, regulatory, legal, et cetera). • Analysis of alternatives for drinking water projects to address the emerging contaminant within the water system and recommended options, which will include but is not limited to, connecting to a nearby water system, developing a new water source and installing treatment. • Estimate of up-to-date project costs for each alternative including material, labor, contingency budget, and other expenses. • Design and/or construction timeline. • Operational feasibility analysis including identification of expected changes in costs for ongoing operation, maintenance, and long-term replacement of the improvements. The draft feasibility study must be submitted to Business Oregon for review.

Note: The full terms and conditions will be contained in the contract.

Outlook

Fw: quick question

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2025-01-22 9:08 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 3:28 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: quick question

Good afternoon, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 3:28 PM
To: Helbling, Tony <helbling@wilsonconst.com>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Luke Nickerson <nickersonlukas@gmail.com>
Subject: RE: quick question

Thanks Tony, we'll include your comment in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Helbling, Tony <helbling@wilsonconst.com>
Sent: Tuesday, January 21, 2025 2:25 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Luke Nickerson <nickersonlukas@gmail.com>
Subject: RE: quick question

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Thanks – I think that will work for us. Stacking hangars is not an all day or overnight process… just takes a few hours at most and we'd happily work with the tower if they knew a 777 was going to taxi by! Life-Flight may have to adjust operations as their western pad would be affected.

Appreciate the quick turn on the info.

Tony Helbling
Logistics Manager
Wilson Construction Company
1190 NW 3rd Ave
Canby, OR 97013
Cell: 503-519-6059
Office: 503-263-6882
helbling@wilsonconst.com
www.wilsonconst.com

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 2:07 PM
To: Helbling, Tony <helbling@wilsonconst.com>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Luke Nickerson <nickersonlukas@gmail.com>
Subject: RE: quick question

Hi Tony,

7a and 7b are correct. When the property acquisition is completed, it would require an amendment to the Access Agreement to reflect the changed Access Point. At that point, I think we would add a distinction to allow relocation of aircraft (but no parking) and related equipment (tugs) and personnel within state property but outside of the Movement Area. For access of the non-movement area for aircraft and tugs, I don't see why case by case permission or ATC clearance would be necessary. Allowable uses within the Movement Area would remain as 7a is written.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Helbling, Tony <helbling@wilsonconst.com>
Sent: Tuesday, January 21, 2025 12:50 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Luke Nickerson <nickersonlukas@gmail.com>
Subject: RE: quick question

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Tony – thanks,

Clarification question… see attached – Item 7 b (I think) is where the answer sits…

If ODAV is going to keep that area as "public-use" then I think we are okay to stack/unstack using that space. Just want to make sure we would not run afoul of 7a, 7b or 7c. My assumption is our tugs and aircraft would not need time of movement permission to go off SECAP ramp into the ROFA (the area of priority acquisition).

I hate to be nit-picky but the distinction is important as we're all gun shy over the VPD issue and now an aircraft that might taxi onto the putting green… we just want to follow the rules, and giving up property is very important!

Please clarify

Tony Helbling
Logistics Manager
Wilson Construction Company
1190 NW 3rd Ave
Canby, OR 97013
Cell: 503-519-6059
Office: 503-263-6882
helbling@wilsonconst.com
www.wilsonconst.com

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 11:58 AM
To: Helbling, Tony <helbling@wilsonconst.com>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Luke Nickerson <nickersonlukas@gmail.com>
Subject: RE: quick question

Hi Tony,

The priority property acquisition along the eastern side of Taxiway A is for the ROFA, the current Non-Movement Area Boundary Marking is in its ultimate location and would not change. Aircraft movement is allowable in the ROFA, allowable uses of state property from private property are provided and explained in our Access Agreements. Since portions of the ROFA are outside of the Movement Area, a person stepping in the ROFA but not entering the Movement Area does not constitute a Surface Incident or V/PD.

I hope this answers your questions, let me know if you need more clarification.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Helbling, Tony <helbling@wilsonconst.com>
Sent: Tuesday, January 21, 2025 9:35 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Luke Nickerson <nickersonlukas@gmail.com>
Subject: quick question

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Tony and Kenji,

Quick question – we're hustling to get our responses together for the deadline today…

Along the front of SECAP – the plan shows priority acquisition of approx. 20' +/- of the ramp. We think that is to protect the ROFA. In that case, does ODAV plan to move the "movement" line back toward the hangars? Will we still be able to work out there freely without contacting the tower?

The ROFA rules say no tie-down of aircraft or parking vehicles (we interpret it to mean a person needs to be actively involved in whatever aircraft or vehicle is in the ROFA but outside the movement line)… but – will that area once owned by ODAV be off limits to airport users without permission from ODAV/the tower? Will we get in trouble for stepping on it?

This is important as we need to "stack/unstack" hangars periodically and usable ramp space is vital to operations.

This is important as to how we respond today.

Please advise,

Tony Helbling
Logistics Manager
Wilson Construction Company
1190 NW 3rd Ave
Canby, OR 97013
Cell: 503-519-6059
Office: 503-263-6882
helbling@wilsonconst.com
www.wilsonconst.com

RECEIVED
JUL 28 2014
By

AURORA STATE AIRPORT
COMMERCIAL ACCESS AGREEMENT

This Commercial Access Agreement is between the State of Oregon, acting by and through its Department of Aviation (AVIATION), and SOUTHEND CORPORATE AIRPARK CONDOMINIUM OWNERS ASSOCIATION (PERMITTEE). AVIATION and PERMITTEE agree as follows:

DEFINITIONS

- "Airport" – The AURORA State Airport, in MARION County, Oregon.
- "Air Operations Area" - Any area of the airport used or intended to be used for the landing, takeoff, or surface maneuvering of aircraft. An air operation area shall include such paved or unpaved areas that are used or intended to be used for the unobstructed movement of aircraft in addition to its associated runway, taxiway, or apron.
- "Access" – The ingress and egress between the Property and public-use area of the Airport
- "Access Agreement" - The Written document that defines the terms of access and fair market value of entry for entry of aircraft, personnel, and/or vehicles onto a public use airport and the location of access described on the Airport Layout Plan (ALP) and in the agreement exhibits.
- "Access Point" - The location at which the Property abuts the public-use area of the Airport, at which PERMITTEE shall be granted a right of ingress and egress under the terms of this agreement, as depicted on the attached Exhibit "B".
- "Based Aircraft" – Lawfully registered aircraft listing Aurora State Airport on the aircraft registration and required to be registered.
- "Public-Use Area" - That portion of the Airport that is available for public use as permitted by AVIATION, as such may change from time to time.
- "Property" - That parcel of real property owned by PERMITTEE, depicted on the attached Exhibit "A".
- "Through-the-Fence Operations" - Through-the-fence operations are those activities permitted by an airport sponsor through an agreement that permits access to the public landing area to independent entities or operators offering an aeronautical activity or to owners of aircraft based on land adjacent to, but not a part of the airport property. The obligation to make an airport available for the use and benefit of the public does not impose any requirement for the airport sponsor to permit access by aircraft from adjacent property.
- "Taxilane" – The portion of the aircraft parking area used for access between taxiways and aircraft parking positions.

RECITALS

I. AVIATION owns and operates the Airport for the benefit of the public.

II. Safe, efficient, and controlled access to the publicly-owned taxiways, aprons, and runways of the Airport for commercial entities promotes economic growth, employment, and aviation-related innovation and commerce at the Airport and in surrounding communities. As the Airport sponsor, AVIATION seeks to allow such access in a manner that complies with federal funding agreements, and federal and state law.

III. PERMITTEE is a commercial enterprise that desires to obtain a right of ingress and egress from the Property through the Access Point to and from the Airport's public-use area for itself, its tenants, employees, agents, contractors, unit owners, and invitees for the purpose of conducting its aviation-related business.

TERMS

1. RIGHT OF ACCESS:

a. AVIATION hereby grants to PERMITTEE a non-exclusive right of access between the Property and the public-use area of the Airport at the Access Point for the uses described in this Agreement as depicted in Exhibit "B". In making this grant, AVIATION reserves the authority to (i) revoke access if, in its reasonable sole discretion, AVIATION determines that the access poses a risk to the safe and efficient operation of the Airport, and (ii) relocate the Access Point upon sixty (60) days' written notice to PERMITTEE, for the purpose of accommodating airport development, third parties or others to whom AVIATION grants access. This grant is contingent on the continued ownership and operation of the Airport by AVIATION, and upon the continued compliance by PERMITTEE with all of the conditions of this agreement.

2. TERM:

a. The term of this agreement is twenty (20) years, beginning 07/01/2014 (the "Effective Date") and ending 06/30/2034, with one five (5) year renewal option from the date the agreement is executed by both parties hereto.

3. NO REAL PROPERTY INTEREST:

a. The Parties agree that the right of access granted by this agreement does not create an interest in real property and shall neither burden the Airport nor benefit the Property.

4. CONSIDERATION:

a. In consideration for the right of access granted herein, PERMITTEE shall pay to AVIATION the greater of the following amounts per OAR 738-010-0025:

1) A fee for each aircraft based on the adjacent property which is the subject of this permit. The per aircraft fee is based on aircraft maximum gross landing weight at the rate published in OAR 738-010-0025 and listed for convenience in Exhibit A; or
2) $275.00 Category II Airport

b. Payment is due on the 1st day of each month for the previous month. At time of payment, **PERMITTEE shall also submit to AVIATION a detailed report listing each based aircraft showing aircraft class per OAR 738-010-0025, N-number, aircraft type, weight and the hangar or tie-down number where the aircraft is stored.**

c. AVIATION will annually review the consideration payable to AVIATION. Based on its review, AVIATION may adjust the monthly fee to ensure fair, reasonable, and nondiscriminatory rates. Adjustment shall be based on the Consumer Price Index-Urban of the state of Oregon, provided that no adjustment shall exceed three percent (3%) of the access payment for the previous CPI increase.

5. OPTION TO RENEW:

a. PERMITTEE may renew this agreement for one additional term of five (5) years, provided PERMITTEE is in compliance with federal grant assurances and state regulations.

6. LATE PAYMENTS AND RETURNED CHECKS:

a. If any payment due under this agreement is not paid within ten days after its due date, PERMITTEE shall owe and shall pay to AVIATION an administrative charge of ten percent of the amount due per month. Failure to make full payment including the administrative charge within 30 days after the date the payment is due is a default. Imposition of an administrative charge on delinquent payments does not constitute a waiver of any of AVIATION's rights to pursue its legal remedies under the law or as provided in this Agreement.

b. If any check to AVIATION for payment under this Agreement is returned to AVIATION by PERMITTEE's bank unpaid for any cause, PERMITTEE shall owe to AVIATION a $50 fee in addition to the amount of the check and any administrative charge owed under the above paragraph. Amounts due AVIATION are considered unpaid until AVIATION receives payment from the bank.

7. USES AND PROHIBITIONS:

a. PERMITTEE shall use the Airport and Access Point exclusively for movement of aircraft and personnel authorized by AVIATION. No other use of the Airport and Access Point is permitted.

b. PERMITTEE's use of the Airport and that of its employees, agents, tenants, contractors, and other authorized persons should be limited to the public-use area and the Access Point and is limited to use by aircraft meeting the Airport's FAA design criteria. Aircraft that do not meet airport design criteria will operate at their own risk and be liable for damage caused to airport property. Permittee is responsible for all guests, employees, agents and contractors under their cognizance.

c. Unless otherwise permitted by AVIATION, automobiles, bicycles, trucks, fuel trucks, motorcycles, and other vehicles, pedestrians, or animals, shall not be allowed on the Air Operations Area.

d. PERMITTEE shall not use or permit to be used any portion of the Airport or other state-owned property for storage of personal property except in areas designated by AVIATION. AVIATION may compel removal of such personal property at PERMITTEE's sole expense. If such personal property is not removed upon reasonable request, AVIATION may remove the same and charge the cost of the removal to PERMITTEE. Reasonable is defined as immediately when safety is affected and within 48 hours for other requests.

e. The transport of dangerous articles or magnetized materials by or under the control of PERMITTEE, its agents, employees, contractors, tenants, customers or other designees over AVIATION'S property shall be done in strict accordance with 49 CFR part 175 and policies of the Federal Aviation Administration.

8. ORGANIZED PUBLIC ACTIVITIES:

a. PERMITTEE shall obtain AVIATION's approval to conduct, host, promote or hold any organized public aviation activity, airshow, fly-in, rally, competition, exhibition or display that makes use of the Access Point or Airport. PERMITTEE shall request such approval in writing on an application form supplied by AVIATION not less 30 days prior to the activity, setting forth facts pertinent to the planned activity.

b. Based on the information supplied by PERMITTEE and at AVIATION's sole reasonable discretion with due regard to airport operational benefit, AVIATION may approve or deny the application. AVIATION may request that PERMITTEE modify the nature of the planned activity if the safety or the efficiency of Airport operations or interests of other Airport users so require.

c. If the application is granted, with or without modifications, PERMITTEE and all participants in the planned activity shall indemnify, save and hold the State of Oregon and AVIATION harmless under the terms of Section 13 of this Agreement for all injuries to persons or property of any nature whatsoever arising out of the conduct of the planned airshow, fly-in, rally, competition, exhibition or display.

d. At any activity approved and conducted under this section, PERMITTEE shall make available a Unicom radio, or its equivalent, and a fully qualified operator thereof, advising aircraft traffic that the scheduled activity is in progress; and

e. At PERMITTEE's sole expense, PERMITTEE shall dispose of all debris, litter, and other personal property remaining on the Airport, public-use area or Access Point within 24 hours of the activity's conclusion. All areas of the Airport and Access Point shall be returned to the same condition or better at the end of the scheduled activity.

9. HAZARDOUS SUBSTANCES:

a. PERMITTEE shall not store, dispose of, or release or allow any hazardous substances as defined in OAR 738-005-0010(67) or petroleum products to be released on any portion of the Access Point, Property or Airport. PERMITTEE shall recycle petroleum products and dispose of hazardous substances in accordance with the Oregon Department of Environmental Quality's rules, regulations and 1200Z permit, which are available by contacting the Oregon Department of Environmental Quality. All costs associated with the use of Hazardous Substances or petroleum products, including but not limited to costs of cleanup, removal, remediation, and compliance with federal, state and local environmental requirements, are the sole responsibility of PERMITTEE. PERMITTEE shall indemnify and hold AVIATION harmless from any and all claims, losses, damage, costs, attorney fees and other expenses incurred by AVIATION in connection with the remediation of hazardous substances in, on, upon or under the Access Point or any portion of the Property or the Airport. All hazardous substances and petroleum products shall be used, handled, cleaned up, removed and remediated in accordance with federal, state and local requirements.

10. MAINTENANCE OF ACCESS SITE AND AIRPORT:

a. PERMITTEE shall maintain the Access Point in a safe condition at all times.

b. PERMITTEE shall post the Property and Access Point against trespassing and exercise control over the Access Point to prevent unauthorized use of the Access Point. Signage shall not interfere with or obstruct taxiing aircraft. AVIATION may require PERMITTEE to replace, relocate or remove signs that AVIATION determines to be inadequate, improper or a safety hazard. PERMITTEE may be required to add signage for safety as directed by aviation.

c. PERMITTEE shall maintain the Access Point, the public-use area of the Airport, (immediately around the access point) and Property in a reasonably clean and neat fashion, and shall not permit the accumulation of rubbish, junk, aircraft or automobile parts or any other material.

d. AVIATION shall maintain the runways, public taxiways, and aircraft parking area at the Airport. AVIATION retains sole authority to determine the methods and schedules by which any maintenance or necessary construction is to be performed. AVIATION may close the Airport whenever it deems it necessary for reasons of public safety or convenience. AVIATION shall make a good faith effort to provide advance notice of Airport closures when possible, but no advance notice is required when closure of the Airport is due to weather, acts of God, or other unforeseen circumstances.

11. FIRE PREVENTION:

a. PERMITTEE shall exercise due and reasonable care and caution to prevent and control fires on the Premises. PERMITTEE shall comply with all relevant state, county, and local fire laws, codes and rules. Local and state fire marshals may enter the Premises to determine compliance with fire prevention laws, codes and rules.

12. INDEMNIFICATION:

PERMITTEE SHALL CONDUCT ITS ACTIVITIES UNDER THIS AGREEMENT AT PERMITTEE'S OWN RISK, AND SHALL INDEMNIFY, HOLD HARMLESS, AND DEFEND THE STATE OF OREGON AND AVIATION AND THEIR OFFICERS, EMPLOYEES AND AGENTS FROM AND AGAINST ALL CLAIMS, SUITS, ACTIONS, LOSSES, DAMAGES, LIABILITIES, COSTS AND EXPENSES OF ANY NATURE WHATSOEVER ARISING OUT OF, OR RELATING TO THE INTENTIONAL MISCONDUCT, OR RECKLESS OR NEGLIGENT ACTS OR OMISSIONS OF PERMITTEE OR ITS OFFICERS, EMPLOYEES, SUBCONTRACTORS, OR AGENTS UNDER THIS AGREEMENT.

13. INSURANCE:

a. Airport Liability Insurance: PERMITTEE shall maintain in force during the term of this Agreement airport liability insurance covering the Access Point, the Property, the Airport, and operations of PERMITTEE, including operation of aircraft. Combined single limit for bodily injury and property damage must not be less than $1,000,000 per occurrence.

b. Additional Insured: The above described insurance shall be provided by an insurance company authorized to do business in the State of Oregon and shall be primary and exclusive of any carried by the State of Oregon and shall be exhausted first. The liability insurance coverages required in this Agreement must include the State of Oregon, the Oregon Department of Aviation, and their

respective officers and employees as additional insureds. Coverage must be severable for all insured or covered under cross-liability of all insured.

c. Notice of Cancellation: There must be no cancellation of any insurance required under this section, or potential exhaustion of aggregate limits, without 30 days written notice from PERMITTEE or its insurer(s) to AVIATION.

d. Certificates of Insurance: As evidence of the insurance coverage required under this agreement, PERMITTEE shall furnish certificate(s) of insurance to AVIATION no later than the effective date of this Agreement. The certificate(s) must clearly reflect compliance with the relevant terms of this section and be obtained from insurers with a Best's rating of not less than "A" or with approved Oregon surplus lines insurers.

e. Adjustments: The parties agree that in the event the insurance limitations required herein are determined by legislation, court action or otherwise to be inadequate, the insurance requirements shall be adjusted within thirty days to comply with the new requirements.

f. Failure to maintain insurance: Failure to keep required insurance in effect or failure to provide proof, upon request by AVIATION, of continuance of such insurance is grounds for default and termination pursuant to ODA regulation and this agreement.

14. ASSIGNMENT:

a. PERMITTEE shall not assign, delegate or otherwise transfer any of its rights or obligations under this agreement without first obtaining the written consent of AVIATION, which AVIATION will not unreasonably withhold. This agreement is binding upon and inures to the benefit of each of the parties, and, except as otherwise provided, their permitted legal successors and assigns.

15. RECORDS:

a. PERMITTEE shall keep proper books of account and other records pertaining to its airport access payment records. The books and records shall be available at all times during normal business hours to AVIATION and its authorized representatives, including but not limited to the Oregon Secretary of State and the Federal Government, which may inspect all such books and records to ascertain compliance with the terms and conditions of this agreement.

16. AIRPORT REGULATIONS:

a. PERMITTEE's use of the Access Point and Airport under this agreement is subject to all existing and future regulations adopted by the FAA and State Aviation Board relative to the operation of the Aurora State Airport, and PERMITTEE agrees to comply with all of the provisions of such regulations. The

operations conducted at this airport must be in compliance with all applicable Federal Aviation Regulations, grant assurances, Oregon AVIATION Laws, and traffic patterns as established at the Airport.

17. COMPLIANCE WITH THE LAW:

a. PERMITTEE shall comply with all laws, ordinances, rules and regulations promulgated by any lawful authority of the United States, the State of Oregon, or any municipal subdivision having authority over or jurisdiction of the premises, including, but not limited to safety, health, sanitary, fire, electrical and building codes, zoning and state and local comprehensive plans and criminal laws, relating to its use of the Access Point, Airport and the Property under this Agreement.

b. PERMITTEE shall register annually with AVIATION any aircraft owned by PERMITTEE and based at the Airport, in compliance with ORS 837.015 , "Registration of aircraft' and 837.040 "Persons required to register aircraft"

c. PERMITTEE and any pilot operating any of PERMITTEE's aircraft, other than out-of-state pilots not conducting commercial operations, shall register with AVIATION as required by ORS 837.020, "Registration of Pilots."

18. PROTECTION OF THE AIRPORT'S IMAGINARY SURFACES:

a. AVIATION may take any action it considers necessary to protect the Airport's imaginary surfaces, as defined in Federal Aviation Regulations (FAR), Part 77, and Oregon Administrative Rules against obstructions, and may prevent PERMITTEE from constructing, altering, erecting, or placing any structure, building or object on the Property, Access Point, or the Airport which, in the opinion of AVIATION, would limit the usefulness of the Airport or constitute a hazard to aircraft.

b. PERMITTEE shall submit notice to the Federal Aviation Administration (FAA) of any and all proposed construction or alteration on or adjacent to the Property to AVIATION on FAA Form 7460-1 "Notice of Proposed Construction or Alteration" as prescribed in FAR § 77.17. PERMITTEE shall obtain AVIATION's written approval prior to commencing any construction activities on Aviation Property.

19. AVIATION'S RIGHT OF ENTRY:

a. AVIATION may enter through the Access Point at any reasonable time to ascertain compliance with the terms of this Agreement.

20. DEFAULT:

a. The following are events of default:

i. Default in access fee: Failure of PERMITTEE to pay any fee or other charge within 60days after it is due.

ii. Default in Other Covenants: Failure of PERMITTEE to comply with any term of this Agreement, other than payment of fees or other charges, within 30 days after written notice by AVIATION specifying the nature of the default with reasonable particularity. If the default is of such a nature that it cannot be completely remedied within the 30-day period, PERMITTEE will not be in default if PERMITTEE begins correction of the default within the 30-day period and thereafter proceeds with reasonable diligence and in good faith to effect the remedy as soon as practicable.

iii. Abandonment: Failure of PERMITTEE to pay for or use the Access Point, unless such failure is excused under other provisions of this Agreement.

iv. Bankruptcy: PERMITTEE enters bankruptcy proceedings and the trustee in such proceedings fails to assume this Agreement.

21. REMEDIES:

a. Upon the occurrence of any one or more events of Default, and after giving PERMITTEE notice as provided in Oregon Administrative Rule 738-015-0090, AVIATION may exercise any one or more of the following remedies, or any other remedy available in law or equity:

i. Remove or occupy any property of either PERMITTEE or PERMITTEE'S unit owners located on any portion of the Airport;

ii. Deny PERMITTEE or PERMITTEE'S unit owners any of their rights under the terms of this agreement, including the rights of ingress and egress to and from the Point of Ingress/Egress.

iii. Recover all unpaid fees due under this agreement, and damages caused by the default including attorney fees, including an administrative fee equal to ten percent of such past due fees or amounts; or

iv. Terminate this agreement, by written notice mailed to PERMITTEE at the addresses set forth in the signatures section of this agreement, and pursue all additional remedies available at law or in equity.

22. TERMINATION:

This Agreement shall terminate upon:

a. Mutual written agreement of the parties.

b. Conveyance, sale or transfer of PERMITTEE's interest in the Property.

c. Termination upon Default.

i. Upon the occurrence of any one or more events of Default and notice required under this Agreement, AVIATION may, in addition to any other remedy available in law or equity, terminate this Agreement by giving written notice to PERMITTEE, as provided in Oregon Administrative Rule 738-015-0090.

ii. Upon termination of this agreement, PERMITTEE and its agents, contractors, employees, tenants or other designees shall immediately cease use of the Access Point, and AVIATION may reenter, block and/or take possession of the Access Point and remove any persons or property therefrom by legal action or by self-help without liability for damages and without having accepted surrender of access. AVIATION may take possession of and remove any personal property belonging to PERMITTEE, its agents, contractors, employees, tenants or other designees located or affixed to the Airport property.

iii. Damages. In the event of termination or retaking of possession of the Access Point following default, AVAITION may recover immediately, without waiting until the due date of any future fees or until the date fixed for expiration of the term of this Agreement, the following amounts as damages:

1. All fees and charges prepaid by PERMITTEE;

2. The loss of income from date of default until a new access agreement is, or with the exercise of reasonable efforts could have been, secured and paying access fees and charges; and

3. The reasonable costs of reentry and repossession of the Access Point and any persons or property from the Access Point or Airport, as described in subsection b. above, including the cost of any cleanup, refurbishing, removal, and storage of said property, or any other expense occasioned by PERMITTEE's default, including any repair costs, attorney fees, and court costs.

d. Termination for Airport Development: Relocation of Access Point. If AVIATION determines that relocation or termination of the Access Point is required for Airport development in accordance with the Airport Master Plan and FAA-approved Airport Layout Plan, AVIATION may offer an alternative Access Point to PERMITTEE, if available, or if no suitable alternative Access Point is available, or PERMITTEE chooses not to relocate within 10 days, this Agreement may be terminated by either party. Upon termination, PERMITTEE shall vacate and cease all use of the Access Point. No compensation is due for loss of renewal

terms. AVIATION shall prorate and return to PERMITTEE any prepaid fees upon satisfactory vacation and closure of the Access Point.

e. Termination Upon Necessary Closure or Sale of the Airport: If the State Aviation Board determines that it is necessary or advisable to abandon, close or convey the Airport due to the development or uncontrollable hazards to flight operations, lack of public use, prohibitive maintenance costs, legislative actions or other cause, AVIATION may terminate this Agreement upon 60 days written notice to PERMITTEE.

f. Survival: Unless otherwise specified in this Agreement, all fees, charges or liabilities owing or arising under this agreement shall survive termination of this agreement.

23. NO WARRANTY OF NON-INTERFERENCE BY ENTITIES OUTSIDE AVIATION'S CONTROL:

a. PERMITTEE acknowledges that actions of local government units, of parties holding land or living adjacent to the Airport, and of government entities not subject to AVIATION's influence and control, may have adverse impacts upon the number and character of flights and other operations at the Airport. However, if, through no fault of PERMITTEE, such actions by others make PERMITTEE's use of the Access Point, Airport or Property economically unfeasible, PERMITTEE may terminate this Agreement by giving written notice to AVIATION.

24. NOTICES:

a. Any notices required under this agreement shall be in writing and given by personal delivery, facsimile or deposit in the regular United States Mail, postage prepaid. Any notice delivered by mail is deemed given three days after mailing as provided above. Any notice delivered by facsimile is deemed given when a confirmation of successful transmission is generated by the transmitting machine. To be effective against AVIATION, facsimile transmission must be confirmed by telephone notice to an employee at the Department of Aviation, at (503) 378-4880. Any communication or notice by personal delivery is deemed given when actually delivered. A party may designate a change of address by written notice to the other party.

b. Notices to AVIATION must be directed to the following address and facsimile number:

Oregon Department of Aviation
3040 25th Street SE
Salem, Oregon 97302
Phone: (503) 378-4880
Fax: (503) 373-1688

c. Notices to PERMITTEE must be directed to the address and facsimile number provided on the signature page of this Agreement.

25. COVENANTS:

a. The covenants of this Agreement are continuing covenants, and waiver, whether express or implied by AVIATION or LESSEE, of any breach of these covenants may not be deemed a wavier of subsequent breaches.

26. ENTIRE AGREEMENT:

a. This Agreement, together with the exhibits attached hereto, constitutes the entire agreement between the Parties and merges all prior and contemporaneous communications with respect to the rights and obligations hereunder. Any future agreements between the parties relative to this Agreement is ineffective to modify or discharge this Agreement, in whole or in part, unless it is in writing and executed with the same formalities as this instrument. PERMITTEE, by signing below, hereby acknowledges reading this Agreement, understanding it, and agreeing to be bound by its terms.

27. SUBORDINATION TO FEDERAL-STATE AGREEMENTS:

a. The provisions of this Agreement shall be subordinate to any existing or future agreement between AVIATION and the United States relative to the operation or maintenance of the Airport, the execution of which has been or may be required as a condition precedent to the receipt of federal funds for the development of the airport. Failure of PERMITTEE to comply with any of the requirements of any existing or future agreement between AVIATION and the United States shall be cause for immediate termination of PERMITTEE's rights hereunder.

b. During a time of war or national emergency, AVIATION may lease the landing area or any part of it to the United States for military or other federal government purposes, and, if this occurs, any term of this Agreement that is inconsistent with the any term in such a lease to the federal government is deemed to be suspended while such a lease is in effect. This Agreement shall be reinstated at such time as the lease with the federal government is terminated. Suspended time shall be considered as part of the term of this lease and will not extend the expiration date of this agreement. The fee to be paid by PERMITTEE to AVIATION provided for in Oregon Administrative Rule 738-010-0025 shall be waived during such time as any lease with the federal government is in effect.

28. AVIATION'S RIGHT TO DEVELOP THE AIRPORT:

a. AVIATION reserves its right to further develop or improve the Airport in accordance with its duty to develop aviation within the State of Oregon as dictated by the demands of air traffic and aviation safety.

29. NO EXCLUSIVE RIGHT:

a. Nothing herein contained shall be construed to grant or authorize the granting of an exclusive right prohibited by Section 308 of the Federal Aviation Act of 1958.

30. TIME:

a. Time is of the essence of every term of this Agreement.

31. AUTHORITY:

a. All powers and authority conferred upon PERMITTEE by this Agreement are to be strictly construed, and no other power may be lawfully exercised by PERMITTEE without AVIATION's prior written consent. PERMITTEE has no authority to act on behalf of AVIATION, or to bind AVIATION to any third party, contractually or otherwise.

b. The terms of this Agreement may not be construed to make PERMITTEE an officer, employee or agency of the State of Oregon or its Department of Aviation, as those terms are used in ORS 30.265.

c. The person executing this Agreement on behalf of PERMITTEE represents that he or she has the legal power, right, and actual authority to bind PERMITTEE to the terms and conditions of this Agreement.

d. The State Aviation Board, by duly-adopted Delegation Order No. 1, dated October 12, 2000, has authorized the Director of the Department of Aviation to act in its behalf in approving and executing this agreement.

[Remainder of page intentionally left blank; signature page to follow.]

EXECUTED by the parties as of the last date written below.

STATE OF OREGON, by and through its Department of AVIATION:

By: _____ Date 7/31/14

As: STATE AIRPORTS MANAGER

LESSEE: SOUTHEND CORPORATE AIRPARK CONDOMINIUM OWNERS ASSOCIATION

By: _____ Date: 7-25-14

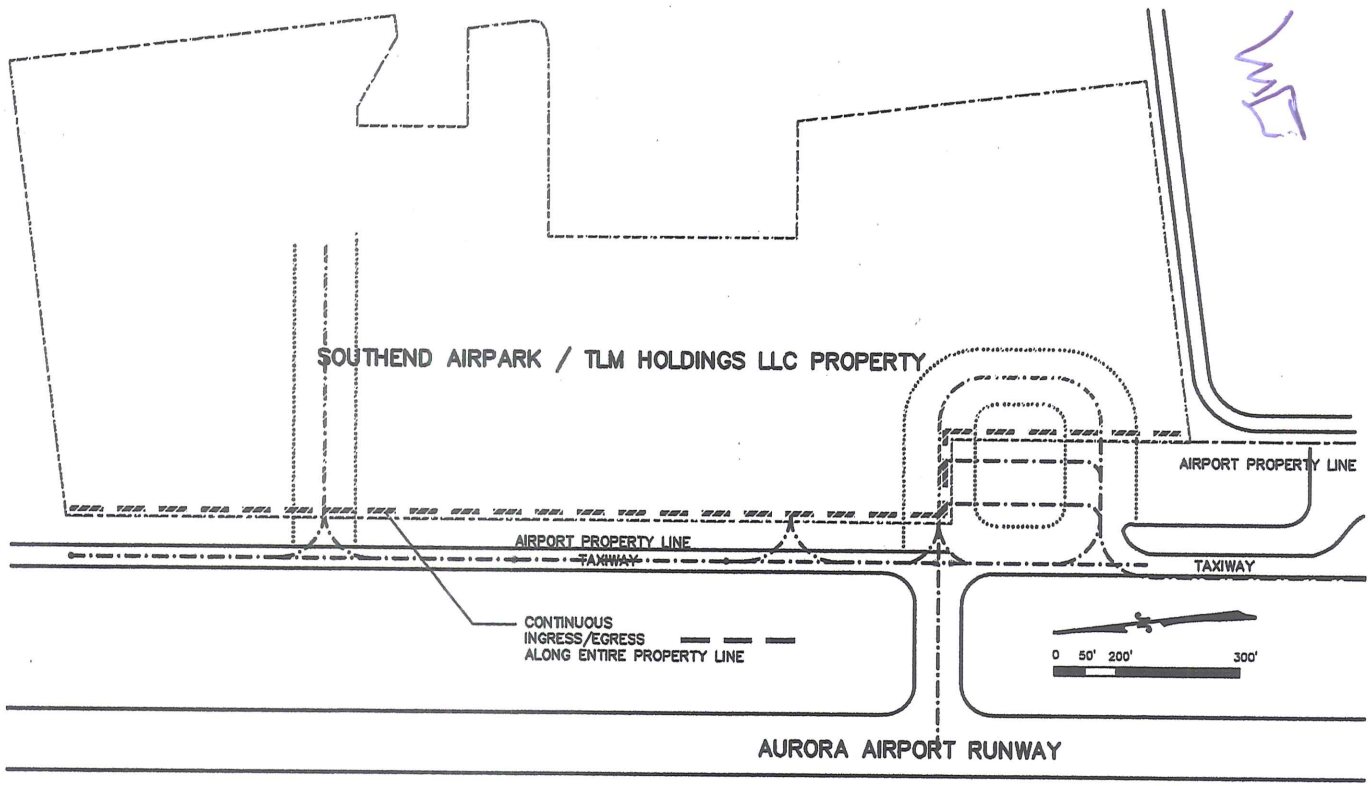
As: President

Address: 14355 Keil Rd NE, Suite 11

Aurora, OR 97002

Telephone (Daytime) (503) 709-7711 (Other)_____

email: tmillar@southendairpark.com



1 ACCESS TO PROPERTY FROM AURORA TAXIWAY
SCALE: 1" = 300'-0"

ARON
FAEGRE
AND
ASSOCIATES
520 S.W. YAMHILL
PORTLAND
OREGON
97204
503-222-2546

SOUTHEND AIRPARK LLC

ACCESS FROM AURORA TAXIWAY

AURORA AIRPORT, AURORA, OREGON

TAXIWAY ACCESS FROM RUNWAY

DATE: 7/10/2014

COMPUTER NAME: SOUTHEND-HD | DRAWN BY: CDA | MB

PLOT FILE NAME: | CHECKED BY: AF

REVISIONS

NO.	DATE:	DESCRIPTION:

PAGE:

EXHIBIT B

Outlook

Fw: Completed: Complete with Docusign: Final HDSE -AAIA Feedback to RPA to KUAO MP.pdf

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-02-04 4:26 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

2 attachments (19 MB)
Final HDSE -AAIA Feedback to RPA to KUAO MP.pdf; Rutland Airport Layout Plan (DRAFT Sept 2021) 20210913 reduced.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Helbling, Tony <helbling@wilsonconst.com>
Sent: Tuesday, January 21, 2025 3:34 PM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: wk@klgpc.com <wk@klgpc.com>; tmillar@wwpmi.com <tmillar@wwpmi.com>; Lukas Nickerson <Luke@flyaerometal.com>; Aron Faegre <faegre@earthlink.net>; Bruce Bennett <bruce@auroraaviation.com>
Subject: FW: Completed: Complete with Docusign: Final HDSE -AAIA Feedback to RPA to KUAO MP.pdf

Please enter into Master Plan record…

Tony Helbling
Logistics Manager
Wilson Construction Company
1190 NW 3rd Ave
Canby, OR 97013
Cell: 503-519-6059
Office: 503-263-6882
helbling@wilsonconst.com
www.wilsonconst.com

From: DocuSign NA4 System <dse_NA4@docusign.net>
Sent: Tuesday, January 21, 2025 3:28 PM
To: Helbling, Tony <helbling@wilsonconst.com>
Subject: Completed: Complete with Docusign: Final HDSE -AAIA Feedback to RPA to KUAO MP.pdf

docusign

Your document has been completed

VIEW COMPLETED DOCUMENT

Lukas Nickerson
nickersonlukas@gmail.com

All parties have completed Complete with Docusign: Final HDSE -AAIA Feedback to RPA to KUAO MP.pdf.

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January 21, 2025

Alex Thomas, Planning and Programs Manager
Tony Beach, State Airports Manager
Brandy Steffen, JLA
Oregon Department of Aviation
3040 25th St SE
Salem, OR 97602
Alex.R.Thomas@odav.oregon.gov

Re – Comments to Refined Preferred Alternative, Aurora State Airport Master Plan, Report on HDSE Easement, Drain Field Options, and AAIA's Request for Involvement in Master Plan Process

Dear Mr. Thomas,

Please include documents in the record.

1. HDSE Easement and Drain Field Lease

HDSE enjoys an easement in perpetuity for its drain field, which is located at the south end of Aurora Airport, inside the Runway Safety Area (RSA). In addition to the easement, HDSE holds a lease for the drain field. HDSE properly executed the first of two five-year extensions for the lease, with the first extension period ending in August 2029.

Should the Oregon Department of Aviation (ODAV) determine, for any reason, that the drain field needs to be relocated, it will be ODAV's responsibility to financially compensate HDSE for its investment in the drain field, which was made in good faith. The following are proposed options for addressing the current situation with the drain field:

Proposed Options for the Drain Field:

- **Option 1a: Retain the Current Drain Field and Install Geo-Tech Fabric System**

  One option is to leave the drain field in its current location and install a geo-tech fabric system. This system, as per the previously submitted study, would support the operation of a CII (Civil International) aircraft and rescue

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equipment, in compliance with the FAA guidelines set forth in AC150/5300-13b, sections 3.10.1.4 and 3.3.a. This would allow the drain field to remain in place as a previously constructed, man-made improvement, like examples such as “a railroad at the end” outlined in FAA Order 5200.8, Appendix 1, 2.d. If necessary, this option could be combined with the following option, 1b.

- **Option 1b: Retain the Current Drain Field and Install Engineered Material Arresting System (EMAS)**

  Another option is to keep the drain field in its current position and, in accordance with AC150/5300-13b, section 3.10.2.3, install an Engineered Material Arresting System (EMAS) to provide protection for CII aircraft within the RSA. The attached document in Tab A outlines this approach. The benefits of implementing EMAS at KUAO are numerous:

  - The overrun area at the end of the runway provides an additional 300 feet of space for aircraft to begin their takeoff roll, allowing for an earlier rotation compared to the Refined Preferred Alternative.
  - An earlier rotation translates to higher altitudes and reduced noise levels over congested areas in the event of an overflight directed by Air Traffic Control (ATC).
  - This solution would enhance the safety of operations for both based and transient CII aircraft.
  - The system would improve operational efficiency for based and transient aircraft, contributing to the overall performance of the airport.

- **Option 1c: Relocate the Drain Field**

  The third option is to move the drain field to a designated acquisition property located directly east of its current position, outside the RSA but within the new airport boundary. This relocation would provide several key advantages:

  - The property could be utilized to its best and highest potential, supporting and protecting investments at KUAO, in accordance with Oregon Revised Statute (ORS) 836-642.
  - The relocation would minimize the airport's impact on surrounding valuable farmland by negating the need to establish a drain field outside the airport’s boundaries.

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- A larger area for the drain field could be developed, potentially serving the entire airport's needs.

2. AAIA's Request for Involvement in the Master Plan Process

The AAIA (Aviation Airport Industry Association) strongly requests that ODAV involve Through the Fence (TTF) parties as collaborative partners in the airport Master Plan process moving forward. This request applies across all state airports. The AAIA highlights the following reasons for their involvement:

- **Direct Impact and Proximity:** Through the Fence parties are located within the confines of the airport property, meaning they are directly affected by any developments or changes proposed in the Master Plan. As such, their interests and operations are more closely impacted than those of any other participants in the planning process.
- **Private Investments Based on ORS 836-642:** Through the Fence parties have made private investments based on the efficacy and stipulations of Oregon Revised Statute 836-642. These investments contribute to the airport's development and its operational success.
- **Source of Airport Improvement Needs:** The investments made by TTF parties contribute directly to the need for airport improvements. These improvements, in turn, are necessary for ensuring safety, efficiency, and respectful business operations, which must be coordinated with the surrounding communities.

In conclusion, HDSE and AAIA advocate for greater collaboration between ODAV and Through the Fence parties to ensure the future growth and operational success of state airports. Their inclusion in the planning process would allow for better alignment of goals, enhance safety, and support the continued development of the state's aviation infrastructure.

Sincerely,

DocuSigned by:
B1DF5D2DC4E84A4...

Lukas Nickerson
Chair
HDSE

Signed by:
Tony Helbling
7130B3F86BAC419...

Tony Helbling
Chair
AAIA

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Tab A

We consulted with Runway Safe Inc. in Logan Township, NJ with primary staff and Mike Barnes as their lead contact person, knowing that they provide an FAA approved Engineered Materials Arrestor System (EMAS) regularly used to reduce the length of Runway Safety Areas (RSA) per AC150-5300-13B Section 3.10.2.3:

> ***Engineered Materials Arresting Systems (EMAS).***
> *Installing EMAS is an acceptable alternative where it is not practicable to obtain the standard RSA dimensions. A properly designed EMAS decelerates an aircraft during an excursion incident without damaging the landing gears, thus providing an equivalent level of safety to a standard RSA. The presence of an EMAS does not diminish the standard RSA width. Refer to AC 150/5220-22, Engineered Materials Arresting Systems (EMAS) for Aircraft Overruns, for guidance on planning, design, installation, and maintenance of EMAS. Refer to FAA Order 5200.9, Financial Feasibility and Equivalency of Runway Safety Area Improvements and Engineered Material Arresting Systems, to determine the best practical and financially feasible alternative. Key design considerations for EMAS performance include:*
> *1. Aircraft weight, landing gear configuration, tire pressure, and entry speed.*
> *2. Stopping the "EMAS critical aircraft" upon exiting the runway at 70 knots is a primary design condition.*
> *3. Application of a standard EMAS may maximize the available runway length.*

We discussed the specifics of the Aurora Airport master plan considerations for preserving the drain fields that are necessary for supporting the 1,500 jobs on the airport. In learning more about their EMAS system, we learned that the EMAS material itself is set back approximately 350 feet from the end of the runway, allowing those 300 feet to also function as more runway for takeoffs (but not for landings).

Runway Safe Inc. suggested Aurora might use a design similar to their design that was installed with FAA funds at Rutland – Southern Vermont Regional Airport, which is a C-II airport. It is an example of what could serve Aurora very well. Attached is the Rutland ALP showing how it is placed at the approach end of Runway 1 which then the FAA approves at a 600 foot RSA in lieu of the standard 1000 foot long RSA.

The Rutland 2022 MP describes the use of EMAS for Runway 1 as follows:

> ***3.2.3.2 Runway Safety Area (RSA)***

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> *According to AC 150/5300-13A, standard RDC C-II runway dimensions include a length beyond the runway end of 1,000 feet, a length prior to the runway end of 600 feet, and may have a width as narrow as 400 feet. Runway 1 is equipped with a 300-foot Engineered Materials Arresting System (EMAS), effectively reducing the required RSA length beyond the departure end to 600 feet. Approximately 600 feet beyond the Runway 19 end, the terrain decreases substantially to Vermont State Route 103 and does not provide the standard 1,000' length. However, this non-standard length was found acceptable as part of a 2007 RSA Determination by the FAA. As activity levels and the design aircraft are not forecast to substantially change during the planning period, the RSA determination will likely remain valid. If the FAA determination is changed and a full 1,000-foot RSA is necessary, it would then be recommended that the north end of the runway be equipped with an EMAS bed similar to the south end.*

As can be seen on the ALP, the FAA in this case allowed the 19 end of the Runway to even have a completely deficient RSA that has a road through it. The resolution was that in the future EMAS could be added there to solve that deficiency.

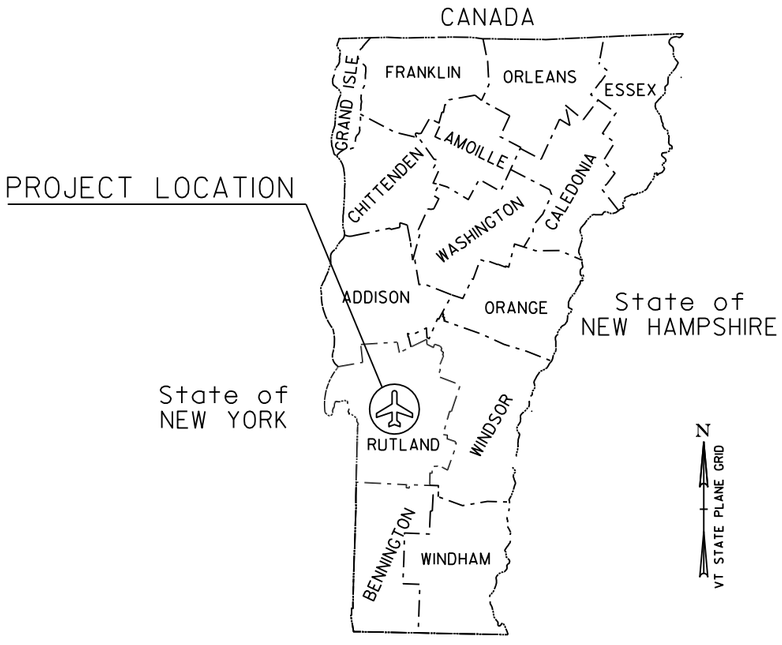
The Runway Safe Inc. staff coordinated with the State of Vermont's aviation department, which manages Rutland Airport. They would very much look forward to working with the ODAV in examining the potential use of EMAS at Aurora. They offered that ODAV staff could call:

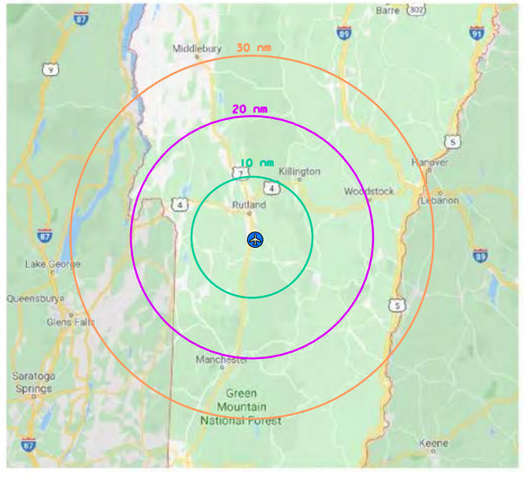
Mike Barnes can be reached directly at mike.barnes@runwaysafe.com or cellphone: 856-491-6315

(ENTIRE Rutland ALP sent in separate file)

VERMONT AGENCY OF TRANSPORTATION
RUTLAND - SOUTHERN VERMONT
REGIONAL AIRPORT
AIRPORT LAYOUT PLAN
SEPTEMBER 2021

SPACE RESERVED FOR
FAA APPROVAL





VICINITY MAP

SHEET INDEX		
SHEET NO.	DECRIPTION	REVISION DATE
1	TITLE SHEET	
2	AIRPORT DATA SHEET	
3	EXISTING AIRPORT LAYOUT PLAN	
4	FUTURE AIRPORT LAYOUT PLAN	
5	AIRPORT AIRSPACE PLAN	
6	RUNWAY 1 INNER PORTION OF APPROACH	
7	RUNWAY 19 INNER PORTION OF APPROACH	
8	RUNWAY 13 INNER PORTION OF APPROACH	
9	RUNWAY 31 INNER PORTION OF APPROACH	
10	RUNWAY OBSTRUCTION DATA OBSTRUCTION	
11	TERMINAL AREA PLAN	
12	LAND USE PLAN	
13	AIRPORT PROPERTY MAP	

REVISIONS

NO.	Description	Date	By

VERMONT AGENCY OF TRANSPORTATON

APPROVED _____ DATE _____
Daniel Delabruere
RAIL AND AVIATION BUREAU DIRECTOR

CHA
111 Winners Circle, PO Box 5269 Albany, NY 12205-0269
518.453.4500 · www.chacompanies.com

PROJECT NAME: AIRPORT LAYOUT PLAN
PROJECT NUMBER: CLARENDON-AV-FY17-007

FILE NAME: z16h171_cov.dgn
PROJECT LEADER: POM
DESIGNED BY: CJK/AJF
TITLE SHEET

PLOT DATE: 9/10/2021
DRAWN BY: MED
CHECKED BY: RTL
SHEET 1 OF 13

FILE NAME = V:\Projects\ANY\K65\36086\CADD_MSTN\16h171\Consultants\Aviation\z16h171_cov.dgn
DATE/TIME = 9/10/2021
USER = 4066

AIRPORT DATA

RUTLAND - SOUTHERN VERMONT REGIONAL AIRPORT
1002 Airport Road
North Clarendon, VT 05759

ITEM	Existing	Future
AIRPORT OWNER	Vermont Agency of Transportation	
STATE SERVICE LEVEL	National Service [1]	
NPIAS SERVICE LEVEL	Regional	
AIRPORT REFERENCE CODE / CRITICAL AIRCRAFT	C-II / Challenger 300	C-II / Challenger 300
MEAN MAXIMUM TEMPERATURE OF HOTTEST MONTH	80.2° F (July)	
AIRPORT ELEVATION (MSL) NAVD 88	787.3 FT	
MAGNETIC DECLINATION	13° 48' W ± 0° 23' changing by 0° 4' E per year [2]	
AIRPORT REFERENCE POINT (NAD 83)	LAT: 43° 31' 47.03"N Long: 72° 56' 58.65"W	LAT: 43° 31' 47.03"N Long: 72° 56' 58.65"W
AIRPORT NAVIGATIONAL AIDS AND MISCELLANEOUS FACILITIES	ILS, GPS, MALSR, PAPI-4, AWOS-3, Rotating Beacon	

Note 1: 2007 Vermont Airport System and Policy Plan
Note 2: NOAA National Centers for Environmental Information, August 2021

RUNWAY SAFETY AREA DATA

DESCRIPTION		RUNWAY 1-19 EXISTING/FUTURE 1	RUNWAY 1-19 EXISTING/FUTURE 19	RUNWAY 13-31 EXISTING/FUTURE 13	RUNWAY 13-31 EXISTING/FUTURE 31
RUNWAY SAFETY AREA (RSA)	(R) LENGTH BEYOND RUNWAY END	600 FT	1,000 FT	300 FT	300 FT
	(P) LENGTH PRIOR TO RUNWAY END	600 FT	600 FT	300 FT	300 FT
	(C) WIDTH	400 FT	400 FT	150 FT	150 FT
RUNWAY OBJECT FREE AREA (ROFA)	(R) LENGTH BEYOND RUNWAY END	1,000 FT	1,000 FT	300 FT	300 FT
	(P) LENGTH PRIOR TO RUNWAY END	600 FT	600 FT	300 FT	300 FT
	(Q) WIDTH	800 FT	800 FT	500 FT	500 FT
APPROACH RUNWAY PROTECTION ZONE (RPZ)	(L) LENGTH	1,700 FT	2,500 FT	1,000 FT	1,000 FT
	(U) INNER WIDTH	500 FT	1,000 FT	500 FT	500 FT
	(V) OUTER WIDTH	1,010 FT	1,750 FT	700 FT	700 FT
DEPARTURE RUNWAY PROTECTION ZONE (RPZ)	(L) LENGTH	1,700 FT	1,700 FT	1,000 FT	1,000 FT
	(U) INNER WIDTH	500 FT	500 FT	500 FT	500 FT
	(V) OUTER WIDTH	1,010 FT	1,010 FT	700 FT	700 FT
RUNWAY OBSTACLE FREE ZONE (ROFZ)	LENGTH BEYOND RUNWAY END	400 FT.	400 FT.	200 FT.	200 FT.
	WIDTH	400 FT	400 FT	250 FT	250 FT
PRECISION OBSTACLE FREE ZONE (POFZ)	LENGTH	N/A	200 FT	N/A	N/A
	WIDTH	N/A	800 FT	N/A	N/A

ALL WEATHER WIND COVERAGE

RUNWAY	10.5 KNOTS	13 KNOTS	16 KNOTS
1-19	92.90%	96.53%	99.06%
13-31	97.89%	99.16%	N/A
COMBINED	99.18%	99.80%	N/A

VFR WEATHER WIND COVERAGE

RUNWAY	10.5 KNOTS	13 KNOTS	16 KNOTS
1-19	92.60%	96.40%	99.06%
13-31	97.80%	99.12%	N/A
COMBINED	99.13%	99.79%	N/A

IFR WEATHER WIND COVERAGE

RUNWAY	10.5 KNOTS	13 KNOTS	16 KNOTS
1-19	96.41%	97.90%	99.04%
13-31	98.90%	97.90%	N/A
COMBINED	99.71%	99.88%	N/A

Data Source:
NOAA National Climatic Center Asheville, NC
Rutland - Southern Vermont Regional Airport
North Clarendon, VT 05759
Station 725165
20011- 2020

RUNWAY DATA

DESCRIPTION		RUNWAY 1-19 EXISTING 1	RUNWAY 1-19 EXISTING 19	RUNWAY 1-19 FUTURE	RUNWAY 13-31 EXISTING 13	RUNWAY 13-31 EXISTING 31	RUNWAY 13-31 FUTURE
RUNWAY LENGTH		5,304 FT		SAME AS EXISTING	3,169 FT		SAME AS EXISTING
RUNWAY WIDTH		100 FT			75 FT		
PAVEMENT TYPE / SURFACE TYPE		ASPHALT / GROOVED			ASPHALT		
PAVEMENT CONDITION		GOOD			GOOD		
PAVEMENT CONDITION NUMBER		73 (CY 2012)			87 (CY 2012)		
PAVEMENT STRENGTH (SINGLE)		40,000 LBS			30,000 LBS		
PAVEMENT STRENGTH (DUAL)		68,000 LBS			-		
EFFECTIVE RUNWAY GRADIENT		0.14%			0.00%		
MAXIMUM RUNWAY GRADIENT		< 0.5%			< 0.5%		
RUNWAY MEETS LINE OF SIGHT REQUIREMENTS? (YES/NO)		NO (TERRAIN)			NO (TERRAIN)		
APPROACH TYPE		NON-PRECISION	PRECISION		VISUAL	VISUAL	
APPROACH VISIBILITY MINIMUM		1 ¼ MILE	½ MILE [1]		VISUAL	VISUAL	
RUNWAY CATEGORY (14 CFR PART 77) / SLOPE		NON-PRECISION / 34:1	PRECISION / 50:1		VISUAL / 20:1	VISUAL / 20:1	
DESIGN AIRCRAFT		CHALLENGER 300			BEECH KING AIR 200		
RUNWAY DESIGN CODE (RDC)		C-II-2400			B-II-VIS		
APPROACH RUNWAY REFERENCE CODE (APRC)		B / III / 4000 D / II / 4000 B / II / 2400	B / III / 5000 D / II / 5000		B / II / VIS	B / II / VIS	
DEPARTURE RUNWAY SURFACE		YES	YES		NO	NO	
OBSTACLE CLEARANCE SURFACE (TABLE 3-2)		SEE OCS TABLE			SEE OCS TABLE		
TOUCHDOWN ZONE ELEVATION		787.3 FT	787.3 FT		784.5 FT	784.5 FT	
HORIZONTAL / VERTICAL DATUM		NAD 83 / NAVD 88	NAD 83 / NAVD 88		NAD 83 / NAVD 88	NAD 83 / NAVD 88	
AERONAUTICAL SURVEY		VGS	VGS		NVGS	NVGS	
RUNWAY MARKINGS		NON-PRECISION	PRECISION		VISUAL	VISUAL	
RUNWAY LIGHTING		MIRL			MIRL		
APPROACH LIGHTING		NONE	MALSR		NONE	NONE	
INSTRUMENT & NAVIGATIONAL AIDS		GPS	ILS, GPS, PAPI-4		REIL	NONE	
DISPLACED THRESHOLD COORDINATES & ELEVATIONS	LATITUDE	43° 31' 29.61"N	N/A		N/A	N/A	
	LONGITUDE	72° 56' 58.21"W	N/A		N/A	N/A	
	DISTANCE	300 FT	N/A		N/A	N/A	
	ELEVATION	782.6 FT	N/A		N/A	N/A	
RUNWAY END COORDINATES & ELEVATIONS	LATITUDE	43° 31' 26.65"N	43° 32' 19.01"N		43° 31' 44.82"N	43° 31' 29.82"N	
	LONGITUDE	72° 56' 58.11"W	72° 56' 59.96"W		72° 57' 16.90"W	72° 56' 39.14"W	
	ELEVATION	781.3 FT	774.0 FT		782.3 FT	782.2 FT	
DECLARED DISTANCES	TORA	5,303 FT	5,303 FT		N/A	N/A	
	TODA	5,303 FT	5,303 FT		N/A	N/A	
	ASDA	4,900 FT	5,303 FT		N/A	N/A	
	LDA	4,600 FT	5,303 FT		N/A	N/A	
	CLEARWAY	N/A	N/A		N/A	N/A	
	STOPWAY	N/A	N/A		N/A	N/A	

Note 1: Visibility Minimum for Runway 19 S-LOC Approach

TAXIWAY DATA

TAXIWAY NAME	TAXIWAY LIGHTING	TAXIWAY DESIGN GROUP	TAXIWAY WIDTH	TAXIWAY SAFETY AREA	TAXIWAY OBJECT FREE AREA	TW to RW CENTERLINE SEPERATION
EXISTING/FUTURE	EXISTING/FUTURE	EXISTING/FUTURE	EXISTING/FUTURE	EXISTING/FUTURE	EXISTING/FUTURE	EXISTING/FUTURE
A	MITL	2	50 FT	118 FT	186 FT	238 FT
B	MITL	2	35 FT	79 FT	131 FT	239 FT
C	MITL	2	50 FT	118 FT	186 FT	238 FT
D	NONE	2	35 FT	79 FT	131 FT	240 FT
F	NONE	2	30 FT	79 FT	131 FT	N/A
G	MITL	2	35 FT	79 FT	131 FT	N/A
H	MITL	2	50 FT	118 FT	118 FT	N/A
J	MITL	2	50 FT	118 FT	118 FT	N/A

MODIFICATIONS TO FAA DESIGN STANDARDS

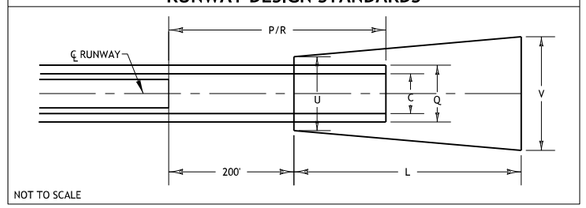
APPROVAL DATE	AIRSPACE CASE NO.	MODIFIED STANDARD	DESCRIPTION
NONE	NONE	NONE	NONE

OBSTACLE CLEARANCE SURFACES (OCS)

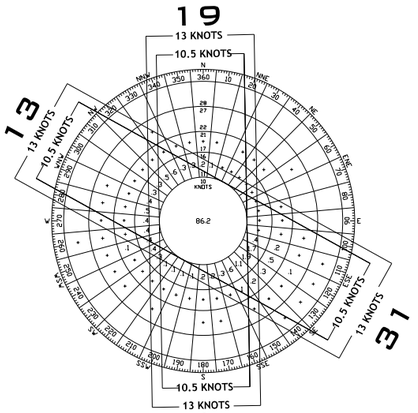
RUNWAY	ROW/TYPE	SLOPE	A	B	C	D	E
1	4	20:1	200 FT	400 FT	3,400 FT	10,000 FT	0 FT
19	5	34:1	200 FT	800 FT	3,400 FT	10,000 FT	0 FT
	6	30:1	0 FT	300 FT	1,520 FT	10,000 FT	0 FT
13	2	20:1	0 FT	250 FT	700 FT	2,250 FT	2,750 FT
31	2	20:1	0 FT	250 FT	700 FT	2,250 FT	2,750 FT

Source: FAA Engineering Brief 99A

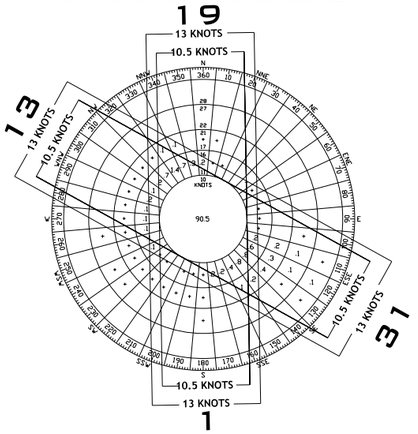
RUNWAY DESIGN STANDARDS



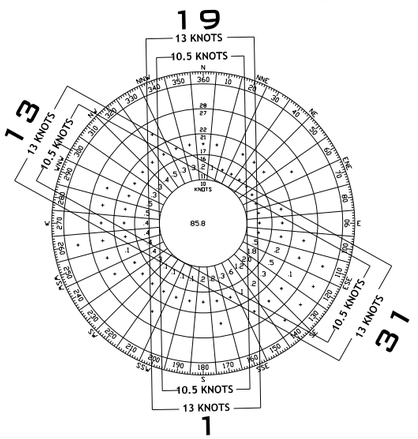
ALL-WEATHER WIND COVERAGE



IFR CONDITION WIND COVERAGE



VFR CONDITION WIND COVERAGE



REVISIONS

NO.	Description	Date	By

CHA
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518.453.4500 • www.chacompanies.com

PROJECT NAME: AIRPORT LAYOUT PLAN
PROJECT NUMBER: CLARENDON-AV-FYI7-007

FILE NAME: z16hl7l_data_sheet.dgn
PROJECT LEADER: POM
DESIGNED BY: CJK/AJF
AIRPORT DATA SHEET

PLOT DATE: 9/10/2021
DRAWN BY: MED
CHECKED BY: RTL
SHEET 2 OF 13

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DATE/TIME = 9/10/2021
USER = 4066

AIRPORT FACILITIES

IDENTIFIER	FACILITY	TOP ELEVATION (MSL)
E1	CORPORATE HANGAR (OMYA)	816.6'
E2	CIVIL AIR PATROL	801.4'
E3	CORPORATE HANGAR (S.D. AIRCRAFT)	806.6'
E4	ARFF STATION	796.4'
E5	CIVIL AIR PATROL	804.2'
E6	VTRANS HANGAR/SRE STORAGE	813.6'
E7	TERMINAL BUILDING	811.8'
E8	CORPORATE HANGAR (PRIVATE)	802.8'
E9	CORPORATE HANGAR (PRIVATE)	808.8'
E10	CORPORATE HANGAR (COLUMBIA AIR)	812.2'
E11	CORPORATE HANGAR (PRIVATE)	806.4'
E12	CORPORATE HANGAR (COLUMBIA AIR)	814.6'
E13	FBO BUILDING (COLUMBIA AIR)	801' (EST.)
E14	CORPORATE HANGAR (COLUMBIA AIR)	815'
E15	T-HANGAR (5-STALLS)	805.1'
E16	T-HANGAR (7-STALLS)	805.1'
E17	FUEL FARM (LIGHT POLE)	10'
E18	SEGMENTED CIRCLE	785'
E19	CORPORATE HANGARS (PRIVATE)	801.6' - 806.7'
E20	SOLAR ARRAY	791' (EST.)
E21	AWOS-III	825.2'
E22	VTRANS STORAGE FACILITIES	775.2' - 780.3'

THRESHOLD LIGHTS
RUNWAY 31 END
LAT: 43° 31' 29.82" N
LONG: 72° 56' 39.14" W
ELEV: 782.2' MSL
RUNWAY LOW POINT
NGS MONUMENT (SACS) AH4606
HIGH POINT ELEV: 722.0'
EXIST. OSC (#2) 20:1 SLOPE
EXIST. PART 77 20:1 SLOPE
HIGH POINT ELEV: 728.0'
RUNWAY 31 RPZ 500' x 700' x 1,000'
ARP
LAT: 43° 31' 47.03" N
LONG: 72° 56' 58.65" W
BEACON 846.5 MSL
TERMINAL PARKING LOT
360,000 SF
GEORGE ROAD
RUNWAY 1 END
LAT: 43°31'26.65" N
LONG: 72°56'58.11" W
ELEV: 781.3' MSL
RUNWAY 19 END
LAT: 43° 32' 19.01" N
LONG: 72° 56' 59.96" W
ELEV: 774.0' MSL
RUNWAY LOW POINT
HIGH POINT ELEV: 722.0'
THRESHOLD LIGHTS
AIRPORT ROAD
AIRPORT PROPERTY LINE
SERVICE ROAD (FORMER TWY E)
TAXIWAY "H"
TAXIWAY 'C'
EXIST. DEPARTURE SURFACE 40:1 SLOPE
EXIST. PART 77 APPROCH 34:1 SLOPE
EXIST. OCS (#4) 20:1 SLOPE
EXIST. PART 77 50:1 SLOPE
EXIST. OCS (#5) 34:1 SLOPE
EXIST. OCS (#6) 30:1 SLOPE
MALSR
STATE ROUTE 103
TAXIWAY 'J'
TAXIWAY 'A'
PAPI
TAXIWAY 'B'
TAXIWAY 'A'
RUNWAY 19 (5304' x 100')
N 1°9'25" W (TRUE)
RUNWAY 1 DEPARTURE RPZ 500' x 1,010' x 1,700'
HIGH POINT ELEV: 696.0'
MILL RIVER
P-VASI (INOPERATIVE)
EMAS
LOCALIZER
END FIRE ILS
GLIDESLOPE CRITICAL AREA
TAXIWAY 'G'
TAXIWAY 'B'
RUNWAY 1 DISPLACED THRESHOLD LAT: 43°31'29.61" N LONG: 72°56'58.21" W ELEV: 782.6' MSL
FORMER VOR (DECOMMISSIONED)
TAXIWAY 'D'
LOCALIZER CRITICAL AREA
THRESHOLD LIGHTS
AIRPORT PROPERTY LINE
RUNWAY INTERSECTION ELEV: 782.2' MSL
RUNWAY 1 APPROACH RPZ 500' x 1,010' x 1,700'
HIGH POINT ELEV: 708.0'
RUNWAY 19 RPZ 1,000' x 2,500' x 1,750'
STATE ROUTE 7B
FENCE (TYP.)
RUNWAY 1-19 HIGH POINT/TDZE ELEV: 787.3' MSL
AWOS CRITICAL AREA
TAXIWAY 'F'
INNOVATION DR.
RUNWAY 13-31 HIGH POINT/TDZE ELEV: 784.5' MSL
NGS MONUMENT (SACS) AH4611
RUNWAY 13 END
LAT: 43° 31' 44.82" N
LONG: 72° 57' 16.90" W
ELEV: 782.2' MSL
STATE ROUTE 7
HIGH POINT ELEV: 712.0'
HIGH POINT ELEV: 716.0'
THRESHOLD LIGHTS
HIGH POINT ELEV: 784.0'
RUNWAY 13 RPZ 500' x 700'' x 1,000'
EXIST. PART 77 20:1 SLOPE
EXIST. OCS (#2) 20:1 SLOPE

LEGEND

- EX. BUILDING
- AIRFIELD PAVEMENT
- EX. AVIGATION EASEMENTS
- CREEK / WATERWAY
- 800 — ELEVATION CONTOURS
- RPZ — RUNWAY PROTECTION ZONE (RPZ)
- RSA — RUNWAY SAFETY AREA (RSA)
- ROFA — RUNWAY OBJECT FREE AREA (ROFA)
- ROFZ — RUNWAY OBSTACLE FREE ZONE (ROFZ)
- RVZ — RUNWAY VISIBILITY ZONE (RVZ)
- TSA — TAXIWAY SAFETY AREA (TSA)
- TOFA — TAXIWAY OBJECT FREE AREA (TOFA)
- BRL — 35' BUILDING RESTRICTION LINE (BRL)

N

DECLINATION: 13° 48' W ± 0° 23'
CHANGING BY 0° 4' E/YEAR
ON AUGUST 2021

0 300 600
SCALE IN FEET

- NAVAID CRITICAL AREA
- PART 77 APPROACH SURFACE
- OBSTACLE CLEARANCE SURFACE (OCS)
- EX. AIRPORT PROPERTY LINE
- EX. FENCE LINE
- SURVEY MARKER
- AIRPORT REFERENCE POINT (ARP)
- EX. WINDCONE

VERMONT AGENCY OF TRANSPORTATION

APPROVED: _____

Daniel Delabruere
RAIL AND AVIATION BUREAU DIRECTOR

DATE _____

SPACE RESERVED FOR FAA APPROVAL

REVISIONS			
NO.	Description	Date	By

CHA
111 Winners Circle, PO Box 5269 Albany, NY 12205-0269
518.453.4500 • www.chacompanies.com

PROJECT NAME: AIRPORT LAYOUT PLAN
PROJECT NUMBER: CLARENDON-AV-FY17-007

FILE NAME: z16h17l_Exist Layout Plan.dgn
PROJECT LEADER: POM
DESIGNED BY: CJK/AJF
EXISTING AIRPORT LAYOUT PLAN
PLOT DATE: 9/10/2021
DRAWN BY: MED
CHECKED BY: RTL
SHEET 3 OF 13

FILE NAME = V:\Projects\ANY\X5\36086\CADD_MSTN\16h17l\Consultants\Aviation\z16h17l_Exist Layout Plan.dgn
DATE/TIME = 9/10/2021
USER = 4066

AIRPORT FACILITIES

IDENTIFIER	FACILITY	TOP ELEVATION (MSL)
F1	SMALL CORPORATE HANGAR (60' X 60')	TBD
F2	MEDIUM CORPORATE HANGAR (60' X 80')	
F3	LARGE CORPORATE HANGAR (120' X 120')	
F4	MEDIUM CORPORATE HANGAR (60' X 80')	
F5	CORPORATE HANGAR (130' X 220')	
F6	SMALL CORPORATE HANGAR (50' X 60')	
F7	SMALL CORPORATE HANGAR (60' X 60')	
F8	LARGE CORPORATE HANGAR (120' X 120')	
F9	MEDIUM CORPORATE HANGAR (60' X 80')	
F10	SMALL CORPORATE HANGAR (60' X 60')	
F11	SMALL CORPORATE HANGAR (60' X 60')	
F12	SNOW REMOVAL EQUIPMENT BUILDING	

RUNWAY 19 END
LAT: 43° 32' 19.01" N
LONG: 72° 56' 59.96" W
ELEV: 774.0' MSL
RUNWAY LOW POINT

ARP
LAT: 43° 31' 47.03" N
LONG: 72° 56' 58.65" W

RUNWAY 31 END
LAT: 43° 31' 29.82" N
LONG: 72° 56' 39.14" W
ELEV: 782.2' MSL
RUNWAY LOW POINT

RUNWAY 1 END
LAT: 43°31'26.65" N
LONG: 72°56'58.11" W
ELEV: 781.3' MSL

RUNWAY 1
DISPLACED THRESHOLD
LAT: 43°31'29.61" N
LONG: 72°56'58.21" W
ELEV: 782.6' MSL

RUNWAY 13 END
LAT: 43° 31' 44.82" N
LONG: 72° 57' 16.90" W
ELEV: 782.2' MSL

RUNWAY 1-19 HIGH POINT/TDZE
ELEV: 787.3' MSL

RUNWAY 13-31 HIGH POINT/TDZE
ELEV: 784.5' MSL

RUNWAY INTERSECTION
ELEV: 782.2' MSL

NGS MONUMENT (SACS) AH4606

NGS MONUMENT (SACS) AH4611

BEACON
846.5' MSL

HIGH POINT ELEV: 722.0'

HIGH POINT ELEV: 728.0'

HIGH POINT ELEV: 708.0'

HIGH POINT ELEV: 696.0'

HIGH POINT ELEV: 784.0'

HIGH POINT ELEV: 712.0

HIGH POINT ELEV: 716.0

TERMINAL BUILDING REHABILITATION

MAIN AREA DEVELOPMENT

EAST AREA DEVELOPMENT

WEST APRON DEVELOPMENT

TERMINAL PARKING LOT

360,000 SF

AIRPORT ROAD

SERVICE ROAD (FORMER TWY E)

INNOVATION DR.

GEORGE ROAD

STATE ROUTE 103

STATE ROUTE 7B

STATE ROUTE 7

MILL RIVER

AIRPORT PROPERTY LINE

RUNWAY 19 (5304' x 100')

N 1°9'25" W (TRUE)

RUNWAY 31 RPZ
500' x 700' x 1,000'

RUNWAY 1
DEPARTURE RPZ
500' x 1,010' x 1,700'

RUNWAY 1
APPROACH RPZ
500' x 1,010' x 1,700'

RUNWAY 19 RPZ
1,000' x 2,500' x 1,750'

RUNWAY 13 RPZ
500' x 700'' x 1,000'

EXIST. OCS (#2) 20:1 SLOPE

EXIST. PART 77 20:1 SLOPE

EXIST. DEPARTURE SURFACE 40:1 SLOPE

EXIST. PART 77 APPROCH 34:1 SLOPE

EXIST. OCS (#4) 20:1 SLOPE

EXIST. PART 77 50:1 SLOPE

EXIST. OCS (#5) 34:1 SLOPE

EXIST. OCS (#6) 30:1 SLOPE

THRESHOLD LIGHTS

TAXIWAY 'A'

TAXIWAY 'B'

TAXIWAY 'B' EXTENSION

TAXIWAY 'D'

TAXIWAY 'F'

TAXIWAY 'G'

TAXIWAY 'H'

TAXIWAY 'J'

PAPI

RELOCATED P-VASI (PAPI)

P-VASI (INOPERATIVE)

MALSR

LOCALIZER

LOCALIZER CRITICAL AREA

GLIDESLOPE CRITICAL AREA

END FIRE ILS

FENCE (TYP.)

AWOS CRITICAL AREA

FORMER VOR (DECOMMISSIONED)

EMAS

THRESHOLD LIGHTS

LEGEND

- EX. BUILDING
- AIRFIELD PAVEMENT
- CREEK / WATERWAY
- 800 — ELEVATION CONTOURS
- RPZ — RUNWAY PROTECTION ZONE (RPZ)
- RSA — RUNWAY SAFETY AREA (RSA)
- ROFA — RUNWAY OBJECT FREE AREA (ROFA)
- ROFZ — RUNWAY OBSTACLE FREE ZONE (ROFZ)
- RVZ — RUNWAY VISIBILITY ZONE (RVZ)
- TSA — TAXIWAY SAFETY AREA (TSA)
- TOFA — TAXIWAY OBJECT FREE AREA (TOFA)
- BRL — 35' BUILDING RESTRICTION LINE (BRL)
- PART 77 APPROACH SURFACE
- OBSTACLE CLEARANCE SURFACE (OCS)
- GLIDE SLOPE CRITICAL AREA
- EX. AIRPORT PROPERTY LINE

N

DECLINATION: 13° 48' W ± 0° 23'
CHANGING BY 0° 4' E/YEAR
ON AUGUST 2021

0 300 600
SCALE IN FEET

- EX. FENCE LINE
- SURVEY MARKER
- AIRPORT REFERENCE POINT (ARP)
- EX. WINDCONE
- FUTURE HANGER DEVELOPMENT
- FUTURE APRON/TAXIWAY
- PAVEMENT/BUILDING REMOVAL
- PFL — FUTURE PROPERTY LINE
- TOFA — FUTURE TAXIWAY/TAXILANE
- TSA — OBJECT FREE AREA/SAFETY AREA
- EX. AVIGATION EASEMENTS
- FUTURE AVIGATION EASEMENTS
- FUTURE PROPERTY ACQUISITION

VERMONT AGENCY OF TRANSPORTATION

APPROVED:

Daniel Delabruere
RAIL AND AVIATION BUREAU DIRECTOR

DATE _____

SPACE RESERVED FOR FAA APPROVAL

REVISIONS			
NO.	Description	Date	By

CHA
111 Winners Circle, PO Box 5269 Albany, NY 12205-0269
518.453.4500 • www.chacompanies.com

PROJECT NAME: AIRPORT LAYOUT PLAN
PROJECT NUMBER: CLARENDON-AV-FY17-007

FILE NAME: z16h171_Future Layout Plan.dgn PLOT DATE: 9/10/2021
PROJECT LEADER: POM DRAWN BY: MED
DESIGNED BY: CJK/AJF CHECKED BY: RTL
FUTURE AIRPORT LAYOUT PLAN SHEET 4 OF 13

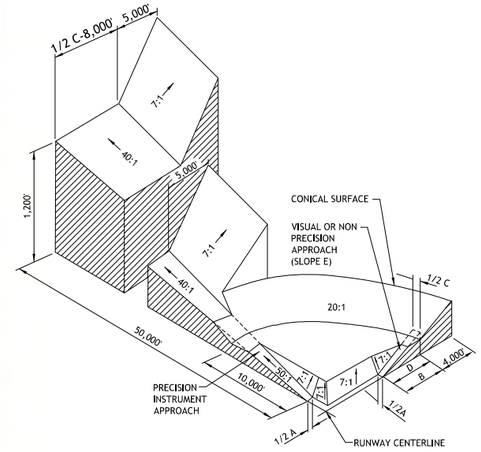
FILE NAME = V:\Projects\ANY\KS\36086\CADD_MSTN\16h171\Consultants\Aviation\z16h171_Future Layout Plan.dgn
DATE/TIME = 9/10/2021
USER = 4066

NOTES:

1. OBSTRUCTION SURVEY WAS CONDUCTED BY QUANTUM SPATIAL ON 4-17-2019. SURVEY DATA FEATURE ACCURACY IS IN ACCORDANCE WITH REQUIREMENTS OF FAA AC 150/5300-18B, "GENERAL GUIDANCE AND SPECIFICATIONS FOR SUBMISSION OF AERONAUTICAL SURVEYS TO NGS: FIELD DATA COLLECTION AND GEOGRAPHIC INFORMATION SYSTEM (GIS) STANDARDS.
2. DUE TO THE LARGE QUANTITY OF OBSTRUCTIONS POINTS, SAMPLE POINTS WITH THEIR CORRESPONDING IDENTIFIERS ARE SHOWN. THE COMPLETE DATA FOR RUT IS AVAILABLE FOR REVIEW UNDER SEPARATE COVER.

DIM	ITEM	VISUAL RUNWAY		NON-PRECISION INSTRUMENT RUNWAY			PRECISION INSTRUMENT RUNWAY
		A	B	A	B C	B D	
A	WIDTH OF PRIMARY SURFACE AND APPROACH SURFACE WIDTH AT INNER END	250	500	500	500	1,000	1,000
B	RADIUS OF HORIZONTAL SURFACE	5,000	5,000	5,000	10,000	10,000	10,000
		VISUAL RUNWAY		NON-PRECISION INSTRUMENT RUNWAY			PRECISION INSTRUMENT RUNWAY
		A	B	A	B C	B D	
C	APPROACH SURFACE WIDTH AT END	1,250	1,500	2,000	3,500	4,000	16,000
D	APPROACH SURFACE LENGTH	5,000	5,000	5,000	10,000	10,000	50,000*
E	APPROACH SLOPE	20:1	20:1	20:1	34:1	34:1	50:1 / 40:1*

A - UTILITY RUNWAYS
B - RUNWAYS LARGER THAN UTILITY
C - VISIBILITY MINIMUMS GREATER THAN 3/4 MILES
D - VISIBILITY MINIMUMS AS LOW AS 3/4 MILE
* - PRECISION INSTRUMENT APPROACH SLOPE IS 50:1 FOR INNER 10,000 FT. AND 40:1 FOR AN ADDITIONAL 40,000 FT.



ISOMETRIC VIEW OF SECTION
77.25 CIVIL AIRPORT IMAGINARY SURFACES

PART 77 SAMPLE OBSTRUCTION POINTS

PT#	OBJECT	OBJECT ELEV. (MSL)	P77 SURFACE	P77 SURFACE ELEV. (MSL)	P77 PENETRATION (FT)
114	TREE	996.6	HORIZONTAL	937.3	59.3
378	TREE	1132.4	HORIZONTAL	937.3	195.1
1178	ANTENNA	1542.5	CONICAL	1084.1	458.5
1208	TREE	1713.2	CONICAL	1134.1	579.1
1282	TREE	1537.7	CONICAL	1090.3	447.5
1781	TREE	865.9	TRANSITIONAL	833.6	32.2
1930	TREE	893.7	TRANSITIONAL	880.7	13
2440	TREE	1033.7	HORIZONTAL	937.3	96.4
3584	TREE	1665.8	HORIZONTAL	937.3	728.5
4468	TREE	2135.5	HORIZONTAL	937.3	1198.2
4909	TREE	1872.3	CONICAL	1091.6	780.7
5272	TREE	2400.2	CONICAL	1125.1	1275.1
5297	TREE	2152.2	CONICAL	1012.3	1139.9

LEGEND

- PART 77 SAMPLE OBSTRUCTION POINT
- × OBSTRUCTION POINT

N
DECLINATION: 13° 48' W ± 0° 23'
CHANGING BY 0° 4' E/YEAR
ON AUGUST 2021

0 2500 5000
SCALE IN FEET

REVISIONS

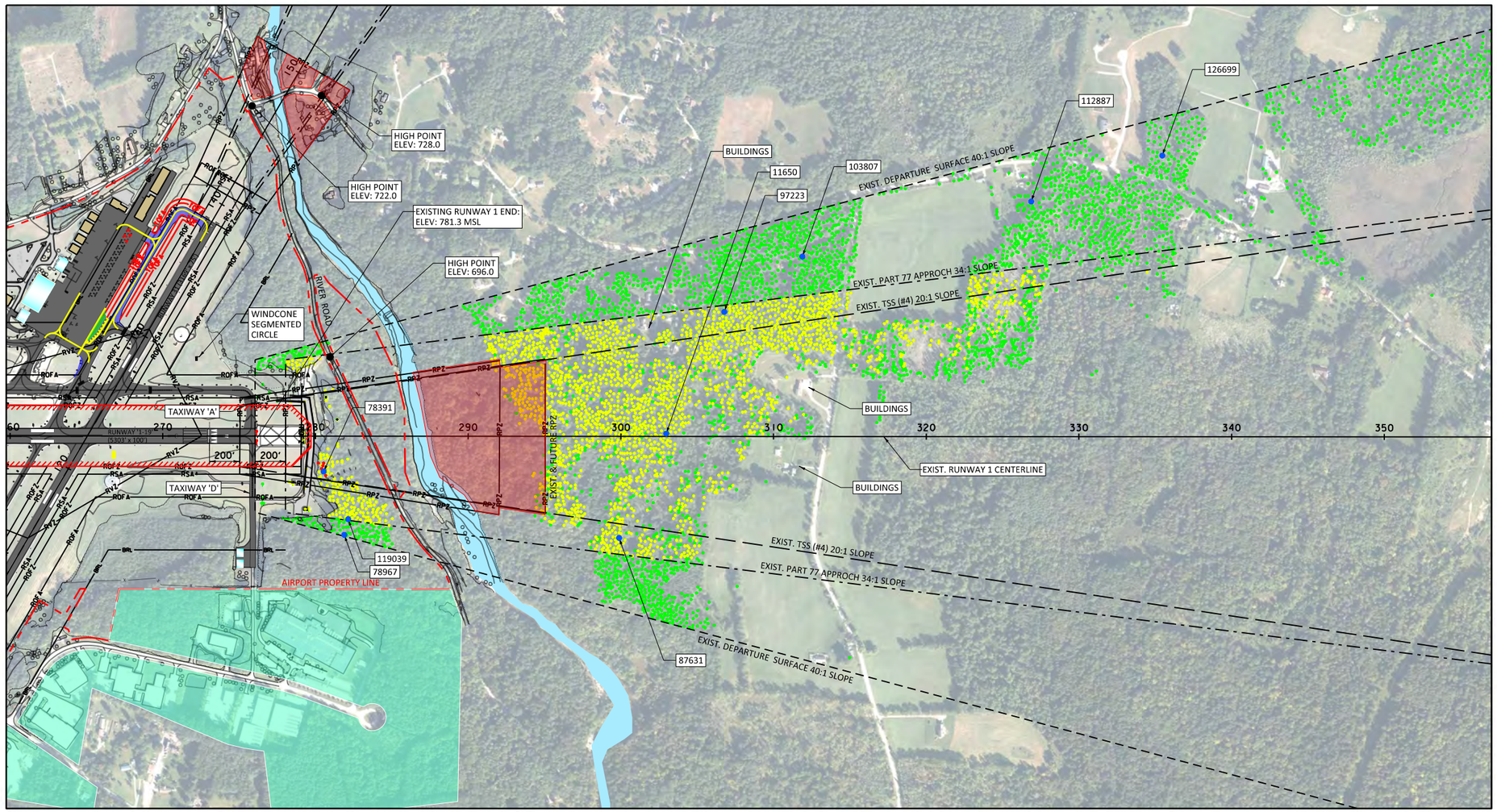
NO.	Description	Date	By

CHA
111 Winners Circle, PO Box 5269 Albany, NY 12205-0269
518.453.4500 • www.chacompanies.com

PROJECT NAME: AIRPORT LAYOUT PLAN
PROJECT NUMBER: CLARENDON-AV-FY17-007

FILE NAME: z16h171_Airspace Layout.dgn
PROJECT LEADER: POM
DESIGNED BY: CJK/AJF
AIRPORT AIRSPACE LAYOUT PLAN
PLOT DATE: 9/10/2021
DRAWN BY: MED
CHECKED BY: RTL
SHEET 5 OF 13

FILE NAME = V:\Projects\ANY\K5\36086\CADD_MSTN\16h171\Consultants\Aviation\z16h171_Airspace Layout.dgn
DATE/TIME = 9/10/2021
USER = 4066



GRAPHIC SCALE (FEET)

0 200 400 800

HORIZONTAL

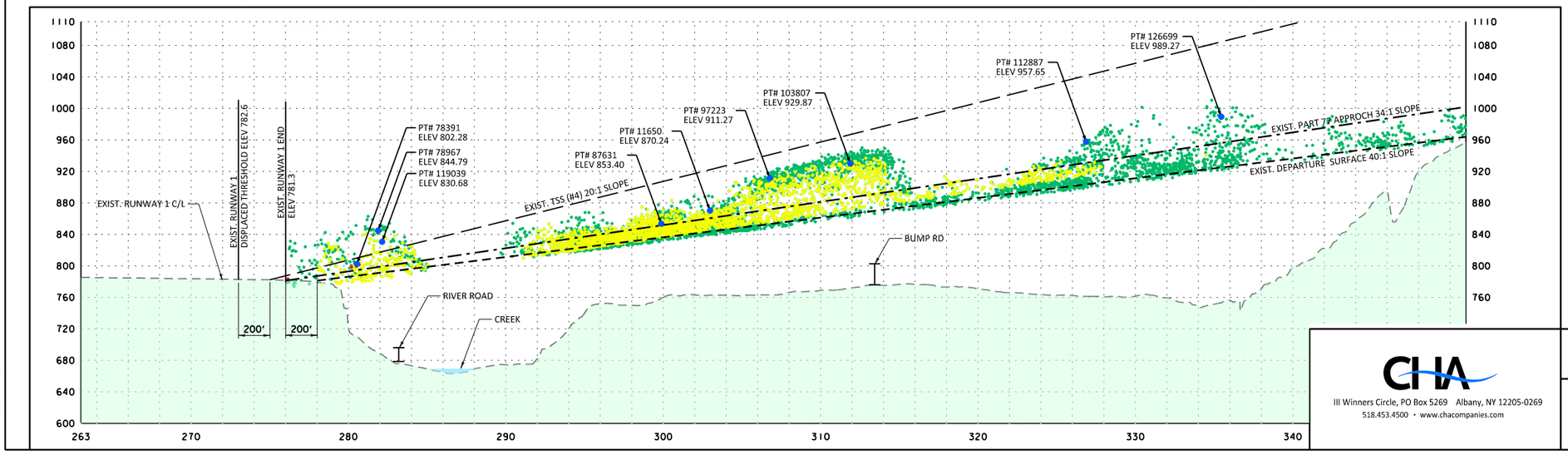
80 0 VERTICAL

N

DECLINATION: 13° 48' W ± 0° 23'
CHANGING BY 0° 4' E/YEAR
ON AUGUST 2021

LEGEND

- EX. BUILDING
- EX. AIRFIELD PAVEMENT
- BUILDING IMPROVEMENTS
- BUILDING REMOVAL
- FUTURE AVIGATION EASEMENTS
- AIRFIELD PAVEMENT
- AIRFIELD PAVEMENT REMOVAL
- 800 ELEVATION CONTOURS
- TREELINES
- CREEK / WATERWAY
- RVZ RUNWAY VISIBILITY ZONE (RVZ)
- ROFZ RUNWAY OBSTACLE FREE ZONE (ROFZ)
- RPZ RUNWAY PROTECTION ZONE (RPZ)
- RSA RUNWAY SAFETY AREA (RSA)
- ROFA RUNWAY OBJECT FREE AREA (ROFA)
- BRL 35' BUILDING RESTRICTION LINE (BRL)
- TOFA TAXIWAY OBJECT FREE AREA (TOFA)
- PART 77 APPROACH SURFACE
- THRESHOLD SITING SURFACE (TSS)
- EX. AIRPORT PROPERTY LINE
- EX. FENCE LINE
- SURVEY MARKER
- 1234 TREE PENETRATION
- APPROACH, THRESHOLD SITING SURFACE (TSS), OBSTRUCTIONS
- APPROACH, PART 77, OBSTRUCTIONS
- DEPARTURE SURFACE OBSTRUCTIONS
- SAMPLE OBSTRUCTION POINT
- 1234 GROUND PENETRATION
- ROAD + VEHICLE HEIGH (10' PRIVATE /15' PUBLIC)



NOTES:

1. OBSTRUCTION SURVEY WAS CONDUCTED BY QUANTUM SPATIAL ON 4-17-2019. SURVEY DATA FEATURE ACCURACY IS IN ACCORDANCE WITH REQUIREMENTS OF FAA AC 150/5300-18B, "GENERAL GUIDANCE AND SPECIFICATIONS FOR SUBMISSION OF AERONAUTICAL SURVEYS TO NGS: FIELD DATA COLLECTION AND GEOGRAPHIC INFORMATION SYSTEM (GIS) STANDARDS.
2. DUE TO THE LARGE QUANTITY OF OBSTRUCTIONS POINTS, SAMPLE POINTS WITH THEIR CORRESPONDING IDENTIFIERS ARE SHOWN. THE COMPLETE DATA FOR THIS RUNWAY IS AVAILABLE FOR REVIEW UNDER SEPARATE COVER. THE PENETRATING OBSTRUCTIONS ARE IDENTIFIED IN THE DATA OBSTRUCTION TABLES ON SHEET 10.
3. ROADWAY ELEVATIONS INCLUDE THE FAR PART 77 TRAVERSE WAY ADJUSTMENT.

REVISIONS

NO.	Description	Date	By

CHA
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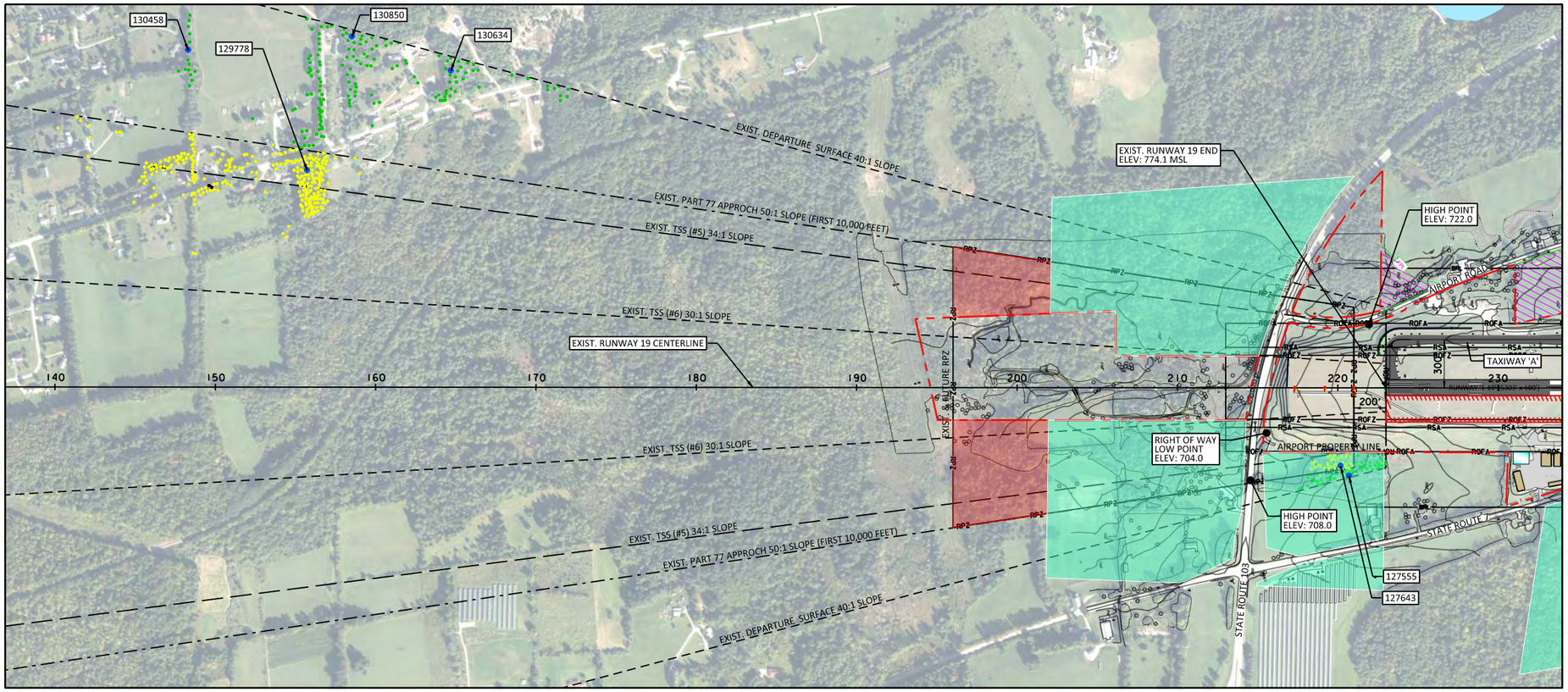
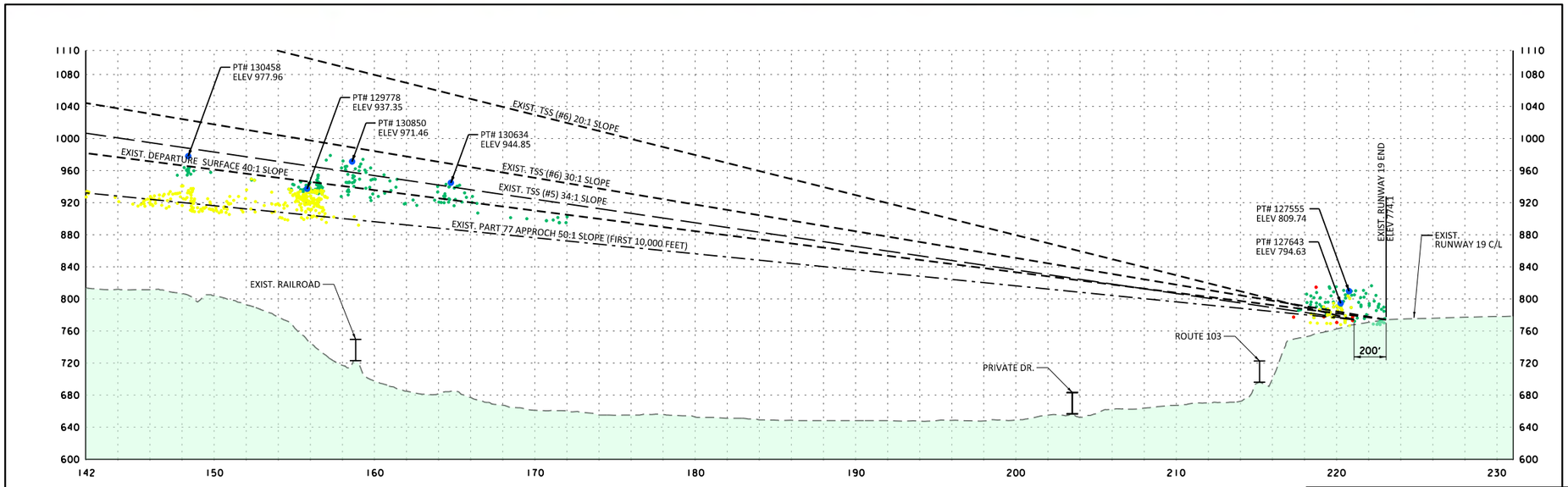
PROJECT NAME: AIRPORT LAYOUT PLAN
PROJECT NUMBER: CLARENDON-AV-FY17-007

FILE NAME: z16h17i_RUNWAY 1INNER.dgn
PROJECT LEADER: POM
DESIGNED BY: CJK/AJF
RUNWAY 1INNER PORTION OF APPROACH SURFACE

PLOT DATE: 9/10/2021
DRAWN BY: MED
CHECKED BY: RTL
SHEET 6 OF 13

FILE_NAME = V:\Projects\VANYK5\36086\CADD_MSTN\16h171\Consultants\Aviation\z16h17i_RUNWAY 1 INNER.dgn
DATE/TIME = 9/10/2021
USER = 4066





GRAPHIC SCALE (FEET)

0 200 400 800

HORIZONTAL

80 VERTICAL 0

N

DECLINATION: 13° 48' W ± 0° 23'
CHANGING BY 0° 4' E/YEAR
ON AUGUST 2021

LEGEND

- EX. BUILDING
- EX. AIRFIELD PAVEMENT
- BUILDING IMPROVEMENTS
- BUILDING REMOVAL
- AIRFIELD PAVEMENT
- AIRFIELD PAVEMENT REMOVAL
- FUTURE AVIGATION EASEMENTS
- 800 ELEVATION CONTOURS
- TREELINES
- CREEK / WATERWAY
- RVZ RUNWAY VISIBILITY ZONE (RVZ)
- ROFZ RUNWAY OBSTACLE FREE ZONE (ROFZ)
- RPZ RUNWAY PROTECTION ZONE (RPZ)
- RSA RUNWAY SAFETY AREA (RSA)
- ROFA RUNWAY OBJECT FREE AREA (ROFA)
- BRL 35' BUILDING RESTRICTION LINE (BRL)
- TOFA TAXIWAY OBJECT FREE AREA (TOFA)
- FPL FUTURE PROPERTY LINE
- PART 77 APPROACH SURFACE
- THRESHOLD SITING SURFACE (TSS)
- EX. AIRPORT PROPERTY LINE
- EX. FENCE LINE
- SURVEY MARKER
- 1234 TREE PENETRATION
- APPROACH, THRESHOLD SITING SURFACE (TSS), OBSTRUCTIONS
- APPROACH, PART 77, OBSTRUCTIONS
- DEPARTURE SURFACE OBSTRUCTIONS
- SAMPLE OBSTRUCTION POINT
- 1234 GROUND PENETRATION
- ROAD + VEHICLE HEIGH (10' PRIVATE /15' PUBLIC)

NOTES:

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3. ROADWAY ELEVATIONS INCLUDE THE FAR PART 77 TRAVERSE WAY ADJUSTMENT.

REVISIONS

NO.	Description	Date	By

CHA
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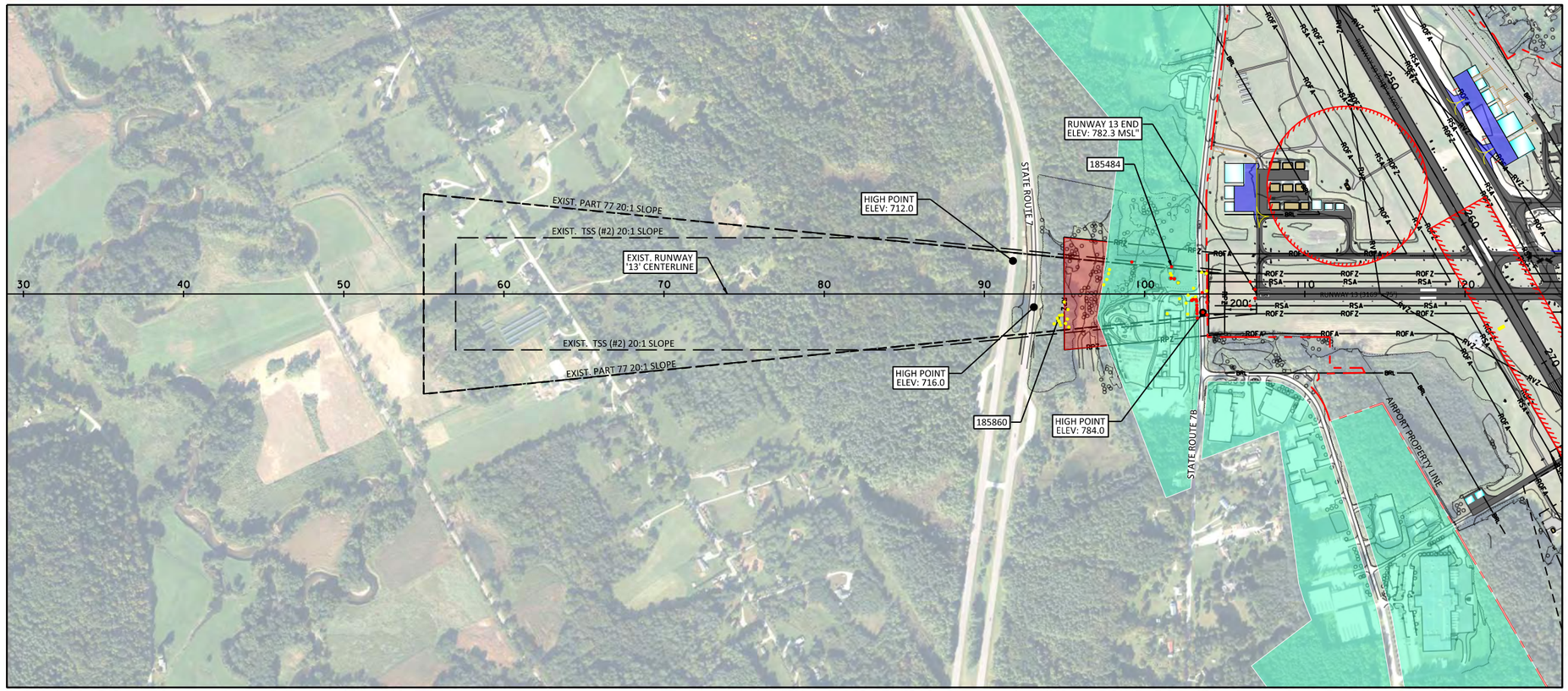
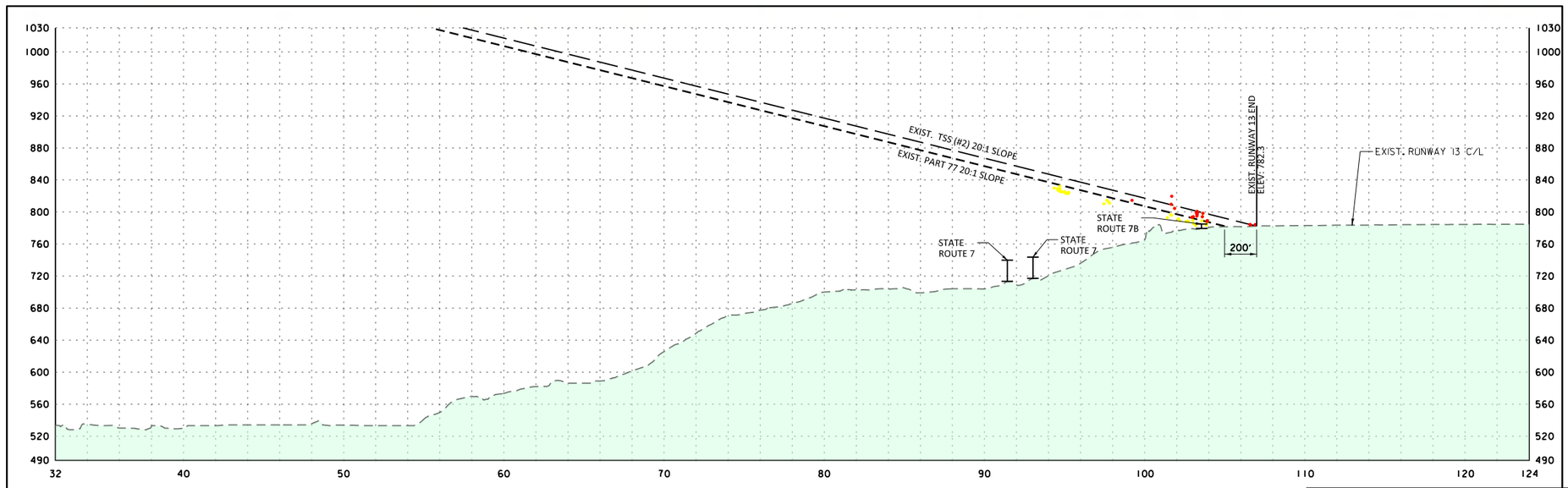
PROJECT NAME: AIRPORT LAYOUT PLAN
PROJECT NUMBER: CLARENDON-AV-FY17-007

FILE NAME: z16h171_RUNWAY 19 INNER.dgn PLOT DATE: 9/10/2021
PROJECT LEADER: POM DRAWN BY: MED
DESIGNED BY: CJK/AJF CHECKED BY: RTL
RUNWAY 19 INNER PORTION OF APPROACH SURFACE SHEET 7 OF 13

FILE NAME = V:\Projects\ANY\K53-36086\CADD_MSTN\16h171\Consultants\Aviation\z16h171_RUNWAY 19 INNER.dgn
DATE/TIME = 9/10/2021
USER = 4066





GRAPHIC SCALE (FEET)
0 200 400 800
HORIZONTAL
80 0 VERTICAL

N

DECLINATION: 13° 48' W ± 0° 23'
CHANGING BY 0° 4' E/YEAR
ON AUGUST 2021

LEGEND

- EX. BUILDING
- EX. AIRFIELD PAVEMENT
- BUILDING IMPROVEMENTS
- BUILDING REMOVAL
- AIRFIELD PAVEMENT
- AIRFIELD PAVEMENT REMOVAL
- FUTURE AVIGATION EASEMENTS
- 800 ELEVATION CONTOURS
- TREELINES
- CREEK / WATERWAY
- RVZ RUNWAY VISIBILITY ZONE (RVZ)
- ROFZ RUNWAY OBSTACLE FREE ZONE (ROFZ)
- RPZ RUNWAY PROTECTION ZONE (RPZ)
- RSA RUNWAY SAFETY AREA (RSA)
- ROFA RUNWAY OBJECT FREE AREA (ROFA)
- BRL 35' BUILDING RESTRICTION LINE (BRL)
- TOFA TAXIWAY OBJECT FREE AREA (TOFA)
- PART 77 APPROACH SURFACE
- THRESHOLD SITING SURFACE (TSS)
- EX. AIRPORT PROPERTY LINE
- EX. FENCE LINE
- SURVEY MARKER
- 1234 TREE PENETRATION
- APPROACH, THRESHOLD SITING SURFACE (TSS), OBSTRUCTIONS
- APPROACH, PART 77, OBSTRUCTIONS
- DEPARTURE SURFACE OBSTRUCTIONS
- SAMPLE OBSTRUCTION POINT
- 1234 GROUND PENETRATION
- ROAD + VEHICLE HEIGH (10' PRIVATE /15' PUBLIC)

NOTES:

1. OBSTRUCTION SURVEY WAS CONDUCTED BY QUANTUM SPATIAL ON 4-17-2019. SURVEY DATA FEATURE ACCURACY IS IN ACCORDANCE WITH REQUIREMENTS OF FAA AC 150/5300-18B, "GENERAL GUIDANCE AND SPECIFICATIONS FOR SUBMISSION OF AERONAUTICAL SURVEYS TO NGS: FIELD DATA COLLECTION AND GEOGRAPHIC INFORMATION SYSTEM (GIS) STANDARDS.
2. DUE TO THE LARGE QUANTITY OF OBSTRUCTIONS POINTS, SAMPLE POINTS WITH THEIR CORRESPONDING IDENTIFIERS ARE SHOWN. THE COMPLETE DATA FOR THIS RUNWAY IS AVAILABLE FOR REVIEW UNDER SEPARATE COVER. THE PENETRATING OBSTRUCTIONS ARE IDENTIFIED IN THE DATA OBSTRUCTION TABLES ON SHEET 10.
3. ROADWAY ELEVATIONS INCLUDE THE FAR PART 77 TRAVERSE WAY ADJUSTMENT.

REVISIONS

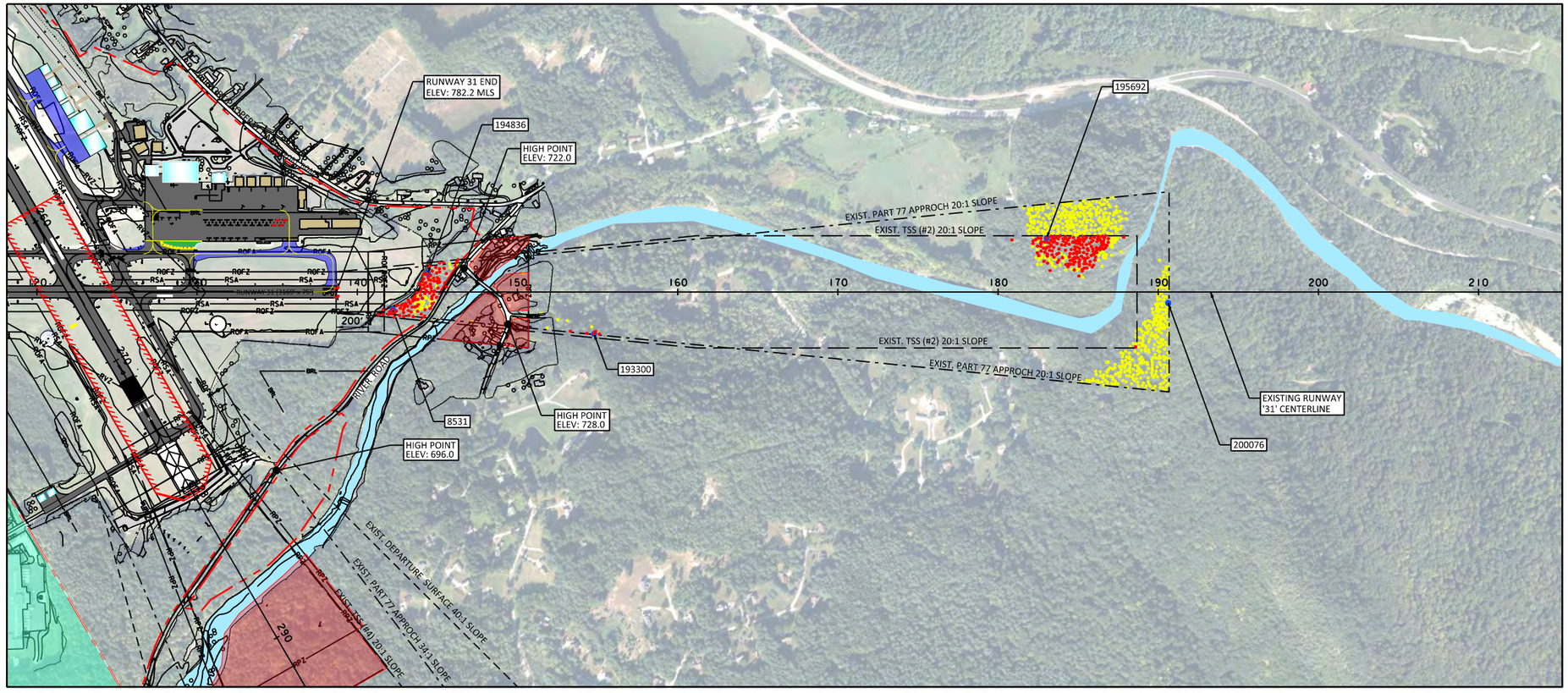
NO.	Description	Date	By

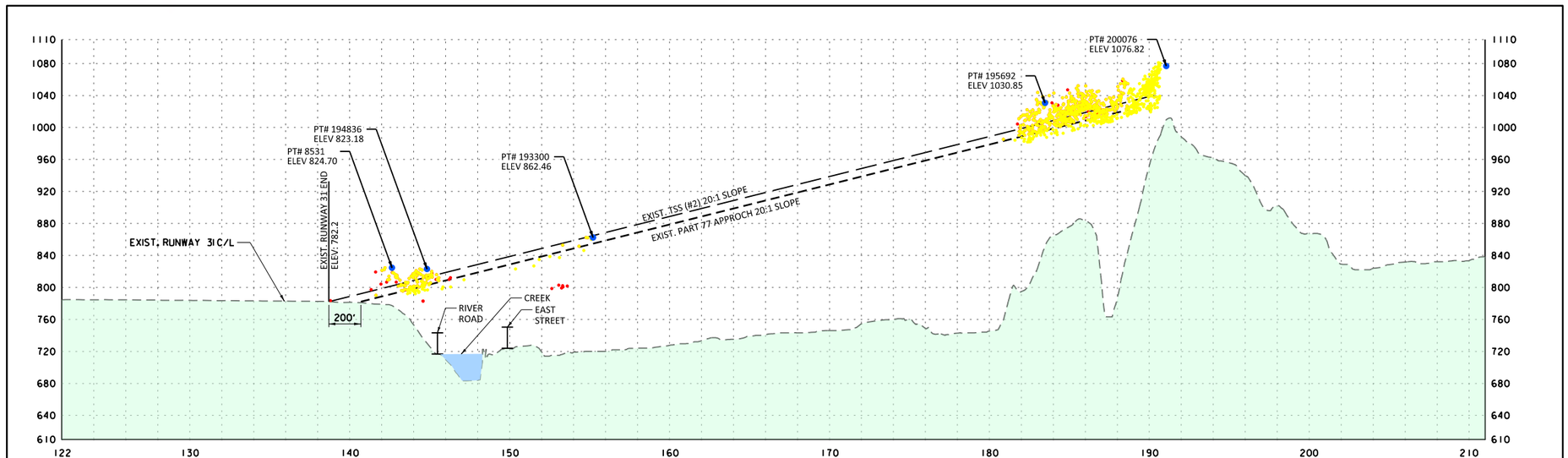
CHA
111 Winners Circle, PO Box 5269 Albany, NY 12205-0269
518.453.4500 • www.chacompanies.com

PROJECT NAME: AIRPORT LAYOUT PLAN
PROJECT NUMBER: CLARENDON-AV-FY17-007

FILE NAME: z16h171_RUNWAY 13 INNER.dgn PLOT DATE: 9/10/2021
PROJECT LEADER: POM DRAWN BY: MED
DESIGNED BY: CJK/AJF CHECKED BY: RTL
RUNWAY 13 INNER PORTION OF APPROACH SURFACE SHEET 8 OF 13

FILE NAME = V:\Projects\ANY\K5\36086\CADD_MSTN\16h171\Consultants\Aviation\z16h171_RUNWAY 13 INNER.dgn
DATE/TIME = 9/10/2021
USER = 4066





GRAPHIC SCALE (FEET)
0 200 400 800
HORIZONTAL
80 0 VERTICAL

DECLINATION: 13° 48' W ± 0° 23'
CHANGING BY 0° 4' E/YEAR
ON AUGUST 2021

LEGEND

- EX. BUILDING
- EX. AIRFIELD PAVEMENT
- BUILDING IMPROVEMENTS
- BUILDING REMOVAL
- AIRFIELD PAVEMENT
- AIRFIELD PAVEMENT REMOVAL
- FUTURE AVIGATION EASEMENTS
- 800 ELEVATION CONTOURS
- TREELINES
- CREEK / WATERWAY
- RVZ RUNWAY VISIBILITY ZONE (RVZ)
- ROFZ RUNWAY OBSTACLE FREE ZONE (ROFZ)
- RPZ RUNWAY PROTECTION ZONE (RPZ)
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- ROFA RUNWAY OBJECT FREE AREA (ROFA)
- BRL 35' BUILDING RESTRICTION LINE (BRL)
- TOFA TAXIWAY OBJECT FREE AREA (TOFA)
- PART 77 APPROACH SURFACE
- THRESHOLD SITING SURFACE (TSS)
- EX. AIRPORT PROPERTY LINE
- EX. FENCE LINE
- SURVEY MARKER
- 1234 TREE PENETRATION
- APPROACH, THRESHOLD SITING SURFACE (TSS), OBSTRUCTIONS
- APPROACH, PART 77, OBSTRUCTIONS
- DEPARTURE SURFACE OBSTRUCTIONS
- SAMPLE OBSTRUCTION POINT
- 1234 GROUND PENETRATION
- ROAD + VEHICLE HEIGH
- (10' PRIVATE /15' PUBLIC)

NOTES:

1. OBSTRUCTION SURVEY WAS CONDUCTED BY QUANTUM SPATIAL ON 4-17-2019. SURVEY DATA FEATURE ACCURACY IS IN ACCORDANCE WITH REQUIREMENTS OF FAA AC 150/5300-18B, "GENERAL GUIDANCE AND SPECIFICATIONS FOR SUBMISSION OF AERONAUTICAL SURVEYS TO NGS: FIELD DATA COLLECTION AND GEOGRAPHIC INFORMATION SYSTEM (GIS) STANDARDS.
2. DUE TO THE LARGE QUANTITY OF OBSTRUCTIONS POINTS, SAMPLE POINTS WITH THEIR CORRESPONDING IDENTIFIERS ARE SHOWN. THE COMPLETE DATA FOR THIS RUNWAY IS AVAILABLE FOR REVIEW UNDER SEPARATE COVER. THE PENETRATING OBSTRUCTIONS ARE IDENTIFIED IN THE DATA OBSTRUCTION TABLES ON SHEET 10.
3. ROADWAY ELEVATIONS INCLUDE THE FAR PART 77 TRAVERSE WAY ADJUSTMENT.

REVISIONS

NO.	Description	Date	By

CHA
111 Winners Circle, PO Box 5269 Albany, NY 12205-0269
518.453.4500 • www.chacompanies.com

PROJECT NAME: AIRPORT LAYOUT PLAN
PROJECT NUMBER: CLARENDON-AV-FY17-007

FILE NAME: z16h171_RUNWAY 31INNER.dgn
PROJECT LEADER: POM
DESIGNED BY: CJK/AJF
RUNWAY 31INNER PORTION OF APPROACH SURFACE
PLOT DATE: 9/10/2021
DRAWN BY: MED
CHECKED BY: RTL
SHEET 9 OF 13

FILE NAME = V:\Projects\ANY\65\36086\CADD_MSTN\16h171\Consultants\Aviation\z16h171_RUNWAY 31 INNER.dgn
DATE/TIME = 9/10/2021
USER = 4066

RUNWAY 1												
			PART 77 APPROACH 34:1		OBSTACLE CLEARANCE SURFACE 20 :1 (#4)		DEPARTURE SURFACE 40:1					
PT#	OBJECT	OBJ. ELEV	PART 77 ELEV.	PENETRATION (FT.)	OCS #4 ELEV.	PENETRATION (FT.)	DEP ELEV.	PENETRATION (FT.)	EASTING	NORTHING	TRIGGERING EVENT	DISPOSITION
78391	TREE	802.283	788.59	14	808.686	-6	792.494	10	1520981.25	373105.684	EXISTING COND.	
11650	TREE	870.238	854.578	16			848.584	22	1521276.763	370867.603	EXISTING COND.	
119039	TREE	830.676	793.31	37	-		796.506	34	1520672.007	372938.887	EXISTING COND.	
97223	TREE	911.268	865.736	46	-		858.068	53	1522081.616	370504.452	EXISTING COND.	
87631	TREE	853.404	845.507	8			840.874	13	1520586.609	371162.106	EXISTING COND.	
78967	TREE	844.787	-		-		795.875	49	1520569.249	372962.071	EXISTING COND.	
103807	TREE	929.873	-		-		870.859	59	1522454.301	370000.247	EXISTING COND.	
112887	TREE	957.647	-		-		908.311	49	1522845.967	368509.783	EXISTING COND.	
126699	TREE	989.272	-		-		929.773	59	1523165.095	367657.573	EXISTING COND.	

- object is outside the limits of the surface

RUNWAY 19												
			PART 77 APPROACH 50:1		OBSTACLE CLEARANCE SURFACE 34 :1 (#5)		DEPARTURE SURFACE 40:1					
PT#	OBJECT	OBJ. ELEV	PART 77 ELEV.	PENETRATION (FT.)	OCS #5 ELEV.	PENETRATION (FT.)	DEP ELEV.	PENETRATION (FT.)	EASTING	NORTHING	TRIGGERING EVENT	DISPOSITION
127643	TREE	794.634	775.666	19	-		781.08	14	1520601.933	379134.24	EXISTING COND.	
127555	TREE	809.737	-		-		779.782	30	1520541.051	379081.049	EXISTING COND.	
130634	TREE	944.854	-		-		919.836	25	1522951.303	384733.17	EXISTING COND.	
130850	TREE	971.459	-		-		935.257	36	1523150.82	385354.156	EXISTING COND.	
129778	TREE	937.346	904.592	33	-		942.239	-5	1522311.487	385616.496	EXISTING COND.	
130458	TREE	977.957	-		-		960.796	17	1523045.33	386373.791	EXISTING COND.	
STATE ROUTE 102 (CENTERLINE)		711	785.8	-75	791.2	-80	793.3	-82	1521055.869	379653.343	EXISTING COND.	
STATE ROUTE 102 (HIGH POINT)		723	-		-		795.1	-72	1520363.508	379705.317	EXISTING COND.	

- object is outside the limits of the surface

RUNWAY 13										
			PART 77 APPROACH 20:1		OBSTACLE CLEARANCE SURFACE 20 :1 (#2)					
PT#	OBJECT	OBJ. ELEV	PART 77 ELEV.	PENETRATION (FT.)	OCS #2 ELEV.	PENETRATION (FT.)	EASTING	NORTHING	TRIGGERING EVENT	DISPOSITION
185484	TREE	819.59	-		808.841	11	1519446.026	375811.763	EXISTING COND.	
185860	TREE	832.076	833.776	-2	-		1518687.521	375884.06	EXISTING COND.	
STATE ROUTE 7B (CENTERLINE)		794	789	5	799	-5	1519535.497	375577.475	EXISTING COND.	
STATE ROUTE 7B (HIGH POINT)		798	789	9	799	-1	1519479.07	375468.082	EXISTING COND.	

- object is outside the limits of the surface

RUNWAY 31										
			PART 77 APPROACH 20:1		OBSTACLE CLEARANCE SURFACE 20 :1 (#2)					
PT#	OBJECT	OBJ. ELEV	PART 77 ELEV.	PENETRATION (FT.)	OCS #2 ELEV.	PENETRATION (FT.)	EASTING	NORTHING	TRIGGERING EVENT	DISPOSITION
8531	TREE	824.697	789.766	35	799.766	25	1522857.721	373608.513	EXISTING COND.	
194836	TREE	823.177	800.709	22	810.709	12	1523157.287	373697.884	EXISTING COND.	
193300	TREE	862.462	852.643	10	862.643	0	1523883.322	372864.593	EXISTING COND.	
195692	TREE	1030.85	993.916	37	1003.916	27	1526645.234	372020.251	EXISTING COND.	
200076	TREE	1076.819	1031.871	45	-		1527112.928	371297.564	EXISTING COND.	
197340	TREE	1048.973	1005.988	43	-		1526887.543	371959.482	EXISTING COND.	
EAST ST. (CENTERLINE)		737	821.7	-85	831.7	-95	1523457.081	373402.11	EXISTING COND.	
EAST ST. (HIGH POINT)		741	725.7	15	835.7	-95	1523496.241	373213.005	EXISTING COND.	

- object is outside the limits of the surface

NOTES:

1. OBSTRUCTION SURVEY WAS CONDUCTED BY QUANTUM SPATIAL ON 4-17-2019. SURVEY DATA FEATURE ACCURACY IS IN ACCORDANCE WITH REQUIREMENTS OF FAA AC 150/5300-18B, "GENERAL GUIDANCE AND SPECIFICATIONS FOR SUBMISSION OF AERONAUTICAL SURVEYS TO NGS: FIELD DATA COLLECTION AND GEOGRAPHIC INFORMATION SYSTEM (GIS) STANDARDS.
2. DUE TO THE LARGE QUANTITY OF OBSTRUCTIONS POINTS, SAMPLE POINTS WITH THEIR CORRESPONDING IDENTIFIERS ARE SHOWN. THE COMPLETE DATA FOR THIS RUNWAY IS AVAILABLE FOR REVIEW UNDER SEPARATE COVER.
3. ROADWAY ELEVATIONS NOT INCLUDED AS PART OF THE OBSTRUCTION SURVEY DATA WERE GENERATED FROM GROUND CONTOUR ELEVATIONS. ROADWAY ELEVATIONS INCLUDE THE FAR PART 77 TRAVERSE WAY ADJUSTMENT.

REVISIONS

NO.	Description	Date	By

CHA
111 Winners Circle, PO Box 5269 Albany, NY 12205-0269
518.453.4500 • www.chacompanies.com

PROJECT NAME: AIRPORT LAYOUT PLAN
PROJECT NUMBER: CLARENDON-AV-FY17-007

FILE NAME: z16h171_Obstruction_data.dgn PLOT DATE: 9/10/2021
PROJECT LEADER: POM DRAWN BY: MED
DESIGNED BY: CJK/AJF CHECKED BY: RTL
OBSTRUCTION DATA SHEET SHEET 10 OF 13

FILE NAME = X:\Projects\ANY #'S 36866\CADD_MGT\N16h171\Consultants\Revision z16h171_Obstruction_data.dgn
DATE/TIME = 9/10/2021
USER = MDE

60' x 80'

130' x 220'

TERMINAL BUILDING REHAB

TIEDOWNS TO BE REMOVED

MAIN APRON
360,000 SF

142'

64'

418'

66'

66'

160'

PAINTED ISLAND SHIFT (NORTH) TO PREVENT DIRECT APRON ACCESS

FUEL FACILITY

77'

67'

131'

79'

35'

TAXIWAY 'B' EXTENSION (ADG II)

240'

Airport Road

BRL

RVZ

TOFA

ROFA

ROFZ

RSA

TSA

RPZ

LEGEND

- EX. BUILDING
- AIRFIELD PAVEMENT
- 800 — ELEVATION CONTOURS
- TREELINES
- CREEK / WATERWAY
- RPZ — RUNWAY PROTECTION ZONE (RPZ)
- RSA — RUNWAY SAFETY AREA (RSA)
- ROFA — RUNWAY OBJECT FREE AREA (ROFA)
- ROFZ — RUNWAY OBSTACLE FREE ZONE (ROFZ)
- RVZ — RUNWAY VISIBILITY ZONE (RVZ)
- TSA — FUT. TAXIWAY SAFETY AREA (TSA)
- BRL — 35' BUILDING RESTRICTION LINE (BRL)
- TOFA — TAXIWAY OBJECT FREE AREA (TOFA)
- PART 77 APPROACH SURFACE
- EX. AIRPORT PROPERTY LINE
- EX. FENCE LINE
- FUTURE APRON/TAXIWAY
- FUTURE HANGER DEVELOPMENT

N

DECLINATION: 13° 48' W ± 0° 23'
CHANGING BY 0° 4' E/YEAR
ON AUGUST 2021

0 50 100
SCALE IN FEET

REVISIONS

NO.	Description	Date	By

CHA
111 Winners Circle, PO Box 5269 Albany, NY 12205-0269
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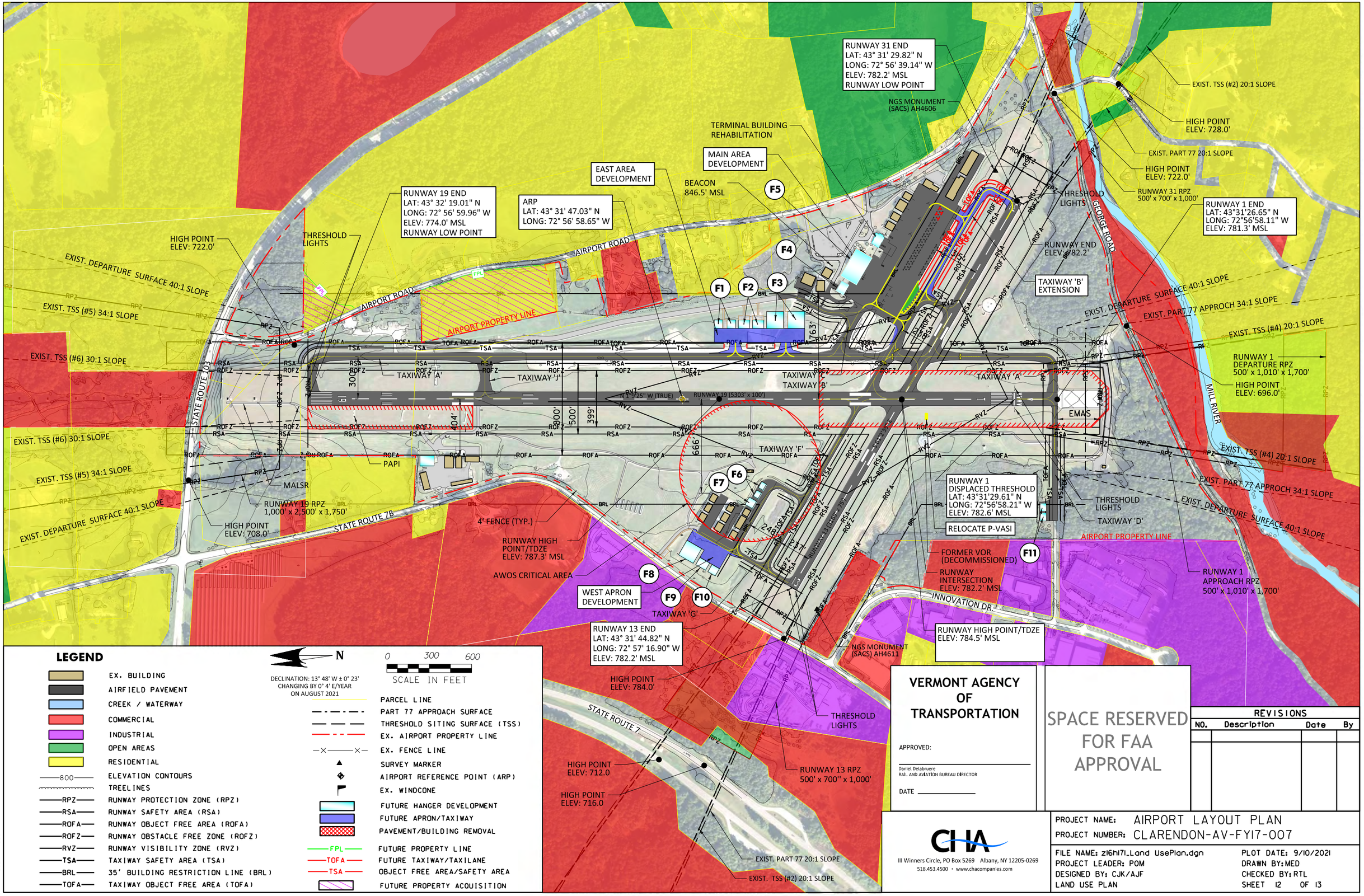
PROJECT NAME: AIRPORT LAYOUT PLAN
PROJECT NUMBER: CLARENDON-AV-FY17-007

FILE NAME: z16h17i_Terminal Area Plan.dgn
PROJECT LEADER: POM
DESIGNED BY: CJK/AJF
TERMINAL AREA PLAN

PLOT DATE: 9/10/2021
DRAWN BY: MED
CHECKED BY: RTL
SHEET 11 OF 13

FILE NAME = V:\Projects\ANY\K5\36086\CADD_MSTN\16h17i\Consultants\Aviation\z16h17i_Terminal Area Plan.dgn
DATE/TIME = 9/10/2021
USER = 4066



LEGEND

- EX. BUILDING
- AIRFIELD PAVEMENT
- CREEK / WATERWAY
- COMMERCIAL
- INDUSTRIAL
- OPEN AREAS
- RESIDENTIAL
- 800 — ELEVATION CONTOURS
- TREELINES
- RPZ — RUNWAY PROTECTION ZONE (RPZ)
- RSA — RUNWAY SAFETY AREA (RSA)
- ROFA — RUNWAY OBJECT FREE AREA (ROFA)
- ROFZ — RUNWAY OBSTACLE FREE ZONE (ROFZ)
- RVZ — RUNWAY VISIBILITY ZONE (RVZ)
- TSA — TAXIWAY SAFETY AREA (TSA)
- BRL — 35' BUILDING RESTRICTION LINE (BRL)
- TOFA — TAXIWAY OBJECT FREE AREA (TOFA)

N

DECLINATION: 13° 48' W ± 0° 23'
CHANGING BY 0° 4' E/YEAR
ON AUGUST 2021

0 300 600
SCALE IN FEET

- PARCEL LINE
- PART 77 APPROACH SURFACE
- THRESHOLD SITING SURFACE (TSS)
- EX. AIRPORT PROPERTY LINE
- EX. FENCE LINE
- SURVEY MARKER
- AIRPORT REFERENCE POINT (ARP)
- EX. WINDCONE
- FUTURE HANGER DEVELOPMENT
- FUTURE APRON/TAXIWAY
- PAVEMENT/BUILDING REMOVAL
- FPL — FUTURE PROPERTY LINE
- TOFA — FUTURE TAXIWAY/TAXILANE
- TSA — OBJECT FREE AREA/SAFETY AREA
- FUTURE PROPERTY ACQUISITION

VERMONT AGENCY OF TRANSPORTATION

APPROVED:

Daniel Delabruere
RAIL AND AVIATION BUREAU DIRECTOR

DATE

SPACE RESERVED FOR FAA APPROVAL

REVISIONS			
NO.	Description	Date	By

CHA
111 Winners Circle, PO Box 5269 Albany, NY 12205-0269
518.453.4500 • www.chacompanies.com

PROJECT NAME: AIRPORT LAYOUT PLAN
PROJECT NUMBER: CLARENDON-AV-FY17-007

FILE NAME: z16h17l_Land UsePlan.dgn
PROJECT LEADER: POM
DESIGNED BY: CJK/AJF
LAND USE PLAN

PLOT DATE: 9/10/2021
DRAWN BY: MED
CHECKED BY: RTL
SHEET 12 OF 13

FILE NAME = V:\Projects\ANY\X5\36086\CADD_MSTN\16h17l\Consultants\Aviation\z16h17l_Land UsePlan.dgn
DATE/TIME = 9/10/2021
USER = 4066

PROPOSED AIRPORT PROPERTY - EASEMENT

REFERENCE NUMBER	BOOK AND PAGE	OWNER	EXISTING LAND USE	ACREAGE	PURPOSE
19	53/426	GILBERT A. ET UX PIERCE	FORESTED	4.6	HEIGHT AND LAND USE CONTROL
20	53/426	HENRY & ILSE VERGI	OPEN SPACE	0.4	HEIGHT AND LAND USE CONTROL
21	N/A	N/A	FORESTED / OPEN SPACE	5.4	HEIGHT AND LAND USE CONTROL
24	N/A	N/A	AGRICULTURAL	3.2	HEIGHT AND LAND USE CONTROL
25	N/A	N/A	CONSERVATION	2.9	HEIGHT AND LAND USE CONTROL
26	N/A	N/A	CONSERVATION / FORESTED	6.5	HEIGHT AND LAND USE CONTROL
27	N/A	N/A	CONSERVATION	< 0.1	HEIGHT AND LAND USE CONTROL
28	N/A	N/A	CONSERVATION	0.2	HEIGHT AND LAND USE CONTROL
29	N/A	N/A	CONSERVATION	0.5	HEIGHT AND LAND USE CONTROL
30	N/A	N/A	CONSERVATION	1.0	HEIGHT AND LAND USE CONTROL
31	N/A	N/A	RESIDENTIAL	0.3	HEIGHT AND LAND USE CONTROL
32	N/A	N/A	RESIDENTIAL	0.2	HEIGHT AND LAND USE CONTROL
33	N/A	N/A	RESIDENTIAL	< 0.1	HEIGHT AND LAND USE CONTROL
34	N/A	N/A	RESIDENTIAL	< 0.1	HEIGHT AND LAND USE CONTROL
35	N/A	N/A	CONSERVATION	0.9	HEIGHT AND LAND USE CONTROL
36	N/A	N/A	CONSERVATION	1.2	HEIGHT AND LAND USE CONTROL

EXISTING AIRPORT PROPERTY - FEE SIMPLE

REFERENCE NUMBER	BOOK AND PAGE	OWNER	ACREAGE	AIP NUMBER	AIP ACREAGE	ACQUISITION DATE	PURPOSE
1	N/A	STATE OF VERMONT	238.9	N/A	N/A	N/A	AVIATION
2	27/158	STATE OF VERMONT	31.3	5902	31.2	1942	AVIATION
3	32/1	STATE OF VERMONT	0.6	6103	X	1961	AVIATION
4	53/426	STATE OF VERMONT	1.2	3-50-0015-08	1.3	1985	AVIATION
5	53/426	STATE OF VERMONT	26.5	6-50-0015-07	12.34	1985	AVIATION
6	65/472	STATE OF VERMONT	0.5	3-50-0015-11	0.5	1989	AVIATION
7	52/102	STATE OF VERMONT	0.7	N/A	N/A	1984	AVIATION
8	55/399	STATE OF VERMONT	0.2	N/A	N/A	1986	AVIATION
9	76/249	STATE OF VERMONT	1.8	N/A	N/A	1993	AVIATION
10	81/79	STATE OF VERMONT	3.9	N/A	N/A	1994	AVIATION
11	83/179	STATE OF VERMONT	2.7	N/A	N/A	1995	AVIATION
12	93/545	STATE OF VERMONT	1.8	N/A	N/A	1995	AVIATION
13	103/534	STATE OF VERMONT	8.3	N/A	N/A	2001	AVIATION
14	104/51	STATE OF VERMONT	9.5	N/A	N/A	2001	AVIATION
15	105/458	STATE OF VERMONT	2.0	N/A	N/A	2002	AVIATION
16	130/433	STATE OF VERMONT	7.1	3-50-0015-26	7.6	2007	AVIATION
		TOTAL	337.0				

LEGEND

- EX. BUILDING
- AIRFIELD PAVEMENT
- CREEK / WATERWAY
- 800 — ELEVATION CONTOURS
- TREELINES
- RPZ — RUNWAY PROTECTION ZONE (RPZ)
- RSA — RUNWAY SAFETY AREA (RSA)
- ROFA — RUNWAY OBJECT FREE AREA (ROFA)
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- RVZ — RUNWAY VISIBILITY ZONE (RVZ)
- TSA — TAXIWAY SAFETY AREA (TSA)
- BRL — 35' BUILDING RESTRICTION LINE (BRL)
- TOFA — TAXIWAY OBJECT FREE AREA (TOFA)
- PART 77 APPROACH SURFACE
- THRESHOLD SITING SURFACE (TSS)
- GLIDE SLOPE CRITICAL AREA
- EX. AIRPORT PROPERTY LINE

N

DECLINATION: 13° 48' W ± 0° 23'
CHANGING BY 0° 4' E/YEAR
ON AUGUST 2021

0 300 600
SCALE IN FEET

- XX — PARCEL NUMBER
- PARCEL LINE
- EX. FENCE LINE
- SURVEY MARKER
- AIRPORT REFERENCE POINT (ARP)
- EX. WINDCONE
- FUTURE HANGER DEVELOPMENT
- FUTURE APRON/TAXIWAY
- PAVEMENT/BUILDING REMOVAL
- FPL — FUTURE PROPERTY LINE
- TOFA — FUTURE TAXIWAY/TAXILANE
- TSA — OBJECT FREE AREA/SAFETY AREA
- EX. AVIGATION EASEMENTS
- FUTURE AVIGATION EASEMENTS
- FUTURE PROPERTY ACQUISITION

PROPOSED PROPERTY ACQUISITION - FEE SIMPLE

REFERENCE NUMBER	BOOK AND PAGE	OWNER	EXISTING LAND USE	ACREAGE	PURPOSE
19 WEST	53/426	GILBERT A. ET UX PIERCE	OPEN SPACE	5.2	AVIATION
19 EAST	53/426	GILBERT A. ET UX PIERCE	FORESTED	7	AVIATION
20	53/426	HENRY & ILSE VERGI	OPEN SPACE	4	AVIATION
21	N/A	N/A	FORESTED / OPEN SPACE	2.8	AVIATION
22	N/A	N/A	RESIDENTIAL / FORESTED	1.5	AVIATION
23	N/A	DAVID & MARY DRANSFIELD	RESIDENTIAL	8.0	AVIATION

EXISTING AIRPORT PROPERTY - EASEMENT

REFERENCE NUMBER	BOOK AND PAGE	OWNER	ACREAGE	AIP NUMBER	AIP ACREAGE	ACQUISITION DATE	PURPOSE
17	31/418	CLIFFORD H. & MARY E. BROWN	< 0.1	6103	N/A	1961	AVIATION
18	51/180	WILLIAM A. & DORIS H. WEEKS	119.9	N/A	N/A	1983	AVIATION
19	53/426	GILBERT A. ET UX PIERCE	64.1	6-50-0015-07	51.7	1985	AVIATION
20	53/426	HENRY & ILSE VERGI	10.5	6-50-0015-07	16.5	1985	AVIATION

REVISIONS

NO.	Description	Date	By

CHA
111 Winners Circle, PO Box 5269 Albany, NY 12205-0269
518.453.4500 • www.chacompanies.com

PROJECT NAME: AIRPORT LAYOUT PLAN
PROJECT NUMBER: CLARENDON-AV-FY17-007

FILE NAME: z16h17l_Property Map.dgn
PROJECT LEADER: POM
DESIGNED BY: CJK/AJF
AIRPORT PROPERTY MAP

PLOT DATE: 9/10/2021
DRAWN BY: MED
CHECKED BY: RTL
SHEET 13 OF 13

FILE NAME = V:\Projects\ANY\K5\36086\CADD_MSTN\16h17l\Consultants\Aviation\z16h17l_Property Map.dgn
DATE/TIME = 9/10/2021
USER = 4066

Outlook

Fw: AAIA Comments to ALP

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-03-04 2:26 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (1 MB)
AAIA Comments to ALP.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, February 25, 2025 3:05 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: AAIA Comments to ALP

Good afternoon,

Please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, February 25, 2025 3:05 PM
To: Helbling, Tony <helbling@wilsonconst.com>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Subject: RE: AAIA Comments to ALP

Hi Tony, thank you for your comments. They'll be sent to the master plan team and included in the public record.

Tony Beach

OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Helbling, Tony <helbling@wilsonconst.com>
Sent: Tuesday, February 25, 2025 12:36 PM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: AAIA Comments to ALP

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Please enter into the record for the Aurora State Airport Master Plan.

Tony Helbling
Chair
AAIA

February 25, 2025

Alex Thomas, Planning and Programs Manager
Tony Beach, State Airports Manager
Brandy Steffen, JLA
Oregon Department of Aviation
3040 25th St SE
Salem, OR 97602
Alex.R.Thomas@odav.oregon.gov

Re – AAIA Comments to Airport Layout Plan (Aurora State Airport Master Plan)

Dear Mr. Thomas,

Please include in the record.

This letter is submitted on behalf of the Aurora Airport Improvement Association (AAIA). AAIA continues to have significant concern about the Aurora State Airport Master Plan.

The proposed master plan neglects airport safety because it continues to plan to punt the runway extension that has been needed for more than 15 years. The safety value of a runway extension to **6000'** has long been the primary focus of this airport's future. Through this most recent Master Planning process, however, it seems ODAV completely lost sight of this top priority. The priority of safety.

The focus of the airport's future has never been the introduction of scheduled airline service or a massive expansion outside the rough footprint of the State-owned land and through the fence properties. Claims otherwise are "boogie-men" meant to distract the process and stir opposition to a runway extension. Aurora State Airport will never be an FAR Part 139 airport.

This current draft Airport Layout Plan and the process that brought us all to this point are clear evidence of ODAV's effort to avoid ever extending the runway to 5500', let alone to the beneficially safe length of 6000'. This proposed plan ignores safety and places any extension far in the future, behind and at the mercy of other projects that due to exorbitant funding requirements, will never happen. This is being done by ODAV claiming those projects are required to be done in the name of safety. This is a false analysis.

The runway extension should happen early in the planning schedule. The FAA allows for this as freely admitted by FAA Planner, Tim House, during a PAC meeting. When questioned, he explained that the sponsor must only show in the plan **progress toward compliance** before the runway can

be extended. This is different from ODAV's claim of perfect design guidance compliance before the runway can be extended.

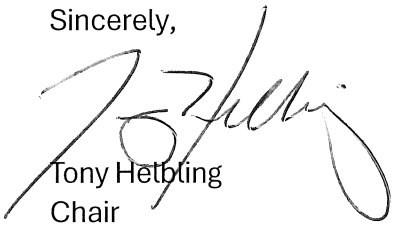
ODAV needs to state in the Master Plan that it intends for the Airport Boundary to be adjusted to take in of the property long identified in all master plans as suitable for airport related use that runs to Airport Road NE in the ALP. Although the FAA does not require specific designation, the State of Oregon land use system, as called out by the courts, does recognize the boundary as important. ODAV is a state agency and as called out in Oregon Revised Statute 836.642, the agency should recognize the importance of the airport, as a whole, whether privately or publicly owned.

ODAV needs to fight for the airport by applying for variances or MoS for ROFA – it is possible as per precedent set in Key West, Florida and Rutland, Vermont. It is clear the FAA can consider pre-existing conditions, as called out in FAA guidance, as reasoning for allowances to be made.

As previously requested, AAIA asks again that ODAV involve Through the Fence (TTF) parties as collaborative partners in the airport Master Plan process moving forward. This request applies across all state airports. The AAIA highlights the following reasons for their involvement:

- **Direct Impact and Proximity:** Through the Fence parties are located within the confines of the airport property, meaning they are directly affected by any developments or changes proposed in the Master Plan. As such, their interests and operations are more closely impacted than those of any other participants in the planning process.
- **Private Investments Based on ORS 836-642:** Through the Fence parties have made private investments based on the efficacy and stipulations of Oregon Revised Statute 836-642. These investments contribute to the airport's development and its operational success.
- **Source of Airport Improvement Needs:** The investments made by TTF parties contribute directly to the need for airport improvements. These improvements, in turn, are necessary for ensuring safety, efficiency, and respectful business operations, which must be coordinated with the surrounding communities.

Sincerely,



Tony Helbling
Chair
AAIA

Outlook

Re: Submittal for the record on Aurora State Airport and expansion plans and alternatives

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 7:59 AM
To phickman@comcast.net <phickman@comcast.net>
Cc 'Dave Mauk' <dave@charbonneaucountryclub.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>

1 attachment (16 KB)
Aurora Airport submittal 1-20-25.docx;

Thank you so much Pat. An email to me is just fine. Thanks so much and I'll pass this along to the rest of the team.

Take care,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: phickman@comcast.net <phickman@comcast.net>
Sent: Monday, January 20, 2025 7:06 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Cc: 'Dave Mauk' <dave@charbonneaucountryclub.com>
Subject: Submittal for the record on Aurora State Airport and expansion plans and alternatives

Hello Brandy,

I did not find the link where comments can be submitted when clicking the link “Refined Preferred Alternative comments”.
It took me to the alternative plans in PDF, no link for any comments submittal that I could locate.
So please see my attached word document for my comments and input regarding the plan and to enter into the public record

Thank you
Charbonneau/Wilsonville resident

[facebook.com/classictubeaudio]

January 20, 2025

I'm opposed to any Aurora State Airport expansion. I have personally been monitoring (over 8 years) the ODA Oregon Department of Aviation overseeing government agencies and many special interest groups as they take steps to expand the Airport for personal and financial gain. The real crux of why this deceptive process is happening with any means possible is so they can bring in large aircraft and create a jet corporate centric airport. As well outside the fence interests to construct space for vertical takeoff aircraft including considered drone delivery services

Why? Business and corporate interests want to increase traffic for jet fuel sales, flight base of operations services (land grabs) on and on, all while pushing out what this airport really is based on, a rural small operation for smaller aircraft. All of this comes at a huge decrease in our citizens' rights to a good quality of life that should not be impacted by very noisy constant jet and jet helicopter operations, pollution, and increased ground traffic.

The airport should get the runway resurfaced/repaired to correct the crown and for improved drainage some additional extension to the North maybe 300 feet. Keep this airport a class D. Do not grant special "waivers" for larger fleets and heavier aircraft that again brings more harm and impact to all surrounding residents. The ODA is a special interest operation catering to the wishes of deep pockets. It has been and continues to not work for the tax paying residents this has been proven over many decades. Untruthful and Corrupt as they have proven time and again

With Regards,

Pat Hickman
Local resident of Wilsonville

Not only was a No Build alternative barely considered, but four of the seven Alternatives which were premised on ARC B-II airfield status (i.e. for small private jets) were removed from consideration the day before this summer's Open House. Apparently ODAV had informed the FAA that it desired to continue inviting larger airplanes including larger/heavier C-II and D-II private jets to use the airport, so the FAA said the airfield must be expanded to the C-II design standards. After the B-II alternatives were summarily dropped without any input from the PAC or the Oregon Aviation Board, then the PAC was informed that the remaining three alternatives were being modified to meet FAA requirements for expanding the airfield to C-II standards. When presented to the Aviation Board, a member described the situation as "a real conundrum."

Outlook

Fw: Draft Airport Layout Plan Sketch

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-02-25 10:26 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (231 KB)
LT ODAV-Draft Airport Layout Plan Sketch.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, February 25, 2025 9:32 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; STEPHENS Cathryn E <CStephens@eugene-or.gov>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Draft Airport Layout Plan Sketch

Good morning,

I am including Ms. Stephens in case she did not receive the original email and attachment.

Brandy and Samantha, please include this in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, February 25, 2025 9:30 AM
To: Darlene Ferretti <Darlene.Ferretti@jordanramis.com>
Cc: oneil@wilsonvilleoregon.gov; mayor@ci.aurora.or.us; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; AHRENS Melissa * DLCD <Melissa.AHRENS@dlcd.oregon.gov>; dlcd.director@dlcd.oregon.gov; HOWARD Gordon * DLCD <Gordon.HOWARD@dlcd.oregon.gov>; AttorneyGeneral@doj.oregon.gov; WARNER Chris * GOV

<Chris.WARNER@oregon.gov>; James D. Howsley <jamie.howsley@jordanramis.com>
Subject: RE: Draft Airport Layout Plan Sketch

Hi Ms. Ferretti,

Thank you for these comments. I see that they are addressed to our Board Chair Cathryn Stephens, but I don't see her as a recipient of this email. I will forward it to her to make sure she receives it, and I will forward it to the rest of the planning team and it will be included in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Darlene Ferretti <Darlene.Ferretti@jordanramis.com>
Sent: Tuesday, February 25, 2025 9:19 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Oregon Department of Aviation <mail.aviation@ODAV.oregon.gov>
Cc: oneil@wilsonvilleoregon.gov; mayor@ci.aurora.or.us; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; AHRENS Melissa * DLCD <Melissa.Ahrens@dlcd.oregon.gov>; dlcd.director@dlcd.oregon.gov; HOWARD Gordon * DLCD <Gordon.HOWARD@dlcd.oregon.gov>; AttorneyGeneral@doj.oregon.gov; WARNER Chris * GOV <Chris.WARNER@oregon.gov>; James D. Howsley <jamie.howsley@jordanramis.com>
Subject: Draft Airport Layout Plan Sketch

You don't often get email from darlene.ferretti@jordanramis.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Good morning,

Please find attached a letter of today's date from Mr. Howsley.

Thank you,
Darlene

Darlene Ferretti | Legal Assistant
Direct: (503) 598-5551

JORDAN RAMIS

1211 SW Fifth Ave, Suite 2700
Portland OR 97204

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JORDAN RAMIS

Jamie D. Howsley
jamie.howsley@jordanramis.com
WA Direct Dial: (360) 567-3913
OR Direct Dial: (503) 598-5503

PacWest, 27th Floor
1211 SW Fifth Avenue
Portland, OR 97204
T (503) 598-7070
F (503) 598-7373

February 25, 2025

VIA EMAIL ONLY

Tony Beach
State Airports Manager
Oregon Department of Aviation
3040 25th Street SE
Salem, OR 97302
Email: Anthony.beach@odav.oregon.gov

Cathryn Stephens
Oregon Aviation Board
Oregon Department of Aviation
3040 25th Street SE
Salem, OR 97302
Email: mail.aviation@odav.oregon.gov

Re: Draft Airport Layout Plan Sketch

Dear Mr. Beach and Ms. Stephens:

Thank you for hosting the Public Advisory Committee meetings for the new Aurora State Airport Master Plan. We represent Smith Aurora, LLC which owns tax lots 1400 and 1500 on the west side of Highway 551, which are zoned Exclusive Farm Use. On these and adjacent tax lots, large greenhouses and open fields grow food crops and flowering plants for distribution throughout the Pacific Northwest. Smith is a family business which has made significant capital investments in the farm and employs 180 workers. The Master Plan would diminish Smith's ability to adequately supply its customers. Therefore, Smith does not support the current draft Airport Layout Plan in the proposed Master Plan.

The draft Airport Layout Plan sketch illustrates that a broad strip of property will be taken from Smith's property for the relocation of the highway. It is important for ODAV to understand the adverse impacts to Smith's farm operations which would result from that taking to the property, which means there is no room left for essential truck operations and the septic drain fields. Specifically, the taking will eliminate much of the truck maneuvering area and hamstring the shipping operations, and thereby increase operational costs and reduce farm income after the project is complete. It also would eliminate half of the parking for full size tractor trailers. The taking will displace the large septic field which abuts the current right-of-way. Relocation of those two uses onto other areas of the property is problematic due to the location of the existing greenhouses. Finally, the taking will displace existing fields along the southern highway frontage where crops currently grow. Those relocations will reduce the areas available for growing crops with a corresponding reduction in farm income.

ODAV should anticipate a considerable cost to cure these problems, and thus substantial severance damages for the taking. In an earlier meeting, ODAV's consultant David Miller stated that the cost estimates for acquiring property were derived using the assessor's market value. But the assessor does not measure severance damages. Thus far we have not seen any indication that severance damages for any impacted property are included in the Capital Improvement Plan cost estimate for the highway relocation (or in the costs of other property acquisitions shown on the draft plans). That financial omission must be corrected before the plan is submitted to the FAA or the Oregon Aviation Board if those decision makers are to have a realistic cost estimate. And legally speaking, adoption of

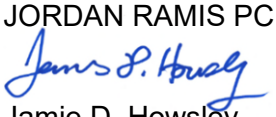
the plan by the Oregon Aviation Board must address the statewide planning goals and thus, under Goal 2, be supported by an adequate factual base. *See* OAR 660-015-0000(2). If ODAV simply disregards this testimony and the testimony of others regarding the severance damages to their properties, then any decision adopting the plan will lack substantial evidence to support it. *Columbia Pacific v. City of Portland*, 289 Or App 739, 757, 412 P3d 258, *rev den*, 363 Or 390 (2018).

Many participants in the PAC meetings have noted the very large public cost for moving the highway, especially in relation to the comparatively short runway extension and the small number of benefitted airport users. The alternative airports including Salem, McMinnville, and Hillsboro are located in cities and already have longer runways and ample areas for additional hangars, without adversely impacting Smith's farm operations. ODAV and OAB should recognize that the region has nearby alternatives for the planes that need longer runways. Under Oregon land use law, ODAV cannot expand its urban airport onto land zoned for Exclusive Farm Use when nearby airports have ample aviation facilities for the private jets that the runway extension and highway relocation are intended to serve. *See* OAR 660-004-0020(2)(b) ("Areas that do not require a new exception cannot reasonably accommodate the use.").

Thank you for your attention to this matter.

Sincerely,

JORDAN RAMIS PC



Jamie D. Howsley
Admitted in Oregon and Washington

cc: Peter Rempp, Smith Gardens, Inc.
Mayor Sean O'Neil, oneil@wilsonvilleoregon.gov
Mayor Brian Asher, mayor@ci.aurora.or.us
Kenji Sugahara, ODAV, kenji.sugahara@odav.oregon.gov
Melissa Ahrens, DLCD, melissa.ahrens@dlcd.oregon.gov
Brenda Bateman, DLCD, dlcd.director@dlcd.oregon.gov
Gordon Howard, DLCD. gordon.howard@dlcd.oregon.gov
Dan Rayfield, Attorney General, AttorneyGeneral@doj.oregon.gov
Chris Warner, Governor's Office, Chris.Warner@oregon.gov

Outlook

Fw: UAO Airport Master Plan - Contact from Betsy Johnson

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Fri 2025-02-07 11:26 AM
To Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Samantha Peterson <SPeterson@CenturyWest.com>
Sent: Friday, February 7, 2025 11:14 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Brandy Steffen <brandy.steffen@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; W. Matt Rogers <WRogers@CenturyWest.com>
Subject: UAO Airport Master Plan - Contact from Betsy Johnson

For the public record.
…

Date: 2/6/2025
Telephone call to CWE office from Ms. Betsy Johnson to David Miller, Century West Engineering
Time: 3:13pm
Call Duration: 32 minutes (32:13)
Number: 503.313.3160

On 2/6/25, former Senator Johnson called David Miller to discuss the comments she made on the record earlier in the day during the Oregon Department of Aviation (ODAV) board meeting, and to ask several related questions. The conversation covered topics discussed at the board meeting and no new information related to the refined preferred alternative was discussed. Ms. Johnson provided a range of opinions and conclusions on the preferred alternative, the overall planning process, ODAV's role as airport owner, and the Federal Aviation Administration (FAA).

Caller areas of interest/concern:

- **Private drainfield at south end of Runway 17/35.** Ms. Johnson asked where the drainfield will be moved to, and why proposals to modify the current drainfield to meet FAA standards, rather than relocating it, have not been considered. My responses were consistent with comments made earlier in the day during the board meeting. I noted that the decision to remove/relocate the drainfield out of the runway safety area (RSA) was made by ODAV and FAA based on available information.
    - The southern drainfield doesn't meet (RSA) grading or load carrying standards as it sits today (James Kirby - CWE)
    - *The drainfield owner/lease holder has not provided enough information (despite many recent requests) to make an assessment the viability of their proposal*. (James Kirby - CWE)

I noted that the recommendation is to eliminate a non-standard item currently located in the RSA, and that future drainfield locations are TBD. No alternative locations on ODAV-owned airport property have been proposed and no evaluations of potential sites within the adjacent privately owned hangar development area have been performed as part of the master plan.

- **Hubbard Highway Shift and Impacts to Adjacent Property Owners.** Ms. Johnson repeated her earlier concerns about the master plan creating "a cloud of condemnation" for the parcels abutting the west side of the Hubbard Highway by showing the highway shift and property acquisition. She dismissed the proposed highway shift as financially unfeasible and unnecessary.

- **Overall Feasibility of the Master Plan to be Implemented/Funded.** Ms. Johnson repeated her earlier comments that the plan would never be funded, so why should the Board ever approve it.

- **Impacts on Airport Users, Jobs, Private Investment, Current Legislature Activities, etc**. Ms. Johnson offered extended comments about these topics and questioned ODAV's intent.

…

Date: 2/7/2025
Telephone call to CWE office from Ms. Betsy Johnson to David Miller, Century West Engineering
Time: 10:33am
Call Duration: <2 minutes (1:33)
Number: 503.313.3160

On 2/7/25, former Senator Johnson called David Miller to follow-up on her previous call (2/6/25) asking for more information about my comment:

> *The drainfield owner/lease holder has not provided enough information (despite many recent requests) to make an assessment the viability of their proposal. (James Kirby - CWE)*

She asked who specifically has not responded, and I suggested that she speak with James Kirby (CWE) directly, as I was not personally involved in those communications.

CENTURY WEST ENGINEERING

David M. Miller, AICP I Lead Aviation Planner
208 West 9th Avenue #3 I Ellensburg, WA 98926
509.795.5870 x600 I 503.860.1947 (Cell) I dmiller@centurywest.com
www.centurywest.com

Please consider the environment before printing this e-mail

Outlook

Fw: Aurora

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2025-01-22 9:30 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (780 KB)
Aurora comments - 01-21-2025.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, January 22, 2025 7:44 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: RE: Aurora

Here's the attachment.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Samantha Peterson <SPeterson@CenturyWest.com>
Sent: Tuesday, January 21, 2025 9:39 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: RE: Aurora

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Same with this one, I'm not seeing the attached letter.

Thanks,
Samantha

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 4:42 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora

Good afternoon, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 4:39 PM
To: Betsy Johnson <betsy@betsyjohnson.com>; brandy.steffen@jla.us.com; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Sen Girod <Sen.FredGirod@oregonlegislature.gov>
Subject: RE: Aurora

Hi Betsy, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Betsy Johnson <betsy@betsyjohnson.com>
Sent: Tuesday, January 21, 2025 4:13 PM
To: brandy.steffen@jla.us.com; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Sen Girod <GirodF@oregonlegislature.gov>
Subject: Aurora

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

As attached

Betsy Johnson

Post Office Box R • Scappoose, Oregon 97056
(503) 543-4200 • FAX (503) 543-5296
Email: betsy@betsyjohnson.com

January 21, 2025

Alex Thomas, Planning & Programs Manager
Tony Beach, State Airport Manager
Brandy Steffen, JLA

RE: January 21, 2025 Comment Letter ODAV Updated Refined Proposed Preferred Alternative

Mr. Thomas, Mr. Beach and Ms. Steffen,

I have communicated with the Oregon Department of Aviation previously. While my "in person" testimony may have been deleted or "otherwise lost", I appreciate the opportunity to comment on the current status of thee ODAV Updated Refined Proposed Preferred Alternative.

This latest iteration of is a vast improvement over original planning concepts. Those of us working toward mutually agreeable solutions appreciate ODAV's willingness to make modifications, but problems still exist.

1. The updated and modified alternative still significantly damages front-line business hangars at Aurora by removing drain fields relied upon by those hangars.

   Alternatives to the removal of the Southend septic system have been offered by recognized airport planning experts. These "compromise" alternatives have been summarily dismissed by ODAV staff.

   I would ask that a meeting be convened immediately to thoroughly "vet" proposed solutions for the "drain field issue" including exploration of an EMAS system or a modification of standards ("MOS") until a viable alternative septic drain field location is identified at the airport.

   I refer you to correspondence already in the record from Mr. Aron Faegre, as well as a very comprehensive memorandum from Wendie L. Kellington dated January 21, 2025.

2. ODAV has failed to expand the airport boundary to include all the land that every previous Master Plan since 1976 has identified as suitable for airport-related development. Even land ODAV wishes to acquire from willing sellers for airport development is rendered meaningless if it is not identified in the airport boundary.

3. As the Court of Appeals has previously pointed out, putting land into the airport boundary is what ODAV is supposed to do with land it forecasts as eligible for airport development.

   Again, I refer you to Ms. Kellington's January 21, 2025 Memorandum.

4. I respectfully request an "in person" meeting with Aurora Airport Stakeholders to finalize the Master Plan "Preferred Alternative" prior to any submission to the FAA. Previously, meetings have all been by "Zoom", with totally inadequate opportunity for real dialog and consensus.

At this juncture, ODAV has been reasonable about modifications to previous planning documents. These modifications demonstrate ODAV tries to seek compromise, but also reveals that ideas fundamentally different from the ODAV staff have merit and should be included in final documents submitted to the FAA.

As a former Director of ODAV and a 20 year veteran of the Oregon Legislature, I believe it is reasonable to expect that state agencies should work with transparency to deliver both good policy as well as a defensible process.

Sincerely,

Betsy Johnson

Cc: Senator Fred Girod

Outlook

Re: Aurora State Airport Master Plan Website Comments - Brett Kacalek

---

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 2025-01-23 3:20 PM
To pondrocker@gmail.com <pondrocker@gmail.com>
Cc THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Samantha Peterson <SPeterson@CenturyWest.com>

Thank you for your comment, Brett. I've sent this along to the rest of the team as well.

Thank you,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com

From: Brett Kacalek <noreply@jotform.com>
Sent: Wednesday, January 22, 2025 4:02 PM
Subject: Re: Aurora State Airport Master Plan Website Comments - Brett Kacalek

Aurora State Airport Master Plan Website Comments

Name	Brett Kacalek
Organization	Bullfrog Properties, LLC
Comments or questions?	Date: 1/22/2025

To Whom It May Concern,

Subject: Opposition to the Aurora State Airport Master Plan and Proposed Relocation of Hubbard Highway

Dear Alex Thomas, ODAV Planning and Programs Manager,

I am writing to formally express my opposition to the proposed Aurora State Airport Master Plan, particularly the relocation of Hubbard Highway, due to the significant

negative impacts it will have on my property located at 22540 Boones Ferry Rd NE, Aurora, OR 97071.

Key Concerns:
1. Impact on Property Use and Loss of Property
The proposed relocation of Hubbard Highway would directly encroach on my property, resulting in a loss of land. This loss not only diminishes the overall value of my property but also disrupts its current use. As a property owner, I depend on the land for nursery stock, livestock, and a landscape business. This relocation would render portions unusable or inaccessible, severely impacting these operations.

2. Lack of Notification and Inclusion in the Planning Process
We were not adequately informed about this project, nor was the community of property owners affected. Proper notification and opportunities for feedback are critical to ensure transparency and fairness, yet these were insufficient. There may still be property owners who will be impacted but have not been adequately informed. The community deserves opportunities to voice legitimate concerns and not be shut out of the process.

3. Increased Noise Pollution
The proposed airport expansion and Hubbard Highway realignment will significantly increase noise pollution. The proximity of additional air traffic and vehicles to our facility will disrupt operations and create a diminished quality of life. Increased noise levels will also impact the marketability and value of my property, making it less desirable for future buyers.

4. Drainage and Water Runoff
The realignment and associated construction could alter natural drainage patterns, potentially causing flooding or erosion issues on my property and those in the surrounding area. This could result in costly mitigation efforts and long-term environmental damage.

5. Economic Burden and Unfair Compensation
The potential loss of property and reduced utility will create an economic burden. Short-term, the disruption of operations will cause immediate financial strain due to the inability to fully utilize the land for business purposes. Long-term, the loss of property and reduced accessibility will diminish the overall value and growth opportunities of the business. Compensation for such impacts rarely reflects the true loss in value and usability, further exacerbating the financial burden placed on property owners.

Request for Reconsideration
Given these substantial concerns, I strongly urge the Oregon Department of Aviation and all associated planning authorities to:

Reevaluate the necessity of relocating Hubbard Highway and explore alternative routes that minimize the impact on private property.

Engage directly with affected property owners to ensure their voices are heard, and their concerns are addressed.

Conduct a comprehensive economic impact study to assess the broader implications of this project.

Consider the economic impact potential lawsuits from disgruntled property owners will bring to the proposed roadway relocation.

In addressing the non-standard Runway and Taxiway Safety Areas (RSA/TSA) at Aurora State Airport, several alternatives have been considered that do not involve relocating Hubbard Cutoff Road. Notably:

Refined Alternative 2 – Shift Runway East and Extend Runway North to 5,500 feet: This proposal suggests shifting the runway approximately 85 feet east and extending it 497 feet north, achieving a total length of

5,500 feet. This adjustment would clear the Runway Object Free Area (ROFA) of existing public roads without altering Hubbard Highway. However, it necessitates the acquisition of approximately 37 acres of property east of the airport and the relocation of certain facilities, including the Air Traffic Control Tower (ATCT).
JLA PUBLIC INVOLVEMENT

Realistic Alternative No. 3: Proposed by George Van Hoomissen, this alternative involves extending the existing runway by 500 feet to the north, bringing it to a total length of 5,500 feet, without relocating Hubbard Highway. While this approach would not fully resolve all non-standard conditions, it would enhance safety and operational capabilities with minimal impact on surrounding properties.
OREGON

Realistic Alternative No. 4: Also suggested by Van Hoomissen, this option entails extending the runway 500 feet north and shifting Hubbard Highway westward within its existing right-of-way. This would mitigate some ROFA infringements without requiring significant property acquisitions. However, it would necessitate coordination with the Oregon Department of Transportation (ODOT) and may not fully eliminate all non-standard conditions.
OREGON

These alternatives aim to address FAA compliance issues while minimizing disruptions to existing infrastructure and private properties.

Conclusion
While I understand the desire to improve the Aurora State Airport, such developments should not come at the expense of local property owners and community members. I respectfully request that my concerns be given due consideration and that the proposed relocation of Hubbard Highway be revisited to prevent undue harm to my

property and livelihood.

Thank you for your attention to this matter. I look forward to your response and the opportunity to discuss potential resolutions.

Sincerely,

Brett Kacalek
Property Owner

Rod Kacalek
Property Owner

Bullfrog Properties, LLC

22540 Boones Ferry Rd NE
Aurora, OR 97071

503-678-7744 Office

This email may contain confidential information and is for the sole purpose of the intended recipient. If you are not the intended recipient, please contact the sender immediately and delete the e-mail and any attachments from your computer.

	I would like to receive email updates.
If you would like a response, please tell us the best way to contact you:	Email
Email	pondrocker@gmail.com
Phone Number	(503) 209-3687

You can edit this submission and view all your submissions easily.

Outlook

Fw: UAO airport plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 1:09 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 7:39 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: UAO airport plan

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 7:34 AM
To: Mohamed Michael Kanso <m.m.kanso@gmail.com>; brandy.steffen@jla.us.com
Subject: RE: UAO airport plan

Hi Michael, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Mohamed Michael Kanso <m.m.kanso@gmail.com>
Sent: Monday, January 20, 2025 7:04 PM
To: brandy.steffen@jla.us.com; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: UAO airport plan

You don't often get email from m.m.kanso@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear Tony, Thank you for considering all airport users, neighbors, airport businesses and airport property owners input. Thank you for the significant improvements in the current plan over the previous plan! Please consider highlighting the importance of maintaining the septic systems and their leases, these are owned by airport tenants and located on airport property as we feel these are a critical piece of the airport infrastructure and represent major investments. We ask that you include the 1.1 acre ODAV property purchase of the ramp space currently adjoining the south end of main UAO ramp (south of the tower) in your "priority purchase" list as this will significantly improve access to CAA as well as Pacific Coast Avionics, the main public ramp, all the mid-field hangars and Aurora Flight trainings ramp. This notable ramp and taxi-lane improvement will increase safety and flow much like the prior plan considered via a parallel taxiway and road but without displacing any hangars or the huge cost. Finally, please eliminate or reduce to an absolute minimum the amount of airport boundary increase, my definition of the airport boundary is all the property currently in aviation use or development and outlined by Arndt rd, Airport rd, Keil rd, & highway 551. Adding additional real estate to UAO would be extremely expensive and is very unpopular with our neighbors and will destroy very important businesses and jobs at the airport. Please use any and all FAA approved mitigation measures to keep the airport safely in its current boundaries. Thank you again for listening and your recent improvements to the plan.

Sincerely,
Michael Kanso

Outlook

Fw: AAIA TESTIMONY FOR RECORD CONCERNING KUAO UPDATED REFINED PREFERRED ALTERNATIVE

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2025-01-22 9:08 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

2 attachments (2 MB)
AAIA LTR 1.21.25 Prefered alternative FINAL.pdf; Exhibit 1 MP- Masterplan Alternative 2025-1-20B.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 3:31 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: AAIA TESTIMONY FOR RECORD CONCERNING KUAO UPDATED REFINED PREFERRED ALTERNATIVE

Good afternoon, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Wendie Kellington <wk@klgpc.com>
Sent: Tuesday, January 21, 2025 1:34 PM

To: brandy.steffen@jla.us.com; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Tony Helbling - Wilson Construction Company (helbling@wilsonconst.com) <helbling@wilsonconst.com>; Ted Millar <tmillar@wwpmi.com>; Aron Faegre (faegre@earthlink.net) <faegre@earthlink.net>; Bruce Bennett - Aurora Aviation (bruce@auroraaviation.com) <bruce@auroraaviation.com>; Schuster, Brad <brad.schuster@aopa.org>; Rachel Bacon <rb@klgpc.com>
Subject: AAIA TESTIMONY FOR RECORD CONCERNING KUAO UPDATED REFINED PREFERRED ALTERNATIVE

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Good Afternoon,

Attached is the Aurora Airport Improvement Association's testimony (AAIA letter plus exhibit) concerning ODAV's proposed updated "Refined Preferred Alternative" for the Aurora State Airport Master Plan. Please provide a copy to the ODAV Board. Please confirm receipt. Thank you. Regards, Wendie Kellington

KELLINGTON LAW GROUP

Wendie L. Kellington | Attorney at Law.
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Chambers RANKED IN USA 2024 Wendie Kellington

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KELLINGTON LAW GROUP, PC

Wendie L. Kellington
P.O. Box 2209
Lake Oswego Or
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January 21, 2025

VIA ELECTRONIC MAIL
Alex Thomas
Planning and Programs Manager
Tony Beach
State Airports Manager
Oregon Department of Aviation
Brandy Steffen
JLA

Re: January 21, 2025 Comment Letter on Behalf of Aurora Airport Improvement Association for Aurora State Airport Master Plan – ODAV Updated Refined Proposed Preferred Alternative

Mr. Thomas, Mr. Beach and Ms Steffen,

This letter is written on behalf of the Aurora Airport Improvement Association (AAIA), whose members include Aurora Airport aviation private business stakeholders, including AAIA members who are also PAC members: Ted Millar for TLM Holdings, LLC, Tony Helbling for Wilson Construction, John Bickford for Atlantic Aviation, Rian Johnson for Vans Aircraft, Dave Wagner, Willamette Aviation/Tri Prop Aviation, all of whom are together referred to herein as "Aeronautical Stakeholders". Please include this letter in the record for the Oregon Department of Aviation's (ODAV) proposed Updated Refined Preferred Alternative for the Aurora State Airport Master Plan.

While it is Appreciated, ODAV's Updated Refined Preferred Alternative Still Removes the Drainfield Relied Upon by the Frontline Hangars. The Southend Septic System Must be Retained, Otherwise the Frontline Hangars are Useless

1. **ISSUE**: ODAV's Updated Refined Alternative Still "Removes" the Frontline Hangars by Removing their Septic System with No Alternative:

Based upon public input, ODAV modified the Preferred Alternative to remove the planned condemnation of the frontline hangars and removed the service road paralleling the taxiway that was driving ODAV's condemnation plan. The Aeronautical Stakeholders greatly appreciate that adjustment to ODAV's Updated Preferred Alternative. But while the Aeronautical Stakeholders appreciate this adjustment to the Updated Preferred Alternative, it is only a symbolic improvement

so long as ODAV continues to show a preferred master plan that removes the Southend Drainfield, with no identified alternative. No one can use the front line hangars without the septic system that ODAV's Updated Refined Preferred Alternative plans to "remove". Saving the frontline hangars from condemnation is obviously meaningless if ODAV removes the Southend Drainfield. Please understand that the 1000+ jobs and $150 million in private investment those hangars represent goes away without a septic system, just as surely as if the front end hangars were condemned by ODAV.

REQUEST: The Updated Preferred Alternative should be adjusted to leave the drainfield in place[1] with the caveat that the preferred alternative ultimately selected should simply state that either (1) the drainfield will be improved to meet FAA standards (i.e. using the EMAS system), or (2) moved if it cannot be improved to FAA design standards at such time as there is a viable alternative location identified for the drainfield at the airport. Concerning the second option, a Modification to Standards (MOS)[2] could be approved to last until a viable alternative septic drainfield location is identified at the airport.[3] Regarding the first option, we note that there is undisputed evidence in the record that it is feasible to improve the drainfield with an EMAS system that would meet all relevant FAA standards, as Mr. Faegre explains in his letter also submitted this date. As Mr. Faegre explains, these EMAS systems are successfully used in many airports including large airports serving aircraft that are much heavier than those at Aurora.

Legal Basis: Making this requested adjustment to the Updated Refined Preferred Alternative meets ODAV's legal responsibilities and makes good policy sense. Further, ODAV is bound by ORS 836.640-642, which is a statute developed by Business Oregon and adopted by the legislature to strongly encourage private investment at the Aurora Airport. The statute commands ODAV to carry out that objective. ORS 836.642 requires ODAV to "Preserve investments [at the Aurora Airport] and the level of service provided by [the Aurora Airport]" and to "promote economic development" at Aurora "by creating family wage jobs, increasing local tax bases" through support of private aviation-related uses so that they may "develop

[1]As noted in other submittals, ODAV expressly approved the drainfield's current location as a part of the goal exception that Marion County approved. This is already in the record and for brevity is not repeated here.

[2] As Mr. Faegre points out in his letter submitted this date, FAA no longer limits MOS to a five year duration per Engineering Policy Memo 23-01 and instead now simply and practically requires a "status update on the nonstandard condition every five years" and that "to the extent practical" that the nonstandard condition will get "high priority" for funding to "mitigate the associated nonstandard condition whenever the opportunity to meet standards becomes feasible."

[3] Details concerning these two options are explained in HDSE's letter submitted this date for the record of this matter. The point we hope to make here is that both of these options for the drainfield are feasible and reasonable. The binary demand in the Updated Refined Preferred Alternative to simply remove the drainfield to nowhere is unhelpful, destructive and wholly unnecessary.

and thrive." ODAV's Updated Refined Preferred Alternative that fails to accommodate the septic system that such economic development depends upon, is in direct contravention of those statutes.

ODAV Must Identify, Show, and Expand the Oregon Land Use Airport Boundary as Required by ORS 836.616(2) and ORS 836.640-642

ODAV seeks to designate as "Reserves" private land at the airport for ODAV acquisition from willing sellers for the purpose of putting that land to aeronautical use. ODAV states it will use FAA funding to acquire such land. However, this cannot be achieved unless ODAV expands the Oregon land use airport boundary as required by ORS 836.616(2) and OAR 660-13-0040. A diagram of the required airport boundary to meet ODAV's objectives is attached as Exhibit 1.

The Court of Appeals explained that inclusion of land within the airport's land use boundary is necessary in order for ODAV to be able to achieve its goal of putting that land to aeronautical use:

> In this case, it is undisputed that the relevant part of the airport boundary is the edge of the state-owned airport property that is bordered by Keil Road. *See* OAR 660-013-0040 (the airport boundary, for purposes of ORS 836.616(2), is shown on a map "adopted by a local government" pursuant to "comprehensive plan and land use regulation requirements").[17] As explained above, the provisions of ORS 836.600 to 836.630 allow airport uses and supersede ORS 215.213 and 215.283 "[w]ithin airport boundaries." ORS 836.616(2); *see also* OAR 660-013-0100 (requiring local governments to "adopt land use regulations for areas within the airport boundaries" that authorize the airport uses enumerated in ORS 836.616).

[17] The map of the Aurora State Airport that has been adopted by Marion County is the 1976 Master Plan ALP, which is part of the Marion County Comprehensive Plan.

In the absence of expanding the airport's land use boundary, ODAV cannot meet FAA grant assurances that would make ODAV eligible for FAA funding to acquire the properties in the "Reserve". This is because those grant assurances require certification that the uses for which FAA grant funds are to be expended are lawful under state law and local law. ODAV must be prepared to make those grant assurances at the time when a willing seller emerges, otherwise the willing seller opportunity will be lost. The way Oregon law says ODAV can make such grant assurances and be in a position to timely acquire such land from a willing seller, is

to establish the airport boundary in the master plan around all of the land that ODAV envisions being put to airport related uses over the master plan's 20-year horizon. As the Court of Appeals noted, the airport's land use boundary has remained static since the land use boundary was first established in the 1976 master plan that was incorporated into the Marion County comprehensive plan. It is time to adjust the airport's land use boundary now to achieve ODAV's and the legislature's objectives for the Aurora Airport. It is undeniable that ODAV should do so as a part of the master planning effort in order to realize the promise of the Updated Preferred Alternative.

Further, ORS 836.640(1) and (5) expect that ODAV will expand the land use airport boundary to include the privately owned through the fence areas to achieve the outcomes listed in ORS 836.642. Again, ODAV cannot achieve the objectives that the legislature requires ODAV to achieve in the absence of expanding the airport's land use boundary.

Finally, expanding the airport land use boundary is necessary for ODAV's Keil Rd and related ODAV acquisitions to result in the intended airport related use. If ODAV wishes to move drainfields, for example, the potential areas to do so should also be in the airport boundary. If ODAV wants to relocate Keil Road, then the area for such relocation must be in the airport land use boundary. Those master plan features are otherwise on land zoned EFU. In the Court of Appeals words, "airport uses" are allowed to "supersede [EFU zone rules]" when they are "[w]ithin airport boundaries." Accordingly, now is the time when the land use boundary for the airport should be expanded because now is the time when it is efficient and effective to do so - all of the information required by OAR 660-012-0040 is being developed in this process and is easily available.

REQUEST: Expand the Aurora Airport land use boundary as contemplated and required by ORS 836-616(2), 836.640-642, and OAR 660-013-0040 as a part of the selection of the airport's preferred alternative.

Legal Basis: ORS 836-616(2), 836.640-642, and OAR 660-013-0040.

Invitation for a Meaningful Meeting to Discuss the Details

Given the importance of getting the master plan right, the importance of the continued success of the airport and the commands of ORS 836-616(2), 836.640-642, and OAR 660-013-0040, ODAV should meet, in person, with representatives of the Aeronautical Stakeholders to finalize the master plan's preferred alternative so that it (1) is capable of achieving ODAV's and the legislature's goals for the airport, (2) can provide the framework for the airport to continue to thrive over the master plan's 20-year planning horizon, and (3) minimize the likelihood of endless appeals

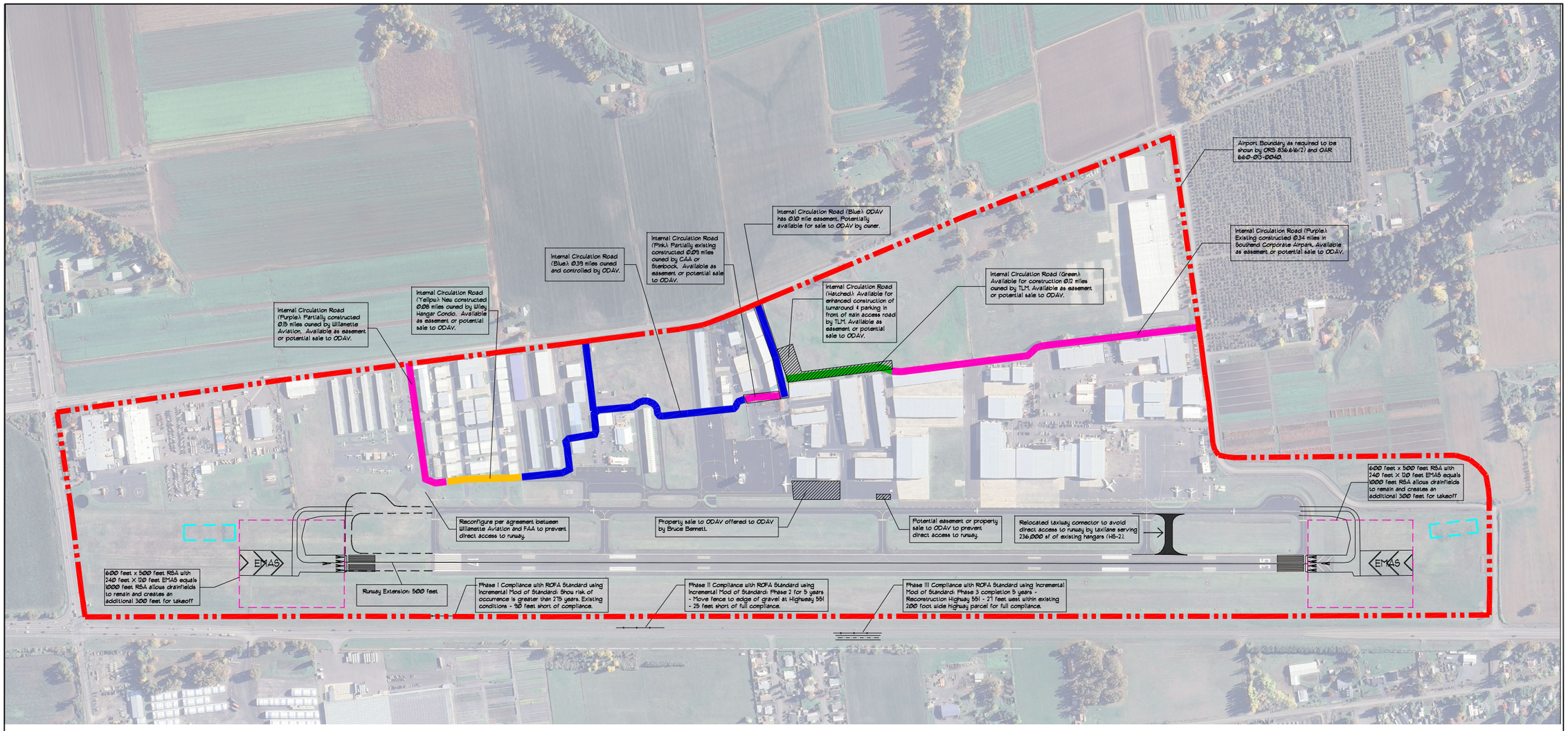
by airport opponents. AAIA stands willing to participate in such a constructive discussion.

Thank you for your consideration.

Very truly yours,

Wendie L. Kellington

WLK:wlk
Exhibit 1 – Airport Land Use Boundary Diagram
CC: Tony Helbling, President AAIA



1.

SITE PLAN

0 200 400 600

N

KEY

- AIRPORT BOUNDARY AS REQUIRED TO BE SHOWN PER ORS 836.616(2) AND OAR 660-013-0040
- 500 FT RUNWAY EXTENSION
- 600 FT X 500 FT RSA WITH EMAS EQUALS 1000 FT RSA
- DRAINFIELDS CAN REMAIN AS CONSTRUCTED IN SMALLER RSA USING EMAS

VERIFY SCALES

BAR IS ONE INCH ON ORIGINAL DRAWING. 0" 1"
IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY.

NO.	DATE	BY	APPR.	REVISIONS

AURORA AIRPORT IMPROVEMENT ASSOC.
PROPOSED ALTERNATIVE

DESIGNED BY:	DRAWN BY:	CHECKED BY:	SCALE:
AF	AF/TH	AF	300' = 1"

DATE: JANUARY 20, 2025
PROJECT: MP – MASTERPLAN ALT AAIA

AURORA STATE AIRPORT (UAO)

AURORA STATE AIRPORT – MASTER PLAN ALTERNATIVE AAIA

DRAWING
MP–AAIA

Outlook

Fw: 040725-UAO-ALPFullSet.pdf

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 4/14/2025 8:12 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN
| **JLA PUBLIC INVOLVEMENT**

Partner + Senior Program Manager

brandy.steffen@jla.us.com »
Schedule
a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Friday, April 11, 2025 3:02 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: 040725-UAO-ALPFullSet.pdf

Good afternoon,

Please include in the public record.

Thank you, have a great weekend!

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Friday, April 11, 2025 3:01 PM
To: Wendie Kellington <wk@klgpc.com>
Cc: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Ted Millar <tmillar@wwpmi.com>
Subject: RE: 040725-UAO-ALPFullSet.pdf

Hi Wendie,

I spoke with our planner at the FAA, they indicated it would not be a problem to make this edit. We'll send an updated version to the FAA and publish it on the website next week.

Thanks again for your input and participation throughout this process.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Wendie Kellington <wk@klgpc.com>
Sent: Friday, April 11, 2025 11:44 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Ted Millar <tmillar@wwpmi.com>
Subject: Re: 040725-UAO-ALPFullSet.pdf

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Tony, thank you. Why is this master plan different from all the others regarding the TLM property? Removing the designation of 'suitable for airport related development' is not consistent with the county plan or the idea that ODAV can acquire the property for aviation uses. ODAV does itself and aeronautics no favors with this very significant change. I strongly recommend that ODAV restore that longstanding designation.

On Apr 11, 2025, at 11:30 AM, BEACH Anthony <Anthony.BEACH@odav.oregon.gov> wrote:

Good morning Wendie,

The Airport Layout Plan (ALP) describes and graphically depicts recommended development for the Airport based on facility needs and forecast demand. The ALP Plans set is just one part of the Master Plan, and includes specific criteria for the Airport facility and sponsor-owned property to satisfy FAA requirements and grant obligations. Part of the ALP Plans set include off-airport land use, which depict city/county zoning and land use designations.

In addition to the Through The Fence Access Points being identified on the ALP, aeronautical uses on adjacent private property are depicted in the Master Plan in Working Paper No. 1. Figures 2-13 and 2-16 show the “Aviation Related Through-the-fence (TTF)” and “TTF Areas.”

Thanks again for your comment.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Thursday, April 10, 2025 4:44 PM
To: Wendie Kellington <wk@klgpc.com>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Cc: Ted Millar <tmillar@wwpmi.com>
Subject: RE: 040725-UAO-ALPFullSet.pdf

Hi Wendie, we’ve received your comments, they’ll be included in the public record.

We will take a look and get back to you.

Thank you,

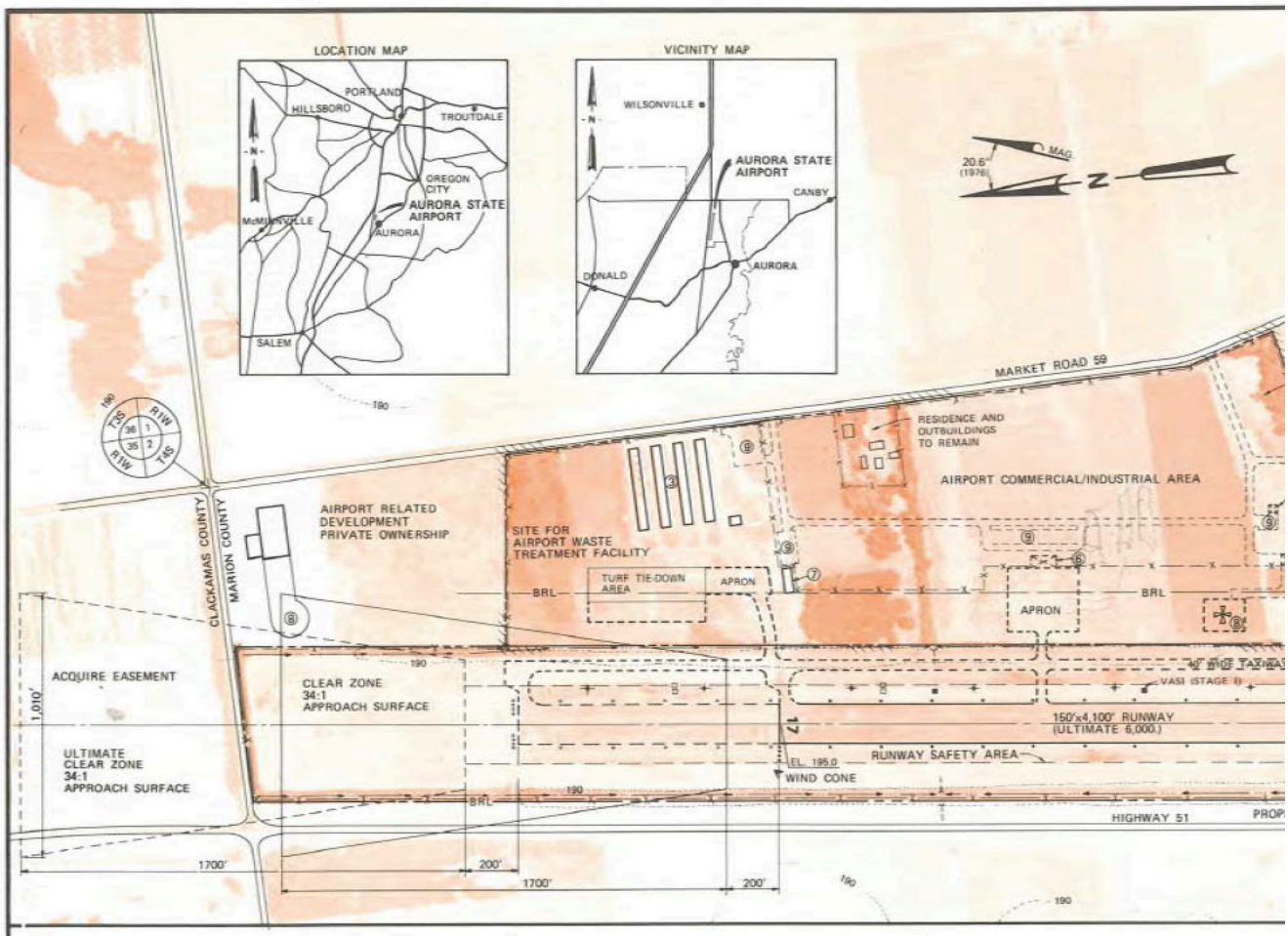
Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

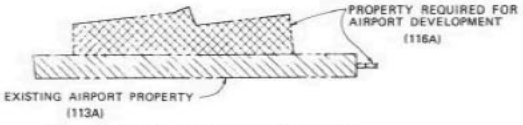
From: Wendie Kellington <wk@klgpc.com>
Sent: Thursday, April 10, 2025 4:13 PM
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Ted Millar <tmillar@wwpmi.com>
Subject: 040725-UAO-ALPFullSet.pdf
Importance: High

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Kenji, Tony,

Just got the attached today. What happened to the statement that has been on every other ALP and importantly is on the ALP (image below) in the county’s acknowledged plan (1976) that says Ted’s property is suitable for airport related development? Please restore that. It matters a lot. Please let me know if you will not do so and if so what the reason is. I am hoping that this is just an oversight. That statement benefits everyone including the state’s ALP stating it can be bought by ODAV from a willing seller for airport related uses. And it is a settled land use issue – hard won. Thanks Wendie





ULTIMATE AIRPORT PROPERTY

BASIC DATA TABLE				
RUNWAY DATA				
	EXISTING (1975)	STAGE I (1975-1980)	STAGE II (1980-1985)	STAGE III (1985-1995)
RUNWAY LENGTH	4,100' 1,250m	4,100' 1,250m	5,000' 1,524m	6,000' 1,829m
RUNWAY WIDTH	150' 46m	150' 46m	150' 46m	150' 46m
EFFECTIVE GRADIENT (%)	0.07	0.07	0.07	0.06
PERCENT WIND COVERAGE	99.5	99.5	99.5	99.5
INSTRUMENT RUNWAY	None	None	None	None
PAVEMENT STRENGTH*	30S	30S	30S	60D
FAR PART 77 CATEGORY	B/C	B/C	B/C	B/C
FAR PART 77 APPROACH SLOPES	34:1	34:1	34:1	34:1
ACTUAL CLEAR APPROACH SLOPES	N26:1 S36:1	34:1	34:1	34:1
LIGHTING	L. Intensity	M. Intensity	M. Intensity	M. Intensity
MARKING	Basic	Non-Precision	Non-Precision	Non-Precision
NAVIGATIONAL AIDS	None	VASI	MALSF	MLS
OPERATIONAL ROLE	GU	GU	BT	BT
*Values given are the gross weight in 1,000 lbs. for single (S) and dual (D) gear aircraft.				

BASIC DATA TABLE		
AIRPORT DATA		
	EXISTING	ULTIMATE
AIRPORT ELEVATION (MSL)	195'	195'
AIRPORT REFERENCE POINT (ARP) LAT.	45° 14' 43"	45° 14' 44"
LNG.	122° 46' 07"	122° 46' 07"
NAVIGATIONAL AIDS	NONE	MLS
NORMAL MAX. TEMP. HOTTEST MONTH	84°F (29°C)	84°F (29°C)
FUNCTIONAL ROLE	S3	S2
MISCELLANEOUS FACILITIES: TAXIWAY MARKING AND LIGHTING	NONE	BASIC

KEY TO ABBREVIATIONS

B/C Non-precision Instrument Runway Larger Than Utility
GU General Utility
BT Basic Transport
S3 Low Density Secondary System
S2 Medium Density Secondary System

Outlook

Re: Improper actions allowing some substitutions and alternates versus denying others

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Fri 2025-02-14 10:18 AM
To Wendie Kellington <wk@klgpc.com>
Cc Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>

2 attachments (526 KB)
Ltr Posegate.pdf; RE: our client ODAV - Aurora Airport Master Plan PAC;

Hello Wendie,

We have received your email. We will add it to the public records page of the website soon.

Thank you,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Wendie Kellington <wk@klgpc.com>
Sent: Tuesday, February 11, 2025 6:55 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>
Subject: Improper actions allowing some substitutions and alternates versus denying others

Brandy and Stacy,

Please see the attached letter and email chain for inclusion in the record of the Aurora State Airport Master Plan proceeding. Please confirm receipt. Thank you. Wendie Kellington

KELLINGTON LAW GROUP

Wendie L. Kellington | Attorney at Law.
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KELLINGTON LAW GROUP, PC

Wendie L. Kellington
P.O. Box 2209
Lake Oswego Or
97035

Phone (503) 636-0069
Mobile (503) 804-0535
Email: wk@klgpc.com

February 11, 2025

Via Electronic Mail
Stacy Posegate
Department of Justice

RE: ODAV Ad Hoc Exclusion of Designated Alternates for Aurora Airport Master Plan Public Advisory Committee Meetings

Dear Stacy:

As you know, a client of this firm requested that I serve as their designated alternate for the 2/11/25 Master Plan Public Advisory Committee (PAC) meeting. This is to reiterate that request. It was a time sensitive request because the relevant PAC meeting is this evening at 5 pm and is probably the last PAC meeting, the last opportunity to influence the outcome of a process vitally important to our clients.

To recap, this firm's request to serve as a PAC Member's alternate was made to ODAV's Tony Beach on **February 3, 2025**. On February 4, 2025, Mr Beach responded to that request: "we don't designate PAC members or alternates for specific meetings," which is inaccurate. ODAV has allowed designation of alternates as well as complete substitutions for particular PAC meetings as well as on longer terms. On February 4, 2025, I corresponded with you requesting that you advise Mr. Beach that he may not exclude the undersigned from serving in a delegate role, where the exclusion has no basis other than Mr. Beach's personal preferences about the messenger and anticipated message. I explained to you that such exclusion is inappropriate and unconstitutional. You corresponded with me today stating that excluding in this manner "is in the agency's discretion", explaining that ODAV has "chosen not to allow additional members this late in the game" and asked me "Can you help me to understand why this is unconstitutional"? This is that explanation.

I would think that you understand that ODAV is not permitted to make standardless, ad hoc decisions about who can participate in public meetings or government led policy discussions. While government entities may impose reasonable, content-neutral rules for participation, such rules must be clearly defined, consistently applied, and not subject to arbitrary enforcement. No "clearly defined" content neutral rules are at issue here, there is no consistent application of Mr. Beach's discretion to pick and choose who he allows to serve as an alternate, instead his choices are, with all due respect, wholly and impermissibly arbitrary.

The federal First Amendment guarantees the right to free speech and the ability to petition the government for redress of grievances. Government officials, acting in their official

capacity, as Mr. Beach, cannot exclude persons from policy discussions merely because they personally dislike the speaker or their anticipated message. Doing so constitutes unlawful viewpoint discrimination, which is presumptively unconstitutional. Please note that in Oregon, the constitution is more protective than the federal First Amendment. In this regard, Article I, Section 8 of the Oregon Constitution states that "No law shall be passed restraining the free expression of opinion, or restricting the right to speak, write, or print freely on any subject whatever; but every person shall be responsible for the abuse of this right." Accordingly, both federal and state precedents are relevant. The United states Supreme Court has consistently ruled that government officials cannot deny participation in public discussions based on personal opposition to a speaker's viewpoint (*Rosenberger v. Rector and Visitors of the University of Virginia*, 515 U.S. 819 (1995); *Police Department of Chicago v. Mosley*, 408 U.S. 92 (1972)). Oregon courts have consistently struck down governmental actions that impose content-based restrictions (*State v. Robertson*, 293 Or 402 (1982); *State v. Henry*, 302 Or 510 (1987)). Given these precedents, ODAV's actions are indefensible under federal and Oregon law.

ODAV has organized PAC public meetings and created a designated public forum for discourse about the Aurora Airport Master Plan. Only PAC members are guaranteed opportunities to speak in that forum without time limits and are the only ones who have the opportunity to vote in the process that ODAV established, when ODAV allows voting. General public comments are allowed but are limited to 3 minutes or less and ODAV may or may not get to them. The "general public" is not allowed more than one opportunity if any to speak. Therefore, being relegated to speaking on behalf of a PAC member during the general public comment period is a disadvantage and harms the interest of that PAC member. Moreover, ODAV gives the testimony of PAC members significant weight that is not assigned to the general public. Which again harms the interests of PAC members who designate alternatives to speak on their behalf when Mr. Beach deems such person unworthy of serving as an alternate. Only PAC members are allowed to speak to ODAV and its consultants during PAC meetings. In fact, ODAV will not talk to anyone about the master plan outside of the PAC process. The only way to have any hope of influencing the outcome of the master plan process is as a PAC member, speaking during the PAC-member part of PAC meetings.

Excluding individuals from these discussions because they or their message are personally disliked undermines the core democratic function of public discourse and constitutes impermissible censorship.

Moreover, ODAV's arbitrary exercise of discretion violates the Oregon Public Meetings Law (ORS 192.610-192.690). Oregon's Public Meetings Law guarantees open governance and public participation in meetings of government advisory bodies, such as the PAC. While agencies may establish reasonable, content-neutral rules for participation, they cannot impose standardless, ad hoc restrictions that selectively exclude individuals based on their identity or viewpoint, as here.

The U.S. District Court for the District of Oregon has directly addressed the issue of excluding individuals from public meetings. In *Walsh v. Enge* (2015), the court ruled that a City of Portland policy allowing exclusions even based on past behavior or anticipated disruptions

was unconstitutional because it effectively silenced dissenting voices. While the undersigned has never been disruptive, ODAV's exclusion of a designated PAC alternate based on personal disagreement violates fundamental public participation rights while allowing others to participate as alternates or substitutes freely.

Concerning the ad hoc nature of Mr. Beach's case-by-case refusals, the United States Supreme Court does not tolerate standardless governmental limits on who can or cannot participate in public discourse. Thus, in *City of Lakewood v. Plain Dealer Publishing Co. (1988),* the Supreme Court ruled that standardless discretion is unconstitutional when it allows government officials to make ad hoc decisions about who can or cannot speak. The Court held that regulations must have "narrow, objective, and definite standards" to prevent viewpoint discrimination.

ODAV's arbitrary restrictions on who can and cannot be a designated alternate are also unlawful prior restraints on participation in public meetings. Per *Walsh v. Enge* (D. Or. 2015) the U.S. District Court for the District of Oregon struck down Portland's policy of prospectively banning individuals from attending public meetings based on past behavior or anticipated disruptions. While there is no issue of disruption as the undersigned has never been disruptive or participated in misconduct, even exclusion's on that basis is not allowed unless justified by actual, documented misconduct, not by a general dislike of a person or their viewpoints. Similarly, in *Minnesota Voters Alliance v. Mansky* (2018), the Supreme Court invalidated a Minnesota law banning political attire in polling places because the ban lacked clear standards and was enforced arbitrarily.

Given these robust protections, Mr. Beach's ad hoc exclusion of some people and allowance of others as PAC member designated alternates based on personal dislike of the speaker or message is unlawful.

Very truly yours,

Wendie L. Kellington

WLK:wlk
CC: Clients

Outlook

RE: our client ODAV - Aurora Airport Master Plan PAC

From Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>
Date Tue 2025-02-11 7:38 AM
To Wendie Kellington <wk@klgpc.com>

Good morning Wendie,
I have reached out to Tony to ask about the changes to the list to see when they have occurred. As you point out however, it is in the agency's discretion and they have apparently chosen not to allow additional members this late in the game. They have recently declined a similar request from the City of Wilsonville for the exact same reasons they have denied your request and Ms. Johnson.

Can you help me to understand why this is unconstitutional?

Stacy C. Posegate
Sr. Asst. Atty General | Transportation and Infrastructure | General Counsel Division
971-718-7950

From: Wendie Kellington <wk@klgpc.com>
Sent: Monday, February 10, 2025 3:24 PM
To: Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>
Subject: RE: our client ODAV - Aurora Airport Master Plan PAC

CAUTION EXTERNAL EMAIL* This email originated from outside of DOJ. Treat attachments and links with caution. *CAUTION EXTERNAL EMAIL

Stacy,

Thank you. However, your responses are mistaken. The list you sent is not the latest list if you look at the current PAC list it is in fact very different form the one you sent. https://publicproject.net/files/2025-02/uao-amp-pacmembers-250207.pdf?8127927eb8 Moreover, under the protocols under "Committee Structure" it states that "additions or refinement of PAC members may take place at the discretion of ODAV staff." https://publicproject.net/files/2025-02/1738623281_uao-amp-pacprotocolsfinal-250203.pdf?b04aef13bf There are in fact serving alternatives, as there should be and as the rules establish is allowed. What appears to be happening is that staff is using its discretion in improper ways – to pick and choose alternates based upon whether staff prefers the messenger / the content of the message and that is, as you know, improper including is unconstitutional. Again, I ask whether I may serve as Atlantic's alternate and be treated the same as others identically situated. Please let me know. Thank you. Best, Wendie

Wendie L. Kellington | Attorney at Law.
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From: Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>
Sent: Monday, February 10, 2025 2:24 PM
To: Wendie Kellington <wk@klgpc.com>
Subject: FW: our client ODAV - Aurora Airport Master Plan PAC

Resending in case you didn't see this.

Stacy C. Posegate
Sr. Asst. Atty General | Transportation and Infrastructure| General Counsel Division
971-718-7950

From: Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>
Sent: Tuesday, February 4, 2025 10:16 AM
To: Wendie Kellington <wk@klgpc.com>
Cc: Anderson Becki L <Becki.L.Anderson@doj.oregon.gov>; Scruggs Rebecca <rebecca.scruggs@doj.oregon.gov>
Subject: RE: our client ODAV - Aurora Airport Master Plan PAC

Good morning Wendie,
I fully support the agency's decision to not allow alternates at this time. Correct me if I am wrong, but I believe that requests were made to identify both you and Betsey Johnson as alternates prior to the last PAC meeting and that ODAV directed you to the

PAC protocols which require identification of alternates at the onset of the project. These protocols were sent to PAC members and are also available on the project website. https://publicproject.net/files/2021/AuroraAirport/uao-amp-pacprotocols-110221.pdf?b72e48ca09. I have also attached a copy for your convenience.

I am not clear as to why your client is unable to attend or why it is necessary for him to request that he, or any member of the PAC, be able to substitute his attorney in his role as PAC member. This is not a commonly recognized practice and it does not appear to serve the primary purpose of the PAC. I assume that all identified PAC members, like your client, were selected because of their individualized interests and personal experiences, which is specifically valuable to the process. Your client in particular appears to be particularly adept at representing and articulating his interests.

Finally, and probably the most significant to me, is that although you are not a PAC member, you have spoken at each meeting, sometimes multiple times. You have done a great job of explaining your concerns and helping to support your client and the other PAC members that likely have the same concerns. ODAV has provided a full forum for all persons to participate, hear the issues and offer their perspectives, PAC members and non PAC members alike. If there is a land use law or agency policy in their public participation requirements, I am unaware of what that might be.

Stacy C. Posegate
Sr. Asst. Atty General | Transportation and Infrastructure| General Counsel Division
971-718-7950
GG1296-22

From: Wendie Kellington <wk@klgpc.com>
Sent: Tuesday, February 4, 2025 6:58 AM
To: Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>
Subject: our client ODAV - Aurora Airport Master Plan PAC

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Stacy,

Our firm's client Atlantic Aviation wishes to designate me as their alternate for the upcoming PAC meeting. Tony Beach is refusing based upon, with all due respect, rules he is making up that appear to be sourced for wholly inappropriate personal considerations. He refused the request last meeting as well. As you know, there is no rule against designating alternates. There are surely rules about decorum and relevance, as with any public meeting. However, few people are more aware of the importance and existence of

such rules as a lawyer. Please let me know if you will advise Tony that I may participate on February 11 at Atlantic's alternate. Thank you. I hope you are well. All the best, Wendie

KELLINGTON LAW GROUP

Wendie L. Kellington | Attorney at Law.
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****

***** CONFIDENTIALITY NOTICE ***** This e-mail may contain information that is privileged, confidential, or otherwise exempt from disclosure under applicable law. If you are not the addressee or it appears from the context or otherwise that you have received this e-mail in error, please advise me immediately by reply e-mail, keep the contents confidential, and immediately delete the message and any attachments from your system. **********

Outlook

Fw: TLM 2.25.25 comments - Aurora Airport Master Plan Record part 1 of 2

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-03-04 2:28 PM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

4 attachments (8 MB)
TLM 2.25.25 comments.pdf; Exhibit 1 - 2017 SAC Reduced.pdf; EXHIBIT 2 HDSE GOAL EXCEPTIONpdf.pdf; Exhibit 3 Reduced.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, February 25, 2025 3:01 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: TLM 2.25.25 comments - Aurora Airport Master Plan Record part 1 of 2

Good afternoon, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, February 25, 2025 3:00 PM
To: Wendie Kellington <wk@klgpc.com>; brandy.steffen@jla.us.com; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Aron Faegre (faegre@earthlink.net) <faegre@earthlink.net>; Ted Millar <tmillar@wwpmi.com>
Subject: RE: TLM 2.25.25 comments - Aurora Airport Master Plan Record part 1 of 2

Good afternoon Wendie,

Confirming we received this email with 4 attachments. Thanks for your comments, they'll be sent to the master plan team and included in the public record.

Thanks again,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Wendie Kellington <wk@klgpc.com>
Sent: Tuesday, February 25, 2025 2:50 PM
To: brandy.steffen@jla.us.com; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Aron Faegre (faegre@earthlink.net) <faegre@earthlink.net>; Ted Millar <tmillar@wwpmi.com>
Subject: TLM 2.25.25 comments - Aurora Airport Master Plan Record part 1 of 2

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Good Afternoon,

Enclosed please find the attached for the record of the Aurora Airport Master Planning effort. One more PDF will follow in a second email to avoid oversize limits. Please confirm receipt. Regards, Wendie Kellington

KELLINGTON LAW GROUP

Wendie L. Kellington | Attorney at Law.
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Chambers RANKED IN USA 2024 Wendie Kellington

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Outlook

Fw: TLM 2.25.25 comments - Aurora Airport Master Plan Record part 2 of 2

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-03-04 2:27 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (5 MB)
EXHIBIT 4 Signed ALP.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, February 25, 2025 3:02 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: TLM 2.25.25 comments - Aurora Airport Master Plan Record part 2 of 2

Good afternoon, here is part 2 of Wendie's emails. Please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, February 25, 2025 3:01 PM
To: Wendie Kellington <wk@klgpc.com>; brandy.steffen@jla.us.com; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Aron Faegre (faegre@earthlink.net) <faegre@earthlink.net>; Ted Millar <tmillar@wwpmi.com>
Subject: RE: TLM 2.25.25 comments - Aurora Airport Master Plan Record part 2 of 2

Hi Wendie, confirming we have received this second part of your email with 1 attachment. It will be included in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Wendie Kellington <wk@klgpc.com>
Sent: Tuesday, February 25, 2025 2:51 PM
To: brandy.steffen@jla.us.com; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Aron Faegre (faegre@earthlink.net) <faegre@earthlink.net>; Ted Millar <tmillar@wwpmi.com>
Subject: RE: TLM 2.25.25 comments - Aurora Airport Master Plan Record part 2 of 2

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Part 2 of 2 is attached for the record of the Aurora Airport master plan effort. Please confirm receipt. Regards, Wendie Kellington

---

From: Wendie Kellington
Sent: Tuesday, February 25, 2025 2:50 PM
To: brandy.steffen@jla.us.com; Tony Beach (anthony.beach@aviation.state.or.us) <anthony.beach@aviation.state.or.us>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: Aron Faegre (faegre@earthlink.net) <faegre@earthlink.net>; Ted Millar <tmillar@wwpmi.com>
Subject: TLM 2.25.25 comments - Aurora Airport Master Plan Record part 1 of 2

Good Afternoon,

Enclosed please find the attached for the record of the Aurora Airport Master Planning effort. One more PDF will follow in a second email to avoid oversize limits. Please confirm receipt. Regards, Wendie Kellington

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February 25, 2025

VIA ELECTRONIC MAIL
Alex Thomas
Planning and Programs Manager
Tony Beach
State Airports Manager
Oregon Department of Aviation
Brandy Steffen
JLA

Re: February 25, 2025, Comment Letter on Behalf of TLM Holdings LLC for Aurora State Airport Master Plan – ODAV Updated Refined Proposed Preferred Alternative

Mr. Thomas, Mr. Beach and Ms. Steffen,

This letter is written on behalf of TLM Holdings, LLC and Ted Millar, its managing member ("TLM"). Please include this letter and attachments in the record for the Oregon Department of Aviation's (ODAV) Master Plan. TLM owns real property at the airport (hangars) and undeveloped land that is adjacent to it. TLM's adjacent property (known as the "church" property) while zoned EFU, has been shown on every airport master plan since 1976 as being suitable for airport related development.

Record and Improper Process

ODAV has not placed on the master plan website all submittals from the undersigned and other aeronautical stakeholders for the master plan's record. That failure should not be interpreted as limiting the contents of the record before the agency for this effort. The record must and does include all submittals, including those not on the website. That failure has also made it impossible to know what airport opponents allege, what their evidence is and to provide any reasonable opportunity to respond to evidence and argument presented.

The process that ODAV has used for adopting this master plan is contrary to Statewide Planning Goal 1 (Citizen Involvement), which requires a meaningful opportunity for public engagement, and has proceeded in a manner that is wholly contrary to ODAV's State Agency Coordination Program, Oregon's administrative procedures act and Oregon land use statutes and rules, as well as *Fasano v. Washington County*, 264 Or 574 (1973) for quasi-judicial actions which this master plan likely is. ODAV has made assertions in "PAC" meetings about why it is taking specified actions, claiming there is justification somewhere in the record, but no such justification exists – at least not anywhere that the public including stakeholders have access to. ODAV's process has made it impossible for aeronautical stakeholders including TLM to

meaningfully participate and protect their property rights in their property they own at the airport.

The process ODAV has used is not only contrary to the above authorities and requirements but also is contrary to FAA's rules about master planning which we have cited at length in other submittals and incorporate here for brevity. What OAAV should do is pause this effort and allow meaningful public engagement in a real hearing process where airport, pilot and passenger safety as well as economic development and prosperity are not relegated to afterthoughts and where participants can speak to and with ODAV based upon a transparent record that is timely made available to participants.

The final Master Plan must show the expansion of the airport boundary per ORS 836.616(2), ORS 836.640-642 and ODAV's state agency coordination program

ODAV must include in the master plan a map demonstrating where the airport's land use boundary will be expanded to achieve the Master Plan's objectives.[1] Marion County must then adopt that "map" showing "the location of the airport boundary." OAR 660-013-0040(1). It is *ODAV's responsibility* to show in its master plan the airport land use boundary within which master plan objectives are to be achieved over the 20-year master planning horizon. It is *ODAV's responsibility* to demonstrate its objectives are consistent with applicable County Plan provisions and statewide planning goals as a part of the master plan process. In this regard, ODAV's State Agency Coordination Program ("SAC," Exhibit 1, p 23-24), says that in adopting master plans that ODAV "shall evaluate and write draft findings of compatibility with acknowledged comprehensive plans of affected cities and counties" as well as "findings of compliance" with applicable planning goals and that ODAV "*shall present to the Aviation Board* the draft plan, *findings of compatibility with the acknowledged comprehensive plans* of affecting cities and counties and *findings of compliance with applicable statewide planning goals*."

There are Marion County plan (including in the County's acknowledged TSP/RTSP) provisions that apply that ODAV has ignored, including policies that say that airports in general are a valuable transportation asset to be protected and that the Aurora Airport should be supported to grow to provide its significant economic benefits and safely accommodate all aircraft that use it. There are state planning goals that ostensibly apply that ODAV has ignored that ODAV must either demonstrate compliance with, take an exception to or demonstrate that they do not apply. Yet, ODAV has done exactly ***none*** of the required planning work, to the significant detriment of all airport stakeholders who require a master plan that is not tied up for years in litigation based upon ODAV failures. For example, ODAV seeks to designate "Aeronautical Reserves" for aeronautical use, that ODAV wishes to acquire using federal money from willing sellers, but that land is not yet zoned for aeronautical use. ODAV seeks to acquire other land – generally in the area of Keil Road -- for aeronautical related uses that is also not zoned for aeronautical use. Moreover, each and every master plan has properly identified

[1] Perhaps that is what ODAV intends by showing all of the various aeronautical use acquisitions and uses on the latest version of the preferred alternative. If that is ODAV's intention, then such should be made clear. Ambiguity helps no one, drives up the cost of airport development and the potential for litigation.

privately owned land at the airport as being suitable for airport development. To realize these objectives, state law (and FAA rules) requires that ODAV show in its airport master plans the airport's land use boundary where aeronautical land uses are expected to occur over the master planning horizon of 20 years, that Marion County can then adopt into its Comprehensive Plan/TSP/RTSP. ODAV has the obligation to demonstrate compliance with applicable Marion County plan provisions and state goals for ODAV's master planning objectives but has failed to make any effort to do so.

Further, ORS 836.640(1) and (5) expect that ODAV will expand the land use airport boundary to include the privately owned through the fence areas to achieve the outcomes listed in ORS 836.642. ODAV cannot achieve the objectives that the legislature requires ODAV to achieve in the absence of expanding the airport's land use boundary.[2] In the Court of Appeals words, "airport uses" are allowed to "supersede [EFU zone rules]" when they are "[w]ithin airport boundaries." Accordingly, now is the time to adjust the land use boundary for the airport. Now is when the SAC anticipates such will occur, when ORS 836.640-642 expects it to happen and importantly now is when it is efficient and effective to do so - all of the information required by OAR 660-013-0040 is being developed in this process and is easily available.

ODAV's persistence in ignoring its land use related responsibilities for this master plan is nothing short of puzzling. ODAV's SAC p, 5, 6, says that Master Plans affect land use and, at those pages and in others, the SAC establishes that applicable state planning goals are supposed to be addressed in findings supporting ODAV's airport master plan. For example, SAC, p 6 explains that ODAV "can show compliance with the statewide planning goals and the Aviation Facility Planning Requirements, as required by OAR 660-013-0040, through the Airport Master Planning process and the Airport Layout Plans (ALP) approved by the Federal Aviation Administration (FAA)." ODAV's SAC program (p 22), explains that "The focus of the Department's efforts to establish compatibility with acknowledged comprehensive plans will be at the facility planning and project planning stages of an Airport Master Plan or Airport Layout Plan."

This is not ODAV's first master plan rodeo where the legal stakes are high, either. The Court of Appeals remanded the last ODAV master plan and explained that inclusion of land within the airport's land use boundary is necessary in order for ODAV to be able to achieve its goal of putting that land to aeronautical use:

[2] Private parties can initiate such land use efforts, but it is an astonishing waste of resources for ODAV not to do its job and move the boundary like it is supposed to do in this million dollar master planning effort so to provide a way for *ODAV* to realize *ODAV's* objectives, but instead, simply rely upon the private sector to do all the work to expand the boundary in individual land use applications to Marion County.

> In this case, it is undisputed that the relevant part of the airport boundary is the edge of the state-owned airport property that is bordered by Keil Road. *See* OAR 660-013-0040 (the airport boundary, for purposes of ORS 836.616(2), is shown on a map "adopted by a local government" pursuant to "comprehensive plan and land use regulation requirements").[17] As explained above, the provisions of ORS 836.600 to 836.630 allow airport uses and supersede ORS 215.213 and 215.283 "[w]ithin airport boundaries." ORS 836.616(2); *see also* OAR 660-013-0100 (requiring local governments to "adopt land use regulations for areas within the airport boundaries" that authorize the airport uses enumerated in ORS 836.616).
>
> [17] The map of the Aurora State Airport that has been adopted by Marion County is the 1976 Master Plan ALP, which is part of the Marion County Comprehensive Plan.

ODAV's failure to show an adjusted land use airport boundary and adopt findings as required, means that ODAV is making itself and the State of Oregon by extension, ineligible to obtain or spend any FAA grant money on master plan objectives because ODAV cannot truthfully aver that federal grant money will be spent on lawful uses, a required showing for any federal grant.

As the Court of Appeals noted, the airport's land use boundary has remained static since the land use boundary was first established in the 1976 master plan that was incorporated into the Marion County comprehensive plan. Most of the land at the airport is already subject to goal exceptions as an area that is committed to airport development. Exhibit 3 (Aurora Airport "committed" goal exception). It is time to adjust the airport's land use boundary to achieve ODAV's legitimate objectives that are the legislature's objectives, for the Aurora Airport.

It is undeniable that ODAV should do so as a part of the master planning effort in order to realize the premise of the Updated Preferred Alternative: to support the airport and achieve the now critically needed runway extension.

ODAV should not "remove" HDSE's Southend drainfield that serves numerous businesses and aircraft hangars

Based upon public input, ODAV modified the Preferred Alternative to remove the planned condemnation of the frontline hangars and removed the service road paralleling the taxiway that was driving ODAV's condemnation plan. While that was an improvement and we appreciate this adjustment to the Preferred Alternative, it turns out that it was only a symbolic improvement to the master plan. That is because ODAV continues to show a preferred master plan that removes the Southend Drainfield, with no identified alternative. No one can use the

front-line hangars without the septic system that ODAV's Updated Refined Preferred Alternative plans to "remove" with no alternative. Saving the frontline hangars from condemnation is obviously meaningless if ODAV removes the Southend Drainfield. Please understand that the 1500+ jobs and $150 million in private investment those hangars represent, go away without a septic system, just as surely as if the front-end hangars were condemned by ODAV.

Moreover, ODAV's basis for removing the drainfield lacks evidentiary support – ODAV's claim that the drainfield does not comply with FAA guidance is incorrect. As noted in other submittals, ODAV and FAA expressly approved the drainfield's current location as a part of the HDSE goal exception that Marion County approved. Exhibit 2. The FAA guidance about soil strength in the RSA has been the same for decades. ODAV and FAA knew the soil strength guidance and applied it correctly when they approved the drainfield exactly as it is and where it is. If the HDSE drainfield soils were a sincere issue then ODAV would be showing significant spoil strengthening for the entire RSA which is composed of the same soils. The fact is, this is a made up problem that has no legal or evidentiary support.

Finally, ODAV is bound by ORS 836.640-642, which is a statute it has all but ignored in this process, and was developed by Business Oregon and adopted by the legislature to strongly encourage private investment at the Aurora Airport. The statute commands ODAV to carry out that objective. ORS 836.642 requires ODAV to "Preserve investments [at the Aurora Airport] and the level of service provided by [the Aurora Airport]" and to "promote economic development" at Aurora "by creating family wage jobs, increasing local tax bases" through support of private aviation-related uses so that they may "develop and thrive." ODAV's Updated Refined Preferred Alternative that fails to accommodate the septic system that such economic development depends upon, is in direct contravention of those statutes.

Extend the Runway as a Short Term Project

ODAV must prioritize the critically needed runway extension in this master plan to occur in the short term. To date it is scheduled for the end of the planning horizon and perhaps never to occur since ODAV has placed it after moving Highway 551 and other expensive wholly unnecessary projects. If ODAV cares the least about aircraft, pilot and passenger safety, then it will show the runway extension as a priority for the short term. The runway extension has been needed since 2012. *See* Exhibit 4, 2012 Master Plan approved ALP. Anything less is an abdication of ODAV's responsibilities as the owner of the runway at the airport.

Thank you for your consideration.

Very truly yours,

Wendie L. Kellington

WLK:wlk

Exhibit 1 – ODAV SAC Program
Exhibit 2 – HDSE Approval
Exhibit 3 Aurora Airport Committed Goal Exception
Exhibit 3: FAA and ODAV approved Airport Layout Plan

CC: Ted Millar, TLM Holdings LLC

OREGON DEPARTMENT OF AVIATION
STATE AGENCY COORDINATION PROGRAM

IN ACCORDANCE WITH ORS 197.180 AND OAR CHAPTER 660,
DIVISION 30 AND 31

March 7, 2017

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EXECUTIVE SUMMARY

Since 1973, Oregon has maintained a strong statewide program for land use planning. The foundation of that program is a set of 19 Statewide Planning Goals. Oregon´s statewide goals are achieved through local comprehensive planning. State law requires each city and county to adopt a comprehensive plan and the zoning and land-division ordinances needed to put the plan into effect. Oregon´s planning laws apply not only to local governments but also to special districts and state agencies. The laws strongly emphasize coordination – keeping local plans and state programs consistent with each other, with the goals, and with acknowledged local plans. State law (ORS 197.180) requires that all state agency programs that affect land use must be carried out in conformance with local land use plans and regulations and in compliance with the statewide land use planning goals. The Land Conservation and Development Commission (LCDC) is charged with establishing State Agency Coordination (or SAC) requirements and assuring that agencies act in accordance with this statute. LCDC administrative rules (OAR Chapter 660, Divisions 030 and 031) set forth requirements for State Agency Coordination (SAC) agreements, and establish a process for formal LCDC certification of each agency's SAC program.

The Oregon Department of Aviation is responsible for the State's Aviation System plan which is an element of the State's Transportation System Plan for all transportation modes. Statewide Planning Goal 12 (Transportation) requires state and local transportation plans in order to facilitate the flow of goods and services so as to strengthen local and regional economies. The goal requires plans to consider all modes of transportation and specifically identifies aviation (air) as a mode of transportation. Furthermore, state law at ORS 836.600 through 836.630, supplemented by OAR 660, division 13, supports the continued operation and vitality of Oregon's airports, promotes a convenient and economic system of airports in the state, and relies on state and local land use planning to reduce risks to aircraft operations and nearby land uses. Therefore, adoption and maintenance of the Department of Aviation state agency coordination agreement is required by both state statutes and by related administrative rules. The agreement assures coordinated land use planning and development at all jurisdictional levels including state, county, region, city and special district, including, port districts and airport districts.

Chapter 1 – Introduction

As stated in OAR 660-13-0030 the "*Oregon Department of Aviation (ODA) shall prepare and adopt a state Aviation System Plan (ASP) in accordance with ORS Chapters 835 and 836 and the State Agency Coordination Program approved under ORS 197.180. ODA shall coordinate the preparation, adoption, and amendment of land use planning elements of the state ASP with local governments and airport sponsors. The purpose of the state ASP is to provide state policy guidance and a framework for planning and operation of a convenient and economic system of airports, and for land use planning to reduce risks to aircraft operations and nearby land uses. The state ASP shall encourage and support the continued operation and vitality of Oregon's airports.*"

In turn a "*city or county with planning authority for one or more airports, or areas within safety zones or compatibility zones described in this division, shall adopt comprehensive plan and land use regulations for airports consistent with the requirements of this division and ORS 836.600 through 836.630. Local comprehensive plan and land use regulation requirements shall be coordinated with acknowledged transportation system plans for the city, county, and Metropolitan Planning Organization (MPO) required by OAR 660, division 12. Local comprehensive plan and land use regulation requirements shall be consistent with adopted elements of the state ASP and shall be coordinated with affected state and federal agencies, local governments, airport*

sponsors, and special districts."

A state agency coordination program for ODA must contain a number of "elements" and must be adopted by ODA as an administrative rule. ODA is one of 26 state agencies with previously certified state agency coordination programs. The Department's current coordination program was certified in January of 1983 and updated in 1990 while ODA was a part of the Oregon Department of Transportation as the Aeronautical Division. Since then, the state agency coordination statute has been amended as well as LCDC administrative rules that implement that statute.

Chapter 2 – ODA Organization and Programs

The State Aviation Board, as required in ORS 835.015 "*shall incorporate as part of its program a definite plan for the development of airports, state airways, airplane industries and aviation generally.*" The Department "*shall also cooperate with and assist the federal government, the municipalities of the state, and other persons in the development of aviation activities. Municipalities are authorized to cooperate with the Department in the development of aviation and aviation facilities in this state, and shall notify the Department of, and allow the Department to participate in an advisory capacity in, all municipal airport or aviation system planning.*" The Department of Aviation (ODA) consists of the Aviation Board, the Director, one Assistant Director and staff divided among three divisions: Projects and Planning, Airports Management and Administration.

In addition, the function of the State Aviation Board is "*to perform such acts, adopt or amend and issue such orders, rules and regulations, and make, promulgate and amend such minimum standards*," all consistent with the provisions of ORS chapter 835.

ODA's programs are divided into several program areas.

Planning Program: The Department's Projects and Planning program is carried out on several levels ranging from a general statewide transportation system plan (Oregon Aviation Plan), to a Statewide Capital Improvement Planning program (SCIP) for Oregon's federally funded airports and a Pavement Evaluation Program (PEP), which precedes the Pavement Maintenance Program (PMP) for paved public use airports in Oregon.

Operations Program: The Department operates 28 state owned airports throughout Oregon.

Maintenance Program: The Department maintains its facilities through general maintenance and upkeep. Of the 28 state owned airports, 12 receive federal funds from the Federal Aviation Administration (FAA) in order to maintain specific airport design, operations and maintenance standards, through grant assurances once federal funds are accepted by the state for capital projects.

Modernization Program: The Department modernizes state owned airports by building new facilities and upgrading existing facilities, including pavement, hangars, critical and essential infrastructure.

Funding Program: The Department receives a number of funds through the FAA's Airport Improvement Program (AIP) through the issuance of Federal Grants, jet and aviation gas tax, pilot registration, airport registration, aircraft registration, aircraft tie-down fees, access agreements and land leases at various state owned airports.

Regulatory Program: The Department regulates several aviation related activities ODA issues licenses and permits, conducts inspections, issues guidance letters and enforces laws and rules

relating to aviation and aviation activities. The department coordinates with local jurisdictions in order to ensure compatible land uses in close proximity to airports.

Technical Assistance Program: The Department provides a variety of other technical services such as planning, construction, improvement, maintenance or operation of airports or air navigation facilities in accordance with ORS 835.015 regarding the development of aviation

Chapter 3 - ODA Programs Affecting Land Use

Goal 12 states that a Transportation Plan is "*to provide and encourage a safe, convenient and economic transportation system*" and shall consider all modes of transportation including aviation. ODA has programs that either carry out or are used to make decisions to carry out one or more activities that are subject to the statewide planning goals or local acknowledged comprehensive plans. These activities include:

1. Adopting both the Oregon Aviation System Plan as well as Airport Master Plans, which include Airport Layout Plans that significantly affect the requirements or objectives of the State's Transportation Planning Goal (Goal 12).
2. Adopting Airport Master Plans, that could include Airport Layout Plans, may include the following projects:
   a. Enlarging an existing airport facility to increase the level of transportation service provided, relocating an existing transportation facility, or constructing a new transportation facility.
   b. Constructing a new Airport Operations Area (AOA), enlarging an existing AOA, or significantly changing the use of an AOA.
   c. Changing the size of land parcels through the sale or purchase of property.
   d. Altering land or structures in a way that significantly affects resources or areas protected by state and federal laws or acknowledged comprehensive plans. Examples include:
      (A). Placing or disposing of materials in wetlands, waterways or floodplains;
      (B). Draining wetlands by ditching or by other means;
      (C). Removing riparian vegetation.
3. Agency review of proposed development in and around Airport Safety Overlay Zone areas in order to promote aviation safety by prohibiting structures, trees, and other objects of natural growth from penetrating "airport imaginary surfaces."
4. Agency review of structures outside of Airport Safety Overlay Zone areas that could be classified as a hazard to air navigation based on the Federal Aviation Administration Advisory Circular (A/C) 7460-1.

The Department's Projects and Planning program affects land use planning and development, especially when development occurs within the Airport Safety Overlay Zone. One issue of concern is the encroachment into overlay zones of buildings and tall structures (e.g., cell towers and wind turbines), as addressed by the FAA's Part 77 Imaginary Surfaces for Obstruction Evaluation criteria. Other areas of this program that relate to land use planning include projects or planning for the enlargement of facilities (i.e., airports) due to growth and increase in airport activity. This enlargement, growth and increase of airports can include the expansion of the physical infrastructure and the purchase of land for future airport related development.

The Department's regulatory program is a "land use program" because through it, permits and

licenses listed in ORS 836 and OAR 660, division 31 are issued. These include airport licensing and airport site approval (ORS 836.105 & OAR 660-031-0012(g)(B)). All of these permits are "Class B permits" subject to LCDC's Permit Compliance and Compatibility Rules (OAR 660, division31).

The Department of Aviation's technical assistance and administrative services programs are not land use programs because they are not used by the Department to carry out activities that significantly affect land use or to make decisions to carry out activities which significantly affect land use. This service can be used by persons or jurisdictions in connection with the planning, acquisition, construction, improvement, maintenance or operation of airports or air navigation facilities.

> ORS 835.015 states: "The State Aviation Board with the advice of the Oregon Department of Aviation shall incorporate as part of its program a definite plan for the development of airports, state airways, airplane industries and aviation generally. It shall through the department cooperate with and assist the federal government, the municipalities of the state, and other persons in the development of aviation activities. Municipalities are authorized to cooperate with the department in the development of aviation and aviation facilities in this state, and shall notify the department of, and allow the department to participate in an advisory capacity in, all municipal airport or aviation system planning."
>
> ORS 836.010 states: "The Director of the Oregon Department of Aviation may, insofar as is reasonably possible, make available the Oregon Department of Aviation's engineering and other technical services with or without charge, to any person requesting such services in connection with the planning, acquisition, construction, improvement, maintenance or operation of airports or air navigation facilities."

It should be noted that the Department is charged with providing public comments as necessary with regard to local land use or permit applications that concern land within the Airport Safety Overlay Zones of airports throughout the State and as required by OAR 738-070. Once these comments are provided it is up to the local land use reviewing agency to consider them and ultimately to enforce the relevant statutes and rules through their locally adopted ordinances, codes and policies.

Chapter 4 – Coordination of Programs Affecting Land Use

The Department can show compliance with the statewide planning goals and the Aviation Facility Planning Requirements, as required by OAR 660-013-0040, through the Airport Master Planning process and the Airport Layout Plans (ALP) approved by the Federal Aviation Administration (FAA) or the Oregon Department of Aviation (ODA) for the non-NPIAS airports. Through the development of an Airport Master Plan and Airport Layout Plan, the Oregon land use planning goals can be addressed and documented. Once complete by ODA, a local jurisdiction must adopt the Master Plan as required by OAR 660, division13.

Planning Program: ODA assures compliance and compatibility of airport development with local government comprehensive plans relating to land uses around airports through the use of provisions in OAR 660, Division 013 and OAR 660, Division 031. These rules require that both the sponsors of airports and local jurisdictions must establish a coordination process that ensures compliance with applicable laws and compatible development of the airport and surrounding areas. At each planning stage, compliance and compatibility issues generally come into focus with sufficient clarity to enable them to be addressed and resolved. The result of this successive refinement process shall be the resolution of all compliance and compatibility issues by the end of the project planning stage of the Airport Master planning program.

Coordination Procedures for Operations, Maintenance and Modernization Programs: The identification of which particular operation and modernization activities significantly affect land use is done during the development of a project prospectus for all activities that proceed through

the Department's project planning process. Compliance and compatibility for operations and modernization projects is evaluated during this process. Daily operations and general maintenance at airports generally do not proceed through the project planning process because they are ongoing activities and do not directly affect land use.

Regulatory Program Procedures: For all of the Department's license and permit programs that affect land use, the Department will notify applicants of their responsibility to demonstrate compliance and compatibility with local land use regulations. The Department will not issue a license or permit unless certification of compatibility is demonstrated by the applicant.

Chapter 5 – Program of Cooperation and Technical Assistance

The Department is interested in amendments to the transportation and land use/zoning elements of city and county comprehensive plans that relate to any airport located within or abutting their jurisdiction. In addition, the Department is interested in a number of types of city and county plan implementation and plan amendment actions that can affect transportation facilities. The Department shall be notified by local governments in accordance with OAR 660, division 13 about:

1. Actions affecting future airport expansions or development
2. Actions affecting future development in close proximity to airports throughout the State
3. Actions affecting state airport drainage
4. Actions involving noise sensitive land uses in the vicinity of airports
5. Actions that involve physical hazards to air navigation and airport obstructions
6. Actions that involve development in runway protection zones, approach safety zones and Airport Safety Overlay Zones
7. Water Impoundments as described in ORS 836.623

ODA will work to incorporate its plans and programs into comprehensive plans in a number of ways. The Department will request that affected cities and counties incorporate relevant portions of the Aviation System Plan and Airport Master Plans be adopted by the Department into comprehensive plans. As an early step in the planning process for an Airport Master Planning project, ODA will coordinate with the affected local government(s) in their required amendment of their comprehensive plans and land use regulations to make them consistent with applicable modal system plans and facility plans, in accordance with OAR 660, division 13. The Department will work with Metropolitan Planning Organizations (MPOs) in the formulation of regional transportation plans. The Department will also work with cities and counties to incorporate agency adopted Airport Master Plans into their local comprehensive plans.

Most of the Department's coordination with local public facility planning will occur during comprehensive planning and development plan updates. As allowed by ORS 835.015 municipalities are encouraged to cooperate with the Department in the development of aviation and aviation facilities in this state, and this Department will assist local governments with airport land use planning. The primary concerns of the Department are that:

1. Local Public facility plans include relevant portions of adopted modal systems plans, regional transportation plans, Airport Master Plan, Airport Layout Plan or project plans.
2. State facilities are not proposed to provide services that are contrary to their functions as set

forth in state and regional transportation plans.

3. Proposed improvements to state airport facilities are consistent with state transportation plans.
4. Short range improvements to state airport facilities may not be proposed if they are not listed in the Department's capital improvement program unless the improvement is needed or required; no projects in the Department's capital improvement program can proceed without first addressing the most critical or essential project.
5. Improvements identified in the Department's capital improvements programs that are compatible with the acknowledged comprehensive plan are identified in the Airport Master Plan or Airport Layout Plan.
6. The Airport Master Plan or the Airport Layout Plan identifies facilities that are needed to serve commercially and industrially planned areas at state airports.

Chapter 6 – Coordination with State and Federal Agencies and Special Districts

The Department's primary areas of coordination with the Department of Land Conservation and Development (DLCD) involve ODA's airport planning program for future airport capital improvements, as well as city and county proposed comprehensive plan and land use ordinance amendments. The Department may also coordinate with DLCD to help resolve issues of local compliance with the statewide planning goals and State laws regarding the compatibility of Airport Master Plans and Airport Layout Plans with acknowledged comprehensive plans for any of its land use programs.

The Department coordinates with a large number of stakeholders, including city, county, state and federal agencies and special districts as it prepares its various Airport Master Plans or Airport Layout Plans. The Department's coordination procedures provide coordination opportunities throughout the Department's planning program.

Chapter 7 – Organization of ODA's Coordination Program

Following are descriptions of organizational responsibilities.

Aviation Board: The Aviation Board, with the advice of the Department, shall incorporate as part of its program a definite plan for the development of airports, state airways, airplane industries and aviation generally. It shall, through the Department, cooperate with and assist the Federal government, the local jurisdictions of the state and other persons in the development of aviation activities. Local jurisdictions are authorized to cooperate with the Department in the development of aviation and aviation facilities in this state and shall notify the Department of and allow the Department to participate in an advisory capacity in all municipal airport or aviation system planning (ORS 835.015).

Aviation Director: The Department is under the supervision and control of a Director who is responsible for the performance of the duties, functions and powers of the Department (ORS 835.100).

Project and Planning Division: The manager of the Project and Planning Division has responsibility for ODA's coordination and technical assistance program. The manager works closely with other airports and local jurisdictions as well as other staff at the Department to assure that objectives are carried out.

CHAPTER 1

INTRODUCTION

INTRODUCTION

Achieving effective coordination between state and local planning bodies was one of the principal issues addressed by the 1973 Legislature in enacting Oregon's land use planning act. The law requires agency coordination to be brought about in two ways (1) through the preparation, acknowledgement and updates of comprehensive plans and zoning ordinances, and (2) by the preparation and certification of state agency coordination programs.

State agency coordination programs describe what agencies will do to comply with Oregon's land use planning program. More specifically, they describe how an agency will meet its obligation under ORS 197.180 to carry out its programs affecting land use in compliance with the statewide planning goals and in a manner compatible with acknowledged comprehensive plans. This is contained in four major elements of the state agency coordination program.

1. Description of agency rules and programs affecting land use.
2. Procedures for carrying out programs affecting land use in compliance with the goals and in a manner compatible with acknowledged comprehensive plans.
3. Procedures for coordinating with the Department of Land Conservation and Development, affected state and federal agencies and special districts.
4. Program for cooperating with and providing technical assistance to local governments.

This is ODA's revised State Agency Coordination Program. It will replace the Department's 1990 State Agency Coordination Program adopted when the Department of Aviation was the Division of Aeronautics under ODOT, which remained ODA's agreement because rules and statutes applicable to the Division of Aeronautics remained in effect for ODA after it was created. The Aviation SAC agreement was certified by the Land Conservation and Development Commission and therefor has continued to apply to ODA.

CHAPTER 2

ODA ORGANIZATION AND PROGRAMS

ODA STRUCTURE AND ENABLING STATUTES

The Department of Aviation is established by ORS 835.015 and carries out the functions set forth in ORS 835 through ORS 838. The Department consists of the State Aviation Board, the Director, one Assistant Director, and three divisions: Projects and Planning, Airports Management and Administration. Figure 1 shows the structure of the Department.

The State Aviation Board, created by ORS 835.102, is the policy body of the Department of Aviation. The function of the Board is to "perform such acts, adopt or amend and issue such orders, rules and regulations, and make, promulgate and amend such minimum standards." The primary duty of the State Aviation Board is to "incorporate as part of its program a definite plan for the development of airports, state airways, airplane industries and aviation generally." By way of the Board adopting Airport Master Plans, they formally recognize the future development of an airport. The Board may also direct staff to work directly with local governments to adopt such plans into their comprehensive plans and development codes as required by ORS 836. Furthermore, the Department shall "cooperate with and assist the federal government, the municipalities of the state, and other persons in the development of aviation activities" as required by ORS 835.015.

The Department of Aviation is responsible for promoting air safety and overseeing the statewide aeronautics system in Oregon. The Department operates, maintains, and improves the 28 state owned airports that are open to the public. In addition, the Department oversees and licenses public use airports, heliports, seaplane bases, and personal-use aviation facilities. The Department is organized under ORS Chapter 835.

Appendix B and C contains copies of the indexes of ODA statutes and rules respectively.

SUMMARY OF ODA PROGRAMS

ODA carries out a number of programs, each of which is composed of a variety of activities. Following is a summary of the principal program areas carried out by the Department.

PLANNING PROGRAM

The Department's Projects and Planning program is carried out through a variety of different programs including a general statewide aviation modal system plan (Oregon Aviation Plan), a Statewide Capital Improvement Planning program (SCIP) and a Pavement Evaluation Program (PEP), which identifies the requirements for the statewide Pavement Maintenance Program (PMP).

1. As one of its duties, the State Aviation Board shall plan for the development of airports, state airways, airplane industries and aviation generally. The Board, with the advice of the Oregon Department of Aviation, shall participate in an advisory capacity with all municipal airport or aviation system planning projects.
2. The Project and Planning Division as well as the Airports Management Division shall prepare a program to collect, summarize and analyze information concerning the condition and usage of each of the state owned airports. Each division shall compile such information in a form

suitable for use by the Director in the planning activities of the Department.

3. As the plan is developed by the Aviation Board, the Director shall prepare and submit to the Board for approval an implementation program. Work approved by the Board to carry out the plan shall be assigned to the appropriate Division for design, construction, maintenance and operation of the facility.

Systems Planning

The Department prepares its five (5) year capital improvement program (CIP) based on the adopted Airport Master Plans and approved Airport Layout Plans (ALPs). The Department's State Agency Coordination Program will be followed in the adoption of Airport Master Plans and the Airport Layout Plans. The Statewide Capital Improvement Plan (SCIP) establishes the direction for the Department's capital improvement programs for both federally and non-federally funded airports.

The Modal System Plan and Facility Plans are described in more detail below.

Oregon Aviation Plan: This is the overall plan and policy for aviation statewide and for the state owned airports. This plan evaluates system wide needs for aviation services, identifies and classifies facilities by function and importance to meet the needs, and establishes policies for the system and each class of facilities. These policies may cover topics such as prioritization of resources across the system; allocation of resources between maintenance, preservation, operation, and modernization; operational goals for classes of facilities; and relationship of facility categories to land use. The Oregon Aviation Plan is adopted by the State Board of Aviation and is the aviation component of the Oregon Transportation Plan.

Airport Master Plans and Airport Layout Plans: These are plans are for individual airport facilities owned and operated by the Department. They include the identification of needs for using the facility, an overall plan for improving the facility to meet the needs, and policies for operating the facility. As part of the Master Planning process a committee is formed which includes local jurisdictional representatives to provide guidance and input about the development of the airport and surrounding area (AOA). The local jurisdiction is able to provide background information as to whether the current land use ordinance and comprehensive plans are compatible with the updated airport plans. The State Aviation Board adopts facility plans based on the final approved Airport Master Plans and Airport Layout Plans.

By having local jurisdictions on the review committee ODA is able to:

- Identify local and state objectives when it comes to the aviation system in the State.
- Helps ensure that local land use plans are compatible with aviation uses within the AOA
- Codes are in place regarding compatible land uses surrounding the airport, principally within the FAA part 77 Imaginary surfaces.
- Ensure that future growth of the airport facility is being taken in to account and that land use compatibilities are in place via adopted Comprehensive Plans and Development Codes.
- Defines ODA’s and the local jurisdiction’s roles, responsibilities and authorities and guides subsequent decisions by the affected local government and ODA about land uses, the aviation system.

Project Planning

The Department of Aviation's planning activities include preparing and updating the Oregon Aviation System Plan and preparing Airport Master Plans, environmental studies, and Airport Layout Plans for state owned airports and air navigation facilities. The Division develops a system plan project priority listing. Facility plans are implemented through the development and implementation of the Capital Improvement Project (CIP) list. For example, project plans may be developed for the extension of an airport runway consistent with the Airport Layout Plan for the airport.

Project planning starts with the preparation of a project prospectus. This is a preliminary description and evaluation of a proposed project which is used by the Department to schedule project development activities.

The prospectus also classifies the project in accordance with the requirements of the Federal Aviation Administration (FAA) and other federal agencies and their regulations and requirements. The Environmental Protection Agency (EPA) classifies projects based on the likelihood that significant environmental effects would result from the construction of the project. The classifications are as follows.

1. Class 1 projects include actions that significantly affect the quality of the environment and require draft and final environmental impact statements (EIS). The type of work normally placed in Class 1 includes (a) a major project involving acquisition or more than minor amounts of land, substantial changes to the airport including large amounts of demolition or large increase in impervious surface (i.e., pavement).

2. Class 2 projects include activities that have little or no environmental impact and consequently are categorically excluded from environmental analysis by federal regulations. The types of work placed in this class include minor improvement, repair and preservation.

3. Class 3 projects include actions where the significance of the environmental impact is unclear and is evaluated through the preparation of an environmental assessment (EA). The purpose of the EA is to establish whether the proposed project will significantly affect the environment. If a potentially significant impact is discovered, the project is reclassified to Class 1 and an EIS is prepared. Otherwise, the assessment results in a "finding of no significant impact" (FONSI).

Once a project prospectus has been approved, the development of project plans for Class 1 and Class 3 projects proceed through two phases, a location phase and a design phase. For Class 2 projects, work may proceed directly to the design phase.

During the location phase, project alternatives are evaluated and specific parameters for project design are determined. Environmental assessments and environmental impact statements are prepared at this level of project planning.

In the design phase, construction plans, specifications and estimates are developed consistent with the design approval. The design phase concludes with the approval of project plans, specifications and estimates (PS&E). With PS&E approval, funding tor project construction is approved.

Several clearances are required before PS&E approval may be granted. Final plans and specifications are reviewed for consistency with environmental mitigation requirements and land use requirements. Land use permits involving design details, such as building permits and floodplain permits, are obtained before completion of final plans. Permits for in-stream work, removal or fill, and necessary removal or disposal of materials are obtained as well.

OPERATIONS PROGRAM

The Department operates 28 state airports, and related facilities such as pilot planning and briefing facilities, hangars and fueling facilities. Operations activities include airport lighting and navigation aids, elimination of hazards to air navigation, and a number of other safety and support activities. The operations program includes the acquisition of land needed to carry out operations activities.

MAINTENANCE PROGRAM

The Department maintains its facilities by mowing, spraying vegetation, re-applying airfield markings, a Pavement Maintenance Program (PMP), and carrying out similar preservation of facility activities.

MODERNIZATION PROGRAM

The Department modernizes state airports. Activities in this program include building new facilities, making facility expansions such as adding new apron areas, extending existing runways and upgrading facilities such as the rehabilitation of impervious areas as well as critical and essential services based on the needs of the FAA, state, local community and other aviation stakeholders.

FUNDING PROGRAM

Of the Department's 28 state owned airports, 12 are eligible to receive federal grants administered by the FAA. These grants are to be used for projects, as identified in the FAA's Airport Improvement Program. The Department prepares a five (5) year capital improvement program to identify the specific project and funding source.

The purpose of the five (5) year capital improvement program is different than that of the Department's planning program. Capital improvements programs are not plans; they reflect the Department's best estimate of how projected revenues can be matched to airport improvement needs. Capital improvements programs also are not a substitute for the funding decisions that are made in concert with the project planning process.

REGULATORY PROGRAM

The Department is responsible for airport site approval and licensing. It also conducts airport safety inspections. (ORS 836.025, 836.080-120) The Division may also adopt rules which define physical hazards to air navigation and establish standards for lighting or marking objects and structures that constitute hazards to air navigation (ORS 836.530, 836.535). The Division also

registers pilots and aircraft (ORS 837.005 837.070) and licenses aircraft dealers (ORS 837.075).

TECHNICAL ASSISTANCE PROGRAM

The Department may assist local governments and airport operators with planning, acquisition, construction, improvement, maintenance or operation of airports or air navigation facilities. (ORS 836.015) The Division is also authorized to act as agent of any municipality in receiving and disbursing federal moneys and in contracting for and supervising planning, acquisition, construction, improvement, maintenance and operation. (ORS 836.025)

CHAPTER 3

ODA LAND USE PROGRAMS

ODA LAND USE PROGRAMS

METHOD FOR IDENTIFYING LAND USE PROGRAMS

SAC Administrative Rule Requirements

An OAR 660-030-0005 defines land use programs as follows:

(2) "Rules and Programs Affecting Land Use":

(a) Are state agency's rules and programs (hereafter referred to as "land use programs") which are:

(A) Specifically referenced in the statewide planning goals; or

(B) Reasonably expected to have significant effects on:

(i) Resources, objectives or areas identified in the statewide planning goats; or

(ii) Present or future land uses identified in acknowledged comprehensive plans.

(b) Do not include state agency rules and programs, including any specific activities or functions which occur under the rules and programs listed in paragraph (2)(a)(A) of this rule if:

(A) An applicable statute, constitutional provision or appellate court decision expressly exempts the requirement of compliance with the statewide goals and compatibility with acknowledged comprehensive plans: or

(B) The rule, program, or activity is nor reasonably expected to have a significant effect on:

(i) Resources objectives or areas identified in the statewide goals; or

(ii) Present or future land uses identified in acknowledged comprehensive plans; or

(C) A state agency transfers or acquires ownership or an interest in rear property without making any change in the use of the property. Action concurrent with or subsequent to a change of ownership that will affect land use or the areas of the property is subject to either the statewide goals or applicable city or county land use regulations.

Application of OAR 660·030·0005

1. Adopting both the Oregon Aviation System Plan as well as Airport Master Plans, which include Airport Layout Plans that significantly affect the requirements or objectives of the State's Transportation Planning Goal (Goal 12).
2. Adopting Airport Master Plans, that could include Airport Layout Plans, may include the following projects:
   a. Enlarging an existing airport facility to increase the level of transportation service provided, relocating an existing transportation facility, or constructing a new transportation facility.
   b. Constructing a new Airport Operations Area (AOA), enlarging an existing AOA, or significantly changing the use of an AOA.
   c. Changing the size of land parcels through the sale or purchase of property.
   d. Altering land or structures in a way that significantly affects resources or areas protected by

state and federal laws or acknowledged comprehensive plans. Examples include:

(A). Placing or disposing of materials in wetlands, waterways or floodplains;

(B). Draining wetlands by ditching or by other means;

(C). Removing riparian vegetation.

3. Agency review of proposed development in and around Airport Safety Overlay Zone areas in order to promote aviation safety by prohibiting structures, trees, and other objects of natural growth from penetrating “airport imaginary surfaces.”
4. Agency review of structures outside of Airport Safety Overlay Zone areas that could be classified as a hazard to air navigation based on the Federal Aviation Administration Advisory Circular (A/C) 7460-1.

ANALYSIS OF ODA PROGRAMS

Projects and Planning Program

Most of the Department's planning program is a land use program because it carries out the Department's aviation planning activities which affect the objectives of statewide land use Goal 12 and because it is used to make decisions to carry out one or more of the activities affecting land use listed above. All Class 1 and Class 3 projects involve activities which significantly affect land use. Some Class 2 projects, however, do not involve any activities which significantly affect land use including minor improvements, repairs and preservation at airports; these can include airfield repair or replacement of lights and signs, pavement maintenance and mowing/weed control. These types of activities are mostly considered under the Operations and Maintenance program. Some other activities carried out in the Department's planning program also do not significantly affect land use. These include information gathering, analysis, and reporting. It should be noted that the Department is asked to provide public comment for land use applications that are in close proximity to airport facilities throughout the State, not just State owned facilities. These comments, if provided, are only recommendations to the local land use reviewing agency and typically are resolved through the adoption of local ordinances, codes and policies.

Operations and Maintenance Program’s

A limited number of items in the Department's operations and maintenance programs can be considered land use programs. Most of the developments are considered outright permitted uses which may only require a building permit. An example of this is the development of hangars, a pilot lounge or a restaurant on airport property. However, most of the activities carried out under these programs do not affect land use and can be considered general maintenance such as replacing runway lights, repainting markings, windsock replacement and weed control.

Modernization Program

The Department's modernization program is a program affecting land use because most of the activities carried out under the program significantly affect land use. However, building some Class 2 projects does not involve any activities that significantly affect land use.

Funding Program

Some of the Department's funding programs may be considered a land use program because future projects are based on revenue collected by the agency and therefore decisions to carry out activities which affect land use. The program that funds Airport Improvement Projects (AIP) affects land use since that program could involve the expansion of an AOA or construct structures that can house uses activities which may require local land use approvals. It should be noted that these funds do not include operations and maintenance at airports. The Department's management of funds to carry out activities affecting land use is also dependent on decisions that are made in the project planning process; meaning funding decisions are not made independently of the planning process. The funds administered may facilitate activities which affect land use but are not determinative on whether those activities are carried out.

Regulatory Program

Some of ODA's permit programs are listed in OAR 660, div.31. These include airport site approval which are classified as Class B permits and are subject to the LCDC Permit Compliance and Compatibility Rule. (OAR 660-031).

Technical Assistance and Administrative Support Programs

ODA's technical assistance and administrative support programs may be considered land use programs because they could carry out activities that significantly affect land use or decisions about land use activities in and around airports (including airport overlay zones). The technical assistance and administrative support programs focus on airport and aviation safety. The assistance ODA provides to jurisdictions includes assistance to updates to their comprehensive plans and zoning codes, while ensuring that ORSs and OARs are followed and adopted. In addition to assistance, ODA also reviews land use applications near airports to ensure that land uses are compatible, as required by OAR 660-013. The Department also reviews structures near airports to ensure that air navigation are free and clear of obstructions as defined in Title 14 CFR Part 77 – Imaginary Surfaces. It should be noted that the Department is asked to provide public comment for land use applications that are in close proximity to airport facilities throughout the State, not just State owned facilities. These comments are only recommendations to the local land use reviewing agency and are enforced by their adopted ordinances, codes and policies.

CHAPTER 4

COORDINATION OF LAND USE PROGRAMS

INDENTIFICATION OF EXEMPT AND COMPATIBLE LAND USE PROGRAMS

None of ODA's land use programs are expressly exempted by statute, constitutional provision or appellate court decision from the requirements in ORS 197.180 to be compatible with acknowledged comprehensive plans.

PROGRAM FOR ASSURING COMPLIANCE WITH THE STATEWIDE PLANNING GOALS AND COMPATIBILITY WITH ACKNOWLEDGED COMPREHENSIVE PLANS

ORS 197.180 and the LCDC State Agency Coordination Rule, OAR 660, div 30, require that the Department develop procedures and adopt an administrative rule for assuring that programs affecting land use are carried out in compliance with the statewide planning goals and in a manner compatible with acknowledged comprehensive plans.

In most instances, the Department shall achieve compliance with the statewide planning goals by assuring that its land use programs are compatible with applicable acknowledged comprehensive plans. However, the Department shall adopt findings demonstrating compliance with the statewide goals when required to do so by OAR 660-030-065(3). The procedures which follow identify the circumstances when the Department shall directly apply the statewide planning goals.

PLANNING PROGRAM PROCEDURES

ODA's program for assuring compliance and compatibility recognizes the successive stages of airport master planning and establishes a process that coordinates compliance and compatibility determinations during the time an Airport Master Plan or Airport Layout Plan is being developed. At each Airport Master Plan or Airport Layout Plan stage, some compliance and compatibility issues come into focus with sufficient clarity to enable them to be addressed. These issues, if possible, need to be resolved at that time. Other issues may be apparent but not seen clearly enough to determine compliance and compatibility. These issues shall be resolved in subsequent planning stages and any plan decisions that depend on their resolution shall be contingent decisions. The result of this successive refinement process shall be the resolution of all compliance and compatibility issues by the end of the planning stage of the Airport Master Plan or Airport Layout Plan planning program.

The Department's coordination efforts at the Airport Master Plan or Airport Layout Plan stages will be directed at involving metropolitan planning organizations, local governments and others in the development of statewide transportation policies and plans. Since these plans have general statewide applicability and since ODA has the mandate under ORS 835.015 to incorporate as part of its program a definite plan for the development of airports, state airways, airplane industries and aviation generally. However, compatibility determinations shall be made for new facilities identified in modal systems plans that affect identifiable geographic areas. Compliance with any statewide planning goals that specifically apply will be established at these planning stages.

The focus of the Department's efforts to establish compatibility with acknowledged comprehensive plans will be at the facility planning and project planning stages of an Airport Master Plan or Airport Layout Plan. At these stages, the effects of the Department's plans are more regional and local in nature although some statewide effects are also present.

Following are the procedures that the Department shall or may use to coordinate its planning program. The required procedures have been incorporated into the Department's administrative rule for state agency coordination, OAR chapter 738 Division 130 (Appendix D).

COORDINATION PROCEDURES FOR ADOPTING THE STATE AVIATION PLAN, AIRPORT MASTER PLAN OR AIRPORT LAYOUT PLAN

1. Except in the case of aviation plan updates, which include Airport Layout Plan 'as-built' updates or updating existing data from previously approved chapters in the Oregon Aviation Plan, the Department shall involve DLCD and affected metropolitan planning organizations, cities, counties, state and federal agencies, special districts and other interested parties in the development or amendment of a facility plan. This involvement may take the form of mailings, meetings or other means that the Department determines are appropriate for the circumstances. The Department shall hold at least one public meeting on the plan prior to adoption.

2. The Department shall provide a draft of the proposed facility plan to planning representatives of all affected cities, counties and metropolitan planning organization and shall request that they identify any specific plan requirements which apply, any general plan requirements which apply and whether the draft facility plan is compatible with the acknowledged comprehensive plan. If no reply is received from an affected city, county or metropolitan planning organization within 45 days of the Department's request for a compatibility determination, the Department may deem that the draft plan is compatible with that jurisdiction's acknowledged comprehensive plan. The Department may extend the reply time if requested to do so by an affected city, county or metropolitan planning organization.

3. If any statewide goal or comprehensive plan conflicts are identified, the Department shall meet with the local government planning representatives to discuss ways to resolve the conflicts. These may include:

(a) Changing the draft facility plan to eliminate the conflicts;

(b) Working with the local governments to amend the local comprehensive plans to eliminate the conflicts; or

(c) Identifying the conflicts in the draft facility plan and including policies that commit the Department to resolving the conflicts prior to the conclusion of the transportation planning program for the affected portions of the transportation facility.

4. The Department shall evaluate and write draft findings of compatibility with acknowledged comprehensive plans of affected cities and counties, findings of compliance with any statewide planning goals which specifically apply as determined by OAR 660-030-0065(3)(d), and findings of compliance with all provisions of other statewide planning goals that can be clearly defined if the comprehensive plan of an affected city or county contains no conditions specifically applicable or any general provisions, purposes or objectives that would be substantially affected by the facility plan.

5. The Department shall present to the Aviation Board the draft plan, findings of compatibility with the acknowledged comprehensive plans of affecting cities and counties and findings of

compliance with applicable statewide planning goals.

6. The Aviation Board shall adopt findings of compatibility with the acknowledged comprehensive plans of affected cities and counties and findings of compliance with applicable statewide planning goals when it adopts the final facility plan

7. The Department shall provide copies of the adopted final facility plan and findings to DLCD, to affected metropolitan planning organizations, cities, counties, state and federal agencies, special districts and to others who request to receive a copy.

COORINATION PROCEDURES FOR ADOPTING PLANS FOR CLASS 1 AND 3 PROJECTS

1. The Department shall involve affected cities, counties, metropolitan planning organizations, state and federal agencies, special districts and other interested parties in the development of project plans. The Department shall include planning officials of the affected cities, counties and metropolitan planning organization on the project technical advisory committee.

2. Goal compliance and plan compatibility shall be analyzed in conjunction with the development of the Draft Environmental Impact Statement or Environmental Assessment. The environmental analysis shall identify and address relevant land use requirements in sufficient detail to support subsequent land use decisions necessary to authorize the project.

3. Except as otherwise set forth in section (4) of this rule, the Department shall rely on affected cities and counties to initiate completion of all plan amendments and zone changes necessary to achieve compliance with the statewide planning goals and compatibility with local comprehensive plans after completion of the Draft Environmental Impact Statement or Environmental Assessment and before completion of the Final Environmental Impact Statement or Revised Environmental Assessment. These shall include the adoption of general and specific plan provisions necessary to address applicable statewide planning goals.

4. The Department may complete a Final Environmental Impact Statement or Revised Environmental Assessment before the affected cities and counties make necessary plan amendments and zone changes in the following case:
   (a) The Final Environmental Impact Statement or Revised Environmental Assessment identifies that the project be constructed in phases; and
   (b) The Department finds:
   (A) There is an immediate need to construct one or more phases of the project. Immediate need may include, but is not limited to, the facility to be improved or replaced currently exceeds or is expected to exceed within five years the level of service identified in the Oregon Aviation Plan; and
   (B) The project phase to be constructed meets a transportation need independent of the overall project, is consistent with the purpose and need of the overall project as identified in the FEIS, and will benefit the surrounding transportation system even if no further phases of the project are granted land use approval.
   (c) The project does not require an exception to a statewide planning goal pursuant to ORS 197.732.

5. If a Final Environmental Impact Statement or Revised Environmental Assessment is completed

pursuant to section (4) of this rule, all necessary plan amendments and zone changes associated with the particular phase of the project to be constructed shall be made by the city or county prior to constructing that phase of the project. The Department may assist affected cities and counties with amendments to their comprehensive plans and land use regulations necessary to make them consistent with applicable modal system plans, facility plans and the agreed project scope and objectives.

6. If compatibility with a city or county comprehensive plan cannot be achieved, the Department may modify one or more project alternatives to achieve compatibility or discontinue the project.

7. The Board or its designee shall adopt findings of compatibility with the acknowledged comprehensive plans of affected cities and counties when it grants design approval for the project. Notice of the decision shall be mailed out to all interested parties.

8. The Department shall obtain all other land use approvals and planning permits prior to construction of the project.

COORDINATION PROCEDURES FOR CLASS 2 PROJECTS DETERMINED TO SIGNIFICANTLY AFFECT LAND USE

Coordination procedures are much simpler for Class 2 projects than for Class 1 or Class 3 projects because the land use impacts of projects in this class are minor. Projects are reviewed when the project prospectus is prepared to determine whether they would involve any activities that would significantly affect land use. The following coordination process shall be follow for those projects that would affect land use.

1. Planning officials of affected cities and counties shall be contacted at the start of project planning to identify any possible compliance or compatibility conflicts and ways to avoiding conflicts.

2. The Department shall attempt to avoid any identified compliance or compatibility conflicts as it develops its plans.

3. Planning officials of affected cities and counties shall be requested to review preliminary final plans to identify whether any local land use approvals are needed and whether any of the acknowledged comprehensive plan's general provisions would be substantially affected. If no local planning approvals are required and if the plan's general provisions would not be substantially affected the Department shall conclude that the project is compatible. If no comments are received from an affected local jurisdiction within 15 days of the Department's request for a compatibility determination, the Department may deem that the preliminary project plans are compatible with the acknowledged comprehensive plan for that jurisdiction. The Department may extend the reply time if requested to do so by an affected city or county.

4. If any local planning approvals are required the Department shall either modify its project plans so as to not require approvals, or shall apply for the necessary approvals.

5. If the affected city or county does not grant approval, the Department may:

(a) Modify the project plans so as to not require approval;
(b) Discontinue further work on the project; or
(c) Appeal the city or county decision.

6. The Department shall obtain local planning approvals prior to construction of the project.

COORDINATION PROCEDURES FOR OPERATIONS, MAINTENANCE AND MODERNIZATION PROGRAMS

The identification of operations and modernization program projects significantly affecting land use occurs when a project prospectus is prepared. Compliance and compatibility for projects that affect land use are established during the project planning process. Additional coordination in accordance with the procedures listed below will only be necessary if significant changes to project plans are proposed.

For operations and maintenance activities that do not proceed through the project planning process, the Department will determine whether the activities are among those listed in previous chapters. The following coordination procedures shall be used when carrying out activities that would significantly affect land use.

1. The Department shall consult planning officials of the affected city or county to determine whether any local land use approvals are required to carry out the proposed activity.
2. If any local planning approvals are required, the Department shall either modify the proposed activity not to require approval, or shall apply for the necessary approvals.
3. If the approvals are not granted by the approval authority, the Department may:

(a) Modify the proposed activity so as to not require permits:
(b) Not do the proposed activity; or
(c) Appeal the local decision.

REFERRAL OF COMPATIBILITY DISPUTES TO THE LAND CONSERVATION AND DEVELOPMENT BOARD

If a compatibility conflict persists after pursuing the compatibility procedures listed above, the Department shall request that the Land Conservation and Development Board make a compatibility determination in accordance with OAR 660-030-070 (7) through (12).

CHAPTER 5

PROGRAM OF COOPERATION AND TECHNICAL ASSISTANCE

COORDINATION WITH PLAN IMPLEMENTATION AND PLAN AMENDMENT

The Department is interested in amendments to the transportation elements of city and county comprehensive plans, as it relates to airports and airport activities. In addition, the Department is interested in a number of types of city and county plan implementation and plan amendment actions that can affect airports facilities. The Department's interests relate to its role as the builder and operator of state owned airport facilities and its role as the statewide aviation planning agency. In accordance with ORS 836.608 the Department must receive notification from and work with local governments in the following instances.

Actions Affecting Future State Airports: Land use actions adjacent to state airports that may affect future expansions of these facilities. The most significant areas of concern include lands near airport runways, taxiways and airport property used for both airside and landside activities.

Actions Affecting State Airports: Land use actions adjacent to or in the vicinity of state airports that will significantly change the quantity or rate of runoff discharge to state ditches and drainage structures, or that may block a drainage way that conveys runoff from state drainage systems.

Actions Involving Noise Sensitive Land Uses In the Vicinity of Public Use Airports: Land use actions on properties in noise corridors around public use airports. Areas of interest include (1) areas identified by Airport Master Plans and (2) areas within 1,500 feet of airport runways for airports for which there is no master plan.

Actions that Involve Physical Hazards to Air Navigation and Airport Obstructions: Land use actions that may result in the creation of physical hazards to air navigation in the state generally and those actions that may result in obstructions to airspace in the vicinity of public and private use airports. Areas of interest generally include (1) areas within 5,000 feet of the runway of a visual approach airport; (2) areas within 10,000 feet of an instrument approach airport, (3) areas designated by an Airport Master Plan or Airport Layout Plan, and (4) any construction of more than 200 feet in height above the ground level. The objective is to identify potential obstructions that may penetrate Title 14 CFR Part 77 – Imaginary Surfaces or impact any activity around airports including missed approaches or flow flying aircraft.

Actions that involve Development in Runway Protection Zones and Approach Safety Zones of Public and Private Use Airports: All proposed development in airport runway protection zones; including all actions that affect the densities of development in approach and transitional safety zones including building population densities, coverage densities and overall densities. Areas of interest are identified in Airport Master Plans, Airport Layout Plans, Title 14 CFR Part 77 – Imaginary Surfaces and both the FAA's and ODA's Land Use Compatibility documents.

COORDINATION WITH COMPREHENSIVE PLAN IMPLEMENTATION

ODA shall use the following process to coordinate with local governments on the plan implementation actions:

1. ODA shall periodically provide all cities and counties with the names and addresses of people in the Department who should be notified regarding all land use actions and building permits of

interest to the Department. Interests of land use actions and building permits include not only state owned airports, but any public use airport within the state.

2. ODA shall respond to local notices within the time prescribed in the notice. The Department shall identify concerns and relate them to comprehensive plan and ordinance requirements. All Divisions of the Department shall coordinate to assure consistency in the Department's comments.
3. ODA shall advise local governments on what factual information is needed to address its concerns and may assist in providing needed information within the limits of its resources. ODA may also comment on the adequacy of factual information supplied by applicants.
4. ODA shall offer to meet with planning officials and applicants in instances where there are significant conflicts.
5. ODA may pursue the following actions where local actions conflict with ODA plans and programs:
   a. Meet with planning officials and applicants and participate in the local decision-making process;
   b. Request informal mediation by the Department of Land Conservation and Development; and
   c. Appeal the decision.

COORDINATION WITH COMPREHENSIVE PLAN AMENDMENTS

ODA shall use the following process to coordinate with local governments on the plan amendment actions:

1. ODA shall periodically provide all cities and counties with the names and addresses of people in the Department who should be notified regarding plan amendments of interest to the Department.
2. If timely notice has been received, ODA shall respond to proposed plan amendments prior to the public first hearing. If not, ODA may ask for an extension of time to review the proposal. ODA shall identify its concerns and relate them to applicable ordinance requirements, plan policies and statewide goal requirements. All Divisions of the Department shall coordinate internally and have one point contact to assure consistency in the Department's comments. ODA will coordinate with DLCD on proposed local plan amendments to ensure that any aviation components is fully addressed and is in compliance with both OAR 660-013 and any applicable aviation ORS and OAR.
3. If the Department has concerns about a proposed plan amendment, it shall identify applicable aviation/transportation plans and advise local governments on what factual information is needed to address its concerns. The Department may assist in providing needed information within the limits of its resources. ODA may also comment on the adequacy of factual information supplied by applicants. All comments are subject to timelines and deadlines as identified adopted by the local jurisdictions and in state law.
4. ODA may pursue the following actions where local actions conflict with ODA plans and programs:

a. Meet with planning officials and applicants and participate in the local planning process;

b. Request informal mediation by the Department of Land Conservation and Development; and

c. Appeal the decision.

INCORPORATION OF ODA PLANS AND PROGRAMS INTO COMPREHENSIVE PLANS AND PARTICIPATION IN PERIODIC REVIEW

ODA shall work to the extent possible to incorporate its plans and programs into comprehensive plans in the following ways:

1. ODA shall request that affected cities and counties incorporate relevant portions of the Airport Land Use Compatibility Guidebook and Airport Master Plan or Airport Layout Plan adopted by the Department into their comprehensive plans. ODA shall assist local governments with the amendments.
2. As an early step in the project planning process for Class 1 and Class 3 projects, ODA shall request that the affected local governments amend their comprehensive plans and land use regulations to make them consistent with applicable Airport Master Plan or Airport Layout Plan.
3. ODA shall work with cities and counties during periodic review to incorporate its plans into local comprehensive plans.

PERIODIC REVIEW AND COORDINATION WITH LOCAL PUBLIC FACILITY PLANNING

Most of the Department's coordination with local public facility planning will occur during periodic review. Therefore the procedures for carrying out such coordination have been combined with periodic review procedures. If a city or county adopts or amends a public facilities plan independent of periodic review, the Department shall follow the procedures for coordinating with plan amendments combined with relevant portions of the procedures listed below.

1. The Department shall notify the Department of Land Conservation and Development when it adopts or amends an Airport Master Plan or Airport Layout Plan, and shall request that DLCD identity these comprehensive plans in periodic review notices.
2. After the Department receives notice of a city or county periodic review, it shall notify the city or county of Department plans that have been adopted pursuant to ORS 835.015 since acknowledgement of the local comprehensive plan. The Department shall also identify substantial changes in circumstances related to statewide aviation that should be addressed during the local government's comprehensive plan review.
3. The Department shall provide the city or county with inventory information on state facilities that need to be included in the public facilities plan. This information may include modal systems plans, facility plans, capital improvements programs, project plans and relevant data.
4. The Department shall assist the city or county, to the extent that resources allow, in their preparation of the portion of the public facilities plan that affects statewide Airport Master Plans or Airport Layout Plans. The Department may also work with the city or county and the Oregon Business Development Department to identify potential sources of funding to carry

airside and landside projects identified in the Airport Master Plans or Airport Layout Plans.

5. The Department shall request to be furnished drafts of the public facilities plan and other portions of the comprehensive plan review to ensure compatibility with adopted plans pursuant to ORS 835.015.
6. The Department shall notify the city or county of any concerns about possible conflicts with its plans and programs prior to the first local public hearing of which it receives timely notice. The Department has the following interest in addition to those listed at the beginning of this chapter:
   a. Airport Master Plans and Airport Layout Plans include relevant portions of adopted regional transportation plans, facilities plans, and project plans.
   b. State facilities or improvements not be proposed to provide services that are contrary to their functions as set forth in the Airport Master Plans or Airport Layout Plans.
   c. Proposed improvements to state facilities be consistent with Airport Master Plans or Airport Layout Plans.
   d. Improvements identified in the Department's capital improvements programs that are compatible with the acknowledged comprehensive plan are identified in the Airport Master Plans or Airport Layout Plans.
   e. Airport Master Plans or Airport Layout Plans identify facilities needed to serve commercially and industrially planned areas at state airports.
7. The Department shall offer to meet with local planning officials in order to resolve conflicts. The Department may also request assistance from the Department of Land Conservation and Development to mediate conflicts.
8. The Department shall notify the Department of Land Conservation and Development of conflicts that remain after a city or county has adopted its final review order.

LOCAL GOVERNMENT RELIANCE ON ODA AIRPORT MASTER PLANS AND AIRPORT LAYOUT PLANS

ODA encourages local governments to adopt relevant portions of the Department's Airport Planning Rule and Land Use Compatibility Guidebook in order to comply with applicable provisions of Goal 12 pursuant to OAR 660-013.

TECHNICAL ASSISTANCE

The Department has a long history of providing technical assistance to cities and counties. The Department's many programs are listed in earlier chapters. The Department will provide technical assistance to local governments on public facility funding, local public facility plans, permit issuance and economic development as required by ORS 197.712(2)(f) and 197.717(1) and (2). The Department recognizes that providing technical assistance will assist it in meeting its goals, and therefore will strive to meet the needs of cities and counties to the extent that its resources allow.

CHAPTER 6

COORDINATION WITH AGENCIES AND SPECIAL DISTRICTS

COORDINATION WITH THE DEPARTMENT OF LAND CONSERVATION AND DEVELOPMENT

The Department's primary areas of coordination with the Department of Land Conservation and Development (DLCD) involve the Department's planning program, city and county plan amendments, and intermittent comprehensive plan review. The Department may also coordinate with DLCD to help resolve issues of compliance with the statewide planning goals and compatibility with acknowledged comprehensive plans for any of its land use programs. Coordination procedures are described in previous chapters.

COORDINATION WITH STATE AND FEDERAL AGENCIES AND SPECIAL DISTRICTS

The Department coordinates with an extensive list of state and federal agencies as it develops Airport Master Plans, Airport Layout Plans or Airport Capital Improvement Project plans. The greatest degree of coordination occurs for Class 1 and Class 3 projects. The Department notifies potentially interested agencies through the state clearinghouse and through its own notification process. Agencies that may be notified include, but are not limited to:

STATE AGENCIES:
Department of Land Conservation and Development
Department of Environmental Quality
Department of Energy
Business Oregon

FEDERAL AGENCIES:
Federal Aviation Administration
US Department of Transportation
US Customs Enforcement

INTERAGENCY COORDINATION CONTACT FOR LAND USE

Chapter 7 identifies the persons in the Department who should be contacted under various circumstances.

CHAPTER 7

ORGANIZATION OF ODA PLANNING COORDINATION PROGRAM

ORGANIZATION OF THE PROGRAM

Overall Description

The Department has established a strong outreach component through its Project and Planning Division. This Division is responsible for managing the program throughout the state of Oregon and coordinates with local governments on land use matters affecting the airports throughout the State; this includes state owned and non-state owned facilities. This is the level where most of the program will be implemented. The Project and Planning Division of the Department of Aviation provides central coordination of the program as well as technical assistance and land use coordination for aviation in the State.

Following are descriptions of organizational responsibilities.

Project and Planning Division

The State Aviation Board and the Director of the Department of Aviation has overall responsibility for ODA's coordination program. The Planning and Project Division reporting to the Director will be responsible for carrying out coordination, technical assistance and land use coordination for the program. The Project and Planning Division works closely with the State Airports Manager, Department Director and other airport sponsors throughout the State to assure that the objectives of this Division is carried out. Responsibilities of the Division include but not limited to:

1. Coordinating and recommending the development of land use policy for the Department to the Director and the State Aviation Board to maintain consistency throughout the State and for all airports.
2. Maintaining and amending the Department's state agency coordination program and interpreting Department compliance and compatibility procedures; assuring that all Divisions of the Department and local jurisdictions carry out their land use programs in accordance with the Department's state agency coordination program, Oregon Revised Statute (ORS) and Oregon Administrative Rules (OAR).
3. Developing findings when the Department must act incompatibly in order to fulfill a statutory obligation.
4. Coordinating land use policy for the Department with the Department of Land Conservation and Development.
5. Coordinating comprehensive plan review responses with the Department of Land Conservation and Development.
6. Requesting informal mediation and formal compatibility determination by the Land Conservation and Development Commission.
7. Providing the technical resources needed in responding to planning issues.
8. Developing guidelines, model comprehensive plan policies and land use ordinances.
9. Coordinating with State, Federal and local agencies while following the policy adopted by the Oregon Board of Aviation for the naming, changing, modifying or the adjustment of airport facilities.

BEFORE THE BOARD OF COMMISSIONERS
FOR MARION COUNTY, OREGON

In the Matter of the	)	Case No. CP 03-4
	)	
Application of:	)	Clerk's File No. 4968
	)	
RICHARD VAN GRUNSVEN	)	COMPREHENSIVE
OF HD AVIATION, TED MILLAR	)	PLAN AMENDMENT
OF SOUTH END AVIATION,	)	
AND JACK HOGAN	)	AN ADMINISTRATIVE ORDINANCE

ORDINANCE NO. 1205

THE MARION COUNTY BOARD OF COMMISSIONERS HEREBY ORDAINS AS FOLLOWS:

SECTION I. Purpose

This Ordinance is enacted pursuant to the authority granted to general law counties in the State of Oregon by ORS Chapters 197, 203, and 215 to implement the Marion County Comprehensive Land Use Plan. This ordinance amends the Marion County Comprehensive Plan by taking exceptions to Statewide Land Use Planning Goals 11—Public Facilities and Services and 14—Urbanization for certain properties to share a septic system at the Aurora State Airport. (T4S; R1W; Section 11A; Tax lots 200, 201, 203, and 400) and (T4S; R1W; Section 02D; Tax lots 1100 and 1600).

SECTION II. Procedural History

The Marion County Board of Commissioners held a public hearing on September 22, 2004, for which proper public notice and advertisement was given. The purpose of the hearing was to consider proposed amendments to the Marion County Comprehensive Plan to take exceptions to Statewide Land Use Planning Goals 11—Public Facilities and Services and 14—Urbanization for certain properties to share a septic system at the Aurora State Airport. All persons present during the public hearing were given the opportunity to speak or present written statements.

SECTION III. Adoption of Findings and Conclusion

The Board has reviewed the evidence and testimony in the record. The amendments to the Marion County Comprehensive Plan made hereunder are based on consideration and analysis of existing Marion County Comprehensive plan goals and policies and zoning regulations and the provision of ORS Chapters 197 and 215, Oregon Administrative Rules 660 Divisions 4, 11, 14, 8, and 33, and the State Land Use Planning Goals.

After careful consideration of all facts and evidence in the record, the Board adopts as its own the Facts and Findings contained in Exhibit A, attached hereto, and by this reference incorporated herein. The properties which are granted goal exceptions are shown on the map attached as Exhibit B, attached hereto, and by this reference incorporated herein.

SECTION IV. Action

The exceptions to Goals 11 and 14 to permit six parcels at the Aurora Airport to share an existing septic disposal system are **GRANTED**.

SECTION VI. Severability

Should any section, subsection, paragraph, sentence, clause, or phrase of this Ordinance or any policy, provision, findings, statement, conclusion, or designation to a particular land use or area of land, or any other portion, segment or element of this Ordinance or of any amendments thereto and adopted hereunder, be declared invalid for any reason, such declaration shall not affect the validity and continued application of any other portion or element of this Ordinance or amendments to the Comprehensive Plan; and if this Ordinance or any portion thereof should be held to be invalid on one ground, but valid on another, it shall be construed that the valid ground is the one upon which this Ordinance of any portion thereof was enacted.

SECTION VII. Effective Date

Pursuant to Ordinance 669, this is an administrative Ordinance and shall take effect 21 days after the adoption and signatures of the Marion County Board of Commissioners.

SIGNED and FINALIZED this 13 day of October, 2004 at Salem, Oregon.

MARION COUNTY BOARD OF COMMISSIONERS

Janet Carlson
Chair

Jan Eastwood
Recording Secretary

JUDICIAL NOTICE

Oregon Revised Statutes (ORS) Chapter 197.830 provides that land use decisions may be reviewed by the Land Use Board of Appeals (LUBA) by filing a notice of intent to appeal within 21 days from the date this ordinance becomes final.

Exhibit A

Facts and Findings:
Exceptions to Goals 11 and 14

BACKGROUND:

In 1999, the applicants received approval from the Oregon Department of Environmental Quality (DEQ) to construct a recirculating gravel filter septic disposal system which was intended to serve six parcels at the southern end of the Aurora. After constructing the system, the applicants were informed by DEQ that Goal 11 forbids the extension of septic lines across property lines and an exception to Goal 11 would have to be taken in order to connect and operate the system.

In June 2003, the applicants applied for a comprehensive plan change to take an exception to Goal 11 to permit shared septic facilities. Staff from the Department of Land Conservation and Development commented that the Goal 11 exception would have to be accompanied with either an exception to Goal 14, because the Public zone at that time did not comply with Goal 14 requirements, or amendments to the Public zone that would bring it into compliance with Goal 14 requirements for rural uses outside of rural communities.

The county was involved in a periodic review task to amend the rural zoning ordinance to comply with Goal 14 and the applicants agreed to place their application on hold until the Goal 14 issues were resolved regarding the Public zone. On July 28, 2004, the Marion County Board of Commissioners adopted amendments to the Marion County Rural Zoning Ordinance which brought the code into compliance with Goal 14 requirements. Subsequently, this application was taken off hold and the applicants requested that the Board call-up the request and hold the first evidentiary hearing. Notice of public hearing was mailed on September 1, 2004 to property owners within 500 feet of the subject parcels. Notice was also published in the Statesman-Journal.

On September 22, 2004, the Board held a public hearing to consider amendments to the Marion County Comprehensive Plan taking exceptions to Goals 11 and 14 for an existing shared septic system for six parcels at the southern end of the Aurora Airport. The Board closed the hearing and directed staff to prepare an ordinance taking those exceptions.

FACTS:

1. The subject properties are designated Public in the Marion County Comprehensive Plan and are correspondingly zoned P (PUBLIC) under the Marion County Rural Zoning Ordinance (MCRZO). The purpose of the Public designation and zone is to provide regulations governing the development of land appropriate for specific public and semi-public uses.

2. The properties are located on the north side of Keil Road NE, approximately 1,700 feet west of the intersection of Airport Road NE and Keil Road. The parcels contain aircraft related facilities and are proposed for additional development in the future.

3. Adjacent properties to the southwest, west, east, and north are zoned P and contain the Aurora Airport and airport related uses and businesses. Properties to the south are zoned EFU (EXCLUSIVE FARM USE) and are devoted to farm use.

4. The airport facility was constructed at this site in 1943 to provide an emergency alternate field for carrier aircraft. It has been in operation as an airport, and zoned public, since that time. Since before 1968, additional land east of the runway and north of Keil Road has also been zoned public and closely associated with the airport. Between 1968 and 1981, properties to the south of Arndt Road and east of the runway were rezoned to public and developed with airport uses. In 1981, the airport facility, and surrounding airport related uses in the public zone, were acknowledged as exceptions in the Marion County Comprehensive Plan.

5. The 1976 Airport Master Plan was adopted by Marion County as part of its comprehensive plan. The adoption included a committed exception area to Statewide Planning Goal 3 of approximately 250 acres at the Aurora State Airport. In 1994, an exception for an additional 1.86 acres was taken and acknowledged to add land to the southwest of the airport. The County's Airport Overlay Zone, Marion County Rural Zoning Ordinance (MCRZO) Chapter 177 has been applied to both the 1981 exception area and the area added in 1994.

6. In Legislative Amendment 03-3, which amended the Marion County Rural Zoning Ordinance to comply with Goal 14 requirements for rural exception areas, an exception to Goal 14 for size of use was approved for airport related uses at the Aurora State Airport due to its being developed with a use that is urban in nature and requiring urban styled development to support the existing uses.

COMMENTS:

7. Marion County Building Inspection commented that based on the information submitted in the attached site plan, Building Inspection cannot make a determination on the permit requirements.

8. The FAA commented, "on-airport development requires submittal to FAA of FAA Form 7460-1, off-airport development requires submittal of separate form 7860-1, concurrence of Oregon Dept. of Aviation required for on-airport development, recommended for off-airport development."

9. All other contacted agencies stated that they had no objections or had not commented at the time the staff report was prepared. All comprehensive plan changes are subject to review by the State Department of Land Conservation and Development (DLCD).

DLCD's comments are contained in the file and explained in the background section of this report.

ANALYSIS:

10. Goal 11—Public Facilities and Services states: "Local Governments shall not allow the establishment or extension of sewer systems outside urban growth boundaries or unincorporated community boundaries...." The Goal defines "extension of a sewer or water system" as "the extension of a pipe, conduit, pipeline, main, or other physical component from or to an existing sewer or water system in order to provide service to a use that was not served by the system on the applicable date of this rule...."

    Goal 14—Urbanization prohibits the establishment of urban services on rural lands and the shared septic facility constitutes a urban level of service as defined by Goal 11. Because of this, an exception to Goal 14 will have to be taken along with an exception to Goal 11.

11. The exception requirements for land physically developed to uses other than those allowed by the applicable goal is set forth in OAR 660-004-0025:

    (1) A local government may adopt an exception to a goal when the land subject to the exception is physically developed to the extent that it is no longer available for uses allowed by the applicable goal.

    (2) Whether land has been physically developed with uses not allowed by an applicable Goal will depend on the situation at the site of the exception. The exact nature and extent of the areas found to be physically developed shall be clearly set forth in the justification for the exception. The specific area(s) must be shown on a map or otherwise described and keyed to the appropriate findings of fact. The findings of fact shall identify the extent and location of the existing physical development on the land and can include information on structures, roads, sewer and water facilities, and utility facilities. Uses allowed by the applicable goal(s) to which an exception is being taken shall not be used to justify a physically developed exception.

12. It was determined previously in Legislative Amendment Case No. 03-3 that the existing airport-related development at the airport exceeds the size limitations for commercial and industrial uses allowed by Goal 14 and the Unincorporated Communities Rule and an exception was talen to permit continued development to occur at a level consistent with existing development at the airport. The Land Use Board of Appeals (LUBA) recognized that the level of development at the airport would likely require exceptions to Goals 11 and 14, referring to the Aurora State Airport as an "urban public facility" and commenting that the text of an exception "probably could be very similar to that required for the proposed exception to Goal 3," an exception which was subsequently acknowledged by LCDC. Murray et al. v. Marion County, 23 Or LUBA 268 (1992).

13. OAR 660-014-0040 sets forth the criteria for taking an exception to Goal 11—Public Facilities and Goal 14—Urbanization:

(1) As used in this rule, "undeveloped rural land" includes all land outside of acknowledged urban growth boundaries except for rural areas committed to urban development. This definition includes all resource and nonresource lands outside of urban growth boundaries. It also includes those lands subject to built and committed exceptions to Goals 3 or 4, but *not* developed at urban density or committed to urban level development.

(2) A county can justify an exception to Goal 14 to allow incorporation of a new city or establishment of new urban development on undeveloped rural land. Reasons which can justify why the policies in Goals 3, 4, 11, and 14 should not apply can include but are not limited to findings that an urban population and urban levels of facilities and services are necessary to support an economic activity which is dependent upon an adjacent or nearby natural resource.

(3) To approve an exception under this rule, a county must also show:

(a) That Goal 2, Part II(c)(1) and (c)(2) are met by showing the proposed urban development cannot be reasonably accommodated in or through expansion of existing urban growth boundaries or by intensification of development at existing rural centers;

(b) That Goal 2, Part II(c)(3) is met by showing the long-term environmental, economic, social and energy consequences resulting from urban development at the proposed site with measures designed to reduce adverse impacts are not significantly more adverse than would typically result from the same proposal being located on other undeveloped rural lands, considering:

(A) Whether the amount of land included within the boundaries of the proposed urban development is appropriate, and

(B) Whether urban development is limited by the air, water, energy and land resources at or available to the proposed site, and whether urban development at the proposed site will adversely affect the air, water, energy and land resources of the surrounding area.

(c) That Goal 2, Part II(c)(4) is met by showing the proposed urban uses are compatible with adjacent uses or will be so rendered through measures designed to reduce adverse impacts considering:

(A) Whether urban development at the proposed site detracts from the ability of existing cities and service districts to provide services; and

(B) Whether the potential for continued resource management of land at present levels surrounding and nearby the site proposed for urban development is assured.

(d) That an appropriate level of public facilities and services are likely to be provided in a timely and efficient manner;

(e) That incorporation of a new city or establishment or new urban development of undeveloped rural land is coordinated with comprehensive plans of affected jurisdictions and consistent with plans that control the area proposed for incorporation.

14. The Aurora Airport has been in place since 1943 and airport related uses have been associated with the airport since before 1968. The airport consists of properties in multiple ownerships providing a wide range of aviation-related and support services such as aircraft instruction, rental, maintenance, charter, sales, avionics sale and repair, aircraft construction, storage, fueling, helicopter maintenance and fueling, aerial photography, and others. This airport provides necessary air transportation services to businesses and individuals in Marion, Clackamas, Washington and Multnomah counties, enhancing the economy of the region and the state. The airport facility depends on its location, and the commercial, industrial and population centers and growth in the area, for its viability and necessity. This state airport facility is uniquely able to provide services to the surrounding rural area and nearby communities, as well as a connection to other urban airports because of it's proximity to the Interstate 5 corridor and Highway 99E, the county roadway system, Clackamas County and the south Metro area. In addition, the need for airport transportation facilities is recognized in the Marion County Comprehensive Plan (MCCP).

The Aurora State Airport is needed to serve the economic and air transportation needs of the surrounding community which is dependent upon the existing location of the airport. The criteria in 13(1) and 13(2) are met.

15. The nearest UGB is that of the City of Aurora, approximately 1500 feet to the southeast of the airport. The land between the existing UGB and the airport boundary is resource land. The City of Aurora originally proposed that the airport be included in the UGB when it was going through acknowledgement; however, this was not approved by LCDC and the UGB was reduced to the present area. It continues to be unreasonable to extend the UGB this distance due to the amount of intervening resource land at this time. There are also no rural centers which could encompass the proposed exception area. The closest rural center, Fargo Interchange, is over 9,000 feet west of the airport. The criterion in 13(3)(a) is met.

16. The criteria in 13(3)(b) require that the long-term environmental, economic, social and energy consequences resulting from urban development at the proposed site not be significantly more adverse than would result from the same proposal being located on

other undeveloped rural lands. Because the Aurora Airport is already developed with airport and airport-related uses, and because of its demonstrated need to be located where it currently is, as explained in #14, there are no alternative locations being considered requiring the use of undeveloped land.

Additionally, information provided by the applicant demonstrates that developing the properties with septic or holding tanks would be much more expensive than using a shared septic system.

Also there are environmental concerns developing with septic systems on the subject properties. The soils on the subject properties are not optimum soils for septic systems and can be difficult to locate a system on an individual property. A shared septic also provides the opportunity to process the effluent in a more complete manner that can be certified to meet Leadership in Energy and Environmental Design (LEED) standards.

Considering the lack of alternatives locations for the airport, as well as the benefits economically and environmentally and the potential for positive affects on the air, water, energy and land resources of properties and surrounding area, the criteria in 13(3)(a) and (b) are met.

17. Public facilities are not provided by any of the surrounding cities or service districts. The airport has existed surrounded by resource land and uses since 1943. During that time there has been no evidence that the airport has reduced the potential for continued resource management of land surrounding the airport. Aside from a runway extension, no expansion of airport facilities has occurred historically and no expansion of facilities is proposed in the airport master plan. There is no evidence that a shared septic system for the subject properties will adversely impact surrounding property uses. The criterion in 13(3)(c) is met.

18. The airport has established an Aurora Airport Water Control District to provide a fire suppression water system. Development on the subject properties would still be limited to the capacity of systems in place, including holding tanks, which would serve the uses. Although the City of Aurora sewer system became operational in 2001, there are no plans to extend the system to the airport, at this time, nor has any determination been made of the capacity of the city system to serve the airport. The criterion in 13(3)(d) is met.

19. No incorporation of a new city or establishment is proposed. Any new urban development of undeveloped rural land will be coordinated with the comprehensive plans of affected jurisdictions and applicable zoning. The criterion in 13(3)(e) is met.

20. OAR 660-004-0018 states that for "physically developed" and "irrevocably committed" exceptions to goals, plan, and zone designations shall authorize a single numeric minimum lot size and shall limit uses, density, and public facilities and services to those:

    (a) Which are the same as the existing land uses on the exception site; or

(b) Which meet the following requirements:

(A) The rural uses, density, and public facilities and services will maintain the land as "Rural Land" as defined by the goals and are consistent with all other applicable Goal requirements; and

(B) The rural uses, density, and public facilities and services will not commit adjacent or nearby resource land to nonresource use as defined in OAR 660-004-0028; and

(c) The rural uses, density, and public facilities and services are compatible with adjacent or nearby resource uses.

21. The proposal does not change the allowable commercial or industrial uses at the airport. The purpose of the exception is to allow a shared septic system to serve six parcels at the airport, consistent with the existing urban level of development already existing at the airport. There is no evidence that an exception to permit a shared septic will not commit adjacent or nearby resource land to nonresource use as defined in OAR 660-004-0028. The proposal satisfies the criterion in 20(a) and (b).

22. The airport has a history of being compatible with adjacent and nearby resources uses since its inception over sixty years ago. There is no evidence that allowing the subject properties to share a septic system will be incompatible with surrounding resource uses. The shared septic will be located on the properties where the septic is shared and will not commit surrounding land to nonresource uses. The surrounding resource uses have also been compatible with airport uses. The master planning process, which the Oregon Department of Aviation recently completed for the airport in 2000, requires consideration of National Environmental Protection Act (NEPA) requirements as well as compatibility with surrounding uses. The proposal satisfies the criterion in 20(c).

23. In addition to providing procedures, the MCCP provides guidelines and policies to ensure compatibility with the adopted comprehensive plan and consistency in the planning process. The first guideline is that the proposal should comply with the Statewide Planning Goals that apply in a particular situation. This proposal must be consistent with all applicable Statewide Planning Goals except Goals 3, 11 and 14 for which exceptions have been taken.

24. The proposal is consistent with Statewide Planning Goal 1—Citizen Involvement, which provides for citizen involvement in the planning process. Notice was sent of the request for goal exceptions. A public hearing will were be held before the Board of Commissioners where concerned citizens will have the opportunity to provide comment and make suggestions.

The application is consistent with Goal 2—Land Use Planning since the proposal is consistent with the County's acknowledged comprehensive plan. Moreover, appropriate analysis of the exception provisions have been provided with regard to Goals 11 and 14.

Goals 3—Agricultural Lands, 4—Forest Lands and 5—Open Spaces, Scenic and Historic Areas, and Natural Resources are not applicable to this proposal.

Because the airport and related uses already exist, and the proposal seeks to maintain development at the existing level of uses and sizes, there is no evidence that the proposal will impact air, water or land resource quality over any impacts of the existing airport. Development within the public zone is subject to standards that address and seek to minimize adverse impacts to surrounding uses and resources. The proposal is consistent with Goal 6—Air, Water and Land Resources Quality.

The airport is not in an area subject to natural disasters; the proposal is consistent with Goal 7—Areas Subject to Natural Disasters and Hazards.

Goal 8—Recreational Needs is not applicable to this proposal.

The proposal is consistent with Goal 9—Economic Development. The subject properties are needed to serve commercial, industrial, and public uses in the surrounding community. Allowing development to continue at sizes commensurate with existing development will sustain the economic viability of the airport. The airport and associated uses provide employment to the area and in the state. Employment at the airport should also increase as use of the airport continues to increase as described in the Aurora State Airport Master Plan.

Goal 10—Housing is not applicable to this proposal.

The proposal is consistent with Goal 12—Transportation because the airport is necessary to serve the aviation needs of users at the airport and the surrounding communities. The location of this airport has also been demonstrated to be necessary because neighboring cities and communities do not provide public airport facilities. In addition, the airport is either bordered by or in close proximity to major road facilities, the Interstate 5 corridor, Hubbard Cutoff Road, Highway 99E, Arndt Road, Keil Road, and Airport Road, which provide the traveling public access to and from the airport for both persons and freight.

Goals 13—Energy Conservation, 15—Willamette River Greenway, 16—Estuarine Resources, 17—Coastal Shorelands, 18—Beaches and Dunes and 19—Ocean Resources do not apply to this proposal.

Overall, the proposal is in compliance with the Statewide Planning Goals or an appropriate exception has been taken.

25. The proposal must also conform to the relevant policies in the comprehensive plan. In discussing this requirement, only relevant comprehensive plan policies will be mentioned.

Rural Services Policy #1: The impact on existing services and the potential for additional facilities should be evaluated when rural development is proposed.

Rural Services Policy #2: It is the intent of Marion County to maintain the rural character of areas outside of urban growth boundaries by allowing those uses that do not increase the potential for urban services.

Rural Services Policy #3: Only facilities and services that are necessary to accommodate planned rural land uses should be provided unless it can be shown that the proposed service will not encourage development inconsistent with maintaining the rural density and character of the area.

Rural Services Policy #4: The sizing of public or private service facilities shall be based on maintaining the rural character of the area. Systems that cannot be cost effective without exceeding the rural densities specified in this Plan shall not be approved. The County shall coordinate with private utilities to ensure that rural development can be serviced efficiently.

Any new development on the subject properties will be airport-related and similar to, and no more intensive than, existing development. There is no evidence that the existence of the airport since 1943 has increased the need for urban services or that the development at the airport has impacted the density or character of the rural area. The shared septic facility reflects the urban nature of uses at the airport while not committing the parcels to a fully urban level of development. The parcels would still be able to be developed with urban facilities once those became available. The proposal complies with the rural development policies.

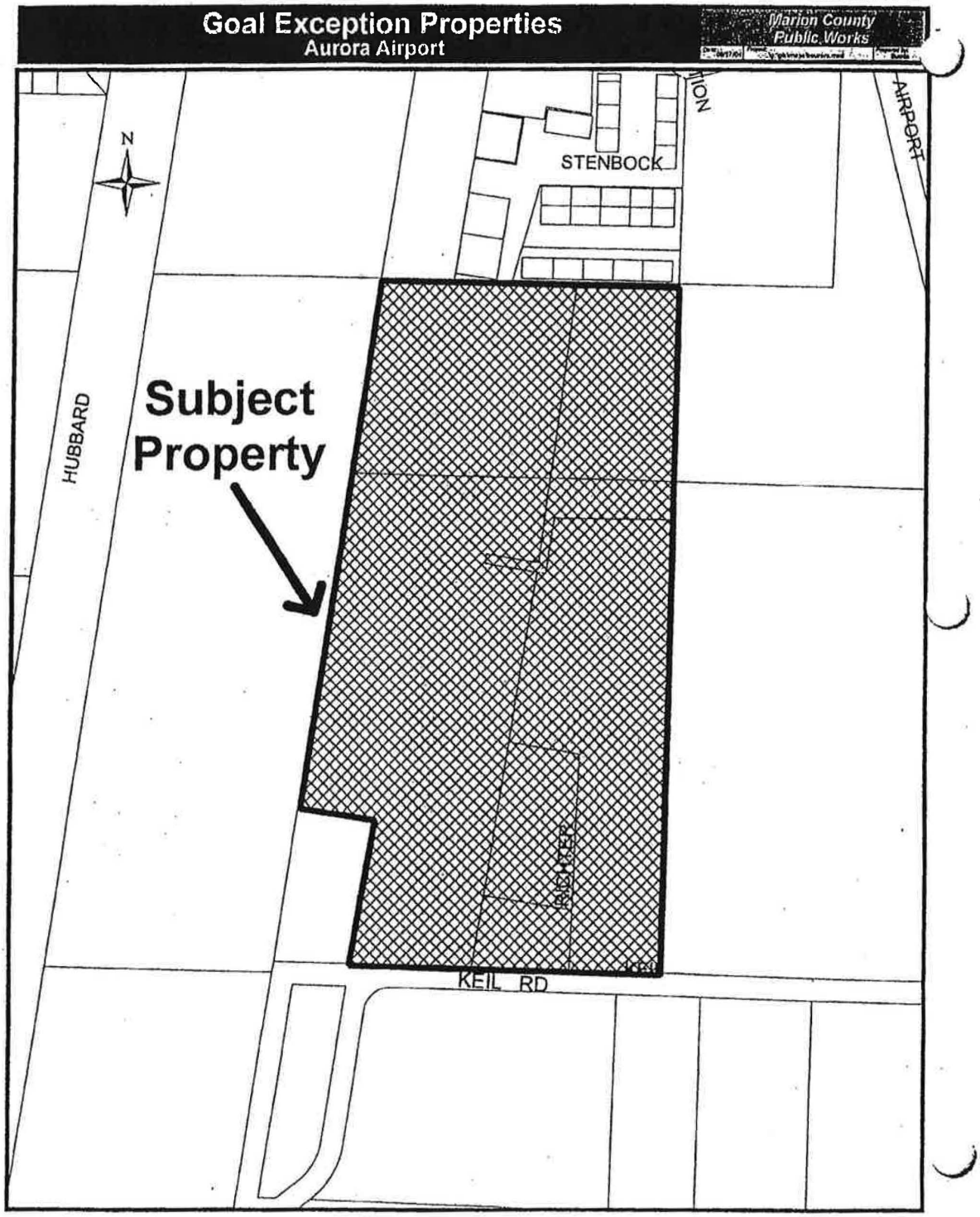
Transportation Policy #8: Airports and airstrips shall be located in areas that are safe for air operations and compatible with surrounding uses.

The existing location of the airport has demonstrated it is in a safe location for air operations. There have been concerns from neighboring residential areas regarding noise at the airport. Efforts have been made over the years to reduce the level of noise associated with airport operations. This proposal will not have an impact on airport operations and, so, will not affect the level of noise produced at the airport. The fact that many of the surrounding lands are in resource zones helps to mitigate the impact of noise from the airport on those lands and surrounding urbanized uses. The proposal complies with applicable transportation policies.

CONCLUSION:

The Board finds that the proposed exceptions meet the applicable criteria in the Oregon Administrative Rules, Oregon Revised Statutes, Statewide Planning Goals, and the Marion County Comprehensive Plan that physically developed and reasons exceptions to Goals 11 and 14 are justified for the subject properties to be able to share a septic system at the Aurora State Airport.

Exhibit B


Goal Exception Properties
Aurora Airport
Marion County
Public Works
N
STENBOCK
AIRPORT
HUBBARD
Subject
Property
KEIL RD

AREA 2.1 - AURORA AIRPORT

Total Acreage 250
Total Parcels 9
Occupied Parcels 5

Plan Designation: Public Use
Zoning: P (Public)

Findings and Conclusions

1. Approximatley 140 acres of this area is owned and operated by the state of Oregon as public airport. The long narrow strip paralleling State Highway 144 contains the runway.

2. Many of the other developed parcels contain private airport related commercial businesses.

3. The entire area is identified in the State Board of Aeronautics Master Plan as being needed for future airport facilities. It is, therefore, recognized by Marion County as being committed to airport related development.

AREA 2.2 - SUNSET HAVEN

Total Acreage 10
Total Parcels 35
Occupied Parcels 34

Plan Designation: Rural Residential
Zoning: AR (Acreage Residential)

Findings and Conclusions

1. This area is a subdivision platted in 1968 creating thirty-five 10,000 square foot lots.

2. All but one of the 10,000 square foot lots presently contain dwellings and the area is therefore developed.

AREA 2.3 - DEER CREEK

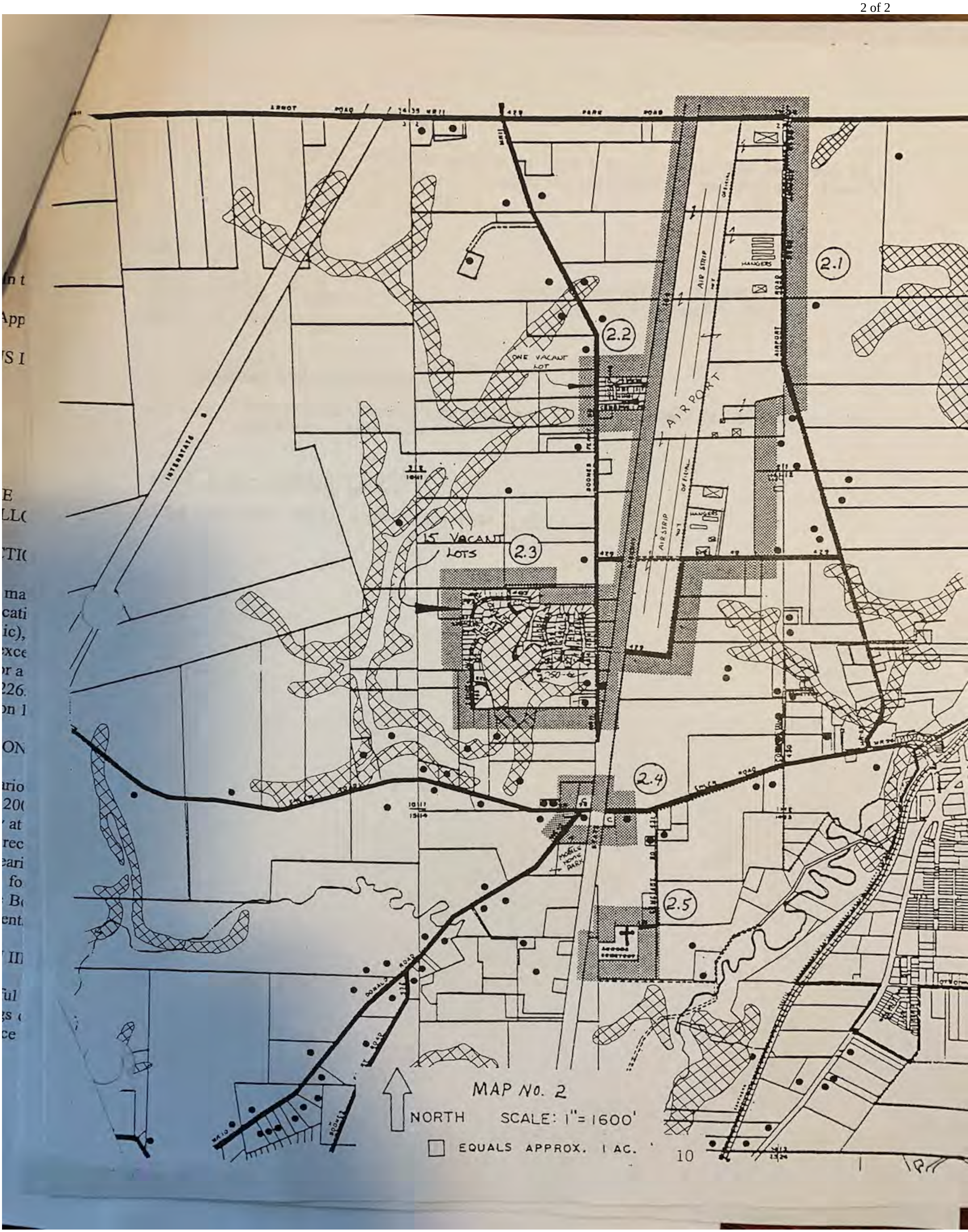
Total Acreage 82
Total Parcels 148
Occupied Parcels 121

Plan Designation: Rural Residential
Zoning: AR (Acreage Residential)

Findings and Conclusions

1. Deer Creek Estates Subdivision (1971), with approximately 10,000 square foot lot sizes, occupies 53 acres of this area. This subdivision is 90 percent occupied with dwellings and is therefore developed.

2. An additional seven acres at the southwest corner of the area was platted in 1974 into five lots as Cederfield Subdivision. Two dwellings occupy this subdivision with the remaining three lots committed to future development.

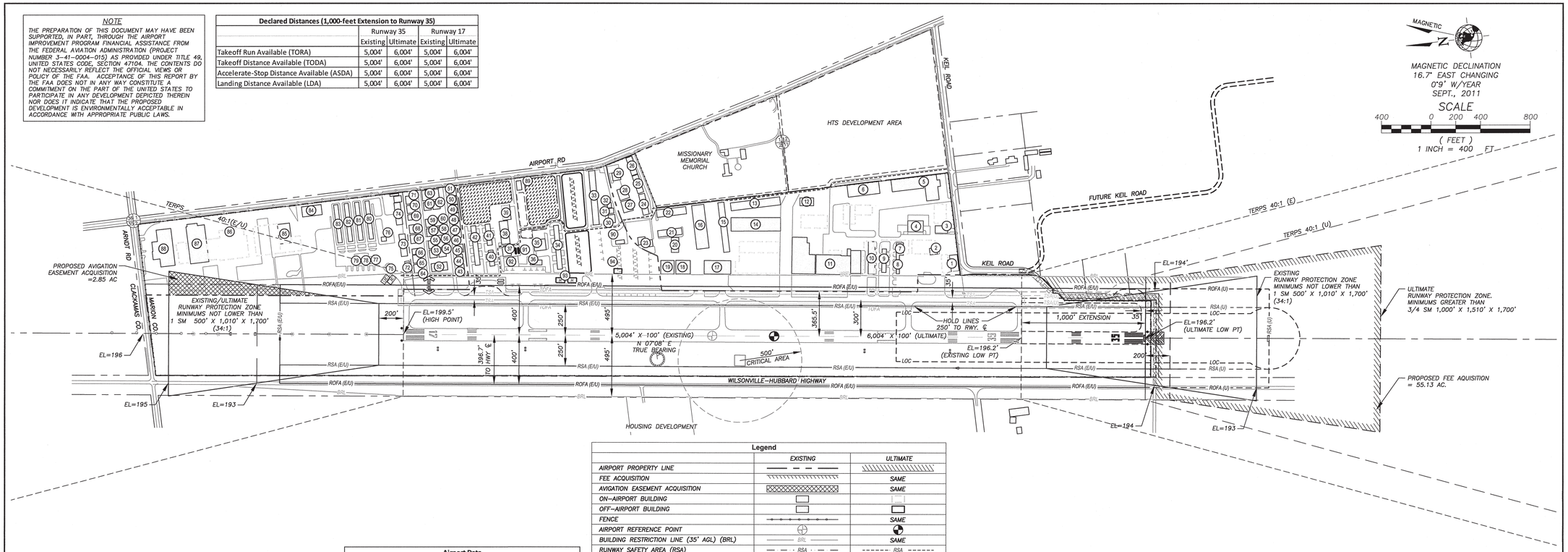

ARNOT ROAD
PARK ROAD
AIR STRIP
AIRPORT
HANGERS
2.1
2.2
ONE VACANT LOT
15 VACANT LOTS
2.3
2.4
2.5
MOBILE HOME PARK
MAP NO. 2
NORTH
SCALE: 1"= 1600'
EQUALS APPROX. 1 AC.

NOTE

THE PREPARATION OF THIS DOCUMENT MAY HAVE BEEN SUPPORTED, IN PART, THROUGH THE AIRPORT IMPROVEMENT PROGRAM FINANCIAL ASSISTANCE FROM THE FEDERAL AVIATION ADMINISTRATION (PROJECT NUMBER 3-41-0004-015) AS PROVIDED UNDER TITLE 49, UNITED STATES CODE, SECTION 47104. THE CONTENTS DO NOT NECESSARILY REFLECT THE OFFICIAL VIEWS OR POLICY OF THE FAA. ACCEPTANCE OF THIS REPORT BY THE FAA DOES NOT IN ANY WAY CONSTITUTE A COMMITMENT ON THE PART OF THE UNITED STATES TO PARTICIPATE IN ANY DEVELOPMENT DEPICTED THEREIN NOR DOES IT INDICATE THAT THE PROPOSED DEVELOPMENT IS ENVIRONMENTALLY ACCEPTABLE IN ACCORDANCE WITH APPROPRIATE PUBLIC LAWS.

Declared Distances (1,000-feet Extension to Runway 35)

	Runway 35		Runway 17	
	Existing	Ultimate	Existing	Ultimate
Takeoff Run Available (TORA)	5,004'	6,004'	5,004'	6,004'
Takeoff Distance Available (TODA)	5,004'	6,004'	5,004'	6,004'
Accelerate-Stop Distance Available (ASDA)	5,004'	6,004'	5,004'	6,004'
Landing Distance Available (LDA)	5,004'	6,004'	5,004'	6,004'



Legend

	EXISTING	ULTIMATE
AIRPORT PROPERTY LINE		
FEE ACQUISITION		SAME
AVIGATION EASEMENT ACQUISITION		SAME
ON-AIRPORT BUILDING		
OFF-AIRPORT BUILDING		
FENCE		SAME
AIRPORT REFERENCE POINT		
BUILDING RESTRICTION LINE (35' AGL) (BRL)	BRL	SAME
RUNWAY SAFETY AREA (RSA)	RSA	RSA
RUNWAY OBJECT FREE AREA (ROFA)	ROFA	ROFA
RUNWAY PROTECTION ZONE (RPZ)		
EXTENDED RUNWAY CENTERLINE		SAME
DISPLACED THRESHOLD	N/A	
RUNWAY HOLDLINE		SAME
TAXIWAY SAFETY AREA (TSA)	TSA	TSA
TAXIWAY OBJECT FREE AREA (TOFA)	TOFA	TOFA
SERVICE ROAD	N/A	
HANGAR DEVELOPMENT AREA		SAME
APRON / TIEDOWN AREA		
WINDCONE & SEGMENTED CIRCLE		SAME
VASI		SAME
PAPI	N/A	
REIL		SAME
ODAL		
LOCALIZER		
LOCALIZER CRITICAL AREA	LOC	SAME
CARGO APRON	N/A	
PAVEMENT		
PAVEMENT REMOVAL		SAME
FUEL TANKS		
HELICOPTER PARKING		
RESIDENTIAL THROUGH THE FENCE ACCESS (RTTF)		SAME

Airport Data

	Existing	Ultimate
Airport Elevation (MSL)	199.5'	Same
Airport Reference Point (ARP)		
Latitude	45°14'54.085"N	45°14'44.758"N
Longitude	122°46'11.405"W	122°46'13.040"W
Mean Maximum Temperature	84°	Same
Airport Reference Code (ARC)	C-II	C-II
Airport Service Level	General Aviation	Same
Design Aircraft	IAI Astra 1125	Cessna Citation X

Runway 17/35 Data

	Existing	Ultimate
Percent Effective Gradient	0.06%	Same
Percent Wind Coverage (10.5 kts)	98.93%	Same
Maximum Elevation Above MSL	199.5'	Same
Runway Length	5,004'	6,004'
Runway Width	100'	Same
Runway Surface Type	Asphalt	Same
Runway Strength (Dual Wheel Gear)	45,000 lbs	60,000 lbs
FAR Part 77 Approach Category		
Runway 17	C (NP)	Same
Runway 35	C (NP)	D (NP)
Approach Type	Nonprecision	Same
Runway 17	Not lower than 1 sm	Same
Runway 35	Not lower than 1 sm	Not lower than 3/4 sm
Approach Slope (Required / Clear)	34:1 / 34:1	Same
Runway Lighting	MIRL	Same
Runway Marking	Precision	Same
Taxiway Lighting	MITL / Reflectors	Same
Taxiway Marking	Standard	Same
Navigation Aids	LOC/DME, NDB	Same
Visual Aids	ODALS, VASI, REIL	ODALS, PAPI, REIL
Runway Safety Area Dimension	500' x 1,000' beyond rwy end	Same
Runway Object Free Area Dimension	800' x 1,000' beyond rwy end	Same
Runway Obstacle Free Zone (OFZ)	No OFZ Penetrations	Same
Runway End Coordinates		
Runway 17 Latitude	45°15'14.166"N	Same
Longitude	122°46'07.828"W	Same
Runway 35 Latitude	45°14'25.148"N	45°14'15.350"N
Longitude	122°46'16.515"W	122°46'18.251"W

Notes

Horizontal datum is NAD 1983, vertical datum is NAVD88.
The Airport is flat. Elevations / ground contours vary by less than 5 feet and are not shown. Drainage features are typically 2-3 feet lower than adjacent land.
Building restriction line is based on a 35-foot building located 495 feet from the runway centerline not penetrating FAR Part 77 surfaces for the Airport.
A Residential Through The Fence (RTTF) access exists at hangar #64 at the Wylee Condominium Association. The tenant is the resident caretaker for the airport.

Modifications to Standards

	Standard Being Modified	Proposed Action
1	Advisory Circular (AC) 150/5300-13, para 307 (Runway Object Free Area)	The standard runway object free area (OFA) for Airport Reference Code C-II airports is 800 feet. Highway 551 runs north/south parallel to Runway 17/35; the approximate distance from the Runway 17/35 centerline to the Highway 551 centerline is 400 feet. As the airport geometry is not changing from the current condition, the Oregon Department of Aviation (ODA) requests a modification of the OFA design standard to allow the runway and highway to remain in their current positions.
2	AC 150/5300-13, Appendix 14 (Declared Distances)	The ODA requests the existing threshold for Runway 17 be referenced in determining FAR Part 77 surfaces and design standard surfaces referenced in AC 150/5300-13 (*i.e.*, RSA, RPZ, OFA, OFZ).

Airport Facilities and Buildings Legend

Building No. Existing	Building No. Ultimate	Name / Owner	Use	Estimated Top Elevation (AGL)
1		Leased by Aurora Jet Center	Maintenance, Aircraft Storage	27'
2		Aurora Jet Center	Fixed Base Operator	22'
3		Private Southend Hangar	Aircraft Storage	19'
4		BPS Associates	Aircraft Storage	23'
5		Van's Aircraft	Business	30'
6		Artex	Business	26'
7, 8		Foxtrot Hangars / Southend Airpark	Aircraft Storage	21'
9		Hangar Row G / Southend Airpark	Aircraft Storage	13'
10		Hangar Row H / Southend Airpark	Business, Aircraft Storage	21'
11		Hangar India, Juliet & Kilo / Southend Airpark	Business, Aircraft Storage	38'
12		Winco	Business	29'
13		Hangar November / Southend Airpark	Business, Aircraft Storage	29'
14		Hangar Mike / Southend Airpark	Business, Aircraft Storage	31'
15 – 17		Airport Aviation Condo Association	Aircraft Storage	32'
18		Airport Aviation Condo Association	Aircraft Storage	32'
19		Aurora Aviation	Maintenance	26'
20 – 22		Airport Aviation Condo Association	Aircraft Storage	25'
23		Columbia Aviation Association	Clubhouse	21'

Airport Facilities and Buildings Legend

Building No. Existing	Building No. Ultimate	Name / Owner	Use	Estimated Top Elevation (AGL)
24 – 26		Meridian Condos	Business	23'
27 – 29		Pacific Coast Aviation	Business	26'
30 – 33		Oregon Dept. of Aviation	Aircraft Storage	25'
34		Columbia Helicopters	Aircraft Storage	22'
35		Columbia Helicopters	Maintenance	28'
36		Aurora Aviation	Fixed Base Operator	16'
37		Pitts Hangar	Aircraft Storage	26'
38 – 42		Aurora Business Park	Aircraft Storage	25'
43 – 71		Wylee Condo Association	Aircraft Storage	27'
72		Civil Air Patrol Building	Aircraft Storage	26'
73		Sunset Helicopters	Business	26'
74		Aerometal	Business	27'
75		Willamette Aviation	Aircraft Fueling	7'
76		Willamette Aviation	Fixed Base Operator	12'
77 – 83		Willamette Aviation	Aircraft Storage	16'
84		Marlow Treit	Aircraft Storage	22'
85 – 88		Columbia Helicopters	Business	30'
89		Fire Suppression Tanks	Fire Suppression	12'
	90	Aurora Rural Fire Protection District	Emergency Response	TBD
	91	Aurora Aviation	Aircraft Fueling	16'
	92	Oregon Dept. of Aviation	Cargo Apron	N/A
	93	Oregon Dept. of Aviation	Helicopter Parking	N/A
	94	Oregon Dept. of Aviation	Air Traffic Control Tower	90'

WHPacific
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503-626-0455 Fax 503-526-0775
www.whpacific.com

OREGON DEPARTMENT OF AVIATION

APPROVAL BLOCK
OREGON DEPARTMENT OF AVIATION
SIGNATURE: Michael Sweet
TITLE: Director DATE: 10/17/2012
FEDERAL AVIATION ADMINISTRATION
SIGNATURE: Carol Suomi
TITLE: Manager, Seattle ADO DATE: 10/18/12
APPROVAL LETTER DATED: See Letter dated 10/19/12

SHEET INFO	
DESIGNED	SML
DRAWN	RAI
CHECKED	REA
APPROVED	----
LAST EDIT	10/17/2012
PLOT DATE	6/28/2012
SUBMITTAL	

REVISIONS

NO.	BY	DATE	REMARKS

AIRPORT LAYOUT PLAN DRAWING

OREGON DEPARTMENT OF AVIATION
AURORA STATE AIRPORT ~ MASTER PLAN UPDATE

PROJECT NUMBER	DRAWING FILE NAME	SCALE
034317	034317-XREF-MSTR-ALP	1"=400'

SHEET NUMBER 1
2 of 10

[DATE: 10/17/2012 9:23 AM] [AUTHOR: riwasaki] [PLOTTER: CutePDF Writer.pc3] [STYLE: WHP-Standard.ctb]
[PATH: P:\Oregon Department of Aviation\034317\Design\Drawings\XRefs\034317-XREF-MSTR-ALP.dwg] [LAYOUT: Layout1]

Outlook

Re: Comments regarding Refined Alternative Plan, Aurora State Airport

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 11:52 AM
To Dave Mauk <dave@charbonneaucountryclub.com>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; Samantha Peterson <SPeterson@CenturyWest.com>

1 attachment (70 KB)
Comment-AMP-final.pdf;

Received, thank you Dave!

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com

From: Dave Mauk <dave@charbonneaucountryclub.com>
Sent: Tuesday, January 21, 2025 11:50 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Comments regarding Refined Alternative Plan, Aurora State Airport

Brandi -
Thank you for entering the attached comments to the record of the Airport Master Plan.

Yours -
--
Dave
David E. Mauk
Charbonneau Country Club | Board Member
Chair, Civic Affairs Committee

January 20, 2025

Comments Submitted In Reference to the Refined Preferred Alternative:

The role of ODAV advocating for expanding Aurora State Airport appears in conflict with their role in maintaining statewide aviation safety. Over the past dozen years, ODAV has shown a disproportionate interest in Aurora Airport. Its actions in appealing to the special interests of a small, elite group of operators as clients, resemble a chamber of commerce lobbying effort.

The immediate communities impacted by more noise overhead, more surface traffic, and less safety, are not given ample weight in the Refined Preferred Alternative (plan). One would never know that this airport is next to thousands of people living in several residential communities. The plan is heavily weighted to special interests favoring expansion, while ignoring neighbors' concerns.

At what point is it government malfeasance that an agency of the State of Oregon is seriously considering tens of millions spent at a constrained site with a 5,000 foot landing strip, overwhelmingly handling light and medium aircraft, when two under-capacity, flight-ready, full service airports, sized for large, heavy aircraft, are both about 20 nautical miles away?

ODAV is serving the special interests of transient aircraft, wealthy out-of-state operators, and highly affluent owners of multimillion dollar, elite jets. This is while disregarding communities whose quality of life, property values, and safety are at risk by the plan. The airport is in an agricultural district of fertile soils and stable crops. More pollutants in the air and on the ground threaten this. The plan disrespects the local community and disregards the risks it imposes.

Aurora State Airport served as a back-up landing strip for the military during WWII. It provided air patrols, support and training. It did not handle large aircraft and heavy payloads. Today it has a civil air patrol base, is home for a regional air ambulance service, and both an aircraft and avionics manufacturer. All of these activities are supported by our local communities. As are the other jobs and businesses based at the airport, and others that are in the vicinity because of it.

None of these jobs, nor the two helicopter operators, are in jeopardy if the plan is not adopted. This bears repeating. The mechanics and repair shops; aircraft and avionics companies; air ambulance service; flight instruction operations; the two helicopter firms; and, other businesses at the airport who provide services, will all prosper as they do today. One change would be that the airport's relationship with the community would be greatly improved.

Aurora State Airport is currently deficient in its own ability to handle emergencies, fires, security and law enforcement. It has no fire truck. No advanced fire suppression equipment. It has no water source. No sewer. Its drain fields are inadequate. It has no housing, no food service. What it is - is a constrained sight near residential neighborhoods, productive farmland, and adjacent to a busy local arterial road, a even busier state highway, within sight of the congested I-5 interstate. Expanding the airport at this location to attract larger aircraft is a fool's errand with the plan lacking community benefits, when multiple, fully operational airports are 12 minutes away through the air.

Aurora Airport, constructed as a flight strip, is a general aviation facility on a constrained site with that landing strip. Its users are over 90% piston, turbo prop and light to medium jet aircraft. All of which can continue to use this facility without creating a ODAV trophy airport. The years of providing waivers, drawing up expansion plans, litigation, and spending money that the state doesn't have, is evidence that ODAV is not accountable to the citizens or government of Oregon. It is a travesty that the ambitions of a elite operators, and agency charged with maintaining flight safety in our state, are empire building at the expense of the community where it operates and state taxpayers.

In representing, and on behalf of 3,000 voters of the Charbonneau District of Wilsonville, the Refined Preferred Alternative is firmly opposed. Please reject the plan and find a solution that doesn't degrade the quality of life, property values, safety and land where we live and we call home.

Yours,

Dave

David E. Mauk
Charbonneau Country Club | Board Member
Chair, Civic Affairs Committee

Outlook

Fw: Public Comment Submission

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2025-02-05 4:09 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (51 KB)
Letter-ODAV Cathryn Stephens.pdf;

Thanks,

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in » Email is the best way to reach me; I try to respond within 3 full workdays.

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, February 5, 2025 3:45:38 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Public Comment Submission

FYI, please include in the record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: MORRIS Alexis <Alexis.MORRIS@odav.oregon.gov>
Sent: Wednesday, February 5, 2025 3:44 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Public Comment Submission

Hey Tony and Alex,

Just FYI, I just received this public comment about the Aurora Master plan that was submitted to the board for tomorrow's meeting. It has been forwarded the board for their review.

Alexis Morris
Marketing & Administrative Specialist
State Aviation Board Administrator
Cell: (503) 507-6965
Alexis.morris@odav.oregon.gov

From: Dave Mauk <dave@charbonneaucountryclub.com>
Sent: Wednesday, February 5, 2025 2:49 PM
To: Oregon Department of Aviation <mail.aviation@ODAV.oregon.gov>
Subject: Public Comment Submission

You don't often get email from dave@charbonneaucountryclub.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Thank you for recording the attached public comment in the record, & considering it at the State Aviation Board meeting of February 6, 2025.

Respectfully,
--

Dave
David E. Mauk
Charbonneau Country Club | Board Member
Chair, Civic Affairs Committee

February 5, 2025

Dear Chairwoman Stephens and the State Aviation Board,

I am a member of Aurora State Airport PAC and PAAM associations, Charbonneau board member, and chair of its civic affairs committee and transportation task force. Our community, part of the city of Wilsonville, has been interested in the new Airport Master Plan from the outset.

That this has been many years in the making is itself a testament to the trials of Aurora State Airport. I think it's fair to say that it's taken a toll on everyone involved, from airport operators, business owners, officials within the various jurisdictions, and the citizen stakeholders of the surrounding communities. And it seems, it's a plan without a home, since the cost of bringing the constrained Aurora airport up to FAA standards is 'significantly expensive.' In layman's terms it's called a boondoggle.

The estimated cost, the proposed changes to local and state roadways, unreasonable nature of property acquisition, and ramp to years of expensive litigation make this plan reckless and irresponsible. It's obvious that 'there is no way this can be justified for any general aviation airport.' The Airport Master Plan for Aurora State Airport is nothing short of a travesty. At what point does the board say enough is enough? The locals have been loudly saying that. for years.

Was it bureaucracy run amuck? Politics? Behind the scenes manipulation of officials by self-interested parties? Whatever got us to this point, it's clear that what's now before PAC is totally unacceptable. This compounds the earlier bomb that dropped this summer, stating the airfield must conform to C-II, not B-II standards, which reduced the alternative designs to three. This came at a PAC meeting less than 48 hours after showing, and asking the public to pick among seven alternatives. Both of these significant revelations display serious communication breakdowns that crashes trust about the process, its intentions, goals, and ODAV itself.

As someone who has been in the business world my entire career, while serving on numerous corporate and nonprofit boards, the absence of due diligence in financial projections, budgets, return on investment, cost-benefit analysis, financial performance metrics, cost of capital, and source of funding displays a level of incompetency only matched by its irresponsibility.

Aurora State Airport is a constrained site. It makes no sense to spend tens of millions at this location, when other airfields within minutes of minutes of flying time already meet those standards. Go back to the drawing board and find a solution that works for more parties. That works for those underutilized airports in our region that are ready-made for large aircraft, airfreight, charters, executive jets, air commuting, and unmanned drones, that already meet FAA standards. That works for Aurora's neighboring communities who don't want more air traffic, noise and risks to our safety. That works for agricultural businesses threatened by airport expansion. The economic impact of less transient and large jet use is far less than the costs associated with expanding Aurora State Airport. And the jobs currently at the airport will largely be unaffected. In fact, without the threat of ODAV's growth ambitions, employers might be more inclined to hire to grow their businesses..

ODAV, along with FAA's checkbook, has spent $1 million getting to this point. ODAV is currently using and seeking more tax-payer money from Oregon's general fund, in part for legal fees incurred by Oregon's public process and land use laws. The Oregon public has more of a right than ever to question how their funds are being used. Costly lawsuits are not part of a winning hand. ODAV can not be trusted with further funds, no matter the source, until it proves less reckless with it's budget. Why would the Airport plan, as it exists today, deserve more than maintenance funds?

Another element of this fiasco is addressing ODAV's role in Oregon state aviation. Its public service and safety missions appear grounded by it's advocacy role promoting aviation. They don't seem compatible. Aurora's entangled master plan process has revealed that it's time to investigate whether this agency's purpose has crash-landed, and needs to be rebuilt as a public service agency whose primary responsibility is for aviation safety, not aviation growth. Maybe the agency needs to return as a division of ODOT, where it can receive more public accountability.

Aurora State Airport's master plan has been a boondoggle from the start. Airport advocates are few, and are there for their own financial interests. It's about development ambitions not flight safety. It's about a handful of elite individuals, some of whom are not Oregon residents, gaming the system for their own economic benefit, not what it brings to the region. Public benefits are disproportionately below its costs. Expansion advocates long ago lost legitimacy, both in the courts of law and public opinion. Surrounding communities overwhelmingly disapprove of the plan, and will continue their opposition as long as this plan is alive. The community appreciates and respects the civil air patrol and emergency response roles at the airport, that are not compromised by denying the preferred alternative Airport Master Plan.

ODAV enabled the current C-II designation in the first place, by permitting greater non-compliant use of the airport by larger aircraft. It makes sense to find another home for these planes at one of the five underutilized regional airports, all within 24 nautical miles of Aurora Airport, that are fully equipped and designated to handle those aircraft. Both Salem and McMinnville airports have dual, asphalt runways, with their longest exceeding 5,400 feet, instrument landing systems, fire suppression, and full service facilities. Utilizing a neighboring airport conforming to FAA standards is surely a better, more cost effective solution than spending tens of millions on a constrained airport that the community is adamantly opposed to, and is used by few aircraft over 30,000 pounds. Proper due diligence would include an assessment of regional airports as an alternative to expanding Aurora State Airport. Failure to do so is a dereliction of oversight, to the point of negligence.

Data shows B-II to be the proper designation for this general aviation airport where over 90% of operations are aircraft under 15,000 pounds. A plan based on this will easily conform to FAA standards without costly improvements, purchasing private or public land, inviting even more community resistance, and incurring costly law suits, further delaying conformance to standards.

ODAV has made no inroads in the course of all this. No friends. No credibility. No trust. Our communities have suffered through all these years of tension about it's future. The flying public and users of Oregon's airports deserve better. ODAV could use a win, too.

It's time to move on from this boondoggle, reset the mission, and provide well maintained, safe airports instead of empire building at a corner of Marion County in a reckless crusade. The city of Salem, itself within Marion County, is home to an up-to-date airport that has 751 acres with asphalt cross runways, roomy taxi ways, excellent facilities, useful service roads, lots of real estate, and easy freeway access. What more could you want? And ODAV doesn't have, nor need to spend tens of millions on a constrained site. Its scarce resources can be better spent on repairing crumbled runways, upgrading worn facilities, and increasing safety at the state's other 27 owned airports.

Pursuing the Airport Master Plan for an airstrip at a constrained site is fiercely opposed by community stakeholders. We believe that the aircraft-ready airports of McMinnville Municipal and Salem-Willamette Valley deserve to be considered by ODAV. And further, we believe the inevitable, common sense conclusion of meeting standards will be a size and designation for a general aviation airport that truly serves public, not elite, nor out-of-state interests.

Respectfully yours,
Dave
David E. Mauk
Charbonneau Country Club
director, civic affairs chair

Outlook

Re: Aurora State Airport Master Plan Website Comments - Dave Mauk

From Dave Mauk <noreply@jotform.com>
Date Tue 2025-01-21 11:40 AM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	Dave Mauk
Organization	Charbonneau Country Club
Comments or questions?	January 20, 2025 Comments Submitted In Reference to the Refined Preferred Alternative: The role of ODAV advocating for expanding Aurora State Airport appears in conflict with their role in maintaining statewide aviation safety. Over the past dozen years, ODAV has shown a disproportionate interest in Aurora Airport. Its actions in appealing to the special interests of a small, elite group of operators as clients, resemble a chamber of commerce lobbying effort. The immediate communities impacted by more noise overhead, more surface traffic, and less safety, are not given ample weight in the Refined Preferred Alternative (plan). One would never know that this airport is next to thousands of people living in several residential communities. The plan is heavily weighted to special interests favoring expansion, while ignoring neighbors' concerns. At what point is it government malfeasance that an agency of the State of Oregon is seriously considering tens of millions spent at a constrained site with a 5,000 foot landing strip, overwhelmingly handling light and medium aircraft, when two under-capacity, flight-ready, full service airports, sized for

large, heavy aircraft, are both about 20 nautical miles away?

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None of these jobs, nor the two helicopter operators, are in jeopardy if the plan is not adopted. This bears repeating. The mechanics and repair shops; aircraft and avionics companies; air ambulance service; flight instruction operations; the two helicopter firms; and, other businesses at the airport who provide services, will all prosper as they do today. One change would be that the airport's relationship with the community would be greatly improved.

Aurora State Airport is currently deficient in its own ability to handle emergencies, fires, security and law enforcement. It has no fire truck. No advanced fire suppression equipment. It has no water source. No sewer. Its drain fields are inadequate. It has no housing, no food service. What it is - is a constrained sight near residential neighborhoods, productive farmland, and adjacent to a busy local arterial road, a even busier state highway, within sight of the congested I-5 interstate. Expanding the

	airport at this location to attract larger aircraft is a fool's errand with the plan lacking community benefits, when multiple, fully operational airports are 12 minutes away through the air. Aurora Airport, constructed as a flight strip, is a general aviation facility on a constrained site with that landing strip. Its users are over 90% piston, turbo prop and light to medium jet aircraft. All of which can continue to use this facility without creating a ODAV trophy airport. The years of providing waivers, drawing up expansion plans, litigation, and spending money that the state doesn't have, is evidence that ODAV is not accountable to the citizens or government of Oregon. It is a travesty that the ambitions of a elite operators, and agency charged with maintaining flight safety in our state, are empire building at the expense of the community where it operates and state taxpayers. In representing, and on behalf of 3,000 voters of the Charbonneau District of Wilsonville, the Refined Preferred Alternative is firmly opposed. Please reject the plan and find a solution that doesn't degrade the quality of life, property values, safety and land where we live and we call home. Yours, David E. Mauk, Charbonneau Country Club | Board Member | Chair, Civic Affairs Committee
	I would like to receive email updates.
If you would like a response, please tell us the best way to contact you:	Email
Email	dave@charbonneaucountryclub.com
Phone Number	(206) 920-4442

You can edit this submission and view all your submissions easily.

Outlook

Fw: Comment re February 11 PAC Meeting

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-03-04 2:30 PM
To 'Dave Mauk' <dave@charbonneaucountryclub.com>
Cc THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>

1 attachment (100 KB)
ODAV Comment 2.25.25.pdf;

Hi Dave,

Thank you so much for your comments and kind words. We've received your attachment of your comments from the last PAC meeting and will include it in our records. I've also sent on to the rest of the project team, for their immediate review.

Thank you,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Dave Mauk <dave@charbonneaucountryclub.com>
Sent: Tuesday, February 25, 2025 12:28 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Comment re February 11 PAC Meeting

Brandi -
Thank you for your professionalism during the PAC meetings considering the Aurora AMP. In light of ODAV board meetings being held in person & streamed, I agree with those who felt having that format for these meetings would have been preferable.

One more thing. It's highly unlikely in the current climate at the federal government that the FAA will be favorably looking at funding a general aviation airport on an urban-rural fringe of Oregon these days.

The attachment are my comments after the last PAC meeting about the refined preferred alternative.

Thank you -
--
Dave
David E. Mauk
Charbonneau Country Club | Board Member
Chair, Civic Affairs Committee

CHARBONNEAU Country CLUB

February 25, 2025

Something that became clear during the February PAC meeting, when Senate Concurrent Resolution 2 was then under consideration, is how out-of-sync the Airport Master Plan is with the airport's history, and its potential in serving regional emergencies and disasters. As recited in the Resolution, Aurora State Airport was a flight strip for air patrols and flight training conducted on behalf of the US Air Force during WWII. Civil air patrol and flight training remain functions at the airport today.

Besides this, the airport is a general aviation airport with its landing strip, and by virtue of its through-the-fence operations, home to numerous aircraft-related businesses and services. There is no question that the airport can fill a greater role and add capability for emergency and disaster management. However, ODAV is not focused on this opportunity as a reasonable plan, that serves a broad, regional public interest, not a narrow elitist one.

Currently, the Aurora State Airport is underprepared for emergency and disaster responsiveness, without the infrastructure and facilities to handle this. An airport built-out on its existing foundation of emergency and disaster management better serves the general public, and has positive regional importance in safety and emergency responsiveness.

The two heavy-life helicopter operators, as well as the air medic service, all located at the airport, are critical assets on which to build a more robust infrastructure and capacity that can better support emergency management for a populous, multi-county region of the state.

Additionally, there are also the two businesses that install and repair components of the electrical grid for the entire nation, which makes adding resiliency to Aurora State Airport a important priority for the State of Oregon. The current Airport Master Plan for leveraging scare ODAV funds using the FAA to subsidize executive jet usage is a questionable business model when compared to building upon an existing foundation of emergency management.

The current infrastructure of Aurora State Airport is 85 years old, with three small drain fields, limited fresh water supply, no fire suppression, no fire fighting equipment, no security, minimum advanced communications and inadequately prepared property for staging an emergency management response. This is where the state aviation board can apply its limited resources for improving Aurora State Airport, developing a critical emergence response and management center regionally, not an unnecessary plan based on executive commuter jets.

There are five airports with asphalt surfaces, suitable lengths, and modern facilities within a 10 minute flight of Aurora Airport that are fully capable of handling medium and large jet aircraft. In particular, Salem-Willamette Valley and McMinnville Municipal deserve your due diligence as locations for an executive flight emphasis, instead of spending millions of state and federal funds at a constrained site that is better suited as a regional base for emergency management flight services.

Your consideration is appreciated.

Dave

David E. Mauk
Charbonneau Country Club | Board Member
Chair, Civic Affairs Committee

Outlook

Re: Aurora State Airport Master Plan Website Comments - Daniel McGuire

From Daniel McGuire <noreply@jotform.com>
Date Fri 2025-01-24 3:00 PM
To JLA Tech Support <tech@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>; Brandy Steffen <brandy.steffen@jla.us.com>

Aurora State Airport Master Plan Website Comments

Name	Daniel McGuire
Organization	100 Fold LLC
Comments or questions?	After Reading the expansion plans for the Aurora airport, and then analyzing the oppositions from those who are now protesting the Airports intended plans I have arrived at an obvious conclusion. The proposed plans should be halted immediately due to being unnecessary and harmful to the entire area surrounding the airport and even farer reaching communities. The protest and uproar from property and homeowners, farmers and businesses that will be affected by losing their properties is a massive hardship and this outrage will not halt until this expansion plan is terminated. This is an un-necessary and extreme financial waste by moving forward, it does not make financial sense! Unless maybe there is hope and promises of Grant money from the government or something of value coming back from the contractors who reward the others involved. The proposed expansion look's illegal by taking agricultural land. This was confirmed in your last attempt and failed plan to extend the runway. Obviously this plan has been in the works for years and was a surprise to me, I did research when I bought my property A little over 2 years ago and was concerned then about Airport expansion. After doing research we

	did not see any warning of pending expansion, just the failed effort to extend the runway due to a high court ruling, thanks to 1000 friends of Oregon. The secrecy and craftiness to hide this plan from the public also brings concerns about you truly caring for anyone other than yourselves and financial gain. Many of the parties to be adversely affected still are not aware of the plan that could devastate their rights as property owners. Soon many others will join forces with the opposition to stop the expansion when they discover this outrage! I recently just found out late last year about the expansion thanks to a caring neighboring property owner. I also Built a structure on the 10 acres earlier last year I own on Boones ferry Rd, at a cost of over $120,000 and moving the highway west would destroy that building and my plans for future agriculture and an AG Business development which is my intent when acquiring this land. Just the threat of this expansion has devalued our property values by around 20%. Daniel McGuire, Melanie McGuire 22430 Boones Ferry Road NE, Aurora OR 97002
If you would like a response, please tell us the best way to contact you:	Email
Email	bmrdaniel@gmail.com
Phone Number	(503) 348-3848

You can edit this submission and view all your submissions easily.

Outlook

Re: PAC meeting

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-02-10 2:59 PM
To Chris Neamtzu <neamtzu@ci.wilsonville.or.us>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>

Thanks for the heads up Chris! Please let Councilor Shevlin know to check their junk folder for the invite from Zoom.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Chris Neamtzu <neamtzu@ci.wilsonville.or.us>
Sent: Monday, February 10, 2025 12:28 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: PAC meeting

Hello Brandy,

I am writing to let you know that I have a personal issue that has arisen that is in conflict with the PAC meeting tomorrow evening.
As a result, I am unable to attend. If you would please be so kind as to ensure that Councilor Shevlin receives the zoom access link as the alternate, I would appreciate it.

Councilor Shevlin can be reached at Shevlin@wilsonvilleoregon.gov .

Thank you,

Chris Neamtzu, AICP
Community Development Director
City of Wilsonville

503.570.1574
neamtzu@ci.wilsonville.or.us
www.ci.wilsonville.or.us

WILSONVILLE
OREGON

29799 SW Town Center Loop East, Wilsonville, OR 97070

Disclosure Notice: Messages to and from this e-mail address may be subject to the Oregon Public Records Law.

Outlook

Fw: HDSE / ODAV Meeting 3/19

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 3/19/2025 4:50 PM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

FYI

BRANDY STEFFEN
| JLA PUBLIC INVOLVEMENT

Partner + Senior Program Manager

brandy.steffen@jla.us.com »
Schedule
a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, March 19, 2025 4:46 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: HDSE / ODAV Meeting 3/19

Good afternoon, please include in the public record for the UAO master plan.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Wednesday, March 19, 2025 4:45 PM
To: Luke Nickerson <luke@flyaerometal.com>; gtvh@vhfour.com
Cc: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Subject: HDSE / ODAV Meeting 3/19

Hi Luke and George,

Thanks again for coming down to Salem to meet with us. As you know, we are working to address a number of non-standard conditions at the Aurora State Airport, and safety is a top priority for us.

Though the primary focus of this meeting was next steps for HDSE's drain field, you also asked for a revision to language in our draft master plan, for us to continue discussions on ways to make the existing drain field meet FAA standards, and an update/commitment on timeframes. I also briefly discussed our Minimum Standards for UAO (found here), and parking aircraft on our apron with Luke.

Regarding prior discussions on the drain field, please see the information we posted to the master plan webpage here: https://publicproject.net/files/UAOAMP/202202-kirbyj-drainfield-emails.pdf. There is additional information listed under PAC Meeting #8 for the December 10th 2024 PAC meeting here under the "Meetings" section here: https://publicproject.net/auroraairport#

Since neither of you were involved in those conversations, we can further discuss the drain field's ability to meet FAA standards. As we stated in this meeting, we do not believe that the drain field can meet the standard.

We will also provide clarification on timeframes for next steps as soon as we can. We plan to give sufficient notice so HDSE has ample time to make plans and react accordingly.

Regarding changes to the master plan, we will consider whether any changes can or should be made to clarify the intent of the current language and ODAV's position.

Thanks again for taking the time to meet with us in person, we will reach out as soon as we have more information.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Luke Nickerson <luke@flyaerometal.com>
Sent: Monday, March 17, 2025 3:04 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Meeting 3/19

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Mr. Beach,

I'm looking forward to our meeting on Wednesday.

If your schedule allows at the conclusion of our meeting about HDSE's drain field, I have a few more items of business I would like to discuss:

On behalf of Aerometal International Inc.:

- Storage of a second DC-3 on the state ramp

On behalf of Pacific Skies Aviation LLC:

- Transfer and or establishing through the fence agreements during a real property transaction
- Transfer or establishing ODAV permits to allow for the retailing of 100LL & Jet A at Aurora State

Kind regards,
Luke Nickerson
Cell: [redacted]

HDSE
14355 Keil Road NE
Aurora, Oregon 97002

Retail

97302

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Oregon Department of Aviation
Attention: Kenji Sugahara, Director
3040 25th Street SE
Salem, Oregon 97302

RECEIVED
FEB 28 2025
By

97302-112540

HDSE Sewer System Owners Association
Bravo Hangar
14355 Keil Road NE
Aurora, OR 97002

RECEIVED
FEB 28 2025
By

February 24, 2025

Delivery by Certified Mail & Email (kenji.sugahara@odav.oregon.gov)

Oregon Department of Aviation
Attention: Kenji Sugahara, Director
3040 25th Street SE
Salem, OR 97302

Re: Comments on Proposed Master Plan for the Aurora State Airport
Notice under Aurora State Airport Lease and Easement

Dear Director Sugahara:

I am writing on behalf of the HDSE Sewer System Owners Association ("**HDSE**"), an Oregon nonprofit corporation which operates a drainfield on property at the south end of the Aurora State Airport pursuant to a certain Non-Commercial Site Lease (the "**Lease**") with the State of Oregon, acting by and through its Oregon Department of Aviation ("**ODAV**"), as well as a certain Aurora State Airport Utility Easement (the "**Easement**") granted to HDSE by ODAV effective September 1, 2019.

Please note that the original Base Term of the Lease was from September 1, 2019 through August 29, 2024; and, in accordance with the terms of the Lease, HDSE exercised its option to renew the Lease for an additional five years. Thus, the current term of the Lease will expire on August 30, 2029, unless HDSE exercises its right to renew the Lease for an additional five years beyond that date. Also please note that, under the Easement, ODAV granted to HDSE a perpetual easement on, over, under and through the portion of the airport which HDSE uses for its drainfield, and such Easement provides rights to HDSE which are in addition to, and not dependent upon, the Lease.

During the February 11, 2025 meeting of the Planning Advisory Committee for the Aurora State Airport Master Plan (the "**Master Plan**"), ODAV provided a presentation which included a plan which is referred to as ODAV's Refined Preferred Alternative. Pages 16 and 17 of that presentation showed maps of the airport which identified the location of HDSE's drainfield, and the map Legends indicated: "DRAINFIELD TO BE REMOVED." Also, Page 24 of the presentation showed a draft Airport Layout Plan which identified the location of HDSE's drainfield, along with a legend titled "NON STANDARD CONDITIONS" which indicated that the planned "disposition" for the drainfield is "TO BE REMOVED."

Please be advised that HDSE strongly objects to ODAV moving forward toward adoption of the Master Plan so long as the document contains language stating that HDSE's drain field must be removed. ODAV should consider this letter to be public input to ODAV with respect to the Master Plan, as well as a Notice to ODAV under the Lease and the Easement.

HDSE understands that ODAV desires to have the Master Plan show a pathway for ODAV to bring the airport into full compliance with all applicable FAA standards over time, and HDSE understands that ODAV currently contends that achieving such compliance will require that HDSE's drainfield be removed from the Runway Safety Area ("**RSA**"). However, there is absolutely no evidence in the record which supports ODAV's contention that removal of the drainfield is the only viable pathway to such compliance, while there is substantial evidence in the record to the contrary.

HDSE is aware that FAA Advisory Circular 150/5300-13B states that the RSA should be:

1. Cleared and graded with no potentially hazardous ruts, humps, depressions, or other surface variations;

2. Drained by grading or storm sewers to prevent water accumulation;

3. Capable, under dry conditions, of supporting snow removal equipment, ARFF equipment, and the occasional passage of aircraft without causing damage to the aircraft; and

4. Graded to the longitudinal and transverse grades in paragraph 3.16.5 (of the Advisory Circular).

Further, HDSE is aware that Paragraph 3.10.1.5 of the Advisory Circular states that the RSA should comply with the compaction criteria in Specification P-152, Excavation Subgrade and Embankment, found in AC 150/5370-10.

As various representatives of HDSE and members of the Planning Advisory Committee have repeatedly informed ODAV, both orally and in writing on numerous occasions, there is nothing in any state or Federal law, or in any FAA or ODAV regulation, which specifically prohibits HDSE's drainfield from remaining exactly where it is now. In fact, the pertinent FAA advisory guidance only calls for the RSA to meet the standards cited above, and based on the analysis and recommendations which HDSE has received from competent professionals, HDSE believes that the drainfield can be modified to ensure that it will indeed meet those standards.

For this reason, the text of the Master Plan and any maps, diagrams and legends contained therein should not say that the HDSE drainfield will be removed, but rather should indicate ODAV's intent to **either**: (a) ensure that the drainfield is modified if necessary to comply with RSA standards, **or** (b) **if the drainfield cannot achieve such compliance in its current location**, then to have the drainfield relocated outside the RSA. A simple and easy change to your map legends which would be acceptable to HDSE would be for the legends to indicate "DRAINFIELD TO BE REMEDIED." This proposed modification would make the map legends identify the condition which ODAV currently contends is "non-standard" and also indicate that ODAV intends for that condition to be addressed, without incorrectly (and therefore improperly) suggesting that the condition may be addressed only by removal of the drainfield, which most certainly has not been established as of this date.

HDSE is aware that Sections 16, 17, and 18 of the Lease contain provisions under which ODAV may require HDSE to take steps to modify the drainfield if necessary in order to ensure that the drainfield complies with all applicable laws, ordinances, rules, and regulations; and, **in the event that HDSE were to be unwilling or unable to modify the drainfield so as to achieve such compliance**, then ODAV would have the right to require that the drainfield be removed. However, the Lease and the Easement certainly do not allow for ODAV to unilaterally require that HDSE remove the drainfield, when to HDSE's knowledge there has been no showing to date that the drainfield currently violates any applicable law, ordinance, rule or regulation; and further, even if such a showing of non-compliance could be made, ODAV would have no right to require HDSE to remove the drainfield so long as HDSE is proceeding with reasonable diligence and in good faith to modify the drainfield as necessary in order to remedy such issue as soon as practicable.

Although HDSE does not concede that the drainfield is currently non-compliant, we are nevertheless aware that ODAV has expressed concern that the drainfield may fail to meet the RSA standards specified in the Advisory Circular referenced above, and as the tenant under the Lease and the grantee under the Easement, HDSE wishes to be responsive to ODAV's concerns. Therefore, please be advised that HDSE intends to undertake work to modify the drainfield in order to address the concerns which ODAV has raised.

Accordingly, I am sending along with this letter a Report of Geotechnical Engineering Services, which was prepared for HDSE's architect Aron Faegre and Associates and which has previously been provided to ODAV by others on several prior occasions. That report, which was stamped by professional engineer Brett A. Shipton, P.E., G.E., outlines the approach that HDSE intends to take to modify the drainfield so as to ensure that it meets the FAA's RSA standards. Please be advised that HDSE intends to move forward within the next 30 days to engage qualified professionals to produce the necessary construction plans for this project and, as soon as such plans are complete, we will send to ODAV a Notice of proposed alteration on FAA Form 7460-1 (Notice of Proposed Construction or Alteration), providing additional information concerning the work that HDSE intends to commence, all as required by Section 11 of the Lease.

In the meantime, if ODAV would prefer that HDSE defer the drainfield modifications described above in order to allow time for ODAV and HDSE to collaboratively explore other alternatives for addressing ODAV's concerns, then HDSE would be happy to defer that work and would be open to discussing with ODAV the possibility of relocating the drainfield to another location on the airport. If ODAV is also open to that possibility, then HDSE would urge ODAV to further modify the Master Plan so that the Preferred Alternative and the Airport Layout Plan will show potential locations to which the drainfield could be relocated. HDSE suggests that the most obvious places where the drainfield potentially might be relocated would be the land which ODAV intends to acquire that is adjacent to Keil Road and east of the current airport boundary, or the land already owned by ODAV which is at the far north end of the airport. Note that, if the drainfield were to be relocated to either of those locations, the drainfield then would be completely outside of the RSA, even after completion of the runway extension that is called for in the Master Plan.

In ODAV's consideration of the preceding requests, ODAV certainly should note and take heed of the provisions of Section 3.10.2.1 of AC 150/5300-13B, which address design considerations for Non-Standard RSAs and call for airport sponsors to: (1) Evaluate *all practicable alternatives and opportunities* to improve a non-standard RSA until it meets all standards for grade, construction, and object frangibility, and (2) On the ALP, *identify future development necessary* to attain a standard RSA.

ODAV's current draft of the Master Plan clearly fails to comply with that FAA guidance, since it unjustifiably precludes compliance with RSA standards by means of the practicable alternative that HDSE now intends to commence, and because it also fails to identify the future development that would be necessary to achieve compliance in the event that at some point in the future ODAV and HDSE ultimately determine that the drainfield should be moved to a new location outside the RSA.

Please be advised that if ODAV continues to move forward toward adoption of the Master Plan with that document including language which asserts that HDSE's drainfield must be removed from the RSA without acknowledging that there is a potential alternative pathway to meeting the FAA's RSA standards, or by asserting that the drainfield must be relocated without providing any alternative location on the airport where the drainfield feasibly could be moved, then that course of conduct by ODAV will cause significant damages to HDSE and its members. If that occurs, regrettably, HDSE will be forced to take appropriate legal action to protect its rights under the Lease and under the Easement.

HDSE sincerely hopes that legal action will not become necessary, as we would greatly prefer to work collaboratively with ODAV in order to achieve a cost-effective resolution of ODAV's concerns about the drainfield. Like ODAV, HDSE wants the airport to be improved, and therefore we hope that you will direct ODAV's staff and consultants to partner with HDSE in efforts to make that happen. We would suggest that a positive step toward establishing such a constructive collaboration would be for ODAV to modify its draft of the Master Plan as suggested above.

I would appreciate it if you would respond to this letter in writing to confirm your receipt.

Sincerely,

Lukas Nickerson
President
HDSE Sewer System Owners Association

CC:

Joe Franco – Partner, Holland & Knight LLP	joe.franco@hklaw.com
Wendy Kellington – Kellington Law Group, PC	wk@klgpc.com
Tony Beach – ODAV State Airports Manager	anthony.beach@odav.oregon.gov
Alex Thomas – ODAV Planning, Policy, & Programs Mgr.	alex.r.thomas@odav.oregon.gov
Brandon Pike – ODAV Aviation Planner	brandon.pike@odav.oregon.gov
Kevin Olsen – ODAV Airport Leasing & Contracts	kevin.j.olsen@odav.oregon.gov

Outlook

Fw: HDSE Letter and Holdover Status

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Mon 2025-03-03 9:56 AM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

2 attachments (1 MB)
20250228133238672.pdf; RE: Existing Drain field;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Friday, February 28, 2025 3:16 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: HDSE Letter and Holdover Status

Good afternoon, please include in the public record for the master plan.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Friday, February 28, 2025 3:10 PM
To: Lukas Nickerson <Luke@flyaerometal.com>
Cc: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: HDSE Letter and Holdover Status

Good afternoon Mr. Nickerson,

I understand you are now the President of the HDSE Sewer System Owners Association. We have received your letter dated February 24th (attached) regarding comments on the master plan for the Aurora State Airport and HDSE's drain field lease. I have forwarded the letter to the master plan team, it will be included in the public record for the master plan.

Please also see the attached email sent 8/15/2023 to then HDSE President Tony Helbling. HDSE's lease is currently in holdover status pending the outcome of the master plan.

We appreciate you reaching out as the point of contact for HDSE. We will be in touch to asses options and next steps as the master plan concludes.

Thanks again,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

Outlook

RE: Existing Drain field

From BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Date Tue 2023-08-15 4:13 PM
To Helbling, Tony <helbling@wilsonconst.com>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>

Good afternoon Tony,

We have given notice on 7/30/2021 that we can't enter the renewal term when the current lease term expires August 30th, 2024. What we can do is look at the drain field and RSA compliance in the master planning process. If August 30th 2024 arrives before the master plan is complete, we will keep the lease in holdover (month to month) until an outcome is determined. We can discuss more about these steps and your research in a future meeting.

Tony Beach

OREGON DEPARTMENT OF AVIATION

STATE AIRPORTS MANAGER

OFFICE 503-378-2523 **CELL** 503-302-5455

M-F 7:30am – 4pm

From: Helbling, Tony <helbling@wilsonconst.com>
Sent: Thursday, August 10, 2023 11:25 AM
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Existing Drain field

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Kenji and Tony –

We understand the ODAV position on the existing drain field. At the same time, we've done quite a bit of research and would like to set up a discussion to share that information with you. In the spirit of yesterday's discussion, we're thinking there may be a way to create a win for all involved as the airport moves forward.

Could we set up a meeting in the next few weeks to go over this info?

Tony Helbling

President
HDSE

Outlook

Fw: KUAO Mater Plan Testimony

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-02-25 8:53 AM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

1 attachment (277 KB)
20250223b-Letter to ODAV.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, February 24, 2025 4:56 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: KUAO Mater Plan Testimony

Hello,

Good afternoon. Please include within the UAO master plan record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:
COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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This e-mail may contain information that is privileged, confidential, or otherwise exempt from disclosure under applicable law. If you are not the addressee or it appears from the context or otherwise that you have received this e-mail in error, please advise me immediately by reply e-mail, keep the contents confidential, and immediately delete the message and any attachments from your system.

From: Lukas Nickerson <nickersonlukas@gmail.com>
Date: Monday, February 24, 2025 at 13:51
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Cc: Joe.Franco@hklaw.com <joe.franco@hklaw.com>, Wendie Kellington <wk@klgpc.com>, BEACH Anthony <Anthony.BEACH@odav.oregon.gov>, THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>, PIKE Brandon <Brandon.PIKE@odav.oregon.gov>, OLSEN Kevin J <Kevin.J.OLSEN@odav.oregon.gov>
Subject: KUAO Mater Plan Testimony

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Kenji - Good Afternoon,

Please see the attached letter from HDSE regarding the drain field at Aurora State. Would you please ensure it is entered in as public testimony for the Aurora State Master Plan project?

Kind regards,
Lukas Nickerson

HDSE Sewer System Owners Association
Bravo Hangar
14355 Keil Road NE
Aurora, OR 97002

February 24, 2025

Delivery by Certified Mail & Email (kenji.sugahara@odav.oregon.gov)

Oregon Department of Aviation
Attention: Kenji Sugahara, Director
3040 25th Street SE
Salem, OR 97302

Re: Comments on Proposed Master Plan for the Aurora State Airport
Notice under Aurora State Airport Lease and Easement

Dear Director Sugahara:

I am writing on behalf of the HDSE Sewer System Owners Association ("**HDSE**"), an Oregon nonprofit corporation which operates a drainfield on property at the south end of the Aurora State Airport pursuant to a certain Non-Commercial Site Lease (the "**Lease**") with the State of Oregon, acting by and through its Oregon Department of Aviation ("**ODAV**"), as well as a certain Aurora State Airport Utility Easement (the "**Easement**") granted to HDSE by ODAV effective September 1, 2019.

Please note that the original Base Term of the Lease was from September 1, 2019 through August 29, 2024; and, in accordance with the terms of the Lease, HDSE exercised its option to renew the Lease for an additional five years. Thus, the current term of the Lease will expire on August 30, 2029, unless HDSE exercises its right to renew the Lease for an additional five years beyond that date. Also please note that, under the Easement, ODAV granted to HDSE a perpetual easement on, over, under and through the portion of the airport which HDSE uses for its drainfield, and such Easement provides rights to HDSE which are in addition to, and not dependent upon, the Lease.

During the February 11, 2025 meeting of the Planning Advisory Committee for the Aurora State Airport Master Plan (the "**Master Plan**"), ODAV provided a presentation which included a plan which is referred to as ODAV's Refined Preferred Alternative. Pages 16 and 17 of that presentation showed maps of the airport which identified the location of HDSE's drainfield, and the map Legends indicated: "DRAINFIELD TO BE REMOVED." Also, Page 24 of the presentation showed a draft Airport Layout Plan which identified the location of HDSE's drainfield, along with a legend titled "NON STANDARD CONDITIONS" which indicated that the planned "disposition" for the drainfield is "TO BE REMOVED."

Please be advised that HDSE strongly objects to ODAV moving forward toward adoption of the Master Plan so long as the document contains language stating that HDSE's drain field must be removed. ODAV should consider this letter to be public input to ODAV with respect to the Master Plan, as well as a Notice to ODAV under the Lease and the Easement.

HDSE understands that ODAV desires to have the Master Plan show a pathway for ODAV to bring the airport into full compliance with all applicable FAA standards over time, and HDSE understands that ODAV currently contends that achieving such compliance will require that HDSE's drainfield be removed from the Runway Safety Area ("**RSA**"). However, there is absolutely no evidence in the record which supports ODAV's contention that removal of the drainfield is the only viable pathway to such compliance, while there is substantial evidence in the record to the contrary.

HDSE is aware that FAA Advisory Circular 150/5300-13B states that the RSA should be:

1. Cleared and graded with no potentially hazardous ruts, humps, depressions, or other surface variations;

2. Drained by grading or storm sewers to prevent water accumulation;

3. Capable, under dry conditions, of supporting snow removal equipment, ARFF equipment, and the occasional passage of aircraft without causing damage to the aircraft; and

4. Graded to the longitudinal and transverse grades in paragraph 3.16.5 (of the Advisory Circular).

Further, HDSE is aware that Paragraph 3.10.1.5 of the Advisory Circular states that the RSA should comply with the compaction criteria in Specification P-152, Excavation Subgrade and Embankment, found in AC 150/5370-10.

As various representatives of HDSE and members of the Planning Advisory Committee have repeatedly informed ODAV, both orally and in writing on numerous occasions, there is nothing in any state or Federal law, or in any FAA or ODAV regulation, which specifically prohibits HDSE's drainfield from remaining exactly where it is now. In fact, the pertinent FAA advisory guidance only calls for the RSA to meet the standards cited above, and based on the analysis and recommendations which HDSE has received from competent professionals, HDSE believes that the drainfield can be modified to ensure that it will indeed meet those standards.

For this reason, the text of the Master Plan and any maps, diagrams and legends contained therein should not say that the HDSE drainfield will be removed, but rather should indicate ODAV's intent to **either**: (a) ensure that the drainfield is modified if necessary to comply with RSA standards, **or** (b) **if the drainfield cannot achieve such compliance in its current location**, then to have the drainfield relocated outside the RSA. A simple and easy change to your map legends which would be acceptable to HDSE would be for the legends to indicate "DRAINFIELD TO BE REMEDIED." This proposed modification would make the map legends identify the condition which ODAV currently contends is "non-standard" and also indicate that ODAV intends for that condition to be addressed, without incorrectly (and therefore improperly) suggesting that the condition may be addressed only by removal of the drainfield, which most certainly has not been established as of this date.

HDSE is aware that Sections 16, 17, and 18 of the Lease contain provisions under which ODAV may require HDSE to take steps to modify the drainfield if necessary in order to ensure that the drainfield complies with all applicable laws, ordinances, rules, and regulations; and, **in the event that HDSE were to be unwilling or unable to modify the drainfield so as to achieve such compliance**, then ODAV would have the right to require that the drainfield be removed. However, the Lease and the Easement certainly do not allow for ODAV to unilaterally require that HDSE remove the drainfield, when to HDSE's knowledge there has been no showing to date that the drainfield currently violates any applicable law, ordinance, rule or regulation; and further, even if such a showing of non-compliance could be made, ODAV would have no right to require HDSE to remove the drainfield so long as HDSE is proceeding with reasonable diligence and in good faith to modify the drainfield as necessary in order to remedy such issue as soon as practicable.

Although HDSE does not concede that the drainfield is currently non-compliant, we are nevertheless aware that ODAV has expressed concern that the drainfield may fail to meet the RSA standards specified in the Advisory Circular referenced above, and as the tenant under the Lease and the grantee under the Easement, HDSE wishes to be responsive to ODAV's concerns. Therefore, please be advised that HDSE intends to undertake work to modify the drainfield in order to address the concerns which ODAV has raised.

Accordingly, I am sending along with this letter a Report of Geotechnical Engineering Services, which was prepared for HDSE's architect Aron Faegre and Associates and which has previously been provided to ODAV by others on several prior occasions. That report, which was stamped by professional engineer Brett A. Shipton, P.E., G.E., outlines the approach that HDSE intends to take to modify the drainfield so as to ensure that it meets the FAA's RSA standards. Please be advised that HDSE intends to move forward within the next 30 days to engage qualified professionals to produce the necessary construction plans for this project and, as soon as such plans are complete, we will send to ODAV a Notice of proposed alteration on FAA Form 7460-1 (Notice of Proposed Construction or Alteration), providing additional information concerning the work that HDSE intends to commence, all as required by Section 11 of the Lease.

In the meantime, if ODAV would prefer that HDSE defer the drainfield modifications described above in order to allow time for ODAV and HDSE to collaboratively explore other alternatives for addressing ODAV's concerns, then HDSE would be happy to defer that work and would be open to discussing with ODAV the possibility of relocating the drainfield to another location on the airport. If ODAV is also open to that possibility, then HDSE would urge ODAV to further modify the Master Plan so that the Preferred Alternative and the Airport Layout Plan will show potential locations to which the drainfield could be relocated. HDSE suggests that the most obvious places where the drainfield potentially might be relocated would be the land which ODAV intends to acquire that is adjacent to Keil Road and east of the current airport boundary, or the land already owned by ODAV which is at the far north end of the airport. Note that, if the drainfield were to be relocated to either of those locations, the drainfield then would be completely outside of the RSA, even after completion of the runway extension that is called for in the Master Plan.

In ODAV's consideration of the preceding requests, ODAV certainly should note and take heed of the provisions of Section 3.10.2.1 of AC 150/5300-13B, which address design considerations for Non-Standard RSAs and call for airport sponsors to: (1) Evaluate *all practicable alternatives and opportunities* to improve a non-standard RSA until it meets all standards for grade, construction, and object frangibility, and (2) On the ALP, *identify future development necessary* to attain a standard RSA.

ODAV's current draft of the Master Plan clearly fails to comply with that FAA guidance, since it unjustifiably precludes compliance with RSA standards by means of the practicable alternative that HDSE now intends to commence, and because it also fails to identify the future development that would be necessary to achieve compliance in the event that at some point in the future ODAV and HDSE ultimately determine that the drainfield should be moved to a new location outside the RSA.

Please be advised that if ODAV continues to move forward toward adoption of the Master Plan with that document including language which asserts that HDSE's drainfield must be removed from the RSA without acknowledging that there is a potential alternative pathway to meeting the FAA's RSA standards, or by asserting that the drainfield must be relocated without providing any alternative location on the airport where the drainfield feasibly could be moved, then that course of conduct by ODAV will cause significant damages to HDSE and its members. If that occurs, regrettably, HDSE will be forced to take appropriate legal action to protect its rights under the Lease and under the Easement.

HDSE sincerely hopes that legal action will not become necessary, as we would greatly prefer to work collaboratively with ODAV in order to achieve a cost-effective resolution of ODAV's concerns about the drainfield. Like ODAV, HDSE wants the airport to be improved, and therefore we hope that you will direct ODAV's staff and consultants to partner with HDSE in efforts to make that happen. We would suggest that a positive step toward establishing such a constructive collaboration would be for ODAV to modify its draft of the Master Plan as suggested above.

I would appreciate it if you would respond to this letter in writing to confirm your receipt.

Sincerely,

Lukas Nickerson
President
HDSE Sewer System Owners Association

CC:

Joe Franco – Partner, Holland & Knight LLP	joe.franco@hklaw.com
Wendy Kellington – Kellington Law Group, PC	wk@klgpc.com
Tony Beach – ODAV State Airports Manager	anthony.beach@odav.oregon.gov
Alex Thomas – ODAV Planning, Policy, & Programs Mgr.	alex.r.thomas@odav.oregon.gov
Brandon Pike – ODAV Aviation Planner	brandon.pike@odav.oregon.gov
Kevin Olsen – ODAV Airport Leasing & Contracts	kevin.j.olsen@odav.oregon.gov

Outlook

Fw: Comment Letter ODAV updated Refined Proposed Preferred Alternative

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2025-01-22 9:30 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (330 KB)
Xerox Scan_01212025160045.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, January 22, 2025 7:43 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: RE: Comment Letter ODAV updated Refined Proposed Preferred Alternative

Here's the attachment.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Samantha Peterson <SPeterson@CenturyWest.com>
Sent: Tuesday, January 21, 2025 9:38 PM

To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: RE: Comment Letter ODAV updated Refined Proposed Preferred Alternative

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Can you re-forward the attached letter for this one? It didn't come through.

Samantha

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 4:42 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Comment Letter ODAV updated Refined Proposed Preferred Alternative

Good afternoon, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 4:40 PM
To: Kevin Ferrasci O'Malley <kevin@wilsonvillechamber.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Subject: RE: Comment Letter ODAV updated Refined Proposed Preferred Alternative

Hi Kevin, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Kevin Ferrasci O'Malley <kevin@wilsonvillechamber.com>
Sent: Tuesday, January 21, 2025 4:13 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Comment Letter ODAV updated Refined Proposed Preferred Alternative

You don't often get email from kevin@wilsonvillechamber.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear Ms Steffen and Mr Beach

Attached is our comment letter
Can you please reply upon receipt.

Sincerely
Kevin

Kevin Ferrasci O'Malley
CEO
Wilsonville Area Chamber of Commerce

http://wilsonvillechamber.com
https://www.oregonbrc.org/
http://www.facebook.com/wilsonvillechamber
https://www.facebook.com/oregonbrc
https://linkedin.com/in/kevinferrasciomalley

If you would like to schedule a phone meeting with me the fastest way is to please go to:
http://www.15withkevin.com
(You're of course always welcome to make a request via email
it will just take a bit more time with back and forth emails for us to match up our calendars. At the 15withKevin.com website you will have immediate access to my calendar availability)

W: 503-682-0411 X: 2
8565 SW Salish Lane, Suite 150 (*)
Wilsonville, Oregon 97070

(*) Our offices are located in the Oregon Restaurant and Lodging Assoc. building. It's best to park in the west side parking lot and to enter thru the side door.

Don’t forget to subscribe to the Chamber e-Newsletter at this link: www.bit.ly/WACCnewsletter

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WILSONVILLE
AREA CHAMBER OF COMMERCE

January 21, 2025

VIA ELECTRONIC MAIL
Alex Thomas, Planning and Programs Manager
Tony Beach, State Airports Manager
Oregon Department of Aviation
Brandy Steffen, JLA

Re: January 21, 2025 Comment Letter on Behalf of Wilsonville Area Chamber of Commerce for Aurora State Airport Master Plan – ODAV Updated Refined Proposed Preferred Alternative

Mr. Thomas, Mr. Beach and Ms Steffen,

The Wilsonville Area Chamber of Commerce sincerely appreciates the opportunity to participate in the Oregon Department of Aviation's Aurora State Airport Master Plan process.

Our stated vision is to "create and promote economic prosperity for businesses and citizens in the south metro region." Additionally, the Federal Aviation Administration (FAA) encourages airport master plans to consider economic impacts.

For this reason, we have repeatedly requested fact-based, meaningful discussions regarding the economic impacts of the proposed alternatives throughout this process. Despite multiple assurances that these discussions would take place, they have not occurred.

As a result, the Wilsonville Area Chamber of Commerce cannot endorse the final report, as it fails to provide any credible analysis of the economic impact upon our regional businesses and communities. The potential consequences for long-standing businesses, their employees, and surrounding areas are significant and must be thoroughly evaluated before advancing any preferred alternatives.

We remain committed to addressing this critical concern and welcome the opportunity to continue these discussions.

Thank you for your consideration.

Sincerely,

Kevin Ferrasci O'Malley, CEO

Wilsonville Area Chamber of Commerce
8565 SW Salish Lane Suite 150
Wilsonville, OR 97070

Outlook

Re: City of Wilsonville Rep to ASA MP PAC

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2/4/2025 4:34 PM
To Mark Ottenad <ottenad@ci.wilsonville.or.us>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc Councilor Anne Shevlin <shevlin@wilsonvilleoregon.gov>; Chris Neamtzu <neamtzu@ci.wilsonville.or.us>; Zoe Mombert <mombert@ci.wilsonville.or.us>

Thank you for the information, Mark. We will update the PAC membership roster to reflect this change.

Thank you,

BRANDY STEFFEN
| **JLA PUBLIC INVOLVEMENT**

Partner + Senior Program Manager

brandy.steffen@jla.us.com »
Schedule
a 30 minute meeting

From: Mark Ottenad <ottenad@ci.wilsonville.or.us>
Sent: Friday, January 24, 2025 9:17 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Councilor Anne Shevlin <shevlin@wilsonvilleoregon.gov>; Chris Neamtzu <neamtzu@ci.wilsonville.or.us>; Zoe Mombert <mombert@ci.wilsonville.or.us>
Subject: City of Wilsonville Rep to ASA MP PAC

Good day Brandy and Tony,

Please note that the City of Wilsonville rep to the Aurora State Airport Master Plan PAC is now City Councilor Anne Shevlin, who replaces retiring Councilor Joann Linville.

City Councilor Anne Shevlin
City of Wilsonville
503-570-1501
shevlin@wilsonvilleoregon.gov

Note that the City is migrating our URL from ci.wilsonville.or.us to wilsonvilleoregon.gov.

Thank you.

- Mark

Mark C. Ottenad
Public/Government Affairs Director
City of Wilsonville / South Metro Area Regional Transit (SMART) / Explore Wilsonville
29799 SW Town Center Loop East

Wilsonville, OR 97070
[redacted]
[redacted]
ottenad@ci.wilsonville.or.us
www.ci.wilsonville.or.us
www.ridesmart.com
www.ExploreWilsonville.com

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Outlook

RE: City of Wilsonville Rep to ASA MP PAC

From BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Date Fri 2/7/2025 9:26 AM
To Mark Ottenad <ottenad@ci.wilsonville.or.us>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc Mayor Shawn O'Neil <oneil@wilsonvilleoregon.gov>; Councilor Anne Shevlin <shevlin@wilsonvilleoregon.gov>; Chris Neamtzu <neamtzu@ci.wilsonville.or.us>; Zoe Mombert <mombert@ci.wilsonville.or.us>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>

Hi Mark,

We have recently received and denied similar requests by Wendy Kellington and Betsy Johnson. I am willing to share that correspondence which also refers to this same protocol with you, and has also been included in the public record.

Our goal is to keep the process as fair and consistent as possible for everyone, and we appreciate Chris' involvement in our master plan process so far.

Thank you for your understanding, and we look forward to the City's participation in our upcoming meeting.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Mark Ottenad <ottenad@ci.wilsonville.or.us>
Sent: Thursday, February 6, 2025 8:41 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: Mayor Shawn O'Neil <oneil@wilsonvilleoregon.gov>; Councilor Anne Shevlin <shevlin@wilsonvilleoregon.gov>; Chris Neamtzu <neamtzu@ci.wilsonville.or.us>; Zoe

Mombert <mombert@ci.wilsonville.or.us>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: RE: City of Wilsonville Rep to ASA MP PAC

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hello Tony,

The City finds this request confusing and inappropriate.

1. Basic matter of principle: Why does ODAV care whom the City of Wilsonville chooses to represent us on the PAC. This is a matter of local choice, and should not be of concern to ODAV. We are not asking for any accommodations to on-board a new member.

2. The City Council unanimously appointed Councilor Shevlin on Jan. 23, 2025, to fulfill the position of City's rep to the ASA MP PAC. City staff cannot override its own city council.

3. The document you reference is from 2021, and was intended for a planning process that was to take originally 12-18 months, and NOT over four years! It is common sense that organizations are going to have personnel turn-over during such an extended planning time period.

4. While the document you reference indicates that additions or refinement of PAC members may take place at the discretion of ODAV staff, please expressly state, in writing, that ODAV staff are unwilling to seat our designated elected official as a member representing the City of Wilsonville.

I have to say, this seems a little petty and unbecoming of a state agency in terms of partnering with local governments.

Thank you for your time and consideration.

- Mark

Mark Ottenad, Public/Government Affairs Director
City of Wilsonville / SMART / Explore Wilsonville
503-570-1505
ottenad@ci.wilsonville.or.us

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, February 5, 2025 2:18 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Mark Ottenad <ottenad@ci.wilsonville.or.us>
Cc: Councilor Anne Shevlin <shevlin@wilsonvilleoregon.gov>; Chris Neamtzu <neamtzu@ci.wilsonville.or.us>; Zoe Mombert <mombert@ci.wilsonville.or.us>
Subject: RE: City of Wilsonville Rep to ASA MP PAC

Hi Mark, we have Chris Neamtzu as the Alternate on the PAC. Is there a reason Chris can't serve as the Primary?

Per our PAC Protocols, "The alternate must be identified to ODAV at the project onset and attend all meetings so that past business doesn't need to be revisited."

Since Chris was the Alternate, we're happy to make him the Wilsonville's PAC representative, and Counciler Anne Shevlin the new Alternate.

Thank you,

Tony Beach

OREGON DEPARTMENT OF AVIATION

STATE AIRPORTS MANAGER

OFFICE 503-378-2523 **CELL** 503-302-5455

M-F 7:30am – 4pm

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Tuesday, February 4, 2025 4:34 PM
To: Mark Ottenad <ottenad@ci.wilsonville.or.us>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Councilor Anne Shevlin <shevlin@wilsonvilleoregon.gov>; Chris Neamtzu <neamtzu@ci.wilsonville.or.us>; Zoe Mombert <mombert@ci.wilsonville.or.us>
Subject: Re: City of Wilsonville Rep to ASA MP PAC

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Thank you for the information, Mark. We will update the PAC membership roster to reflect this change.

Thank you,

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**

Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Mark Ottenad <ottenad@ci.wilsonville.or.us>
Sent: Friday, January 24, 2025 9:17 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Cc: Councilor Anne Shevlin <shevlin@wilsonvilleoregon.gov>; Chris Neamtzu <neamtzu@ci.wilsonville.or.us>; Zoe Mombert <mombert@ci.wilsonville.or.us>
Subject: City of Wilsonville Rep to ASA MP PAC

Good day Brandy and Tony,

Please note that the City of Wilsonville rep to the Aurora State Airport Master Plan PAC is now City Councilor Anne Shevlin, who replaces retiring Councilor Joann Linville.

City Councilor Anne Shevlin
City of Wilsonville
503-570-1501
shevlin@wilsonvilleoregon.gov

Note that the City is migrating our URL from ci.wilsonville.or.us to wilsonvilleoregon.gov.

Thank you.

- Mark

Mark C. Ottenad
Public/Government Affairs Director
City of Wilsonville / South Metro Area Regional Transit (SMART) / Explore Wilsonville
29799 SW Town Center Loop East
Wilsonville, OR 97070
General: 503-682-1011
Direct: 503-570-1505
ottenad@ci.wilsonville.or.us
www.ci.wilsonville.or.us
www.ridesmart.com
www.ExploreWilsonville.com

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Outlook

Fw: Question about

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Fri 2025-01-17 9:12 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

I'm not sure if this needs to be tracked on the website, but I wanted to keep you in the loop.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Friday, January 17, 2025 7:55 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; MORRIS Alexis <Alexis.MORRIS@odav.oregon.gov>
Subject: FW: Question about

FYI

From: Poehler, William <bpoehler@Salem.gannett.com>
Sent: Thursday, January 16, 2025 5:32 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: RE: Question about

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Tony-
Great. Thank you. I wanted to check about the postcards.

Thank you,
-Bill Poehler
Reporter
Statesman Journal
503-881-8545

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Thursday, January 16, 2025 3:56 PM
To: Poehler, William <bpoehler@Salem.gannett.com>
Subject: RE: Question about

Hi Bill,

For each PAC and public master plan meeting, ODAV and the master plan team have sent email notifications to PAC members, and anyone from the public who has signed up or requested to receive outreach and notifications for the Master Plan. We have also published ads in the Statesman Journal, Canby Herald, and Wilsonville Spokesman, as well as mailed physical postcards with meeting notices to the residents and owners of properties within a 1 mile radius of the airport. Some of these postcard notices have gone out of state, as those were the formal notice mailing addresses received from Marion and Clackamas Counties. When we got to the Alternatives portion of the master plan process, we additionally sent postcards to all of the physical mailing addresses of properties potentially affected by the alternatives. Sending postcards to the County's formal notice addresses as well as the physical addresses likely resulted in duplication, but we wanted to ensure they were being received by those potentially affected.

Further, ODAV has a link in the center of the homepage of our website pointing people to the master plan project website. We have also provided updates as well as pointed to the project website and where to subscribe for master plan updates in public meetings such as our Board meetings. There have been several articles about the master plan in the three papers over the years. Additionally, we have asked all PAC members to share master plan information and meeting details with the constituents of the organizations or groups they are representing (members include local neighborhood/development areas as well as the local counties and cities). The City of Wilsonville also mailed out postcards in advance of the last public meeting and has posted extensive information on their website.

I am happy to hear our postcards reached the person that you've been in touch with. Attached is a copy of the postcard we have sent out for the next master plan meeting. Upcoming meeting information, the project website address, and contact information are provided for them to ask questions and understand everything that is going on with the aurora master plan.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Poehler, William <bpoehler@Salem.gannett.com>
Sent: Thursday, January 16, 2025 10:51 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Question about

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Tony-
Can you tell me what kind of outreach JLA/ODAV did with neighbors of properties around the airport about the master plan? I've had some tell me that they received post cards to addresses in other states and never received anything and didn't know what was going on at all.

Thank you,

-Bill Poehler
Reporter
Statesman Journal
503-881-8545

Outlook

Fw: Highway 551

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-07 10:07 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 7, 2025 7:37 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Highway 551

FYI, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 7, 2025 7:37 AM
To: Poehler, William <bpoehler@Salem.gannett.com>
Subject: RE: Highway 551

We haven't looked into that, but theoretically it is possible to have a drainfield outside of the Runway Safety Area. When private development occurs on our property, permitting/due diligence is always the

responsibility of the developer.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Poehler, William <bpoehler@Salem.gannett.com>
Sent: Monday, January 6, 2025 4:35 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: RE: Highway 551

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Tony-
Oh, okay. Now that makes more sense. I was looking at that again. So if the drainfield has to be removed from the runway safety area, and Keil Road were moved, could that drainfield be moved to the space that would theoretically be vacant from where the road is moved?

Thank you,
-Bill Poehler
Reporter
Statesman Journal
503-881-8545

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Monday, January 6, 2025 3:19 PM
To: Poehler, William <bpoehler@Salem.gannett.com>
Subject: RE: Highway 551

Hi Bill,

Thanks again for coming down to our office to talk UAO Master Plan. I enjoyed the discussion and answering your questions.

I did want to follow up on one question, you asked why the non-standard ditch isn't depicted south of the taxiway and runway. After taking a closer look, it is because that ditch shifts east outside of the Runway Safety Area, and is not a non-standard condition in that location.

I hope your new year is off to a great start, please let me know if I can answer any other questions or provide further clarification.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Thursday, January 2, 2025 4:06 PM
To: HOUSE David J <David.J.HOUSE@odot.oregon.gov>; Poehler, William <bpoehler@Salem.gannett.com>
Subject: RE: Highway 551

Hi guys, happy new year!

Thanks for the link and pointing him my way, David.

I'm now in touch with Bill and will answer his questions.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: HOUSE David J <David.J.HOUSE@odot.oregon.gov>
Sent: Thursday, January 2, 2025 12:11 PM
To: Poehler, William <bpoehler@Salem.gannett.com>
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: RE: Highway 551

Hi,
This is still in the planning process at Oregon Department of Aviation – maybe you saw their planning doc: https://publicproject.net/AuroraAirport

So I suggest contacting Tony Beach at ODAV: Anthony.BEACH@odav.oregon.gov

Happy new year!

David House
ODOT Public Affairs for Region 2 North – projects in Clatsop, Columbia, Tillamook, Yamhill and Marion counties, and northeast Polk counties

503-551-8641

From: Poehler, William <bpoehler@Salem.gannett.com>
Sent: Thursday, January 2, 2025 10:57 AM
To: HOUSE David J <David.J.HOUSE@odot.oregon.gov>
Subject: Highway 551

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David-
I'm writing a story about the master plan process at Aurora State Airport, and as part of that they are proposing to move Highway 551 to the east alongside the airport, basically from Keil Road to Arndt Road. Who from ODOT should I talk with about the proposal to move the highway?

Thank you,
-Bill Poehler
Reporter
Statesman Journal
503-881-8545

Outlook

Fw: Aurora airport master plan comments

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 1:08 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 7:39 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora airport master plan comments

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 7:35 AM
To: Josh <jpruzek@aol.com>; brandy.steffen@jla.us.com
Subject: RE: Aurora airport master plan comments

Hi Josh, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Josh <jpruzek@aol.com>
Sent: Monday, January 20, 2025 8:21 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; brandy.steffen@jla.us.com
Subject: Aurora airport master plan comments

You don't often get email from jpruzek@aol.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hello Tony,

Thank you for the opportunity to provide input on the ongoing changes to the Aurora State Airport Master Plan. I have flown out of Aurora State since 1996, worked there as a flight instructor and charter pilot for 4+ years, and have based four aircraft there since 2003. I am also the AOPA Airport Support Network volunteer for KUAO and a former AOPA NW Mountain Regional Manager. Aurora is one of the most significant airports in the region and I appreciate the balance needed to guide this critical piece of transportation infrastructure into the future.

Although I have not attended many of the public meetings on the Master Plan, I do remain abreast of it and appreciate the significant improvements made in recent revisions. Here are a few comments concerning the most recent revision:

- Please consider highlighting the importance of maintaining existing infrastructure made by airport tenants as leasehold improvements. These represent major investments made by tenants over the years and critical portions of the existing airport infrastructure. Failure to do so could send an unintended message to current and future leaseholders that airport investments are unwise.
- I support including the 1.1-acre ODAV property purchase of the ramp space currently adjoining the south end of the main UAO ramp, south of the tower, in your "priority purchase" list. This will improve access to the Columbia Aviation Association clubhouse as well as Pacific Coast Avionics, the main public ramp, all the mid-field hangars, and the Aurora Flight training ramp. This ramp and taxi-lane improvement will increase safety, reduce runway incursions, and improve traffic flow much like the prior plan considered via the parallel taxiway but without displacing any hangars.

Thank you again for your efforts to continually improve the KUAO Master Plan. As a 25+ year user of the airport, I am optimistic that you and the ODAV will arrive at a solution that balances the needs of all stakeholders, and better positions Aurora State for the next 25 years.

Best Regards,

Josh Pruzek
AOPA Airport Support Network Volunteer - UAO
N808JP, N806PS & N240WP

A "Blue Hangar" tenant since 2003

Outlook

Fw: Aurora Airport expansion - ODAV seeking comment

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-02-25 8:53 AM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, February 24, 2025 4:56 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Aurora Airport expansion - ODAV seeking comment

Hello,

Good afternoon. Please include within the UAO master plan record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357

EMAIL Alex.R.Thomas@ODAV.Oregon.Gov

SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:
COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: Buehrig, Karen <KarenB@clackamas.us>
Date: Friday, February 21, 2025 at 16:26
To: PIKE Brandon <Brandon.PIKE@odav.oregon.gov>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>, BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: RE: Aurora Airport expansion - ODAV seeking comment

You don't often get email from karenb@clackamas.us. Learn why this is important

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Brandon – I wanted to thank you for your very detailed response. I do not have any additional comments at this time.

Karen

Karen Buehrig
Phone – (503) 742-4683
Mobile – (971) 291-8127

Clackamas County
Working Hours: Monday – Friday 8 AM – 5 PM

From: PIKE Brandon <Brandon.PIKE@odav.oregon.gov>
Sent: Thursday, February 6, 2025 10:58 AM
To: Buehrig, Karen <KarenB@clackamas.us>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: RE: Aurora Airport expansion - ODAV seeking comment

Warning: External email. Be cautious opening attachments and links.

Hi Karen,

Thanks for reaching out about this. I'd be glad to chat with you sometime if you'd like. I've also provided an explanation below:

Yes, in the proposed scenario, dubbed the *refined preferred alternative*, the runway would be extended to the north 497'. You may have already seen this version of the plan, but just in case, here's a link to the preferred alternative I'm referencing: https://publicproject.net/files/UAOAMP/uao-refinedpreferredalternative-010725.pdf

As an aside, full project information and maps can be found on the project website: https://publicproject.net/auroraairport#

The lines you're noticing to the north of Arndt Road are likely the new boundaries of the runway protection zone (RPZ), shown in light blue in Figure 1 of the refined preliminary alternative. Because the runway's dimensions would change under the new plan, with the runway extending farther to the north, the associated RPZ would shift to the north, as well. Pursuant to the FAA's design guidelines for airports and runways (AC 150/5300-13B), the RPZ is designed to enhance the protection of people and property on the ground.

In an ideal scenario, the airport sponsor/owner would have ownership or control over the land in the RPZ in order to reduce the potential for conflicts and ensure compatible land uses. But in cases like this where it's under separate ownership, there are a number of land use types that can still be deemed compatible. Pursuant to the State of Oregon's *Airport Land Use Compatibility Guidebook*, agricultural uses (excluding livestock), parks, utilities, and certain transportation features (roads, parking, terminals) can all be deemed compatible assuming they meet a list of criteria relating to height, creation of smoke, creation of bird attractants, etc. (per Table 3-4: Compatible Land Uses per FAR Part 77 Surfaces and FAA Safety Areas).

When coming up with this plan, our consultant reviewed Clackamas County's zoning for the area north of Arndt Road and determined that it was zoned EFU—which is generally one of the zones that's easiest to ensure compatibility when located inside an RPZ. Like any development or land use actions on property adjacent to public-use airports in Oregon, if future development or zoning changes were to occur on this land, ODAV would comment at that time, as appropriate (if, for example, a proposed structure would impact airspace).

Finally, with the proposed changes to the dimensions of the runway, Clackamas County's associated airport overlay zone would automatically expand 497' to the north, based on my understanding of how your overlay zone is written (ZDO 713). Therefore, while I don't think your code would need revisions as a result of the new airport master plan, the dimensions of your overlay zone would change. Structures north of the runway would be subject to slightly more stringent height limitations per federal (14 CFR FAR Part 77) and state (OAR 738, Division 70) aviation regulations, since the approach surface would begin 497' sooner than it currently does.

Let us know if you foresee any issues with any of this at this stage. As part of the airport master planning process, our goal is to include the local community, public officials, and other stakeholders throughout the process.

Additionally, let us know if you'd like to discuss this further or if you have follow-up questions.

Best,

BRANDON PIKE
OREGON DEPARTMENT OF AVIATION (ODAV)
AVIATION PLANNER

PHONE 971-372-1339

EMAIL brandon.pike@odav.oregon.gov

3040 25TH STREET SE, SALEM, OR 97302

WWW.OREGON.GOV/AVIATION

Alternative Contacts:

COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structures: LandUse@ODAV.Oregon.Gov

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From: Buehrig, Karen <KarenB@clackamas.us>
Date: Wednesday, February 5, 2025 at 10:21
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora Airport expansion - ODAV seeking comment

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Alex-

Do you have the time to talk with me to help me understand the implications of this plan on land in unincorporated Clackamas County? It appears that there are some lines that extend north of Arndt Road, but I can't really tell what they mean.

Thank you for your assistance.

Karen

Karen Buehrig
Long Range Planning Manager, Clackamas County
Phone – (503) 742-4683
Mobile – (971) 291-8127

Clackamas County
Working Hours: Monday – Friday 8 AM – 5 PM

From: REID Kelly * DLCD <Kelly.REID@dlcd.oregon.gov>
Sent: Monday, February 3, 2025 1:38 PM
To: Hughes, Jennifer <jenniferh@clackamas.us>; Buehrig, Karen <KarenB@clackamas.us>
Subject: Aurora Airport expansion - ODAV seeking comment

Warning: External email. Be cautious opening attachments and links.

Hi Jennifer and Karen,

I am not sure if you all have been involved in any of the Aurora Airport Master Plan meetings, but Melissa Ahrens shared with me that the Dept. of Aviation is seeking comment on the preferred alternative and has another meeting scheduled for February 11th.

We thought it might be possible that some land under Clackamas County jurisdiction on the north side of Arndt Road could be impacted, based on the maps in this revised plan: uao-refinedpreferredalternative-010725.pdf

Just wanted to make sure you are aware.

Best,

Kelly Reid
Regional Representative for Multnomah and Clackamas Counties
Portland Metro Regional Solutions
Pronouns: She/her
Oregon Department of Land Conservation and Development
1600 SW Fourth Avenue, Suite 109 | Portland, OR 97201
Cell: 971-345-1987
kelly.reid@dlcd.oregon.gov | www.oregon.gov/LCD

Outlook

FW: FAA Modifications of Standards

From BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Date Fri 2/28/2025 11:12 AM
To Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Sent: Friday, February 28, 2025 7:27 AM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Fw: FAA Modifications of Standards

Tony- can you get this added to the public record for the PAC? Ty!

Kenji

From: Rottinghaus, Mike (FAA) <mike.rottinghaus@faa.gov>
Sent: Friday, February 28, 2025 8:50:49 AM
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Cc: House Timothy <Timothy.A.House@faa.gov>
Subject: FAA Modifications of Standards

Mr. Sugahara,

You don't often get email from mike.rottinghaus@faa.gov. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

It is my understanding you received a letter from Mr. Aron Faegre, dated February 25, 2025, concerning the potential for application of Modification of Standards (MOS) at Aurora State Airport, Aurora, OR. As the subject matter expert for MOS within FAAs Office of Airports, Mr. Faegre contacted me in late January to gain a better understanding of the purpose of an FAA issued MOS. As a professional courtesy, I provided him a brief explanation of the purpose and limitations of an FAA MOS, which he captured in the telephone memorandum attached to his February 5, 2025, letter. There was no discussion related to application at a specific airport or project.

Mr. Faegre's letter introduced additional context surrounding the basis for his inquiry, specifically at Aurora State Airport, that we did not discuss. Unfortunately, Mr. Faegre's letter is lacking some further understanding of an MOS. An MOS is a grant instrument that allows FAA to participate in a development project that contains nonstandard conditions. It represents a site-specific change to the published standard based on local conditions at the time of a project and only applies to a specific development project. It does not represent a permanent waiver or exception to an FAA standard and does not have an enduring application.

The assertion that an MOS is not available in Oregon is not accurate. I believe that confusion lies with our policy that an MOS is only applicable for development and equipment projects. Issuance of an MOS will be considered for a proposed development project with nonstandard conditions at a time the Airport expressing interest to proceed with a project. An FAA issued MOS remains valid for the proposed project for up to five years, after which time, the project specific MOS expires.

Given airport operations and risk are ever changing and the airport planning process establishes airport development strategies beyond 5 years, it is FAA's policy to not consider issuance of an MOS for a Master Plan or ALP project. The ALP needs to reflect full conformance with current FAA standards to help identify where nonconformance is an issue. This aids an airport with the decision-making process as it relates to funding of proposed development.

I have discussed this matter with Tim House of the FAA Seattle Airport District Office (ADO), and I believe we have a consistent understanding. Please continue to work with the Seattle ADO to address this matter.

Respectfully,

Mike A. Rottinghaus, P.E.

Federal Aviation Administration
Airport Engineering - Design & Construction Branch AAS-110
800 Independence Ave. SW
Washington D.C. 20591

O:(202) 267-3622

Outlook

Fw: Aurora Oregon Airport KUAO

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 1:10 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 7:38 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Aurora Oregon Airport KUAO

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 7:30 AM
To: Mary Schu <maryschuaviation@gmail.com>; brandy.steffen@jla.us.com
Subject: RE: Aurora Oregon Airport KUAO

Hi Mary, received, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Mary Schu <maryschuaviation@gmail.com>
Sent: Sunday, January 19, 2025 5:24 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; brandy.steffen@jla.us.com
Subject: Re: Aurora Oregon Airport KUAO

You don't often get email from maryschuaviation@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Hello again,

I would like to make an additional clarification regarding the Airport boundary that needs to be considered:
The Aurora Airport boundary (KUAO) is all the property currently in aviation use or development and outlined by Arndt rd, Airport rd, Keil rd, & highway 551.

I hope that is helpful in comparing this to other smaller possibilities that are not inclusive of what is currently necessary for the Aurora Airport.

Thank you for your time and kind consideration in this very important matter.

Sincerely,
Mary Schu
ATP, CFI, FAAATeam
FAA Designated pilot examiner
2015 National Flight Instructor of the Year

Maryschuaviation@gmail.com
541-390-3980

On Sat, Jan 18, 2025 at 2:50 PM Mary Schu <maryschuaviation@gmail.com> wrote:

> Dear Tony,
>
> Thank you for considering us airport users' and property owners (as Columbia Aviation Association members) input and for the significant improvements in the current plan over the previous.
>
> Please consider highlighting the importance of maintaining the septic systems and their leases, these are owned by airport tenants and located on airport property as we feel these are a critical piece of the airport infrastructure and represent major investments.

We ask that you include the 1.1 acre ODAV property purchase of the ramp space currently adjoining the south end of main UAO ramp (south of the tower) in your "priority purchase" list as this will significantly improve access to CAA as well as Pacific Coast Avionics, the main public ramp, all the mid-field hangars and Aurora Flight trainings ramp. This notable ramp and taxi-lane improvement will increase safety and flow much like the prior plan considered via a parallel taxiway and road but without displacing any hangars or the huge cost.

Finally, please eliminate or reduce to an absolute minimum the amount of airport boundary increase, adding additional real estate to UAO would be extremely expensive and is very unpopular with our neighbors. Please use any and all FAA approved mitigation measures to keep the airport safely in its current boundaries.

Thank you again for listening and your recent improvements to the plan.

Sincerely,
Mary Schu
ATP, CFI, DPE Designated Pilot Examiner

Outlook

Fw: AOPA TESTIMONY FOR RECORD CONCERNING AURORA STATE AIRPORT UPDATED REFINED PREFERRED ALTERNATIVE

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2025-01-22 9:29 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

1 attachment (206 KB)
AOPA Letter RE_UAO 2024 Master Plan Alternatives_01212025_FINAL.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, January 22, 2025 7:46 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: RE: AOPA TESTIMONY FOR RECORD CONCERNING AURORA STATE AIRPORT UPDATED REFINED PREFERRED ALTERNATIVE

Here's the attachment. I made sure to include these in the first round in the morning, but missed them in the evening. Thanks for making sure we have everything included.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Samantha Peterson <SPeterson@CenturyWest.com>
Sent: Tuesday, January 21, 2025 9:41 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: RE: AOPA TESTIMONY FOR RECORD CONCERNING AURORA STATE AIRPORT UPDATED REFINED PREFERRED ALTERNATIVE

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Same with Brad's email. I'm not seeing the attached letters.

Thanks,
Samantha

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 4:42 PM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Subject: FW: AOPA TESTIMONY FOR RECORD CONCERNING AURORA STATE AIRPORT UPDATED REFINED PREFERRED ALTERNATIVE

Good afternoon, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 4:38 PM
To: Schuster, Brad <brad.schuster@aopa.org>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; brandy.steffen@jla.us.com
Subject: RE: AOPA TESTIMONY FOR RECORD CONCERNING AURORA STATE AIRPORT UPDATED REFINED PREFERRED ALTERNATIVE

Hi Brad, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Schuster, Brad <brad.schuster@aopa.org>
Sent: Tuesday, January 21, 2025 3:39 PM
To: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; brandy.steffen@jla.us.com
Subject: AOPA TESTIMONY FOR RECORD CONCERNING AURORA STATE AIRPORT UPDATED REFINED PREFERRED ALTERNATIVE
Importance: High

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Good afternoon Alex,

Attached is the Aircraft Owners and Pilots Association (AOPA) testimony for the record concerning ODAV's proposed updated "Refined Preferred Alternative" for the Aurora State Airport Master Plan.

Request you acknowledge receipt and provide a copy to the appropriate parties.

Thanks again for your collective continuing efforts to find a fair, balanced, and reasonable alternative for UAO airport users, tenants, and the local broader communities.

Blue skies.

Brad Schuster
AK and Northwest Mountain Region Manager
Aircraft Owners & Pilots Association (AOPA)
Tel: 202.851.7502
www.aopa.org
Join AOPA!

Outlook

Fw: 1-21-25 Comment For Aurora Airport Master Plan - Current Refined Preferred Alternative

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2025-01-22 9:29 AM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

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Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, January 22, 2025 7:49 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: 1-21-25 Comment For Aurora Airport Master Plan - Current Refined Preferred Alternative

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 CELL 503-302-5455
M-F 7:30am - 4pm

-----Original Message-----
From: BEACH Anthony
Sent: Wednesday, January 22, 2025 7:48 AM
To: 'Tom Stevenson' <tstevens@iinet.com>; brandy.steffen@jla.us.com
Subject: RE: 1-21-25 Comment For Aurora Airport Master Plan - Current Refined Preferred Alternative

Hi Tom, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 CELL 503-302-5455
M-F 7:30am - 4pm

-----Original Message-----
From: Tom Stevenson <tstevens@iinet.com>
Sent: Tuesday, January 21, 2025 11:20 PM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; brandy.steffen@jla.us.com
Subject: 1-21-25 Comment For Aurora Airport Master Plan - Current Refined Preferred Alternative

[You don't often get email from tstevens@iinet.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear Tony,

Thank you for considering us airport users' and property owners (as Columbia Aviation Association members) input and for the significant improvements in the current plan over the previous.

Please consider highlighting the significant importance of maintaining the septic systems and their leases. These are owned by the airport tenants and are located on airport property. It is felt that these are a critical piece of the airport infrastructure and represent major investments.

We also ask that you include the 1.1 acre ODAV property purchase of the ramp space currently adjoining the south end of main UAO ramp (south of the tower) in your "priority purchase" list as this will significantly improve access to CAA as well as Pacific Coast Avionics, the main public ramp, all the mid-field hangars and Aurora Flight trainings ramp. This notable ramp and taxi-lane improvement will increase safety and flow much like the prior plan considered via a parallel taxiway and road but without displacing any hangars, or the huge projected cost.

Thank you again for listening and your recent improvements to the plan.

Tom Stevenson
Pilot, Airport User, and CAA Member

601 Pennsylvania Ave NW, Suite 250
Washington, D.C. 20004

T. 202-509-9670
www.aopa.org

January 21, 2025

Alex Thomas, ODAV Planning & Programs Manager
Oregon Department of Aviation (ODAV)
3040 25th Street SE
Salem, OR 97302

TRANSMITTED VIA ELECTRONIC MAIL TO: Alex.R.THOMAS@odav.oregon.gov

RE: Aurora State Airport (UAO) Master Plan Alternatives – Concerns/Recommendations

Dear Alex:

On behalf of the Aircraft Owners and Pilots Association (AOPA), the world's largest general aviation membership organization, we write to express our concerns over the proposed Aurora State Airport (UAO) master plan update and recommend the Oregon Department of Aviation (ODAV) consider the alternatives provided by the UAO aviation community.

We wholeheartedly agree with the position held by many of the aeronautical users of UAO and Planning Action Committee (PAC) that NONE of the three alternatives originally proposed reflected a fair and reasonable future for UAO development that would have been in the best interest of the UAO aviation ecosystem. On a related note, AOPA concurs with the requests made by the Aurora Airport Improvement Association (AAIA) in their letter dated January 21, 2025 "*January 21, 2025 Comment Letter on Behalf of Aurora Airport Improvement Association for Aurora State Airport Master Plan – ODAV Updated Refined Proposed Preferred Alternative*" through their legal counsel Wendie Kellington as it reflects a rational perspective with the best interests of the airport users, tenants, and broader communities in mind.

Although AOPA always supports Federal Aviation Administration (FAA) design standard compliance, it is significantly easier to do so when conditions to meet standards can be met without unreasonable limitations or impacts being imposed on our members. In particular, the previously planned demolition of hangars would have been very counter-productive, and we congratulate ODAV, the PAC, and the entire Aurora area aviation community for collaborating to get this alternative removed from the current plan.

AOPA also supports the following:

- Lengthening of the runway that has been planned since the 1970's as it is vital for the safe operations of the aircraft currently utilizing UAO and we believe this project is long past-due and that it should be made a priority with no strings attached
- Improving airport infrastructure (septic systems in particular) to ensure they fully comply with FAA standards (if current design/construction conflicts with FAA guidance due to airport designation changes)

- Improving separation-related safety objectives by acquiring property to enable both extending the main ODAV-managed ramp/taxi-lane south to connect with taxiway A while simultaneously improving airport ground vehicle safety and flow
    - Particularly as this suggested purchase would represent a significant savings when compared to other previously suggested alternatives, this land purchase should be added to the UAO plan purchase list as among your highest priority projects on your Capital Improvement Plan.

Please let us know if there is anything else AOPA can do to help ensure that the right decisions are made for the future of the Aurora State airport and that those decisions are in support of the entire UAO airport user, tenant/owner, and surrounding communities. Feel free to contact me with respect to this topic or any other matters impacting general aviation. I can be reached at email: brad.schuster@aopa.org or by phone: 202-851-7502.

Sincerely,

Brad Schuster, AOPA
Alaska and Northwest Mountain Regional Manager

Cc:
ODAV Director
ODAV State Airports Manager
JLA Public Involvement Strategist

Outlook

Fw: Auora master plan

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-01-21 1:10 PM
To Jen Winslow <Jen.winslow@jla.us.com>; Ashley Balsom <ashley.balsom@jla.us.com>

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com
Meeting + email hours 9 a.m.–5 p.m. Monday–Thursday » Administrative-only hours Friday
Check my availability » Schedule a 30 minute check-in

JLA Public Involvement's mission: To create collaborative, meaningful and exceptionally effective public processes that lead to better, more inclusive outcomes.

Please note: I will be on vacation, without access to my email, starting Friday, 01/24/25 and returning Monday, 02/03/25.

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Tuesday, January 21, 2025 7:38 AM
To: Samantha Peterson <SPeterson@CenturyWest.com>; Brandy Steffen <brandy.steffen@jla.us.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Auora master plan

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: BEACH Anthony
Sent: Tuesday, January 21, 2025 7:29 AM
To: Walter Swan <waswan@comcast.net>; brandy.steffen@jla.com
Subject: RE: Auora master plan

Hi Walt, thank you for your input, I've forwarded it to the master plan team and it will be included in the public record.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Walter Swan <waswan@comcast.net>
Sent: Sunday, January 19, 2025 10:47 AM
To: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; brandy.steffen@jla.com
Subject: Auora master plan

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Mr Beach, Ms Steffen;
I am an interested party and a member of Columbia Aviation Association and have same concerns as many people about the Aurora Airport master plan being considered. I am in agreement with the letter below.
Thank you for listening.
Walt Swan

View in your browser

Regarding the Aurora Airport - Current Refined Preferred Alternative

Dear Tony,

Thank you for considering us airport users' and property owners (as Columbia Aviation Association members) input and for the significant improvements in the current plan over the previous.

Please consider highlighting the importance of maintaining the septic systems and their leases, these are owned by airport tenants and located on airport property as we feel these are a critical piece of the airport infrastructure and represent major investments.

We ask that you include the 1.1 acre ODAV property purchase of the ramp space currently adjoining the south end of main UAO ramp (south of the tower) in your "priority purchase" list as this will significantly improve access to CAA as well as Pacific Coast Avionics, the main public ramp, all the mid-field hangars and Aurora Flight trainings ramp. This notable ramp and taxi-lane improvement will increase safety and flow much like the prior plan considered via a parallel taxiway and road but without displacing any hangars or the huge cost.

Thank you again for listening and your recent improvements to the plan.

y.

Outlook

Re: Reminder - Submit comments on Refined Preferred Alternative by 01/21/25

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Thu 2025-01-16 3:49 PM
To David Waggoner <willametteaviation@icloud.com>
Cc BEACH Anthony <Anthony.BEACH@odav.oregon.gov>

1 attachment (6 MB)
A1 Hot Spot for Master Plan.pdf;

Thanks for your email David. I received the attachment and will pass this along to the rest of the team.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner
She/Her » Why pronouns matter
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com

From: David Waggoner <willametteaviation@icloud.com>
Sent: Thursday, January 16, 2025 2:24 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: Re: Reminder - Submit comments on Refined Preferred Alternative by 01/21/25

Brandy,

I noticed an omission dealing with Hot Spot 1 at the airport. Please see my attached comment.

Let me know if you have any question. Please confirm you received the attachment.

Thank you,

David Waggoner

Willamette Aviation Service
23115 Airport Rd NE
Aurora OR 97002

Direct: 503-680-3597
Office: 503-678-2252
dave@willametteair.com

On Jan 14, 2025, at 4:00 PM, Brandy Steffen <brandy.steffen@jla.us.com> wrote:

Hello PAC members,

Thank you to those of you who have already submitted comments on the refined preferred alternative. If you haven't done so already, please email your comments to me by Tuesday, January 21 (a week from today).

Thank you,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner

From: Brandy Steffen
Sent: Tuesday, January 7, 2025 1:22 PM
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Aurora Airport - Refined Preferred Alternative comments by 01/21/25

Good afternoon PAC members,

Thank you for attending PAC Meeting #8 and submitting your feedback on the Preferred Alternative. ODAV and the Planning Team has reviewed all feedback received and has made the following key refinements:

- Removed the proposed parallel taxilane.
- Removed the proposed vehicle service road that would require additional property acquisition.
- Depicted the priority property acquisition as the property required to meet FAA standards, based on the existing and future runway configuration. Reserve property acquisition is depicted in the event of a future willing seller and for the purpose of FAA grant funding eligibility.

The Refined Preferred Alternative maintains the improvements needed to comply with RSA, TSA, and ROFA standards. Please review the Refined Preferred Alternative Summary including the Refined Preferred Alternative figures for additional detail on the project website: https://publicproject.net/auroraairport# (on the "Resources & Documents" Page).

Please submit any comments on the Refined Preferred Alternative no later than Tuesday, January 21, 2025.

Thank you,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
brandy.steffen@jla.us.com » Office 503-235-5881 » jla.us.com

Tri-Prop, LLC
Opening Doors for the General Aviation Community

23115 Airport Rd NE #6
Aurora, OR 97002
503-678-3343
tri.prop3@gmail.com

January 16th, 2025

RE: A1 Hot Spot Mitigation

Brandy Steffen,

The Refined Preferred Alternatives does not reflect the modifications required to mitigate Hot Spot A1 at the Aurora Airport. Although the Hot Spot will be removed when the runway is extended, that may be years in the future. It is my understanding the mitigation plan must be reflected in the Master Plan before it can be included on the Airport Layout Plan and approved.

Attached is the plan to eliminate Hot Spot 1 submitted to the ODAV and FAA on June 9th, 2023. You will note that mitigation plan suggests a one -way in and one-way taxiway lane between Taxiway A and the TTF taxilane. This will eliminate traffic congestion around A1.

Both Tony Beach from ODAV and George Buley, the Northwest Mountain Region, Runway Safety Program Manager have included in the development of this recommendation. The Hot Spot and a proposed change to Taxiway A have been discussed earlier in the Master Planning process.

I recommend the A1 Hot Spot mitigation be included in the Master Plan.

Thank you,

David & Richard Waggoner
Tri-Prop, LLC
Opening Doors for the General Aviation Community
503-678-3343 – Office
503-680-3597 – Direct

Attachments:

FAA 7460-1 dtd 9 Jun 23 - A1 HS
Extracts;
Facility Goals and Requirements, Taxiways and Taxilanes, Chapter 4
Preliminary Alternatives Summary, Landside Alternatives Introduction
Figure 11: Remove Direct Access - North End

Federal Regulations (14 CFR), part 77 authorizes FAA to collect this information. PURPOSE(S): FAA will use the information provided to administer the Aeronautical Study Process. ROUTINE USE(S): In accordance with DOT's system of records notice, DOT/ALL 16 Mailing Management System and DOT/FAA 826 Petitions for Exemption, Other than Medical Exemption-Public Dockets, the information provided may be disclosed to officials within the Federal government and the public in general.

Please Type or Print on This Form

Form Approved OMB No.2120-0001
Expiration Date: 05/31/2026

Failure To Provide All Requested Information May Delay Processing of Your Notice

U.S. Department of Transportation
Federal Aviation Administration

Notice of Proposed Construction or Alteration

FOR FAA USE ONLY
Aeronautical Study Number

1. Sponsor *(person, company, etc. proposing this action):*
Attn. of
Name: Tri-Prop, LLC
Address: 23115 Airport Rd. NE #6
City: Aurora State: OR Zip: 97002
Telephone: 503-678-3343 Fax:

2. Sponsor's Representative *(if other than #1):*
Attn. of
Name: David Waggoner
Address: 23115 Airport Rd. NE #6
City: Aurora State: OR Zip: 97002
Telephone: 503-680-3597 Fax:

3. Notice of: ☐ New Construction ☑ Alteration ☐ Existing

4. Duration: ☐ Permanent ☐ Temporary (___ months, ____ days)

5. Work Schedule: Beginning Pending End

6. Type: ☐ Antenna Tower ☐ Crane ☐ Building ☐ Power Line ☐ Landfill ☐ Water Tank ☑ Other Ramp

7. Marking/Painting and/or Lighting Preferred:
☐ Red Lights and Paint ☐ Dual - Red and Medium Intensity
☐ White-Medium Intensity ☐ Dual - Red and high Intensity
☐ White -High Intensity ☑ Other No preference

8. FCC Antenna Structure Registration Number *(if applicable):*

9. Latitude: 45 ° 15 ' 15 . 53 "
10. Longitude: 122 ° 46 ' 2 . 53 "
11. Datum: ☑ NAD 83 ☐ NAD 27 ☐ Other
12. Nearest: City: Aurora State OR
13. Nearest *Public-use* *(not private-use)* or Military Airport or Heliport:
Aurora State Airport (KUAO)
14. Distance from #13. to Structure: 340'
15. Direction from #13. to Structure:
16. Site Elevation *(AMSL)*: 196' ft.
17. Total Structure Height *(AGL)*: 0' ft.
18. Overall Height (#16 + #17) *(AMSL)*: 196' ft.
19. Previous FAA Aeronautical Study Number *(if applicable)*: -OE
20. Description of Location: *(Attach a USGS 7.5 minute Quadrangle Map with the precise site marked and any certified survey)*

21. Complete Description of Proposal:
Add additional paving for a taxi lane to eliminate ground vehicle & aircraft conflicts to access Taxiway A at the Aurora Airport, allowing the completion of the internal circulation road outside the airport Movement Area.

See attachment

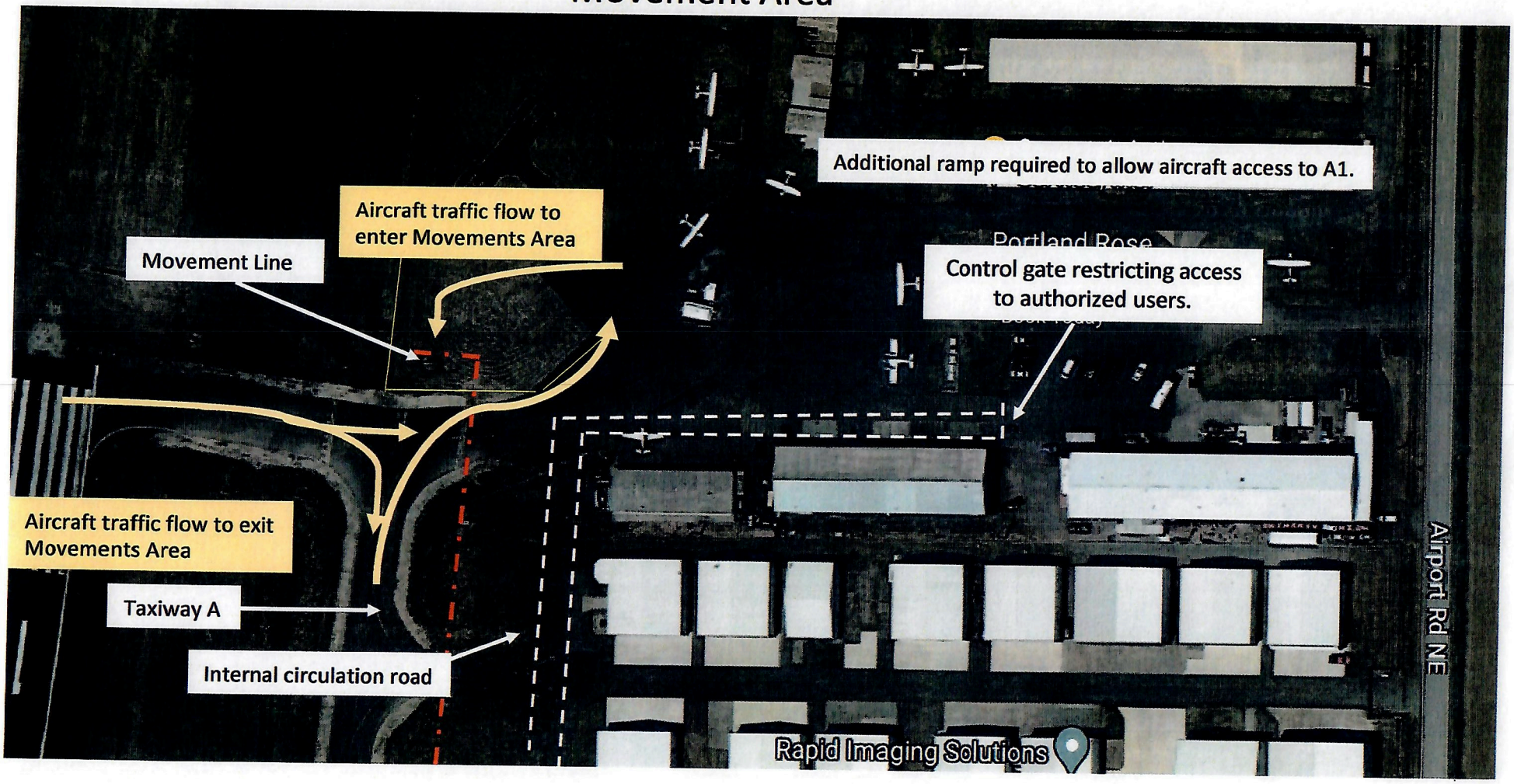
Frequency/Power (kW)	

Notice is required by 14 Code of Federal Regulations, part 77 pursuant to 49 U.S.C., Section 44718. Persons who knowingly and willingly violate the notice requirements of part 77 are subject to a civil penalty of $1,000 per day until the notice is received, pursuant to 49 U.S.C., Section 46301(a)

I hereby certify that all of the above statements made by me are true, complete, and correct to the best of my knowledge. In addition, I agree to mark and/or light the structure in accordance with established marking & lighting standards as necessary.

Date	Typed or Printed Name and Title of Person Filing Notice	Signature
June 9th, 2023	David Waggoner	

Proposed Taxilane and Internal circulation road with proper setback and aircraft flow to and from the Movement Area



Attachment item 21, FAA 7460-1 dtd 06/09/2023

Extract –

Facility Goals and Requirements, Taxiways and Taxilanes, Chapter 4

Two FAA-designated hot spots exist on the Aurora State Airport taxiway system. A hot spot is a location on an airport movement area with a history or potential risk of collision or runway incursion, and where heightened attention by pilots and drivers is necessary. The hot spots and other locations on the Taxiway A system that warrant further consideration are summarized below:

Hot Spot #1 is located at Taxiway A and A1. Based on previous discussions with FAA, it is understood that this hot spot will be removed from the designation list if proper marking and signage is installed. Airport management reports that the appropriate pavement markings have been updated and the signage will be addressed in a future project. Further discussion with FAA will be required to remove the designation from the FAA Hot Spots List database.

Extract -

Preliminary Alternatives Summary, Landside Alternatives Introduction Figure 11: Remove Direct Access - North End

FIGURE 11: REMOVE DIRECT ACCESS - NORTH END

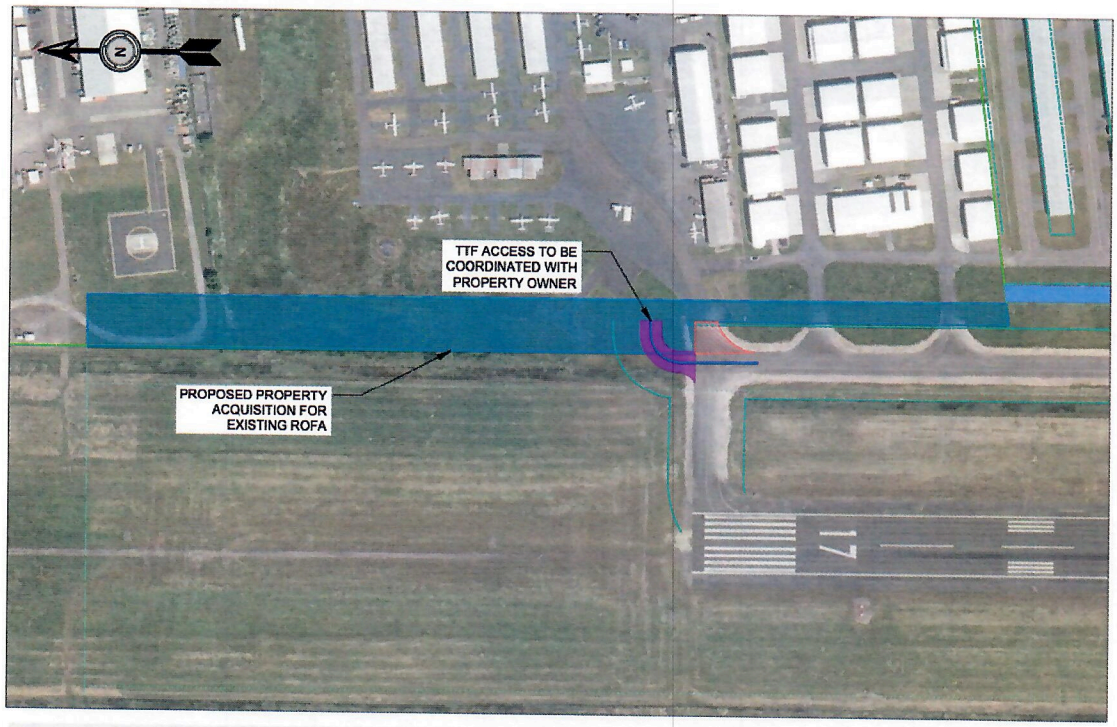


Figure 11 depicts a proposed reconfiguration of the existing TTF taxilane connection to Taxiway A1. The change in configuration would create a new taxi route between the adjacent apron and the runway, including a 90-degree turn to access Taxiway A and a second 90-degree turn to access Taxiway A1. This would eliminate the direct aircraft access configuration on Taxiway A1. The proposed changes require a new taxiway section and coordination with the adjacent private property owner. It is noted that a portion of this private property is also located in the ROFA for the existing Runway 17/35, which is recommended for property acquisition to meet FAA standards.

Outlook

Re: Reminder - PAC Meeting 9 is next Tuesday

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Wed 2025-02-05 10:22 AM
To Michael Weimer <MWeimer@lifeflight.org>
Cc Ben Clayton <bclayton@lifeflight.org>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>

Hi Michael,

Thanks for reaching out. You are listed as an alternate and Ben is the primary PAC member. We ask that only one member/alternate participates in the meeting discussions but both are welcome to attend the meeting (the alternate would just participate via the "attendee" or public section).

I also sometimes get delivery delay messages for your email, so please let me know if you are NOT receiving the PAC emails.

Please let me know if you have any other questions.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: Michael Weimer <MWeimer@lifeflight.org>
Sent: Tuesday, February 4, 2025 1:23 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>
Subject: RE: Reminder - PAC Meeting 9 is next Tuesday

Hi Brandy,

I am not sure if I am an official PAC member or not. Can you please clarify? If so, I have not received a Zoom invite.

Michael Weimer | Chief Operating Officer
Office 503.678.4364 | Mobile 208.258.4323 | Fax 503.678.4369
Life Flight Network | 1550 South Tech Lane | Suite 105 | Meridian, ID 83642

LIFE FLIGHT NETWORK™

From: Brandy Steffen <brandy.steffen@jla.us.com>
Sent: Tuesday, February 4, 2025 9:00 AM

Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: Reminder - PAC Meeting 9 is next Tuesday

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Hello PAC members,

We are looking forward to seeing you at **next week's meeting (VIRTUAL) on Tuesday, February 11, 2025 from 5:00-8:00 p.m.** when we'll review and discuss the refined preferred alternative, the Airport Layout Plan (ALP), and Capital Improvement Plan (CIP) for the Airport Master Plan project.

Date/Time: Tuesday, February 11, 2025 from 5:00-8:00 p.m.
Location: Zoom

- PAC members have been registered via Zoom and will get an email directly from Zoom with the login information (please check your junk folder). Please do not forward this email to anyone.
- Others can join using the link on the website: https://publicproject.net/AuroraAirport (on the "meetings" page)

Materials: The agenda is attached and posted to the website.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner

From: Brandy Steffen
Sent: Friday, January 10, 2025 4:56 PM
Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: PAC Meeting 9 scheduled for Tuesday, Feb. 11, 2025

Hello PAC members,

We are looking forward to seeing you at the **next meeting (VIRTUAL) on Tuesday, February 11, 2025 from 5:00-8:00 p.m.** when we'll review and discuss the refined preferred alternative, the Airport Layout Plan (ALP), and Capital
Improvement Plan (CIP) for the Airport Master Plan project.

Thanks again for all of the comments from the last PAC meeting. As a reminder, **please submit any comments on the Refined Preferred Alternative no later than Tuesday, January 21, 2025.**

Date/Time: Tuesday, February 11, 2025 from 5:00-8:00 p.m.
Location: Zoom

- PAC members have been registered via Zoom and will get an email directly from Zoom with the login information (please check your junk folder). Please do not forward this email to anyone.
- Others can join using the link on the website: https://publicproject.net/AuroraAirport (on the "meetings" page)

Materials: The agenda will be posted to the website once it is finalized.

Thanks,
BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Senior Program Manager + Partner

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Outlook

Fw: Communication re: Aurora Airport Master Plan Adoption and Compatibility Process

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-02-25 8:53 AM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

2 attachments (16 MB)
Friends of French Prairie v. Dept of Aviation.pdf; p17027coll5_29140.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Sent: Monday, February 24, 2025 4:58 PM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>; BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Communication re: Aurora Airport Master Plan Adoption and Compatibility Process

Hello,

Good afternoon. Please include within the UAO master plan record.

ALEX THOMAS
OREGON DEPARTMENT OF AVIATION (ODAV)
POLICY, PLANNING, & PROGRAMS MANAGER

CELL 971-375-2357
EMAIL Alex.R.Thomas@ODAV.Oregon.Gov
SALEM, OR 97302
WWW.OREGON.GOV/AVIATION

Schedule a meeting with me.

Schedule a meeting with any of the programs listed below.

Alternative Contacts:
COAR Grants: Grants@ODAV.Oregon.Gov
Procurement / Contracts: Contracts@ODAV.Oregon.Gov
Pavement (PEP/PMP): Pavement@ODAV.Oregon.Gov
Land Use / Tall Structure: LandUse@ODAV.Oregon.Gov

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From: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Date: Friday, February 21, 2025 at 17:17
To: House Timothy <Timothy.A.House@faa.gov>, WYTOSKI Beth * GOV <Beth.Wytoski@oregon.gov>, AHRENS Melissa * DLCD <Melissa.Ahrens@dlcd.oregon.gov>, Doyle, Peter (FAA) <peter.doyle@faa.gov>, PARADA Angela G * DAS <Angela.G.Parada@das.oregon.gov>, BROOKS Kelly S * GOV <Kelly.S.BROOKS@oregon.gov>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>, BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Subject: FW: Communication re: Aurora Airport Master Plan Adoption and Compatibility Process

Folks-

Since you weren't cc'ed on this email. I am passing this along for transparency purposes. Also note that all of this will be uploaded to the project website for transparency as well.

Kelly- this just popped up so if anything, this would be an update.

TY!

From: Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>
Date: Friday, February 21, 2025 at 4:59 PM
To: fofp99@gmail.com <fofp99@gmail.com>
Cc: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>, Cathryn.E.Stephens@ci.eugene.or.us <cathryn.e.stephens@ci.eugene.or.us>, Anderson Becki L <Becki.L.Anderson@doj.oregon.gov>, Scruggs Rebecca <rebecca.scruggs@doj.oregon.gov>
Subject: FW: Communication re: Aurora Airport Master Plan Adoption and Compatibility Process

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Dear Mr. Williams,
Director Sugahara forwarded your emails to me to assist in providing a response. As the Director stated, your emails will be made part of the Aurora Master Plan decision record to preserve your statements and to ensure that any member of the public will have access to all of the comments and testimony provided as part of the planning process.

As to your comment below, it appears that you are not asking a question. But, instead stating your interpretation of ODAV and the Board's legal obligations with respect to the process for making a final land use decision, including the final adoption of a master plan and the issuance of the state agency coordination findings supporting that plan. As Dir. Sugahara responded to you below, the Board and ODAV will follow the appropriate process for taking these final actions. I invite you to review ORS 197.180, ORS 836.025, OAR 660, division 30 and OAR 738, division 130 if you have any further questions about the laws that apply to the Board and ODAV's land use planning authority and duties.

I would also like to take this opportunity to correct you on a statement that you made during the last PAC meeting and that you continue to make publicly that the Court of Appeals held that the 2012 Master Plan was never adopted. That is not correct and none of the three tribunals (LUBA, the Court of Appeals or the Marion County Circuit Court) have issued any order or judgment finding that that the 2012 Master Plan was, or was not, adopted. I have attached for your convenience the final judgments by the Court of Appeals in 2021 when it was asked to review LUBA's affirmation of the Board's 2019 State Agency

Coordination Findings, and the 2023 Judgment affirming the Marion County Circuit Court's dismissal of the petitions for judicial review of the 2019 SAC Findings. As I believe you are aware, the Court of Appeals in its 2012 decision found that it was unable to determine whether LUBA's was decision was correct because the record before LUBA was not complete. On that basis, it remanded the matter back to LUBA. LUBA in turn remanded the matter back to the Board, at its request. The effect of this remand, as stated in the 2023 attached judgment, was to render the **2019 SAC Decision** ineffective. No decision was entered or made as to the validity of the 2012 Master Plan. I ask that you please review your files which should include the briefing, orders and judgments in the LUBA matter, the circuit court matter and the two court of appeals cases and refrain from misstating the ultimate holdings in these cases.

I hope that this email addresses your comments below and any additional questions you may regarding the 2012

Stacy C. Posegate
Sr. Asst. Atty General | Transportation and Infrastructure| General Counsel Division
971-718-7950
GG1296-22

From: Ben Williams <fofp99@gmail.com>
Date: Friday, February 21, 2025 at 11:02 AM
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Cc: STEPHENS Cathryn E <CStephens@eugene-or.gov>, House Timothy <Timothy.A.House@faa.gov>, Doyle, Peter (FAA) <peter.doyle@faa.gov>, WARNER Chris * GOV <Chris.WARNER@oregon.gov>, WYTOSKI Beth * GOV <Beth.Wytoski@oregon.gov>, AHRENS Melissa * DLCD <Melissa.Ahrens@dlcd.oregon.gov>, Austin Barnes <abarnes@co.marion.or.us>, Guile-Hinman, Amanda <guile@ci.wilsonville.or.us>, Joseph Schaefer (jschaefer@ci.aurora.or.us) <jschaefer@ci.aurora.or.us>, mk@friends.org <mk@friends.org>
Subject: Re: Communication re: Aurora Airport Master Plan Adoption and Compatibility Process

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Kenji;

Thank you for the prompt response to my last email concerning the approval and adoption process for the Aurora Airport Master Plan. However, the response that my letter will be added to the record does not actually address the inquiry. To clarify, the question I asked is whether ODAV will confirm that the Oregon Aviation Board will adopt the master plan with land use findings pursuant to OAR 738-130-0055(6), and any appeals of that adoption will be completed, prior to ODAV or the OAB signing the Airport Layout Plan and prior to confirming to the FAA that the master plan is consistent with local land use and zoning pursuant to grant assurance number 6.

Please answer yes or no, and include the answer in the record.

Further, to Mr. House:

Will the FAA confirm that it will not sign the Airport Layout Plan or conclude that grant assurance number 6 is satisfied until the Oregon Aviation Board has adopted the master plan with land use findings pursuant to OAR 738-130-0055(6) and successfully resolved any appeals thereof under Oregon law?

Please answer yes or no, and include the answer in the record.

Sincerely

Ben Williams

Friends of French Prairie

On Tue, Feb 18, 2025 at 8:43 AM SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov> wrote:

> Mr. Williams,
>
> Thank you very much. Your letter will be added to the ongoing master plan record and both the Department and the Board intend that any final decision made with respect to the master plan, including state agency coordination findings supporting that plan, will be made in accordance with the applicable state and federal law.
>
> Sincerely,
>
> **KENJI SUGAHARA**
> **OREGON DEPARTMENT OF AVIATION**
> DIRECTOR
>
> **OFFICE** 503-378-2340
>
> **EMAIL** kenji.sugahara@odav.oregon.gov
>
> **3040 25TH STREET SE, SALEM, OR 97302**
>
> **WWW.OREGON.GOV/AVIATION**
>
> *****CONFIDENTIALITY NOTICE*****
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>
> ---
>
> **From:** Ben Williams <fofp99@gmail.com>
> **Sent:** Monday, February 17, 2025 11:04 AM
> **To:** STEPHENS Cathryn E <CStephens@eugene-or.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
> **Cc:** House Timothy <Timothy.A.House@faa.gov>; Doyle, Peter (FAA) <peter.doyle@faa.gov>; WARNER Chris * GOV <Chris.WARNER@oregon.gov>; WYTOSKI Beth * GOV <Beth.Wytoski@oregon.gov>; AHRENS Melissa * DLCD <Melissa.Ahrens@dlcd.oregon.gov>; Austin Barnes <abarnes@co.marion.or.us>; Guile-Hinman, Amanda <guile@ci.wilsonville.or.us>; Joseph Schaefer (jschaefer@ci.aurora.or.us) <jschaefer@ci.aurora.or.us>; mk@friends.org
> **Subject:** Communication re: Aurora Airport Master Plan Adoption and Compatibility Process
>
> This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.
>
> Chair Stephens and Director Sugahara;
>
> Please see the attached letter regarding the approval and adoption process for the Aurora Airport Master Plan in addition to the process for compliance with local comprehensive plans and statewide planning goals.
>
> The intent is to clarify confusion resulting from what the PAC and Aviation Board have been told versus the statutory requirements that apply.
>
> Sincerely

--
Ben Williams
Friends of French Prairie
fofp99@gmail.com

--
Ben Williams
Friends of French Prairie
fofp99@gmail.com

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****
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****

This is a nonprecedential memorandum opinion pursuant to ORAP 10.30 and may not be cited except as provided in ORAP 10.30(1).

IN THE COURT OF APPEALS OF THE
STATE OF OREGON

FRIENDS OF FRENCH PRAIRIE
and 1000 Friends of Oregon,
Petitioners-Appellants
Cross-Respondents,

v.

DEPARTMENT OF AVIATION
and State Aviation Board,
Respondents-Respondents,

and

AURORA AIRPORT IMPROVEMENT ASSOCIATION
and Bruce Bennett,
Proposed Intervenor-Respondents,
Cross-Appellants.

Marion County Circuit Court
19CV56274; A179634 (Control)

CITY OF AURORA,
Petitioner-Appellant,
Cross-Respondent,

v.

OREGON DEPARTMENT OF AVIATION
and Oregon State Aviation Board,
Respondents-Respondents,

and

AURORA AIRPORT IMPROVEMENT ASSOCIATION
and Bruce Bennett,
Proposed Intervenor-Respondents,
Cross-Appellants.

Marion County Circuit Court
19CV55909; A179649

Joseph SCHAEFER,
Petitioner-Appellant,
Cross-Respondent,
v.
OREGON DEPARTMENT OF AVIATION
and Oregon State Aviation Board,
Respondents-Respondents,
and
AURORA AIRPORT IMPROVEMENT ASSOCIATION
and Bruce Bennett,
Proposed Intervenor-Respondents,
Cross-Appellants.

Marion County Circuit Court
19CV54617; A179661

Daniel J. Wren, Judge.

Submitted August 4, 2023.

Andrew Mulkey filed the briefs for appellants-cross-respondents Friends of French Prairie and 1000 Friends of Oregon.

David James Robinson filed the brief for appellant-cross-respondent City of Aurora.

Joseph Schaefer filed the brief *pro se*.

Erick J. Haynie, David Watnick, and Perkins Coie LLP filed the briefs for cross-appellants Aurora Airport Improvement Association and Bruce Bennett.

Ellen F. Rosenblum, Attorney General, Benjamin Gutman, Solicitor General, and Jona J. Maukonen, Assistant Attorney General, filed the brief for respondents Oregon Department of Aviation and Oregon State Aviation Board.

Amanda Guile-Hinman filed the brief *amicus curiae* for City of Wilsonville.

Before Tookey, Presiding Judge, Egan, Judge, and Kamins, Judge.

TOOKEY, P. J.

Remanded with instructions to modify judgment to dismiss petitions for judicial review without prejudice; otherwise affirmed.

TOOKEY, P. J.

In this consolidated appeal from a judgment dismissing three petitions for judicial review as moot, petitioners assert a combined 12 assignments of error. The petitions for judicial review sought review of an October 31, 2019, decision (the 2019 Order)[1] of the Oregon Aviation Board (OAB) under ORS 183.484, which provides for judicial review of orders in other than contested cases. Petitioners' cases in the trial court were stayed during the pendency of an appeal by the same parties to LUBA of the 2019 Order.

LUBA ultimately remanded the 2019 Order to OAB. In its opinion remanding the 2019 Order, LUBA, consistent with its precedent, concluded that "after remand, the challenged decision is ineffective." No party sought judicial review of that decision by LUBA. The trial court then dismissed the petitions for judicial review of the 2019 Order as moot with prejudice.

Now, on appeal from the trial court's judgment dismissing the petitions for judicial review as moot with prejudice, petitioners Friends of French Prairie and 1000 Friends of Oregon (Friends) assert three assignments of error; petitioner City of Aurora asserts five assignments of error; and petitioner Joseph Schaefer asserts four assignments of error.[2] We remand with instructions to dismiss the petitions for judicial review without prejudice and otherwise affirm.

Friends' First Assignment of Error, Aurora's Fourth Assignment of Error, and Schaefer's Third Assignment of Error. In their first assignment of error, Friends, relying on *Kalmiopsis Audubon Soc'y v. Div. of State Lands*, 66 Or App 810, 812, 676 P2d 885 (1984), assert that the trial court erred because "as a matter of law, LUBA's remand did not deprive the court of its ability to review respondents' 2019 Order." As Friends see it, both LUBA and the circuit court had jurisdiction to review the 2019 Order, with LUBA's "scope of

[1] As we explained in *Schaefer v. Oregon Aviation Board*, 312 Or App 316, 318, 495 P3d 1267, *adh'd to as modified on recons*, 313 Or App 725, 492 P3d 782, *rev den*, 369 Or 69 (2021), the 2019 Order adopted findings of "land use compatibility to bring [OAB's] adoption of [a] Master Plan [for the Aurora State Airport] into compliance with ORS 197.180 and an implementing rule, OAR 738-130-0055(6)."

[2] Additionally, the City of Wilsonville has filed an *amicus curiae* brief in support of petitioners.

review over state agency land use decisions *** limited to determining whether 'the state agency made a decision that violated the goals'" (quoting ORS 197.835(9)(b)) and with the circuit court's scope of review to include "review [of] appellant's non-goal-related claims." Friends acknowledge that, as a result of LUBA's remand, OAB could "no longer rely on the 2019 order," but contend that that "did not deprive the circuit court of its ability to complete its independent and parallel review."

Examining "mootness is one part of the broader question of whether a justiciable controversy exists." *Couey v. Atkins*, 357 Or 460, 470, 355 P3d 866 (2015) (internal quotation marks omitted). Generally speaking, a justiciable controversy exists under Oregon law "when the interests of the parties to the action are adverse" and "the court's decision in the matter will have some practical effect on the rights of the parties to the controversy." *Barcik v. Kubiaczyk*, 321 Or 174, 182, 895 P2d 765 (1995) (internal quotation marks omitted). An otherwise justiciable case "becomes moot when a court's decision will no longer have a practical effect on the rights of the parties." *State v. K. J. B.*, 362 Or 777, 785, 416 P3d 291 (2018). "[W]e review for legal error a trial court's ruling on a motion to dismiss on mootness grounds." *Birchall v. Miller*, 314 Or App 521, 522, 497 P3d 1268 (2021).

Assuming without deciding that both LUBA and the trial court had jurisdiction to review the 2019 Order, as Friends contend, we conclude that the trial court did not err in concluding that the petitions for judicial review of the 2019 Order had become moot. The 2019 Order was remanded to OAB by LUBA, and by operation of LUBA's remand, it had become ineffective. *See Eastern Oregon Mining Association v. DEQ*, 360 Or 10, 16, 376 P3d 288 (2016) (explaining that, "[u]nder the Administrative Procedure Act, a challenge to an order in other than contested case entitles a court to 'affirm, reverse, or remand *the order*' that is the subject of the challenge," and if "there is no longer any order in effect for a court to affirm, reverse, or remand" then the case has no practical effect and is moot (quoting ORS 183.484(5)(a); emphasis in *Eastern Oregon Mining Association*)). Our decision in *Kalmiopsis Audubon Soc'y*, which held that "the

legislature did not intend to divest this court of jurisdiction over appeals taken pursuant to ORS 183.480 and 183.482 claiming [Administrative Procedures Act] violations, even when the agency decision comes within the definition of a land use decision," 66 Or App at 815, does not alter that conclusion regarding mootness. In other words, *Kalmiopsis Audubon Soc'y* did not conclude that when an administrative agency remands of an order a parallel review of that order by the circuit court is not moot.

Further, in Friends' first assignment of error, as well as in Aurora's fourth assignment of error, and in Schaefer's third assignment of error,[3] petitioners raise various contentions of error under ORS 183.484(4)[4] regarding OAB "withdrawing" the 2019 Order. ORS 183.484(4) specifies circumstances under which an agency may withdraw an order for reconsideration subsequent to the filing of a petition for review.

The difficulty with petitioner's arguments is that, although the trial court used the word "withdrawal" in its ruling, OAB did not withdraw the 2019 Order "for purposes of reconsideration" within the meaning of ORS 183.484(4), nor did the trial court find that it did. Rather, after our remand to LUBA, LUBA remanded the 2019 Order to OAB, and the trial court determined that LUBA's remand rendered the petitions for judicial review moot. Thus, contrary to respondents' arguments, the mandates of ORS 183.484(4) are inapplicable with regard to the agency order and the trial court's ruling in this case.

Friends' Second Assignment of Error and Schaefer's Fourth Assignment of Error. These assignments of error concern the trial court's determination that ORS 14.175[5] did

[3] Another aspect of Schaefer's third assignment of error is discussed below.

[4] ORS 183.484(4) provides:

"At any time subsequent to the filing of the petition for review and prior to the date set for hearing, the agency may withdraw its order for purposes of reconsideration. If an agency withdraws an order for purposes of reconsideration, it shall, within such time as the court may allow, affirm, modify or reverse its order."

[5] ORS 14.175 provides:

"In any action in which a party alleges that an act, policy or practice of a public body, as defined in ORS 174.109, or of any officer, employee or agent of

not apply to petitioners' claims. Specifically, Friends' second assignment of error asserts that "the circuit court erred when it declined to review the case under ORS 14.175," because, in cases like this one, where there is a challenge to an administrative agency decision that involves both "goal related and non-goal related assignments of error" and which is appealed to both LUBA and the circuit court, given "LUBA's statutory deadlines for review and expedited timelines for review at the Court of Appeals, a LUBA proceeding will likely proceed much faster than the circuit court." Thus, as Friends see it, the nongoal related claims in the circuit court will evade review.

Schaefer's fourth assignment of error asserts that "the dismissal with prejudice means the APA claims will evade future judicial review, and therefore the circuit court erred in concluding the ORS 14.175 exception to mootness does not apply." That is so, in Schaefer's view, because dismissal with prejudice prevents the trial court from considering a future challenge to "the 2012 Master Plan," and because OAB "is not obligated to act on LUBA's remand."

The trial court determined that the exception to mootness set forth at ORS 14.175 did not apply, because the "challenged policy or practice, or similar acts," were not "likely to evade judicial review in the future." ORS 14.175(3). Reviewing for legal error, *Progressive Party of Oregon v. Atkins*, 276 Or App 700, 706-07, 370 P3d 506, *rev den*, 360 Or 697 (2016), we conclude that the trial court did not err.

In this case, petitioners obtained judicial review of the challenged the 2019 Order in *Schaefer v. Oregon Aviation Board*, 312 Or App 316, 495 P3d 1267, *adh'd to as modified on recons*, 313 Or App 725, 492 P3d 782, *rev den*,

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a public body, as defined in ORS 174.109, is unconstitutional or is otherwise contrary to law, the party may continue to prosecute the action and the court may issue a judgment on the validity of the challenged act, policy or practice even though the specific act, policy or practice giving rise to the action no longer has a practical effect on the party if the court determines that:

"(1) The party had standing to commence the action;

"(2) The act challenged by the party is capable of repetition, or the policy or practice challenged by the party continues in effect; and

"(3) The challenged policy or practice, or similar acts, are likely to evade judicial review in the future."

369 Or 69 (2021), after an appeal from LUBA. As a result of that review, we remanded back to LUBA, and LUBA then remanded back to OAB, rendering the 2019 Order ineffective. Thus, petitioners prevailed on their challenge to the 2019 Order, after obtaining judicial review of that order.

Although Friends may be correct that LUBA proceedings generally move more quickly than judicial review under ORS 183.484, and assuming without deciding that, as Friends asserts, both LUBA and the circuit court have jurisdiction to review different aspects of certain state agency decisions, we are not persuaded that LUBA completing its review prior to the circuit court means an issue is "likely to evade judicial review." Further, regarding Schaefer's argument concerning dismissal with prejudice, as explained below, we conclude the trial court erred in that regard and we remand with instructions to dismiss without prejudice.

Schaefer's and Aurora's First Assignments of Error and Friends' Third Assignment of Error. The trial court's order dismissing the petitions for judicial review as moot contained the following statement: "This dismissal neither makes nor implies any findings or conclusions as to the final agency order dated October 31, 2019, or to the 2011 Aurora Airport Master Plan referenced therein."

In his first assignment of error, Schaefer contends that the trial court "inconsistently and therefore erroneously ruled that dismissal for lack of a final agency order 'neither makes nor implies any findings or conclusions as to the final agency order dated October 31, 2019, or to the 2011 Aurora Airport Master Plan referenced therein.'" In Aurora's first assignment of error, it joins Schaefer's first assignment of error. In Friends' third assignment of error, they contend that "the circuit court's order is internally inconsistent, and its conclusion that its dismissal for lack of a final decision does not make or imply any findings or conclusions about the 2019 order or the airport master plan referenced therein ultimately undermines its conclusion that the case is moot."

We are not persuaded by petitioners' arguments. We understand the trial court's statement regarding its findings and conclusions to mean that its decision dismissing

the action as moot should not be read as making any determinations as to the merits of petitioners' claims, and merely reflecting that, in view of the 2019 Order being remanded, the cases were moot. Having determined that the cases were moot, the trial court did not err in declining to reach the merits of petitioners' claims. *City of Damascus v. State of Oregon*, 367 Or 41, 68 n 13, 472 P3d 741 (2020) ("[T]here are prudential and jurisprudential reasons to avoid unnecessarily deciding legal issues that may be presented in a case, if the case can be appropriately resolved on more limited grounds.").

Schaefer's Second Assignment of Error and Aurora's Second and Third Assignments of Error. In Schaefer's second assignment of error, which is joined by Aurora in its second assignment of error, they contend that "[w]hether the Final Agency Order in 2019 is a separate proceeding from the 2012 Master Plan is a precluded issue that the Court of Appeals already decided."[6] They assert that the trial court improperly "segregate[d]" the "2012 Master Plan *** from the Final Agency Order adopted in 2019 into two separate proceedings."

In Aurora's third assignment of error, it contends that the "circuit court erred in treating the 2012 Airport Master Plan as separate from the 2019 Final Agency Order because that plan was only a preliminary agency decision that preceded final agency action under ORS 183.310(6)(b)."[7] Aurora contends that "the 2012 Aurora Airport Master

---

[6] Petitioners' "preclusion" argument relies on our opinion in *Schaefer*, 312 Or App 316. In that case, we concluded, among other legal points, that "the version of the master plan that the [OAB] approved on October 27, 2011, along with any other materials that the board considered at that meeting, had to be part of the record before LUBA" in petitioners' appeal to LUBA of the 2019 Order. *Id.* at 326. We explained that that was so because the 2019 Order was "an effort to comply with OAR 738-130-0055(6), which provides that '[t]he Aviation Board shall adopt findings of [land-use] compatibility *** *when it adopts the final facility plan*,'" and, under that rule, "the board's adoption of a final facility plan and its land-use compatibility findings are two parts of the same proceeding." *Id.* at 325 (brackets, omission, and emphasis in *Schaefer*).

[7] ORS 183.310(6)(b) provides:

> "'Final order' means final agency action expressed in writing. 'Final order' does not include any tentative or preliminary agency declaration or statement that:
>
> "(A) Precedes final agency action; or

Plan was a nonfinal agency order subject to review once Respondents adopted the 2019 Final Agency Order."

In our view, the trial court did not err in the manner described in Schaefer's and Aurora's second assignments of error or Aurora's third assignment of error. Given the record, we understand the trial court's order to have recognized that the final order that provided it with jurisdiction under ORS 183.484—the 2019 Order—was ineffective and for that reason the case was moot. Regardless of whether the 2019 Order was appropriately characterized as part of the same proceeding as an earlier proceeding, petitioners' challenge to the 2019 Order had become moot.

Aurora's Fifth Assignment of Error and Schaefer's Third Assignment of Error. As noted, the trial court dismissed the petitions for judicial review with prejudice. In its fifth assignment of error, Aurora contends that that was error. Additionally, in its argument in its third assignment of error, Schaefer contends that that was error. We conclude that although the trial court did not err in dismissing the petitions as moot, they should have been dismissed without prejudice. *See, e.g.*, *Arnold v. Kotek*, 370 Or 716, 719, 524 P3d 955 (2023) (dismissing motion for stay as moot, but doing so "without prejudice").[8]

Consequently, we remand with instructions to modify the judgment to dismiss the petitions for judicial review without prejudice, and we otherwise affirm.[9]

"(B) Does not preclude further agency consideration of the subject matter of the statement or declaration."

[8] Citing ORAP 10.30(2)(b), Aurora and Schaefer request that we publish a precedential decision in resolving this appeal. Having considered the factors in ORAP 10.30(2)(b), we conclude a nonprecedential decision is appropriate.

Further, to the extent petitioners have raised arguments that we have not specifically addressed in this opinion, we reject them.

[9] We note that cross-appellants, the Aurora Airport Improvement Association and Bruce Bennett, have filed a "conditional cross appeal," in which they ask that, if we determine that petitioners' petitions for review are not moot, we reverse the trial court's "apparent determination that it otherwise had subject matter jurisdiction." We need not reach that argument, because we agree with the trial court that this case is moot.

Further, cross-appellants, whose motions to intervene in the trial court were denied as moot, request that "in the event *** this Court rules in favor of Petitioner-Appellants and orders and further proceedings in the Circuit Court," we reverse "the Circuit Court's denial of their intervention motions, to ensure

Remanded with instructions to modify judgment to dismiss petitions for judicial review without prejudice; otherwise affirmed.

[their] participation in any Circuit Court proceedings upon remand." Because we agree with the trial court that this case is moot, and remand for the limited purpose of modifying the judgment to reflect that the dismissals are without prejudice, we conclude that the trial court did not err in denying the motions to intervene because they are moot.

IN THE COURT OF APPEALS OF THE
STATE OF OREGON

Joseph SCHAEFER,
City of Aurora, City of Wilsonville,
1000 Friends of Oregon, and
Friends of French Prairie,
Petitioners,
and
CLACKAMAS COUNTY,
Intervenor-Petitioner below,
v.
OREGON AVIATION BOARD;
Oregon Department of Aviation;
Aurora Airport Improvement Association;
Bruce Bennett; Wilson Construction Company, Inc.;
Ted Millar; TLM Holdings, LLC;
Anthony Alan Helbling; and
Wilsonville Chamber of Commerce,
Respondents.

Land Use Board of Appeals
2019123, 2019127, 2019129, 2019130;
A175219

Submitted March 19, 2021.

Joseph Schaefer filed the brief *pro se*.

Sara Kendrick filed the brief for petitioner City of Aurora.

Barbara A. Jacobson and J. Ryan Adams filed the brief for petitioner City of Wilsonville.

Andrew Mulkey filed the brief for petitioners 1000 Friends of Oregon and Friends of French Prairie.

Ellen F. Rosenblum, Attorney General, Benjamin Gutman, Solicitor General, and Jona J. Maukonen, Assistant Attorney General, filed the brief for respondents Oregon Aviation Board and Oregon Department of Aviation.

Eric S. Postma and Bittner & Hahs, PC; Wendie L. Kellington and Kellington Law Group, PC, filed the brief for respondents Aurora Airport Improvement Association, Bruce Bennett, Wilsonville Construction Company, Inc., Ted Millar, TLM Holdings, LLC, Anthony Alan Helbling, and Wilsonville Chamber of Commerce.

Before Armstrong, Presiding Judge, and Tookey, Judge, and Aoyagi, Judge.

ARMSTRONG, P. J.

Reversed and remanded.

ARMSTRONG, P. J.

In 2011, the Oregon Aviation Board (board) adopted a Master Plan for the Aurora State Airport. In 2019, the board belatedly adopted findings of land use compatibility to bring its adoption of the Master Plan into compliance with ORS 197.180 and an implementing rule, OAR 738-130-0055(6).[1] The board determined that the Master Plan complied with the Marion County Comprehensive Plan and that, because of that compliance, there was no need to consider whether it complied with any statewide planning goals. Alternatively, the board determined that the Master Plan complied with the goals.

Petitioners appealed to the Land Use Board of Appeals (LUBA), contending that the Master Plan that the board actually adopted in 2011 was not in the record and, in any case, that the 2012 Master Plan, which was in the record, was compatible with neither the Marion County Comprehensive Plan nor the statewide planning goals. Petitioners asserted, among other things, that the Airport Layout Plan contained in the 2012 Master Plan showed the airport development extending onto nearby land that is zoned for Exclusive Farm Use (EFU). LUBA rejected all of petitioners' challenges, concluded that the 2012 Master Plan complied with the Marion County Comprehensive Plan and that the goals did not apply, and dismissed the appeal.

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[1] ORS 197.180(1) provides as follows:

"Except as provided in ORS 197.277 or subsection (2) of this section or unless expressly exempted by another statute from any of the requirements of this section, state agencies shall carry out their planning duties, powers and responsibilities and take actions that are authorized by law with respect to programs affecting land use:

"(a) In compliance with the goals, rules implementing the goals and rules implementing this section; and

"(b) In a manner compatible with acknowledged comprehensive plans and land use regulations."

OAR 738-130-0055(6) provides as follows: "The Aviation Board shall adopt findings of compatibility with the acknowledged comprehensive plans of affected cities and counties and findings of compliance with applicable statewide planning goals when it adopts the final facility plan."

In 2011, a similar but separate rule, promulgated by the Oregon Department of Transportation, applied to the board's adoption of facility plans like the Master Plan. However, the parties have not addressed any differences between the two rules, and, accordingly, we do not address any differences.

LUBA concluded that the decision was not a land use decision because, after deciding—correctly, in LUBA's view—that the Master Plan complied with the Marion County Comprehensive Plan (MCCP), the board did not need to directly apply the goals.[2] ORS 197.015(10)(a)(B) ("Land use decision" includes "A final decision or determination of a state agency other than the commission with respect to which the agency is required to apply the goals."). Our disposition in this case makes it unnecessary for us to consider whether LUBA's construction of ORS 197.180(1) and ORS 197.015(10)(a)(B) is correct.

Petitioners seek judicial review, contending that, for a variety of reasons, LUBA's decision was unlawful in substance and procedure.[3] As we will explain, we agree with petitioners City of Aurora and City of Wilsonville that LUBA committed procedural error by denying petitioners' objection that the Master Plan approved in 2011 needed to be in the record. We also address various petitioners' contentions that LUBA's order is unlawful in substance because (1) it holds, contrary to the Master Plan document, that the Master Plan does not include airport-related development on EFU land; (2) LUBA incorrectly construed ORS 836.642 and, based on that construction, concluded that the airport expansion complies with various provisions of the MCCP and Goal 14 because any land use at the Aurora State Airport is a rural

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[2] The board relied on OAR 660-030-0065(2), which provides as follows:

> "Except as provided in section (3) of this rule, a state agency shall comply with the statewide goals by assuring that its land use program is compatible with the applicable acknowledged comprehensive plan(s) as provided in OAR 660-030-0070."

The parties have disputed whether that provision applies and, if it does, whether it is valid. However, our disposition makes it unnecessary for us to consider those issues.

[3] Some of the parties have filed joint briefs on judicial review. Petitioners 1000 Friends of Oregon and Friends of French Prairie have filed a joint brief, and we refer to them as 1000 Friends.

Respondents Aurora Airport Improvement Association, Bruce Bennett, Wilson Construction Company, Inc., Ted Millar, TLM Holdings, LLC, Anthony Alan Helbling, and Wilsonville Chamber of Commerce have filed joint briefs, and we refer to them as the private respondents.

Respondents Oregon Aviation Board and Oregon Department of Aviation have filed a joint brief, and we refer to them as the agency respondents.

Petitioners City of Aurora, City of Wilsonville, and Joseph Schaefer have filed individual briefs.

use as a matter of law; and (3) LUBA incorrectly construed OAR 660-012-0065(3)(n) when it held that the changes proposed in the Master Plan were not changes that would "permit service to a larger class of airplane" and, consequently, that the Master Plan complied with Goals 3, 11, and 14 as a matter of law. As explained below, we agree with petitioners on all of those points. We reject without discussion petitioner City of Wilsonville's fourth and fifth assignments of error, and our disposition makes it unnecessary for us to address private respondents' cross-assignment of error.[4] We reverse and remand LUBA's order.

I. BACKGROUND

We begin with a brief procedural background and provide additional facts below as we address each of petitioners' arguments. In late 2009, the board began a public process to update the master plan for the Aurora State Airport. At a meeting on October 27, 2011, the board had before it a document entitled Aurora State Airport Master Plan, which we refer to as the 2011 Master Plan. The board adopted a Master Plan at the October 27, 2011, meeting.[5]

After the Federal Aviation Administration (FAA) rejected the preferred development alternative identified in the 2011 Master Plan, the Master Plan was modified in 2012. Throughout this opinion, we refer to the modified master plan document as the 2012 Master Plan or simply the Master Plan. The FAA eventually approved the preferred alternative identified in the 2012 Master Plan, and the director of the Oregon Aviation Department signed the plan. However, the board never formally approved or adopted the 2012 Master Plan after October 27, 2011.

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[4] In petitioner City of Wilsonville's fourth assignment of error, it contends that the City of Wilsonville and Clackamas County are an "affected city [and] county" under OAR 738-130-000(5). It does not contend that the City of Aurora is an affected city, and we express no opinion on that question.

[5] Petitioner City of Wilsonville contends that the board adopted only the last two chapters of the Master Plan at the October 27, 2011, meeting and argues that LUBA erred in determining that the board legitimately adopted any version of the Master Plan. Likewise, petitioner City of Aurora contends that the 2012 Master Plan was never adopted. LUBA should consider those arguments on remand in light of the complete record. For purposes of this opinion, we assume, without deciding, that the board adopted the 2012 Master Plan on October 27, 2011.

In 2019, the board adopted findings of land use compatibility for the 2012 Master Plan. The board explained that it had "adopted the Master Plan at its October 27, 2011, meeting."

Petitioners challenged the land-use compatibility findings before LUBA. LUBA rejected all of petitioners' assignments of error to the procedure and substance of the board's findings, and petitioners seek judicial review.

II. STANDARD OF REVIEW

At the outset, we consider our standard of review of LUBA's decision in a case, like this one, where LUBA considered whether "[t]he state agency made a decision that violated the goals." ORS 197.835(9)(b). As always, our task on review is to discern whether LUBA's order is "unlawful in substance or procedure," ORS 197.850(9)(a), and we "may not substitute [our] judgment for that of [LUBA] as to any issue of fact," ORS 197.850(8). Our understanding of how to implement that standard of review turns on LUBA's scope of review.

ORS 197.835 sets out LUBA's scope of review. For our purposes, the relevant subsection of the statute is subsection (9), which provides as follows:

> "In addition to the review under subsections (1) to (8) of this section, [LUBA] shall reverse or remand the land use decision under review if the board finds:
>
> "(a) The local government or special district:
>
> "(A) Exceeded its jurisdiction;
>
> "(B) Failed to follow the procedures applicable to the matter before it in a manner that prejudiced the substantial rights of the petitioner;
>
> "(C) Made a decision not supported by substantial evidence in the whole record;
>
> "(D) Improperly construed the applicable law; or
>
> "(E) Made an unconstitutional decision; or
>
> "(b) *The state agency made a decision that violated the goals.*"

(Emphasis added.); *see also* ORS 197.835(8) (LUBA "shall reverse or remand a decision involving the application of a

plan or land use regulation provision if the decision is not in compliance with applicable provisions of the comprehensive plan or land use regulations").

Abundant case law applies our standard of review of LUBA orders applying subsection (9)(a), that is, LUBA orders deciding whether a local government or special district committed reversible error in one of the five specified ways. Under that case law, our review of LUBA's determination of whether a local government made a decision not supported by substantial evidence in the whole record, ORS 197.835(9)(a)(C), is very limited:

> "[W]here LUBA has properly understood and applied the 'substantial evidence' test of ORS 197.835([9])(a)(C), a reviewing court should affirm its order, notwithstanding the reviewing court's disagreement with LUBA as to whether the evidence is 'substantial.' This does not mean, of course, that a reviewing court must blindly accept LUBA's evaluation of substantiality. The evidence in a particular case might be so at odds with LUBA's evaluation that a reviewing court could infer that LUBA had misunderstood or misapplied its scope of review, and reversal or remand might be proper."

Younger v. City of Portland, 305 Or 346, 358-59, 752 P2d 262 (1988) (citation omitted). In other words, "where LUBA has review of a local government's findings of fact, we review to determine whether LUBA 'misunderstood or misapplied' the substantial evidence standard of review." *Rogue Advocates v. Jackson County*, 282 Or App 381, 388 n 4, 385 P3d 1262 (2016) (quoting *Younger*, 305 Or at 359).

In contrast with the specificity of LUBA's scope of review established in ORS 197.835(9)(a)(A) through (E), paragraph (9)(b) of ORS 197.835 states only that LUBA shall reverse and remand "if the board finds *** [t]he state agency made a decision that violated the goals." We have never addressed what our standard of review requires when LUBA has reviewed a state agency decision for compliance with the goals.

Under ORS 197.835(9)(a), LUBA uses an appellate lens to review the local government or special district's decision: LUBA makes determinations about the jurisdiction and

procedural adequacy of the previous decisionmaker, ORS 197.835(9)(a)(A), (B); the sufficiency of the evidence before the previous decisionmaker, ORS 197.835(9)(a)(C); or the legal correctness of the previous decisionmaker's decision, ORS 197.835(9)(a)(D), (E). By contrast, in defining LUBA's scope of review, ORS 197.835(9)(b) does not invoke appellate concepts that would cause LUBA to defer to the factual or legal determinations of any previous decisionmaker. Rather, it appears that, under ORS 197.835(9)(b), LUBA directly assesses, in the first instance, whether the substance of the state agency's decision complied with the goals.

This case does not require us to fully elaborate our standard of review of LUBA's decisions under ORS 197.835(9)(b). In a case like this one, where the central question is whether a facility plan—a document—complies with the goals, and the parties agree (for some purposes, at least) that that document is in the record, our review is largely for mistaken construction of the applicable law; there are few, if any, relevant factual issues for us to review. ORS 197.850(9)(a). To the extent that we are called on to review LUBA's factual determinations in this case, it suffices to note that, as to the few disputed facts at issue, there is no evidence in the record to support LUBA's erroneous findings.[6]

III. ANALYSIS

A. *The 2011 Master Plan*

We begin our analysis by considering petitioners' City of Aurora and City of Wilsonville's contention that LUBA erred in denying petitioners' requests to add to the

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[6] It may be that we review factfinding by LUBA under ORS 197.835(9)(b) for substantial evidence. *Cf.* ORS 197.850(9)(c) (providing that the court shall reverse and remand a LUBA order if "[t]he order is not supported by substantial evidence in the whole record as to facts found by the board under ORS 197.835(2)"); *Rogue Advocates*, 282 Or App at 388 n 4 ("Under ORS 197.850(9)(c), where LUBA itself engages in fact finding [about certain enumerated procedural issues], we review those findings for substantial evidence."). *See also Zimmerman v. LCDC*, 274 Or App 512, 519, 361 P3d 619 (2015) (noting that our review of LUBA's legal determinations is the "functional equivalent" of our standard of review of an agency's legal determination under ORS 183.482(8)(a)); ORS 183.482(8)(c) (Court of Appeals reviews agency factfinding for substantial evidence); ORS 183.482(7) (Court of Appeals "shall not substitute its judgment for that of the agency as to any issue of fact"). However, as noted in the text, we need not decide that question here.

record the Master Plan document that the board had before it on October 27, 2011.

A document entitled Aurora State Airport Master Plan appears in the record. That document includes material created after 2011, including an Appendix to Chapter 5 that narrates events that occurred through at least November 2012.[7] LUBA and the parties agree that the version of the master plan in the record is the 2012 version. That document indisputably was substantially modified after October 27, 2011, by, for example, identifying a different development option as the preferred alternative and omitting some of the discussion and documentation relating to the original preferred alternative. Although the Appendix to Chapter 5 narrates subsequent events and some of the changes that were made, the 2012 Master Plan does not include the text of the 2011 Master Plan or a complete list of changes; it is impossible to identify most of the material that was added and any that was removed after October 27, 2011.

OAR 661-010-0025(1)(b), one of LUBA's evidentiary rules, provides that the record "shall include" "[a]ll written testimony and all exhibits, maps, documents or other materials specifically incorporated into the record or placed before, and not rejected by, the final decision maker, during the course of the proceedings before the final decision maker." Before LUBA, petitioners contended that the document that the board approved on October 27, 2011, was required to be in the record. LUBA did not disagree with that proposition, but rather held that the 2012 Master Plan document included the master plan that had been approved on October 27, 2011. On that ground, it rejected petitioners' contentions that the 2011 Master Plan document had to be included in the record.

On review, petitioners City of Aurora and City of Wilsonville assign error to that ruling, pointing out that there is no evidence that the 2012 Master Plan includes the 2011 version and that the 2012 Master Plan itself demonstrates that it does not include the 2011 version. Agency respondents defend LUBA's determination that the 2012

[7] Petitioner City of Wilsonville points out that parts of the 2012 Master Plan are dated later than 2012, including one item that is dated 2017.

Master Plan includes the 2011 Master Plan. For their part, private respondents contend that the proceedings before the board in 2019 are the only "proceedings before the final decision maker" that are at issue here, and that the 2012 Master Plan was the only version of the master plan presented in those proceedings.

We agree with petitioners. First, no evidence supports LUBA's determination that the 2012 Master Plan included the version of the Master Plan approved on October 27, 2011. To the contrary, the 2012 Master Plan itself demonstrates conclusively that the later version is different from the earlier version; it narrates events and explains some of the changes to the document that occurred after 2011, which include identifying a different preferred alternative in the text and on the Airport Layout Plan (ALP). And it is impossible to tell from the 2012 Master Plan what material was added and what was removed after 2011. LUBA erred in concluding that the 2012 Master Plan includes the 2011 Master Plan.

We also reject private respondents' contention that the events of 2019 are the only "proceedings before the final decision maker" at issue here. OAR 661-010-0025(1)(b). The board made its 2019 findings in an effort to comply with OAR 738-130-0055(6), which provides that "[t]he Aviation Board shall adopt findings of [land-use] compatibility *** *when it adopts the final facility plan*." (Emphasis added.) Under that rule, the board's adoption of a final facility plan and its land-use compatibility findings are two parts of the same proceeding. That remains the case here, notwithstanding the delay between the adoption of the Master Plan and the findings of land-use compatibility.[8]

[8] Given the process contemplated in OAR 738-130-0055(6) to implement ORS 197.180(1), we also question whether an agency can treat its adoption of a facility plan as final while also contemplating, as the board argues it did here, that the plan may undergo significant changes before it achieves its final form. If the "final facility plan" that is adopted and for which the agency adopts land-use compatibility findings is not, in fact, the final version of the facility plan, then it is not clear how the procedure established in OAR 738-130-0055 actually ensures that the agency is "carry[ing] out [its] planning duties, powers and responsibilities and tak[ing] actions that are authorized by law with respect to programs affecting land use" "[i]n compliance with the goals" and "[i]n a manner compatible with acknowledged comprehensive plans and land use regulations." ORS 197.180(1).

The version of the master plan that the board approved on October 27, 2011, along with any other materials that the board considered at that meeting, had to be part of the record before LUBA. OAR 661-010-0025(1)(b). We need not consider whether that procedural error, standing alone, would merit reversal, because, as explained below, we agree with petitioners that the case must be remanded in any event.

B. *Compliance with the MCCP and the Goals*

1. *Marion County's failure to identify conflicts with the MCCP*

We turn to the parties' central contentions about LUBA's determination that the 2012 Master Plan complies with the MCCP and that Goals 3, 11, and 14 do not apply. As an initial matter, we reject the agency respondents' contention that LUBA should not have evaluated the Master Plan for compliance with the MCCP because Marion County was part of the public master planning process and did not identify any conflicts with its comprehensive plan. *See* OAR 738-130-0055(2) (allowing the Oregon Department of Aviation (ODA) to "deem that the draft plan is compatible with that jurisdiction's acknowledged comprehensive plan" if it receives no response from a jurisdiction after providing a draft plan to the jurisdiction).

The agency respondents do not explain, and we do not perceive, how *ODA*'s ability to deem the draft plan compatible with the MCCP affects *the board's* obligation to "adopt findings of compatibility with the acknowledged comprehensive plans of affected cities and counties and findings of compliance with applicable statewide planning goals when it adopts the final facility plan." OAR 738-130-0055(6); *see also* ORS 197.180(1) (requiring state agencies to "take actions that are authorized by law with respect to programs affecting land use *** [i]n compliance with the goals, rules implementing the goals and rules implementing this section; and [i]n a manner compatible with acknowledged comprehensive plans and land use regulations"). Moreover, even to any extent that the board could have relied on ODA's decision to deem a plan compatible with the comprehensive

plan, that is not what the board did in this case; rather, it adopted findings of compatibility.

2. *The Master Plan proposes airport development on EFU land*

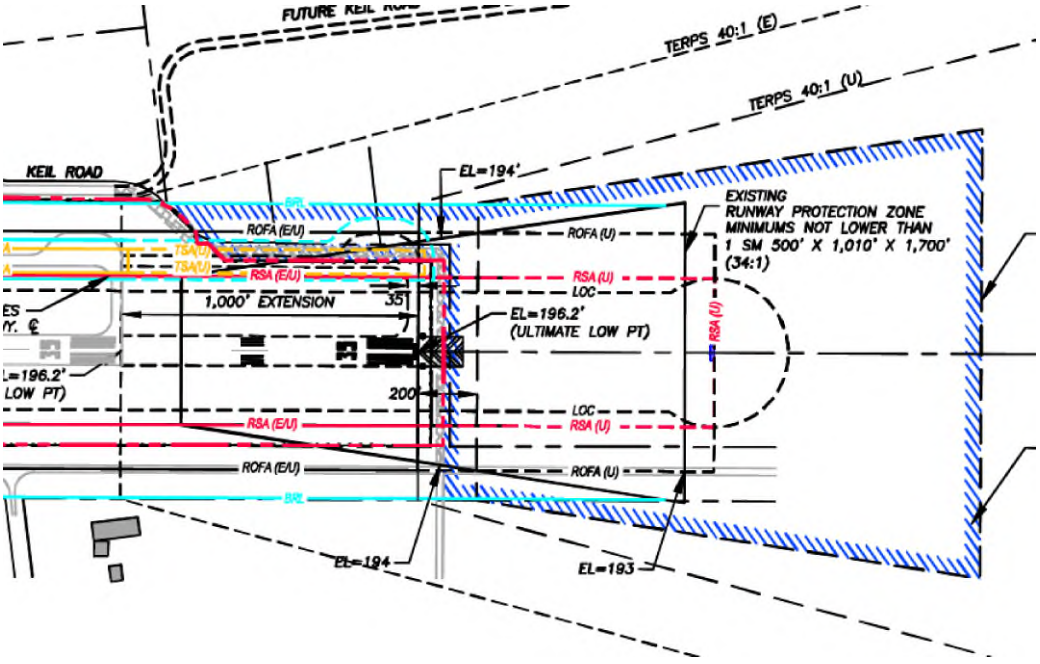
We next consider whether the Master Plan proposes airport development on land zoned EFU. Before LUBA, petitioners contended that it did, and, consequently, that the Master Plan was incompatible with the Agricultural Lands policies of the MCCP. Rather than relying on the contents of the Master Plan itself to answer that question, LUBA relied substantially on information provided later, including information about changes, or potential changes, to the board's development plans that took place after the Master Plan was complete, to determine that the Master Plan did not propose airport development on EFU land.

We begin with factual background. The Master Plan contains seven chapters that, together, provide the facts and reasoning to support its proposed development plan, which the Master Plan identifies as the preferred alternative. The preferred alternative is described in text and also depicted in the Airport Layout Plan, or ALP, a set of drawings that makes up Chapter 6. The Master Plan explains that the ALP is "a pictorial culmination of the master planning process." That is, as the Master Plan explains, "[t]he ALP depicts the current airport layout and proposed improvements to the Airport for the 20-year planning period." *See also* OAR 738-005-0010(20) (ALP "refers to a major product of airport master planning"). An ALP must be submitted to the FAA for approval, and "[a]ll airport development carried out at federally obligated airports [like the Aurora State Airport] must be done in accordance with an FAA-approved ALP." OAR 738-005-0010(20).

The state-owned property that the airport occupies is zoned Public (P) in the Marion County Code. On the south and southeast, the airport property ends at Keil Road, and the property across Keil Road from the airport to the south and east is zoned EFU. The ALP in the Master Plan depicts a runway extension of 1,000 feet to the south of the

existing runway, within the boundary of the property that the airport currently occupies. As shown in Figures 1 and 2, at the end of the runway, the ALP depicts an additional chevron-striped stopway continuing southward in line with the runway.[9] The stopway extends beyond the airport property line, across Keil Road, and onto land zoned EFU. The ALP also depicts an Instrument Landing System Localizer extending further beyond the stopway to the south on EFU land.[10] The ALP also depicts part of a taxiway on the east side of the runway (upwards on the ALP drawings) extending off of the airport property, across existing Keil Road (which is shown on the ALP as being rerouted) onto land zoned EFU.

Figure 1

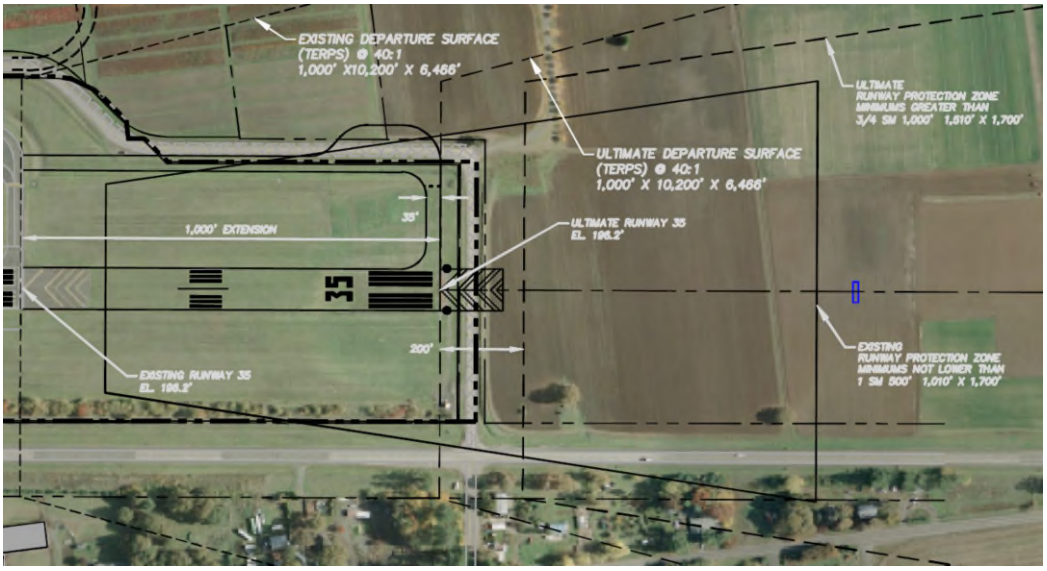


[9] We have included excerpts from two of the drawings that make up the ALP to make the expansions off the existing airport property more easily understood. Both drawings show the same expansions in the same places.

[10] In light of our conclusion, explained below, that the Master Plan proposes development of the stopway and taxiway on EFU land, we do not reach private respondents' contention, raised in their cross-assignment of error, that the Localizer is an allowed use in the EFU zone.

For the same reason, we do not reach the parties' arguments about the Runway Protection Zone, the Runway Object Free Area, and the relocation of Keil Road. On remand, LUBA may consider those arguments, as well as arguments about the Localizer, in light of our clarification that the Master Plan, and only the Master Plan, embodies the relevant decision.

Figure 2



The record also contains additional information about the board's development plans and the significance of the development proposed in an airport master plan. For example, in their testimony, Matthew Maass, ODA Deputy Director, and Aron Fagre, an airport planning expert, explained in a variety of ways that the development shown on the ALP is not actually the development that the board intends for the airport. Maass explained that "[t]he Master Plan is a concept document that shows where future development might go" and that "My understanding is, that it is the intent of this agency to not construct any pavement on current EFU land as part of the runway extension." Fagre indicated that "ALPs are not drawn to surveyed or engineering specificity" and opined that "it is certainly feasible for the airport to construct all improvements—runway, taxiway including run up area and stop way in the Marion County P zone."

LUBA rejected petitioners' arguments that the ALP depicted, and, consequently, the Master Plan proposed, airport development on EFU land. After noting various respondents' arguments, including their contention that the ALP "is not a design-level document or a site plan," LUBA explained, "given respondents' responses [to petitioners' arguments] and the evidence in the record, it is not clear to us that the taxiway and the stopway are

proposed to be located outside the P zone." LUBA also held that

> "respondents' explanation that ODA could choose not to construct the taxiway or install the Localizer if they had to be located on EFU land, and that the stopway will be located in the P zone, undercuts petitioners' speculation that the improvements will be located in the EFU zone. Stated differently, petitioners' speculation that those improvements may be located outside the P zone is, at this point, just speculation, and not enough to demonstrate that he 2012 Airport Plan is incompatible with the MCCP."

LUBA misunderstood its task. It relied on testimony in the record about the board's plans for development to conclude that the board did not intend to construct airport improvements on EFU land. But the question is not what the board's development plans are; the question is what development the Master Plan proposes, and whether *that* development is consistent with the MCCP and the goals. OAR 738-130-0055(6) (requiring the board to adopt land-use compatibility findings "when it adopts the final facility plan"); OAR 738-130-0005 (the purpose of ODA's state agency coordination rules is to establish procedures to "assure that [ODA] land use programs"—including "[a]doption of transportation facility plans," OAR 738-130-0025(3)—"are carried out in compliance with the statewide planning goals and in a manner compatible with acknowledged comprehensive plans").

LUBA reasoned that, because the ALP "is not a design-level document or a site plan," it is impossible to assess the development it depicts for compliance with the MCCP and the goals; thus, LUBA relied on other testimony about where the improvements might or might not ultimately be built to determine the Master Plan's compliance with those provisions. That reasoning again misapprehends the task at hand. The ALP is not a casual sketch of potential future development; it is the "pictorial culmination of the master planning process" and it depicts the "proposed improvements to the airport for the 20-year planning period." It must be approved by the FAA, and "[a]ll airport development" "must be done in accordance with" it. OAR

738-005-0010(20). In light of the ALP's role in the master planning process, the ALP drawings are the authoritative documents that determine the location of the improvements proposed by the Master Plan.[11]

The improvements that the ALP depicts extend off the airport property and onto EFU property. Thus, the Master Plan proposes airport development on EFU land. That conclusion requires us to remand to LUBA for reconsideration of its determination that the Master Plan complies with the Agricultural Lands policies of the MCCP.[12]

3. *ORS 836.640 does not apply*

LUBA rejected petitioners' other challenges to the Master Plan's compliance with the MCCP on the ground that those arguments relied on an assumption that the airport expansion was an urban use of rural land, but that ORS 836.640 establishes, as a matter of law, that the airport and the development proposed in the Master Plan are rural uses.[13] On review, petitioners Schaefer and City of Aurora contend that LUBA erred in relying on ORS 836.640 to conclude that the airport development was "rural" for land use

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[11] We do not discount the possibility that, once design-level documents for the improvements proposed in the Master Plan are developed, the details of the location of the improvements may change from the locations shown on the ALP drawings. Our point is simply that, as the "final facility plan," OAR 730-130-0055(6), the Master Plan, and its "pictorial culmination," the ALP, are, as a matter of law, sufficiently authoritative to be evaluated for compliance with the MCCP and the goals.

[12] Private respondents contend that the compatibility of the Master Plan with the MCCP was conclusively determined by the Marion County Board of Commissioners' 2013 adoption of a resolution in support of the Master Plan. The resolution states that the Board of Commissioners "acknowledges and supports" the 2012 Master Plan; it is not a determination, formal or otherwise, of the plan's compliance with the MCCP.

[13] Petitioners challenged the Master Plan's compliance with the Rural Development Policies 1, 3, and 4; Rural Services Policies 1 through 4; Special District Policies 6, 7, and 8; Urban Land Use Goals a, b, and c; Urban Growth Policies 1, 2, 3, and 6; Growth Management Framework Purposes 1, 2, 3, and 5; and Growth Management Framework Goals 1, 6, and 7.

Petitioners also contended that the Master Plan conflicted with the MCCP because the 1976 Aurora State Airport Master Plan is part of the MCCP, and it proposed extension of the runway to the north rather than the south. Schaefer renews that argument on appeal. However, in light of our disposition, we do not reach it. LUBA should consider it on remand.

purposes.[14] They point out that LUBA has previously held that, "in view of the area served and level of service provided," formerly existing and proposed uses at the Aurora State Airport "are clearly urban public facility uses." *Murray v. Marion County*, 23 Or LUBA 268, 283-84 (1992).

Petitioners' argument requires us to construe ORS 836.642, which we do by "examining the text and context of [the statute], with the goal of determining legislative intent. *State v. Gaines*, 346 Or 160, 171, 206 P3d 1042 (2009)." *Stop the Dump Coalition v. Yamhill County*, 364 Or 432, 446, 435 P3d 698 (2019). ORS 836.642(1) requires the ODA to "establish a pilot program at up to six rural airports to encourage development of through the fence operations designed to promote economic development."[15] The pilot program "shall operate at" "[t]he Aurora State Airport" and "[n]ot more than five additional rural airports." ORS 836.642(2). "'Rural airport' means an airport described in ORS 836.610(1) that principally serves a city or metropolitan statistical area with a population of 500,000 or fewer." ORS 836.640(4). Thus, ORS 836.642 implies that the Aurora State Airport is a "rural airport," a defined term referring to an airport that "principally serves a city or metropolitan statistical area with a population of 500,000 or fewer."[16]

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[14] We reject without discussion respondents' contention that these assignments of error are not preserved or were waived before LUBA.

In its order, LUBA indicated that it was relying on ORS 836.642 in part because petitioner Schaefer had not adequately developed an argument to the contrary. Regardless of whether that is accurate with regard to Schaefer, the City of Aurora fully developed its argument that ORS 836.642 was irrelevant to the question at hand, and it renews that argument on appeal.

It is true that neither Schaefer nor the City of Aurora developed extremely detailed arguments against the application of ORS 836.642. That is because, as we explain below, nothing about the statutory text or context suggests that it applies here; thus, very little explanation was required to demonstrate that it did not apply.

[15] "'Through the fence operation' means a customary and usual aviation-related activity that *** [i]s conducted by a commercial or industrial user of property within an airport boundary; and *** [r]elies, for business purposes, on the ability to taxi aircraft directly from the property employed for the commercial or industrial use to an airport runway." ORS 836.640(5).

[16] That statutory implication is in some tension with the Master Plan, which notes that, in the Oregon Aviation Plan, the statewide plan promulgated by the ODA, the Aurora State Airport is categorized as an Urban General Aviation Airport serving the Portland metropolitan area.

LUBA concluded that those statutory provisions establish as a matter of law that all current uses at the Aurora State Airport and the additional development proposed by the Master Plan are rural, rather than urban, uses for purposes of Goal 14 and the MCCP provisions listed above, 312 Or App at 331 n 13. *See generally 1000 Friends of Oregon v. LCDC (Curry Co.)*, 301 Or 447, 724 P2d 268 (1986) (explaining the significance of rural and urban land uses). LUBA misconstrued the statute. As explained below, although ORS 836.642 does address land use, its provisions unambiguously demonstrate that the legislature did not intend its implied categorization of the Aurora State Airport as a "rural airport" to affect the question of whether existing or new land uses at the airport are urban or rural.

ORS 836.642(4) is the only subsection of the statute that addresses land use. It provides,

> "The Department of Land Conservation and Development [(DLCD)], the county and a city, if any, within whose jurisdiction a pilot site is located shall coordinate with the Oregon Department of Aviation to ensure that the applicable comprehensive plans and land use regulations, including airport zoning classifications pursuant to ORS 836.600 to 836.630, facilitate through the fence operations and support the development or expansion of the pilot site *consistent with applicable statewide land use planning requirements*."

(Emphasis added.) Thus, ORS 836.642 establishes a pilot program encouraging "through the fence programs" at certain "rural airports"—airports serving small cities or metropolitan areas—including Aurora State. It tasks DLCD, the county, and a city with working with ODA to ensure that the applicable comprehensive plans and land use regulations "support the development or expansion of the pilot site *consistent with applicable statewide land use planning requirements*." ORS 836.642(4) (emphasis added). The text does not suggest that the legislature intended any section of ORS 836.642 to affect how land use requirements apply to the programs or uses of land at the identified airports; to the contrary, it explicitly makes the programs subject to "applicable statewide land use requirements." ORS 836.642(4).

Nor does the legislature's use of "rural" to describe airports eligible for the pilot program suggest anything about how existing or new uses at airports with pilot programs should be categorized for land-use purposes. As noted above, in ORS 836.642, "rural airport" is a defined term describing airports serving smaller cities and metropolitan statistical areas. Whether the land uses that exist or are proposed for a "rural airport" are rural or urban is an entirely separate question, one that the statute does not purport to address.

Because private respondents appear to argue that the provisions of ORS 836.600 to 836.630 indicate that ORS 836.642 affects the classification of airport uses as rural or urban, we also briefly address those provisions. In 1995 and 1997, the legislature acted to protect and support existing airports, including by modifying land-use laws within airport boundaries. Or Laws 1995, ch 285; Or Laws 1997, ch 859. ORS 836.600 sets out state policy regarding airports:

> "In recognition of the importance of the network of airports to the economy of the state and the safety and recreation of its citizens, the policy of the State of Oregon is to encourage and support the continued operation and vitality of Oregon's airports. Such encouragement and support extends to all commercial and recreational uses and activities described in ORS 836.616(2)."

For purposes of ORS 836.600 to 836.630, airport is defined as

> "the strip of land used for taking off and landing aircraft, together with all adjacent land used in 1994 in connection with the aircraft landing or taking off from the strip of land, including but not limited to land used for the existing commercial and recreational airport uses and activities as of December 31, 1994."

ORS 836.605(2).

ORS 836.616(2) provides that, "[w]ithin airport boundaries established pursuant to [LCDC] rules, local government land use regulations shall authorize" a variety of airport uses. ORS 836.625(1) clarifies that "[t]he limitations on uses made of land in exclusive farm use zones described

in ORS 215.213 and 215.283 do not apply to the provisions of ORS 836.600 to 836.630 regarding airport uses."

In this case, it is undisputed that the relevant part of the airport boundary is the edge of the state-owned airport property that is bordered by Keil Road. *See* OAR 660-013-0040 (the airport boundary, for purposes of ORS 836.616(2), is shown on a map "adopted by a local government" pursuant to "comprehensive plan and land use regulation requirements").[17] As explained above, the provisions of ORS 836.600 to 836.630 allow airport uses and supersede ORS 215.213 and 215.283 "[w]ithin airport boundaries." ORS 836.616(2); *see also* OAR 660-013-0100 (requiring local governments to "adopt land use regulations for areas within the airport boundaries" that authorize the airport uses enumerated in ORS 836.616).

The provisions of ORS 836.600 to 836.630 are independent from ORS 836.640 and 836.642, and they do not suggest that we should understand the latter provisions to have a greater effect on land use than their text indicates. Nor do the provisions of ORS 836.600 to 836.630 apply directly to the airport development that the Master Plan proposes outside the airport boundaries.

In short, nothing about the statutory text or context suggests that LUBA's construction of ORS 836.642 is correct. LUBA erred by relying on ORS 836.642 to conclude that existing and new uses at the Aurora State Airport are rural.[18]

4. *OAR 660-012-0065(3)(n) does not apply*

Finally, we consider petitioners 1000 Friends' and Schaefer's contention that LUBA erred in concluding that OAR 660-012-0065(3)(n) excused the board's decision from complying with Goals 3, 11, and 14. The board reasoned

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[17] The map of the Aurora State Airport that has been adopted by Marion County is the 1976 Master Plan ALP, which is part of the Marion County Comprehensive Plan.

[18] Petitioners Schaefer and City of Aurora also provide legislative history supporting their view of the statute's meaning. However, because the text of the statute unambiguously demonstrates that it has no bearing on whether a use is urban or rural for land-use purposes, we need not continue our analysis. *Gaines*, 346 Or at 172.

that the development proposed by the Master Plan would not change the airport's Airport Reference Code, which is described below, and, consequently, that it did not propose expansion or alteration of the airport that would "permit service to a larger class of airplane."[19] Before LUBA, petitioners disputed that contention.

In its order, LUBA adopted the reasoning in the response briefs and concluded, without elaboration, that "the improvements contemplated by the 2012 Airport Plan do not permit service to a larger class of airplanes." The response briefs whose arguments LUBA adopted construe "a larger class of airplanes" to mean a class made up of larger airplanes as measured by their wingspan or tail height.

On judicial review, petitioner 1000 Friends disputes that construction and contends that the development proposed in the Master Plan does permit service to a larger class of airplanes. Both 1000 Friends and Schaefer also argue that LUBA's construction of OAR 660-012-0065(3)(n) conflicts with numerous statutes and the goals because, under LUBA's construction, the rule allows airport development on EFU land without an exception to the goals and without applying the farm-impacts test required by ORS 215.213(10)(b) and ORS 215.283(3)(b).[20]

"When interpreting an administrative rule, we seek to divine the intent of the rule's drafters, employing

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[19] As an alternative to its conclusion that OAR 660-012-0065(3)(n) applied, the board reasoned that OAR 660-012-0065(3)(a), (b), or (d) applied to some of the challenged airport improvements. It urges us to rely on its alternative reasoning as a ground for rejecting petitioners' challenge to LUBA's interpretation of OAR 660-012-0065(3)(n).

OAR 660-012-0065(3)(a) and (b) address transportation uses that are either allowed by ORS 215.213 or 215.283 or that are accessory to uses allowed under those statutes, subject to the farm impacts test. *See* ORS 215.213(10)(b); ORS 215.283(3)(b). OAR 660-012-0065(3)(d) allows "[r]ealignment of roads not otherwise allowed under subsection (a) or (b) of this section," subject to application of the farm impacts tests and the alternatives test set out in OAR 660-012-0065(5). Before LUBA, the board was silent about its alternative reasoning, and it has never identified what airport-related use or uses are allowed, in its view, under ORS 215.283.

LUBA did not acknowledge or address the board's alternative reasoning. Under these circumstances, we leave it to LUBA to consider, on remand, the significance of that alternative reasoning.

[20] Schaefer also raises additional arguments about the rule's validity.

essentially the same framework that we employ when interpreting a statute. Under that analytical framework, we consider the text of the rule in its regulatory and statutory context." *Noble v. Dept. of Fish and Wildlife*, 355 Or 435, 448, 326 P3d 589 (2014) (internal citation omitted) (citing *State v. Hogevoll*, 348 Or 104, 109, 228 P3d 569 (2010)). "In construing statutes and administrative rules, we are obliged to determine the correct interpretation, regardless of the nature of the parties' arguments or the quality of the information that they supply to the court." *Gunderson, LLC v. City of Portland* , 352 Or 648, 662, 290 P3d 803 (2012) (citing *Dept. of Human Services v. J. R. F.*, 351 Or 570, 579, 273 P3d 87 (2012), and *Stull v. Hoke*, 326 Or 72, 77, 948 P2d 722 (1997)). As explained below, applying those principles, we conclude that LUBA erred in concluding that OAR 660-012-0065(3)(n) applies to the development proposed in the Master Plan.

We begin by considering the statutory and regulatory context of OAR 660-012-0065(3)(n). ORS 215.213 and ORS 215.283 govern uses allowed on EFU land.[21] In subsections (1) and (2), both statutes set out lists of allowed farm and nonfarm uses. Airport development is not one of the uses identified in subsections (1) or (2) of either statute. ORS 215.283(3) and ORS 215.213(10), which have the same text, set out a framework for transportation facilities and improvements that are not addressed in earlier subsections. They provide as follows:

> "Roads, highways and other transportation facilities and improvements not allowed under subsections (1) and (2) of this section may be established, subject to the approval of the governing body or its designee, in areas zoned for exclusive farm use subject to:
>
> "(a) Adoption of an exception to the goal related to agricultural lands and to any other applicable goal with which the facility or improvement does not comply; or
>
> "(b) ORS 215.296 for those uses identified by rule of the Land Conservation and Development Commission

[21] ORS 215.213 applies in counties that adopted a marginal lands system prior to 1993, and ORS 215.283 applies in nonmarginal lands counties. Each contains the same provision, set out in the text, regarding transportation facilities and improvements. ORS 215.213(10); ORS 215.283(3). ORS 215.283 applies in Marion County, where the airport is located.

> [(LCDC)] as provided in section 3, chapter 529, Oregon Laws 1993."[22]

ORS 215.296 sets out the farm-impacts test, which requires assessment of whether a proposed nonfarm use on EFU land would "'[f]orce a significant change' in accepted farm practices or '[s]ignificantly increase the cost' of those practices on surrounding agricultural lands." *Stop the Dump Coalition v. Yamhill County*, 364 Or 432, 434, 435 P3d 698 (2019) (quoting ORS 215.296). Thus, under ORS 215.213 and ORS 215.283, establishing a transportation facility or improvement that is not listed elsewhere in those statutes on EFU land requires either (a) an exception to Goal 2 or, (b) for uses identified by LCDC rule, application of the farm-impacts test.

LCDC is empowered to refine the legislature's policy regarding uses on EFU land "so long as [LCDC's rules] are not *less* restrictive than [ORS 215.213 and 215.283]—that is, if they do not allow *more* uses than the statutes." *Lane County v. LCDC*, 325 Or 569, 583, 942 P2d 278 (1997) (emphases in original). Consistently with the statutory scheme, LCDC has promulgated OAR 660-012-0065 to "identif[y] transportation facilities, services and improvements which may be permitted on rural lands consistent with Goals 3, 4, 11, and 14 without a goal exception." OAR 660-012-0065(1). OAR 660-012-0065(3) provides as follows:

> "The following transportation improvements are consistent with Goals 3, 4, 11, and 14 subject to the requirements of this rule:
>
> "* * * * *
>
> "(n) Expansions or alterations of public use airports that do not permit service to a larger class of airplanes[.]

The rule does not elaborate on what it means to "permit service to a larger class of airplanes."

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[22] Section 3, chapter 529, Oregon Laws 1993 provided as follows:

> "The Department of Transportation shall, by March 30, 1994, submit to the Land Conservation and Development Commission proposed rules identifying the other roads, highways and transportation facilities that may be allowed pursuant to ORS 215.213(10)(b) and 215.283(5)(b). The Land Conservation and Development Commission shall adopt rules implementing ORS 215.213(10)(b) and 215.283(5)(b) by June 30, 1994."

To understand the rule and the development proposed in the Master Plan, some technical background information is necessary. We begin by considering Airport Reference Codes (ARCs). The FAA uses an ARC to relate airport design standards to the characteristics of the aircraft that use the airport. A given airplane's ARC is made up of a letter, which represents the Aircraft Approach Category and is determined by aircraft approach speed, and a roman numeral, which represents the Airplane Design Group and is determined by wingspan or tail height of the aircraft.

An airport's ARC is the same as the ARC of the airport's "critical aircraft," which, the Master Plan explains, is "the most demanding aircraft that uses the airport 'regularly' or 'substantially.'" The Master Plan explains that the FAA defines "regular" or "substantial" use as "at least 500 annual itinerant operations." The FAA must approve the determination of an airport's critical aircraft. FAA Advisory Circular 150, 5000-17, *Critical Aircraft and Regular Use Determination* (2017), at 2.6, 2-4 (available at https://www.faa.gov/documentLibrary/media/Advisory_Circular/AC_150_5000-17.pdf (last accessed June 8, 2021)).[23]

"Different aircraft may define separate elements of airport design. Therefore, effective planning of an airport may need to consider different and multiple Critical Aircraft ***." *Id.* at 3.1.1, 3-1. Above, we explained that the critical aircraft determination takes into account the Aircraft Approach Category (approach speed) and Airplane Design Group (wingspan or tail height) of the aircraft that regularly use the airport. Those classifications determine many of the airfield design standards including runway and taxiway width and separation and the size of various areas at the sides and ends of the runway that protect aircraft and nearby land uses.

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[23] We take judicial notice of FAA Advisory Circular 150, 5000-17, *Critical Aircraft and Regular Use Determination* (2017) (available at https://www.faa.gov/documentLibrary/media/Advisory_Circular/AC_150_5000-17.pdf (last accessed June 8, 2021)), and FAA Advisory Circular 150/5325-4B, *Runway Length Requirements for Airport Design* (2005) (available at https://www.faa.gov/documentLibrary/media/Advisory_Circular/AC_150_5325-4B.pdf (last accessed June 8, 2021)). *See, e.g.*, *Thomas v. Wasco County*, 284 Or App 17, 23 n 9, 392 P3d 741 (2017), *rev den*, 362 Or 666 (2018) (taking judicial notice in a LUBA case).

Determining runway length, however, requires reference to a potentially different critical aircraft: The "critical aircraft or grouping of aircraft for runway length" is "the single aircraft, or grouping of aircraft with similar operational requirements, that have the longest runway length requirement that makes regular use of the runway." *Id.* at 3.2.1, 3-1. Generally, runway length requirements for planes up to 60,000 pounds Maximum Certified Takeoff Weight (MTOW) are determined by reference to a "family grouping of airplanes having similar performance characteristics and operating weights." FAA AC 150/5325-4B, *Runway Length Requirements for Airport Design* (2005), ¶ 102, 2 (emphasis omitted) (available at https://www.faa.gov/documentLibrary/media/Advisory_Circular/AC_150_5325-4B.pdf (last accessed June 8, 2021)). Those family groupings depend on MTOW and, for small planes up to 12,500 pounds MTOW, approach speed and number of passengers. *See id.*, Table 1-1, at 3. Runway length requirements for planes over 60,000 pounds MTOW are determined by the needs of the particular aircraft, rather than a family grouping. *Id.*

With that background in mind, we return to the text of OAR 660-012-0065(3)(n), which, again, provides that "[e]xpansions or alterations of public use airports that do not permit service to a larger class of airplanes" are consistent with goals 3, 4, 11, and 14 without goal exceptions. As we understand LUBA's reasoning, it concluded that the term "class of airplanes" refers to the Airplane Design Group—the wingspan or tail height. That is, it appears that LUBA understood "larger" in "larger class of airplanes" to refer to the size of the airplanes, and it looked to the physical dimensions of the airplanes, as represented by the Airplane Design Group, to determine airplane size.

The FAA does not use the term "class" to describe airplane sizes.[24] As set out above, however, the FAA groups

[24] The FAA does sort airplanes into classes for pilot-licensing purposes. 14 CFR § 61.5(b) (2021). In the aircraft category "airplane," the four classes are "[s]ingle-engine land"; "[m]ultiengine land"; "[s]ingle-engine sea"; and "[m]ultiengine sea." 14 CFR § 61.5(b)(2). None of the parties proposes that that sorting system is the one to which the rule refers, and we agree that that understanding is implausible.

airplanes in several ways; as relevant here, it groups them by weight as well as by wingspan or tail height. Even if we were to accept LUBA's premise that "larger" modifies "airplanes"—that the phrase "larger class of airplanes" is equivalent to "class of larger airplanes"—we do not understand why LCDC would have intended to consider only wingspan or tail height, rather than also including airplanes that are larger by weight.

However, we think it is more likely that, by placing "larger" immediately before "class," rather than immediately before "airplanes," LCDC indicated an intention to refer to a larger—that is, a more inclusive—class of airplanes, rather than merely referring to larger airplanes. With that understanding, and considering that the FAA's method of determining critical aircraft includes consideration of MTOW and approach speed as well as wingspan or tail height, we conclude that LCDC intended "larger class of airplanes" to mean a class that includes airplanes with a greater variety of approach speeds, a greater variety of MTOWs, or a greater variety of wingspans or tail heights.

That textual understanding is consistent with the rule's context. As explained above, the legislature has empowered LCDC to allow certain transportation improvements—improvements that the legislature has not considered important enough to list in sections (1) and (2) of the statutory provisions—on EFU land without exceptions to goals 3, 4, 11, and 14. ORS 215.213(10)(b); ORS 215.283(3)(b). The uses allowed under those provisions necessarily represent LCDC's balancing of goal 12 transportation needs against goals 3, 4, 11, and 14. *See* ORS 197.340(1) (requiring LCDC to "give the goals equal weight in any matter in which the goals are required to be applied"). The considerations that might be relevant to that balancing process are numerous. However, we perceive no reason that LCDC would focus its rule exclusively on the physical dimensions of the wings or tails of airplanes that serve the airport.

The board, and the response briefs whose reasoning LUBA adopted, also reasoned that the development that the Master Plan proposes for the airport does not "permit service" to a larger class of airplanes because, when the Master

Plan was created, the airport's ARC could already have been C-II; that is, it was already serving many of the larger planes that the airport expansion would accommodate.

To assist in our consideration of that argument, we set out additional facts about the airport expansion proposed by the Master Plan. The Master Plan explains that, last time the Master Plan was updated, in 2000, the planned ARC for the airport was B-II:

> "According to the 2000 Airport Master Plan, the planned ARC was B-II, exemplified by the King Air turboprop and the Cessna Citation jet. At that time, ODA decided to constrain the forecast by keeping the airfield ARC at B-II. A runway designed for ARC B-II is adequate for about 45% of the business jets manufactured."

(Footnote omitted.) By the time of the 2012 update, the airport had more than 500 annual itinerant operations by airplanes that fit into Aircraft Approach Category C. Consequently, the Master Plan proposed that "the current ARC should be C-II." The Master Plan elaborated:

> "The current and forecast ARC is C-II, which reflects a family of business jets. The critical aircraft is the aircraft in ARC that uses the Airport the most. The current critical aircraft is the IAI Astra 1125. A runway designed for ARC C-II would be adequate for about 90% of the business jets manufactured."

(Footnote omitted.)

To explain how the airport could currently be meeting the FAA standards for an ARC of C-II even though it had a planned ARC of B-II and met B-II design standards, the Master Plan explained that "the airfield is adequate for many operators of Aircraft Approach Category C airplanes, even though the Airport does not meet all design standards for ARC C-II."[25]

The Master Plan proposed improvements to the airport to move from ARC B-II design standards to ARC

[25] Although the airport's planned ARC was B-II, it met C-II design standards in some respects, including in runway and taxiway width. In addition, larger planes can use airports with shorter runways and other lower-level design standards by employing constrained operations. The Master Plan explains that "[a] constrained operation is one that must reduce payload for takeoff, or stop en route for fuel, for example."

C-II design standards. The improvements necessary to meet C-II design standards were expanding the Runway Safety Area, expanding the Runway Object Free Area, expanding the Obstacle Free Zone, expanding the Runway Protection Zone, and adding runway blast pads.

The Master Plan also proposed lengthening the runway to a length more appropriate for the MTOW classification of the new critical aircraft. The Master Plan explains, "The current runway length of 5,004 feet accommodates 100% of the small aircraft fleet [(MTOW up to 12,500 lbs.)] with fewer than 10 passenger seats. However, the recommended lengths for larger aircraft exceed the current runway length." The development option that the Master Plan proposed included a runway expansion of 1,000 feet, yielding a 6,004-foot runway. The Master Plan identified a 5,500-foot runway as adequate for 100% of large airplanes with MTOW between 12,500 and 60,000 at 60% of their useful load. The Master Plan also explained, "The runway extension [(of 1,000 feet)] would accommodate nearly all business Jets with ARC C-II and below that could potentially operate at the Airport."

As explained above, the board reasoned (and respondents argued before LUBA) that the development proposed by the Master Plan would not "permit service to a larger class of airplanes" because, although the airport's planned ARC was B-II, the airport already served enough planes with an ARC of C-II to bring its ARC up to C-II. They contended that the airport expansion would not "permit service" to a larger class of airplanes because the airport already served larger airplanes. LUBA apparently agreed.

As we understand that argument, it construes "permit" to mean "to make possible." *Webster's Third New Int'l Dictionary* 1683 (unabridged ed 2002). Thus, the reasoning goes, because it is already possible for a larger class of airplanes to use the airport, the expansion does not "permit" service to those airplanes.

"Permit" also has another meaning: "to give (a person) leave **:** authorize." *Id.* If we understand "permit service" to be synonymous with "authorize service," then the rule is focused on the design capacity of the airport's facilities,

rather than the airplanes that it is possible for the facilities to accommodate. Under that interpretation, the question is whether the expansion or alteration of the airport authorizes service to a larger class of airplanes by increasing airport design standards or, by contrast, whether the expansion or alteration merely updates airport facilities within the existing design standards.

The latter construction is more consistent with the rule's context. If "permit" means "make possible," the rule allows nearly all expansions or alterations of public-use airports on EFU land. Many large airplanes can use an airport the size of Aurora State by means of constrained operations or in an emergency; the Master Plan documents service at Aurora State to planes with an ARC of D-III and a plane with an MTOW of 93,500 pounds. *See also* FAA AC 150/5000-17, *Critical Aircraft and Regular Use Determinations*, 3.11.1, at 3-4 ("[T]he airport sponsor cannot restrict airport access based on design standards without an FAA determination ***."). Because it is already possible for very large airplanes to use the airport, very few, if any, expansions or alterations will make it possible for a larger class of airplanes to use the airport.

Furthermore, as explained above, an airport's ARC increases only when the ARCs of the aircraft that *currently use* the airport have increased, because the critical aircraft determines the airport's ARC, and the critical aircraft is based on the airplanes that "regularly" or "substantially" use the airport. Consequently, an airport expansion or alteration that increases ARC design standards will always follow increased service to larger airplanes; it will never precede that service. If "permit service" means to make service possible, then an alteration or expansion that increases design standards will always fall within the rule—and be exempt from the goals—because that alteration or expansion will merely bring the airport facilities up to the design standards required by the airplanes currently served.

By contrast, if "permit service" means "authorize service," then the focus of the rule is on the design and size of the airport facilities, a logical consideration given the rule's context. As explained above, OAR 660-012-0065(3)(n)

represents LCDC's decision on how to balance goal 12 transportation needs against goals 3, 4, 11, and 14. It that context, LCDC likely intended the rule to focus on airport design and space needs, not whether it is possible for larger and faster planes to use runways that are designed for smaller, slower planes.

We conclude that LCDC intended "permit service" to mean "authorize service." With that understanding, an upgrade to design standards for a greater ARC or a longer runway to serve planes with greater MTOW is an expansion or alteration that permits—authorizes—service to a larger class of airplanes. Airplanes in the upgraded ARC or the greater MTOW grouping are then among the airplanes authorized to use the airport by virtue of its design standards.

Thus, an "expansion[] or alteration[] of a public use airport that do[es] not permit service to a larger class of airplanes" is an expansion or alteration that does not authorize the airport, by increasing design standards or otherwise, to serve a group of airplanes with a greater variety of approach speeds, a greater variety of MTOWs, or a greater variety of wingspans or tail heights. OAR 660-012-0065(3)(n). The Master Plan proposes increasing the airfield design standards from ARC B-II to ARC C-II and increasing the length of the runway to accommodate airplanes that approach the runway faster and airplanes that have an MTOW over 12,500 pounds. Accordingly, the Master Plan proposes an alteration or expansion of the airport that permits service to a larger class of airplanes.[26]

To summarize, LUBA erred in excluding the 2011 Master Plan—the Master Plan document that was before the board on October 27, 2011—from the record; in holding

[26] In light of our conclusion that OAR 660-012-0065(3)(n) does not cover the airport expansion proposed in the Master Plan, we need not consider petitioners 1000 Friends' and Schaefer's contentions that the rule is invalid. We do note, however, that nothing in the text of the rule suggests that LCDC intends to allow any transportation improvements on EFU land without applying the farm impacts test; the rule does not purport to supersede the statutory requirement that "[r]oads, highways and other transportation facilities and improvements" not otherwise addressed in ORS 215.213 and 215.283 can be allowed without a goal exception only if they are also "subject to" "ORS 215.296," the farm impacts test. ORS 215.213(10); ORS 215.283(3).

that the 2012 Master Plan did not propose airport development on EFU land; in relying on ORS 836.642 to conclude that proposed new uses at the Aurora State Airport are rural uses for land-use purposes; and in determining that OAR 660-012-0065(3)(n) applied.

Reversed and remanded.

Outlook

Fw: Communication re: Aurora Airport Master Plan Adoption and Compatibility Process

From Brandy Steffen <brandy.steffen@jla.us.com>
Date Tue 2025-03-04 2:22 PM
To Ashley Balsom <ashley.balsom@jla.us.com>; Jen Winslow <Jen.winslow@jla.us.com>

2 attachments (16 MB)
p17027coll5_29140.pdf; Friends of French Prairie v. Dept of Aviation.pdf;

BRANDY STEFFEN | **JLA PUBLIC INVOLVEMENT**
Partner + Senior Program Manager
brandy.steffen@jla.us.com » Schedule a 30 minute meeting

From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>
Sent: Wednesday, February 26, 2025 11:09 AM
To: Brandy Steffen <brandy.steffen@jla.us.com>; Samantha Peterson <SPeterson@CenturyWest.com>
Cc: THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>
Subject: FW: Communication re: Aurora Airport Master Plan Adoption and Compatibility Process

Good morning, please include in the public record.

Thank you,

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER
OFFICE 503-378-2523 **CELL** 503-302-5455
M-F 7:30am – 4pm

From: Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>
Sent: Tuesday, February 25, 2025 12:05:19 PM
To: Ben Williams <fofp99@gmail.com>
Cc: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Cathryn.E.Stephens@ci.eugene.or.us <cathryn.e.stephens@ci.eugene.or.us>; Anderson Becki L <Becki.L.Anderson@doj.oregon.gov>; Scruggs Rebecca <rebecca.scruggs@doj.oregon.gov>
Subject: RE: FW: Communication re: Aurora Airport Master Plan Adoption and Compatibility Process

Mr. Williams,

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Thank you for your quick response.

Again, I direct you to Dir. Sugahara's response to your question regarding the process for issuing a final decision adopting the master plan and a final decision on the state agency coordination requirements. To the extent you have in fact asked a question, that question has been answered to the best of the agency's ability. To repeat, ODAV and the Board will follow state law with respect to the adoption of the master plan and the adoption of the state agency coordination findings. If you have further questions or comments regarding the Board's adoption of the state agency coordination findings, that decision will be made as part of a regularly scheduled and noticed Board meeting. Until that agenda item has been set, any questions or comments as to process or the substance of a future state agency coordination decision are premature. Please refer to ODAV's website for a listing of future meetings and agenda items.

You are incorrect as to your interpretation of the meaning and effect of the multiple judicial decisions, including the Supreme Court's denial of a petition for review, relating to the Board's 2019 State Agency Coordination findings. And, I assume from your email below that you will continue to misrepresent the express wording of these decisions. While I we would prefer that you refrain from doing so, at this point and as we explained to LUBA in our request to remand the matter back to the Board, this issue is now moot and no longer relevant to the current master planning process.

I am also unclear as to why it is necessary to include the Governor's office, DLCD, Marion County, or any organization on these emails and have removed them again from this discussion. Please feel free to forward my response if you feel that is necessary to include them.

Stacy C. Posegate
Sr. Asst. Atty General | Transportation and Infrastructure | General Counsel Division
971-718-7950

From: Ben Williams <fofp99@gmail.com>
Sent: Sunday, February 23, 2025 1:43 PM
To: Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov>
Cc: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>; Cathryn.E.Stephens@ci.eugene.or.us; Anderson Becki L <Becki.L.Anderson@doj.oregon.gov>; Scruggs Rebecca <rebecca.scruggs@doj.oregon.gov>; WARNER Chris * GOV <Chris.Warner@oregon.gov>; House Timothy <timothy.a.house@faa.gov>; Doyle, Peter (FAA) <peter.doyle@faa.gov>; WYTOSKI Beth * GOV <Beth.Wytoski@oregon.gov>; AHRENS Melissa * DLCD <Melissa.Ahrens@dlcd.oregon.gov>; Austin Barnes <abarnes@co.marion.or.us>; Guile-Hinman, Amanda <guile@ci.wilsonville.or.us>; Mary Kyle McCurdy <mkm@friends.org>; Joseph Schaefer (jschaefer@ci.aurora.or.us) <jschaefer@ci.aurora.or.us>
Subject: Re: FW: Communication re: Aurora Airport Master Plan Adoption and Compatibility Process

CAUTION EXTERNAL EMAIL* This email originated from outside of DOJ. Treat attachments and links with caution. *CAUTION EXTERNAL EMAIL

Stacey;

Thank you for your email responding to the questions I sent to Director Sugahara and Tim House of the FAA. This correspondence is also attached in PDF.

First, let me point out that while you assumed I was making some kind of definitive statement about Oregon law relative to the approval and adoption to the current Aurora Airport master plan, in fact I asked a question of both gentlemen about approval and adoption and compliance with Oregon land use laws. A question which you did not answer.

Second, specific to your assertion that I have been making misleading and incorrect statements concerning the Court of Appeals findings about adoption and approval of the 2012 Master Plan, you qualify it by stating that "none of the three tribunals…have issued **any order or judgment** finding that the 2012 Master Plan was, or was not, adopted." That lawyerly language admits the 2012 Master Plan may not have been adopted, and deflects from the historical reality because, as you know, the substantive rulings from the Oregon Court of Appeals are in the form of opinions, not orders or judgments. And LUBA's second order never addressed the Court of Appeals' instruction to reconsider whether the Master Plan complies with the Agricultural Lands policies of the comprehensive plan. Your clients and LUBA skated around that instruction, and no final determination of compliance was ever made by either LUBA or the Aviation Board.

The Court of Appeals found that the Aviation Board failed to approve and adopt the 2012 Aurora Airport master plan. Your appeal of that decision to the Oregon Supreme Court argued that "The Aviation Board and ODA adopted the 2012 Aurora Airport Master Plan in 2011" but that court refused to even consider the argument. I know it was never adopted not just because I attended every Aviation Board meeting in 2011 and 2012, but because in 2019 ODAV confirmed that fact in writing —see attached.

That in turn led to the failed attempt by the Aviation Board in October of 2019 to retroactively approve the 2012 master plan eight years after the fact!

Notwithstanding those personal observations, you referenced the LUBA and Court of Appeals rulings, from which you ignore these salient quotations (all of which I do have in my files!), so allow me to share.

1. The 2012 Master Plan was not properly approved and adopted.

…it is impossible to tell from the 2012 Master Plan what material was added and what was removed after 2011. LUBA erred in concluding that the 2012 Master Plan includes the 2011 Master Plan… ***the board never formally approved or adopted the 2012 Master Plan*** *after October 27, 2011.*

Court of Appeals, June 16, 2021, No. 419, Pages 325 & 320.

2. The master plan was never determined to comply with Marion County's Comprehensive Plan.

the Master Plan proposes airport development on EFU land. ***That conclusion requires us to remand to LUBA for reconsideration of its determination that the Master Plan complies with the Agricultural Lands policies*** *of the MCCP.*

Court of Appeals, June 16, 2021, No. 419, Page 331.

3. The 2012 Master Plan does not exist without the 2019 OAB decision.

*We also reject private respondents' contention that the events of 2019 are the only "proceedings before the final decision maker" at issue here. OAR 661-010-0025(1)(b). The board made its 2019 findings in an effort to comply with OAR 738-130-0055(6), which provides that "[t]he Aviation Board shall adopt findings of [land-use] compatibility * * * when it adopts the final facility plan." (Emphasis added.)* ***Under that rule, the board's adoption of a final facility plan and its land-use compatibility findings are two parts of the same proceeding.*** *That remains the case here, notwithstanding the delay between the adoption of the Master Plan and the findings of land-use compatibility.*

Court of Appeals, June 16, 2021, No. 419, Page 325.

4. The 2012 Master Plan is "ineffective".

*The petitions for judicial review sought review of an October 31, 2019, decision (the 2019 Order) of the Oregon Aviation Board (OAB) under ORS 183.484, which provides for judicial review of orders in other than contested cases…**In its opinion remanding the 2019 Order, LUBA, consistent with its precedent, concluded that "after remand, the challenged decision is ineffective."***

Court of Appeals Opinion; March 6, 2024 [Nonprecedential Memo Op: 331 Or App 438 (2024), Page 441.

I trust that you and your client will reset your interpretation of the referenced rulings and additionally elect to cease the revisionist history in terms of what did and did not happen in the period from 2011 through 2024 as concerns the compliance of the master plan with the Marion County comprehensive plan as well as the approval and adoption of the so-called 2012 Aurora Airport Master Plan.

It is also worth noting to you that the so-called 2012 Aurora Airport Master Plan is posted on the Aurora Airport web site as the "Current Master Plan,"which is rather difficult to understand on the face of it, given all of the above!

Sincerely

Ben Williams, President

Friends of French Prairie

On Fri, Feb 21, 2025 at 4:59 PM Posegate Stacy C <Stacy.C.Posegate@doj.oregon.gov> wrote:

> Dear Mr. Williams,
> Director Sugahara forwarded your emails to me to assist in providing a response. As the Director stated, your emails will be made part of the Aurora Master Plan decision record to preserve your statements and to ensure that any member of the public will have access to all of the comments and testimony provided as part of the planning process.
>
> As to your comment below, it appears that you are not asking a question. But, instead stating your interpretation of ODAV and the Board's legal obligations with respect to the process for making a final land use decision, including the final adoption of a master plan and the issuance of the state agency coordination findings supporting that plan. As Dir. Sugahara responded to you below, the Board and ODAV will follow the appropriate process for taking these final actions. I invite you to review ORS 197.180, ORS 836.025, OAR 660, division 30 and OAR 738, division 130 if you have any further questions about the laws that apply to the Board and ODAV's land use planning authority and duties.
>
> I would also like to take this opportunity to correct you on a statement that you made during the last PAC meeting and that you continue to make publicly that the Court of Appeals held that the 2012 Master Plan was never adopted. That is not correct and none of the three tribunals (LUBA, the Court of Appeals or the Marion County Circuit Court) have issued any order or judgment finding that that the 2012 Master Plan was, or was not, adopted. I have attached for your convenience the final judgments by the Court of Appeals in 2021 when it was asked to review LUBA's affirmation of the Board's 2019 State Agency Coordination Findings, and the 2023 Judgment affirming the Marion County Circuit

Court's dismissal of the petitions for judicial review of the 2019 SAC Findings. As I believe you are aware, the Court of Appeals in its 2012 decision found that it was unable to determine whether LUBA's was decision was correct because the record before LUBA was not complete. On that basis, it remanded the matter back to LUBA. LUBA in turn remanded the matter back to the Board, at its request. The effect of this remand, as stated in the 2023 attached judgment, was to render the **2019 SAC Decision** ineffective. No decision was entered or made as to the validity of the 2012 Master Plan. I ask that you please review your files which should include the briefing, orders and judgments in the LUBA matter, the circuit court matter and the two court of appeals cases and refrain from misstating the ultimate holdings in these cases.

I hope that this email addresses your comments below and any additional questions you may regarding the 2012

Stacy C. Posegate
Sr. Asst. Atty General | Transportation and Infrastructure | General Counsel Division
971-718-7950
GG1296-22

From: Ben Williams <fofp99@gmail.com>
Date: Friday, February 21, 2025 at 11:02 AM
To: SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
Cc: STEPHENS Cathryn E <CStephens@eugene-or.gov>, House Timothy <Timothy.A.House@faa.gov>, Doyle, Peter (FAA) <peter.doyle@faa.gov>, WARNER Chris * GOV <Chris.WARNER@oregon.gov>, WYTOSKI Beth * GOV <Beth.Wytoski@oregon.gov>, AHRENS Melissa * DLCD <Melissa.Ahrens@dlcd.oregon.gov>, Austin Barnes <abarnes@co.marion.or.us>, Guile-Hinman, Amanda <guile@ci.wilsonville.or.us>, Joseph Schaefer (jschaefer@ci.aurora.or.us) <jschaefer@ci.aurora.or.us>, mk@friends.org <mk@friends.org>
Subject: Re: Communication re: Aurora Airport Master Plan Adoption and Compatibility Process

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Kenji;

Thank you for the prompt response to my last email concerning the approval and adoption process for the Aurora Airport Master Plan. However, the response that my letter will be added to the record does not actually address the inquiry. To clarify, the question I asked is whether ODAV will confirm that the Oregon Aviation Board will adopt the master plan with land use findings pursuant to OAR 738-130-0055(6), and any appeals of that adoption will be completed, prior to ODAV or the OAB signing the Airport Layout Plan and prior to confirming to the FAA that the master plan is consistent with local land use and zoning pursuant to grant assurance number 6.

Please answer yes or no, and include the answer in the record.

Further, to Mr. House:

Will the FAA confirm that it will not sign the Airport Layout Plan or conclude that grant assurance number 6 is satisfied until the Oregon Aviation Board has adopted the master plan with land use findings pursuant to OAR 738-130-0055(6) and successfully resolved any appeals thereof under Oregon law?

Please answer yes or no, and include the answer in the record.

Sincerely

Ben Williams

Friends of French Prairie

On Tue, Feb 18, 2025 at 8:43 AM SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov> wrote:

> Mr. Williams,
>
> Thank you very much. Your letter will be added to the ongoing master plan record and both the Department and the Board intend that any final decision made with respect to the master plan, including state agency coordination findings supporting that plan, will be made in accordance with the applicable state and federal law.
>
> Sincerely,
>
> **KENJI SUGAHARA**
> **OREGON DEPARTMENT OF AVIATION**
> DIRECTOR
>
> **OFFICE** 503-378-2340
>
> **EMAIL** kenji.sugahara@odav.oregon.gov
>
> **3040 25TH STREET SE, SALEM, OR 97302**
>
> **WWW.OREGON.GOV/AVIATION**
>
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>
> ---
>
> **From:** Ben Williams <fofp99@gmail.com>
> **Sent:** Monday, February 17, 2025 11:04 AM
> **To:** STEPHENS Cathryn E <CStephens@eugene-or.gov>; SUGAHARA Kenji <Kenji.SUGAHARA@odav.oregon.gov>
> **Cc:** House Timothy <Timothy.A.House@faa.gov>; Doyle, Peter (FAA) <peter.doyle@faa.gov>; WARNER Chris * GOV <Chris.WARNER@oregon.gov>; WYTOSKI Beth * GOV <Beth.Wytoski@oregon.gov>; AHRENS Melissa * DLCD <Melissa.Ahrens@dlcd.oregon.gov>; Austin Barnes <abarnes@co.marion.or.us>; Guile-Hinman, Amanda <guile@ci.wilsonville.or.us>; Joseph Schaefer (jschaefer@ci.aurora.or.us) <jschaefer@ci.aurora.or.us>; mk@friends.org
> **Subject:** Communication re: Aurora Airport Master Plan Adoption and Compatibility Process
>
> This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.
>
> Chair Stephens and Director Sugahara;
>
> Please see the attached letter regarding the approval and adoption process for the Aurora Airport Master Plan in addition to the process for compliance with local comprehensive plans and statewide planning goals.

> The intent is to clarify confusion resulting from what the PAC and Aviation Board have been told versus the statutory requirements that apply.
>
> Sincerely
>
> --
> Ben Williams
> Friends of French Prairie
> fofp99@gmail.com

--
Ben Williams
Friends of French Prairie
fofp99@gmail.com

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****

--
Ben Williams
Friends of French Prairie
fofp99@gmail.com

***** CONFIDENTIALITY NOTICE ***** This e-mail may contain information that is privileged, confidential, or otherwise exempt from disclosure under applicable law. If you are not the addressee or it appears from the context or otherwise that you have received this e-mail in error, please advise me immediately by reply e-mail, keep the contents confidential, and

immediately delete the message and any attachments from your system.
****

Mayors of the Aurora State Airport Area Communities

Aurora **Wilsonville**

Mayor Brian Asher **Mayor Shawn O'Neil**

June 2, 2025 *Sent via email to:*

The Honorable Tina Kotek, Governor, State of Oregon *Governor.Kotek@oregon.gov*
The Honorable Ron Wyden, U.S. Senator *Breanna_Irish@wyden.senate.gov*
The Honorable Jeff Merkley, U.S. Senator *Sara_Schmitt@merkley.senate.gov*
Honorable Andrea Salinas, U.S. Representative *Erin.Chen@mail.house.gov*

RE: Intervention Requested to Address Issues of Significant Public Concern with Federal Aviation Administration (FAA) and Oregon Department of Aviation (ODAV) Aurora State Airport (KUAO) 2021-2025 Master Planning Process

Dear Governor Kotek, Senator Wyden, Senator Merkley and Congresswoman Salinas:

We write to you as the elected leaders of the communities—the Cities of Aurora and Wilsonville—located in closest proximity to the Aurora State Airport (KUAO) to express our profound disappointment at the Federal Aviation Administration (FAA) and Oregon Department of Aviation (ODAV) handling of the long, drawn-out 2021-2025 Aurora State Airport Master Planning process.

ODAV and the FAA are now proposing a $185 million boondoggle to greatly expand the Aurora State Airport with more larger jets and a longer runway despite substantial public-safety concerns over the Airport's operations in a highly constrained site. Our communities bear the brunt of impacts of the airport's operations, and yet the federal and state aviation departments are discounting our concerns with plans to expand the airport despite numerous public-safety and other substantial problems that have been identified but not addressed in the pending Master Plan.

We request your immediate intervention to correct a series of failures with the master plan process and to provide a path forward that utilizes actual airport data, provides for a regional approach to airport planning and respects local community concerns regarding aircraft noise and low-altitude overflights.

In particular, we respectfully ask for:

- **Governor Kotek to instruct the ODAV State Aviation Board to Not adopt the new Aurora State Airport Master Plan** and instead to request a re-do of the Plan without a predetermined outcome favoring expansion that conforms with actual data, the reality on the ground of the Airport's highly constrained site, the role of other airports in the region and local community aspirations.

- **Senators Wyden and Merkley and Congresswoman Salinas to intercede with the FAA to Not approve the new Aurora State Airport Airport Layout Plan (ALP)** submitted by ODAV and to return the unapproved ALP to ODAV for action first by the State Aviation Board.

  Furthermore, we request our federal representatives to lobby the FAA to not force ODAV to accept a larger class of aircraft known as C-II and D-II at the Aurora State Airport, and instead to request the FAA to withdraw the finding that B II airfield design is not appropriate.

The Cities of Aurora and Wilsonville, along with other Planning Advisory Committee (PAC) members to the Aurora State Airport Master Planning process such as 1000 Friends of Oregon and Friends of French Prairie, seek to raise significant issues of public concern, yet there has not been a single public hearing before either the FAA or ODAV. This federally funded Aurora State Airport Master Plan demonstrates the federal and state aviation departments apparent bias and inability at providing fair public processes that meet Oregon's standards for meaningful public engagement.

One of the most important aspects that the FAA has highlighted at the Aurora State Airport is the Airport's current unsafe operation that threatens public safety. So many modifications of public-safety standards have occurred over the years that the FAA now demands improvement to these public-safety concerns by moving a state highway and greatly enlarging the Airport. The FAA has in effect threatened ODAV that failure to expand the Aurora State Airport will result in the Airport being placed in a "maintenance mode" and withdrawal of federal aviation funds. And ODAV allows larger, heavier aircraft to use the Airport than the Airport's rating that further increases public-safety risks, and results in damage to the runway. Thus, in a sense, ODAV's actions in allowing larger aircraft to use the Aurora State Airport has forced the agency into a position that it must accept Airport expansion in order to keep receiving federal airport improvement funds — many members of the community speculate that this was ODAV's intention all along in allowing more larger, over-sized aircraft to use the Airport.

Airport expansionists have demonstrated that they are very concerned about FAA's finding of a lack of ODAV compliance with important public-safety standards and demand for correction of key safety features without further "modifications of standards" (MOS). A proposed Oregon Senate Resolution praising the Aurora State Airport's importance was introduced in the current 2025 state legislative session for the primary purpose of seeking FAA deferral of not issuing MOS for public safety standards at the Airport, and was deemed important enough that those giving oral testimony before the Rules Committee sought to equate federal modifications of standards with local conditional use permits in an attempt to lessen the fact that in this

case the desired MOS's result in a relaxing of airfield design standards and a loosening of safety standards. In other words, Airport expansion interests seek new modifications of standards that have the effect of decreasing public safety.

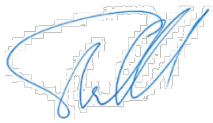
We are concerned that ODAV is again making similar mistakes as it did with the prior controversial 2011/2012 Aurora State Airport Master Plan process that both the Oregon Supreme Court and the Oregon Court of Appeals found in 2021 violated Oregon land-use and public-process laws. The Court of Appeals found that the Aviation Board failed to approve and adopt the "2012 Master Plan" in 2011—notwithstanding that it was submitted to the FAA, which then approved the accompanying Airport Layout Plan that was then signed by both FAA and ODAV. The 2012 Master Plan was not approved and adopted at the time, OAB only attempting to do so eight years after the fact in 2019. We have found so far that the State Aviation Board is unable to demonstrate decisive leadership that provides confidence to local-government officials that federal and state planning processes are conducted in a legal and ethical manner above reproach, which at this time appears questionable.

On the following pages is a summary of core problems with the increasing contentious 2021-2025 Aurora State Airport Master Plan process — substantial problems that most parties in the master plan process oppose. In all of our years of government service, we have never seen federal and state agencies act with such disregard to the concerns of local communities, and appropriate and fair public process. We request your intervention now to provide for an unbiased process that produces trust-worthy results for a viable Aurora State Airport Master Plan. We believe that if ODAV were to comply with—rather than seek to evade—the letter and spirit of Oregon's land-use and public-process laws, judicial intervention to set a course correction would not be a necessary remedy that must be pursued by local governments and concerned citizens.

Again, we appreciate your time and consideration of these important issues, and we look forward to your timely response. Thank you.

Sincerely,

Brian Asher, Mayor
City of Aurora
mayor@ci.aurora.or.us



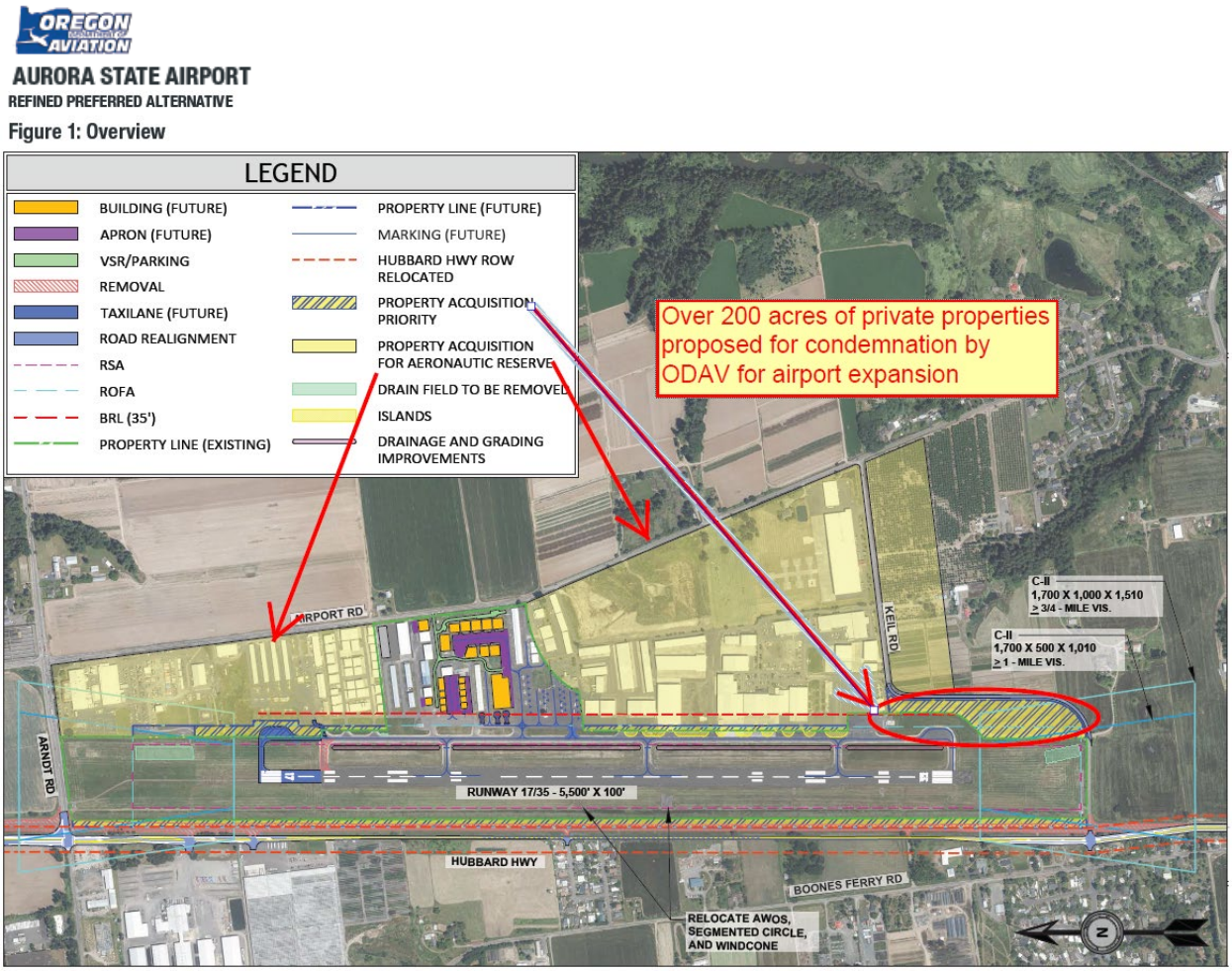
Shawn O'Neil, Mayor
City of Wilsonville
mayor@ci.wilsonville.or.us

cc: Office of Governor Tina Kotek
Senate President Rob Wagner
Senator Courtney Neron Misslin (SD 13)
Clackamas County Board of County Commissioners
Marion County Board of County Commissioners
William Garrison, FAA NW Mountain Region
State Aviation Board
House Speaker Julie Fahey
Metro Council President Lynn Peterson
Metro Councilor Garrett Rosenthal
Gordon Howard, DLCD Regional Rep
Warren Ferrell, Seattle Airports Dist Office

Following is a summary of core problems with the increasing controversial 2021-2025 Aurora State Airport Master Plan process:

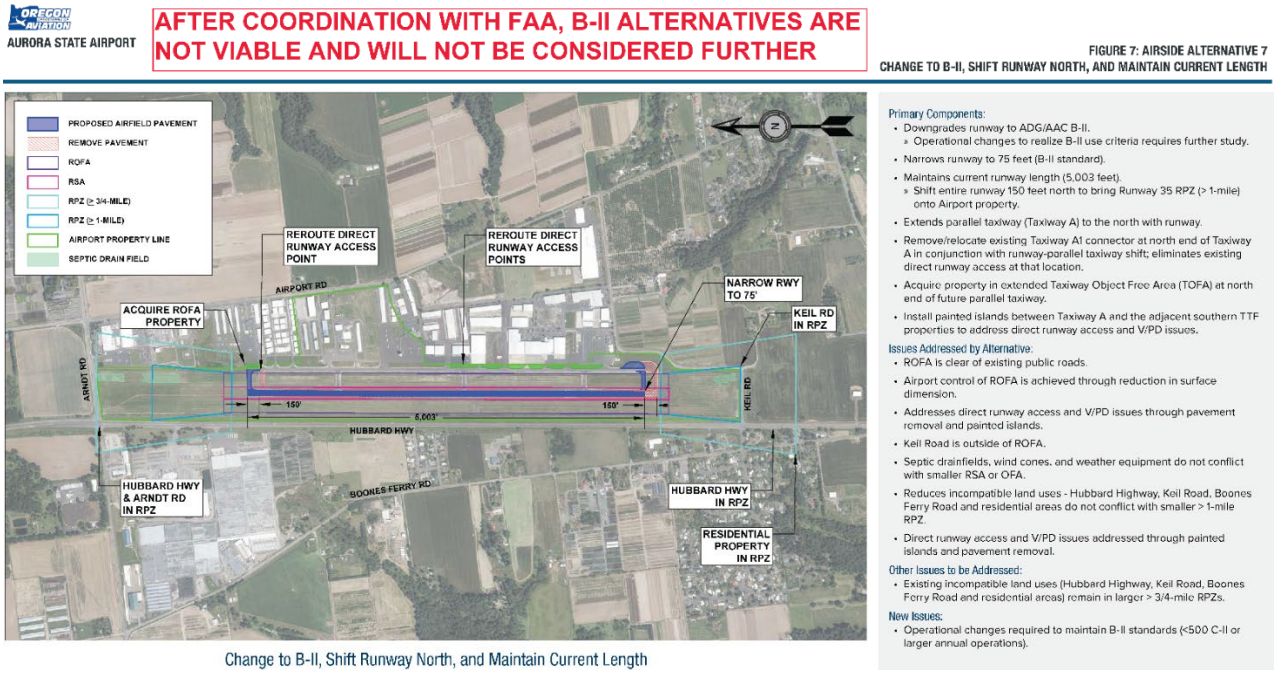
- **Proposed Expansion of Aurora State Airport by the new Master Plan proposes to condemn over 210 acres of private property, including:**
    - 148 acres of private airport businesses' property zoned "Public Use";
    - 62 acres zoned Exclusive Farm Use (EFU), composed of 16 acres at the former church camp, 31 acres of prime farmland south of Keil Road, and 15 acres west of State Highway 551 proposed for relocation by the Master Plan.

As described by PAC member Tony Helbling of Wilson Construction, ODAV's publicly stated position to acquire private business properties at the Airport creates "pre-condemnation blight" by reducing the real-estate value of these properties. Additionally, the proposed property acquisition by ODAV to be funded by FAA Airport Improvement funds includes prime EFU farmland, dozens of low-income residents' housing and local, long-term agricultural-based businesses along Highway 551, which ODAV proposed to relocate 80 feet to the west of current location.



- **Only Airport-Expansion Alternatives Are to Be Considered; No Alternatives Maintain Airport's Current Footprint:** Of seven (7) original Alternatives in the draft Master Plan, three (3) that would keep the Airport operational for the vast majority of 88% of all current airport users have been arbitrarily eliminated by the FAA. Only four (4) Alternatives remain that all propose to expand the airport onto prime farmland, add a 500-foot runway extension and spend millions of taxpayer dollars to move State Highway 551 to accommodate only 7% of large, oversized aircraft.

  The FAA, however, has told the public that a "No Action" Alternative is *Not allowable* and *only Airport expansion* can occur since the Aurora State Airport is already violating too many air-safety requirements, which seems to indicate that other steps should be taken to increase public safety.



Change to B-II, Shift Runway North, and Maintain Current Length

See Exhibit for details.

- **Bogus Operations Forecast Numbers Used to Justify Airport Expansion:** The FAA and ODAV are ignoring nine (9) years' worth of actual Airport control tower flight operations data to project future Airport growth. Rather than use actual Airport operations data or the standard "FAA Oregon Federal Contract Tower Terminal Area Forecast (TAF) Model," the draft Master Plan uses inflated population growth projections of Clackamas and Marion Counties to determine future Airport growth. ODAV's FAA-approved dubious methodology inexplicably equates population growth with increasing operations at the Airport — a false correlation between general population growth of counties and Airport without passenger air service. Furthermore, ODAV Airport Operations Forecast is 50% greater than the

standard FAA Oregon Federal Contract Tower Terminal Area Forecast (TAF) Model forecast.

- **Actual Data Is Contrary to Decisions Favoring Airport Expansion:** FAA and ODAV are disregarding actual airport operations data that shows a decrease over time in larger, heavier C-I and C-II aircraft, and that smaller, lighter B-II and smaller aircraft are the vast majority of Airport users. The current FAA-approved Airport Layout Plan shows the Aurora State Airport to be an airport with an Airport Reference Code (ARC) of C-II. This increase in ARC occurred as a result of the so-called "2012 Master Plan," and prior to that the airport was rated as B-II. Approximately 88% of all aircraft using the airport are smaller B-II aircraft, while about 7% of aircraft are larger C-I and larger aircraft. It makes no sense to expand the airport for larger aircraft when those aircraft operations are decreasing.

TABLE 3-7: AURORA STATE AIRPORT INSTRUMENT FLIGHT OPERATIONS

	TFMSC IFR Operations by AAC/ADG - Calendar Year Data											
AAC/ADG	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	Average Annual Operations	
A-I	2,372	2,638	2,414	2,482	2,750	2,750	3,428	2,458	2,162	2,330	2,578	28.0%
A-II	410	494	1,108	1,554	1,814	1,966	1,844	1,158	930	1,398	1,268	13.8%
A-III	14	6	2	4	4	10	6	2	0	4	5	0.1%
A-IV	0	0	0	0	0	0	0	0	0	0	0	0.0%
B-I	1,498	1,368	1,422	1,194	1,198	1,126	1,134	1,190	1,024	1,154	1,231	13.4%
B-II	2,222	2,232	2,214	2,620	3,270	3,110	3,152	3,798	3,448	4,182	3,025	32.8%
B-III	0	0	0	2	0	2	4	8	2	0	2	0.0%
B-IV	0	0	0	0	0	0	0	0	0	0	0	0.0%
C-I	360	374	514	440	340	306	274	286	170	274	334	3.6%
C-II	348	378	294	208	316	370	358	226	242	264	300	3.3%
C-III	18	10	4	8	0	14	50	54	10	0	17	0.2%
C-IV	0	0	0	0	0	0	0	0	0	0	0	0.0%
C-V	0	0	0	0	0	0	0	0	0	0	0	0.0%
D-I	2	8	16	0	4	6	8	4	0	12	6	0.1%
D-II	4	0	4	0	2	6	2	8	26	84	14	0.2%
D-III	6	10	4	2	6	8	4	0	4	6	5	0.1%
D-IV	0	0	0	0	0	0	0	0	0	0	0	0.0%
D-V	0	0	0	0	0	0	0	0	0	0	0	0.0%
Unknown	446	390	380	388	504	376	366	472	442	572	434	4.7%
Total	**7,700**	**7,908**	**8,376**	**8,902**	**10,208**	**10,050**	**10,630**	**9,664**	**8,460**	**10,280**	**9,218**	100.0%
Operations by AAC C and D Aircraft	**738**	**780**	**836**	**658**	**668**	**710**	**696**	**578**	**452**	**640**	**676**	
Operations by ADG II and Larger	**3,022**	**3,130**	**3,630**	**4,398**	**5,412**	**5,486**	**5,420**	**5,254**	**4,662**	**5,938**	**4,635**	

87.9%

Down-ward Trend

7.3%

Source: FAA TFMSC Report - 4/14/2022 (Aurora State Airport)

Table 3-7 from the new Aurora State Airport Master Plan compares 2021 Operations data with the 10-year Average Annual Operations data and reveals the following:

- At no time did C-II aircraft ever meet the 500 operations FAA threshold for designating an airport's ARC

- The most active class of aircraft accounting for largest share of operations at 33% are **B-II aircraft,** which totaled 2,066 operations in 2021, *45% over the 10-year average.*
- The second most active group, **C-I aircraft,** totaled 252 ops in 2021, *23% below the 10-year average.*
- The third most active group, **C-II aircraft,** totaled 218 ops in 2021, *52% below the 10-year average.*

To make matters worse, ODAV has submitted to the FAA for approval an Airport Layout Plan (ALP) that states that ODAV seeks to re-classify the Aurora State Airport as CII/DII, although during the master plan process the concept of increasing aircraft size to DII was never presented nor discussed. Thus, ODAV has again demonstrated deceit in how the agency approaches the master-planning process in relation to the conclusion of the Aurora State Airport Master Plan.

- **ODAV Seeks a Money Grab with Airport Expansion for Bigger Aircraft that Burn More Fuel:** The main revenue source for Oregon Department of Aviation is a tax on aviation fuel, with Aurora State Airport generating a significant cash flow for the agency. ODAV also generates revenue from aircraft hangar leases at the Airport.

  Expansion of the Aurora State Airport to accommodate more large, heavy aircraft can dramatically increase aviation fuel sales and hangar rentals that provide more funds for ODAV, despite negative impacts to residents, farmers, environment and climate-change goals. In essence, the Aurora State Airport competes with other regional airports as a relatively cheap gas station and parking lot for aircraft and no additional landing fees.

- **FAA and ODAV Do Not Consider Negative Impacts to Other Regional Airports of Aurora State Airport Expansion:** The FAA and ODAV disregard that other regional airports—including Hillsboro, PDX, Salem, McMinnville, Troutdale and Eugene—with over 5,000-foot runways are all underutilized and would welcome additional based aircraft and operations. Each of these airports has less total average daily operations in 2023, ranging from -22% to -64%, than 10 years prior in peak-year of 2013.

  How does the Aurora State Airport fit in with other airports in the area? Does it make sense to spend millions on expanding Aurora, when so many other airports are operating far below past levels? The Master Plan makes no attempt to conduct an analysis, which the land use laws require prior to expansion onto agricultural land outside an urban growth boundary. In the interest of safety, should we keep

larger private jets with heavy fuel loads at the safest possible airport, PDX, where highest level fire services are provided 24/7 on-airport?

The table of data below illustrates the across-the-board decline in aircraft operations at regional airports in northwest Oregon.

Airport	Direction & Distance from KUAO	Runway dimensions (largest)	Weight Capacity (single gear)	Fire & Rescue	TAF data avg daily Total Ops (peak year)	ATADS data 2019: avg daily Total Ops	ATADS data 2023: avg daily Total Ops	ATADS data % local Ops	2023 vs peak year
Aurora (KUAO)	--	5,003ft x 100ft	30,000 lbs	no ARFF Index	286 (2013)	172	173	46%	-40%
Portland International (KPDX)	22nm NNE	11,000ft x 200ft	200,000 lbs	ARFF Index E	898 (1997)	653	521	1%	**-42%**
Hillsboro (KHIO)	19nm NW	6,600ft x 150ft	50,000 lbs	no ARFF Index	714 (2008)	422	503	64%	**-30%**
Salem (KSLE)	23nm SW	5,811ft x 150ft	105,000 lbs	ARFF Index B	272 (2007)	108	121	41%	**-56%**
McMinnville (KMMV)	16nm W	5,420ft x 100ft	40,000 lbs	no ARFF Index	213 (2007)	no ATC, no count	no ATC, no count	??	
Troutdale (KTTD)	24nm NE	5,399ft x 150ft	19,000 lbs	no ARFF Index	367 (2018)	267	287	72%	**-22%**
Eugene (KEUG)	70nm SSW	8,009ft x 150ft	120,000 lbs	ARFF Index C	443 (1991)	172	159	32%	**-64%**

ARFF: Aircraft Rescue & Fire Fighting Index ranges from 'A' to 'E'; PDX has the highest ARFF Index, to handle accidents for the largest aircraft.
ATADS & TAF are two FAA databases; ATADS provides precise operational counts for each of 500+ U.S. airports with ATC (air traffic control tower); TAF is Terminal Area Forecast and provides past annual operations totals and future projected ops levels for each of nearly 4,000 U.S. airports.
Weight Bearing Capacity is an important metric, to define which aircraft can safely and sustainably use a runway. When an airport authority allows uses by larger and overweight aircraft, the runway surface is rapidly degraded, which reduces safety.

Rather than working with the FAA create a rational coordinated airport operations program in the Portland metro/Willamette Valley region, ODAV's actions to expand the Aurora State Airport at the current projected cost of $185 million is severely detrimental to these other airports' operations. For example the Port of Portland is seeking $150+ million to strengthen the PDX runway to be seismically resilient; whereas Oregon Department of Geology and Mineral Industries geologic hazard maps illustrate that the Aurora State Airport runway will be broken apart into pieces when the projected 9.0 Cascadia Subduction Earthquake hits.

- **Aurora State Airport Master Plan Effort is Tainted by Poor Quality, Four-Year-Long Public-Engagement Process:** The Aurora State Airport Master Plan process has been riddled with unnecessary requirements and lack of communications that hamper public engagement. While commencing the Aurora State Airport master plan process in 2021, one-year-plus delays by FAA and ODAV are now resulting in a tentative completion date of the master plan in 2025. A four-year process for a small airport's master plan is by definition a long, drawn-out process that frustrates meaningful opportunity for public engagement.

  ODAV initially required advance public registration to attend public meetings of the PAC and key information about the process has not been communicated timely to

the PAC. If members of the public had not registered in advance to attend a PAC meeting, they were unable to attend at all.

Other than a meeting agenda, ODAV never sent any information to the PAC members prior to PAC meetings. Thus, PAC members went in "blind" each time to a PAC meeting and had no idea of the specific issues or topics to be discussed. Even at the last PAC meeting in February 2025, the Director of ODAV expressed surprise that the proposed ALP had not been sent to PAC members in advance of the meeting; thus PAC members were unable to intelligently review and discuss the ALP as presented.

An FAA/ODAV-hosted Open House on the four (4) remaining Airport-expansion alternatives in June 2024 was barely promoted by the agencies, with no announcements being published in local media or other forms of substantial public notification being used. Since the City of Wilsonville could not allow such a travesty of public input by conducted, the City actively notified local-area constituents. ***And to make matters worse, the agencies ran out of public comment forms less than half-way through the three-hour open-house event attended by hundreds of concerned citizens whose comments were unable to be collected or addressed.***

- **Master Plan Totally Ignores Important Issues and Key State Laws**: None of the four (4) remaining Aurora State Airport expansion alternatives in the draft Master Plan address substantively any land-use, surface transportation, pollution and other issues of concern to area constituents or that are required by Oregon law:

  A. **No study of surface-transportation impacts on poor quality roads in the Airport area vicinity** that are narrow, unimproved rural county roads with no shoulders or sidewalks and deep ditches. No study of Airport expansion on increased traffic has been conducted and no improvements to roads servicing the Airport are proposed by the Master Plan. While proposing airport expansion, the Master Plan ignores that people need to drive to the airport on hazardous roads and are unable to take a bus, walk or bike to the Airport.

     Related to the lack of study of Airport expansion impacts to local roads, ODAV failed to conduct Oregon's mandatory Climate Friendly Equitable Communities (CFEC) analysis on the proposed relocation of State Highway 551 and enlarged intersection with Boones Ferry Road. The $185 million proposed Airport expansion seeks to condemn private-property for State highway roadway relocation/expansion over one mile long and displace lower-income neighborhoods and rural agricultural businesses.

  B. **Negative impacts to the farming-based agricultural economy** due to proposed airport expansion onto prime EFU farmlands of French Prairie and

resulting speculative real-estate deals that drive up the cost of farmland near the airport are not addressed. Already local farmers complain about land-speculation of developers buying cheap farmland to 'flip' to an urban airport use.

C. **No mitigation methods for low-flying overflights and loud aircraft noise** that negatively impact area real-estate values and residents' quality-of-life are presented in the Master Plan. Already the cities of Aurora and Wilsonville field increasing numbers of complaints from constituents regarding loud and low-flying aircraft that do not follow ODAV-designated flight paths. Aurora and Wilsonville-area residents resent that neither ODAV nor the FAA have taken seriously an increasing number of noise and public-safety complaints.

D. **Failure to conduct review of a lack of infrastructure at the Aurora State Airport, including no study of safe domestic water, sewage/wastewater treatment, stormwater treatment, and the lack of fire-fighting equipment on site.** Currently, ODAV plans to call PDX and request a foam fire-fighting truck be sent when a aircraft crash happens at the Aurora State Airport. When that special fire-fighting truck arrives an hour later at the Aurora State Airport, it will be too late to be of any use.

E. **Lack of study of known pollution** sources from fuel, sewage, contaminated stormwater and US EPA-listed PFAS forever chemicals generated by Airport users. The master plan completely disregards any study of negative impacts from stormwater pollution to salmon-bearing streams with headwaters adjacent to the Airport. The Aurora State Airport is listed on the EPA and Oregon DEQ lists of sites contaminated by FAS forever chemicals generated by Airport users.

F. **Absence of any review of impacts from increasing climate change greenhouse gas (GHG) emissions at the Airport.** The Master Plan proposes a substantial increase in large jets using the Airport . Money-making ODAV fuel sales at Aurora State Airport are disregarded by the Master Plan, as are the state mandates of Oregon's Climate Action Plan that call for reduction in carbon emissions.

G. **Master Plan Disregards Seismic Earthquake hazard** documented by the Oregon Department of Geology and Mineral Industries (DOGAMI) data showing that the Aurora State Airport is located in an area subject to major potential damage in a projected 9.0 Cascadia Subduction Zone Earthquake. Airport area soils are prone to shaking and liquefaction during major earthquake, resulting in runway broken-apart into many sections and unserviceable for a long period of time. Only helicopters, which don't need a runway, will be able to operate at the Aurora State Airport for months or years after the Big One hits.

H. **State land-use Goals 3, 11, and 14 to not conduct urban-level activities on rural farmlands** is also flouted by ODAV, which seeks to expand the airport without municipal governance or public sewage or water service and other urban-development requirements. Rather, ODAV unfairly subsidizes airport businesses that do not pay typical charges that businesses in other cities pay for roads, sidewalks and other public utilities.

I. **Adverse effects to residents' quality of life and homeowner real-estate values** are not accounted for in the master plan. Already residents of Aurora/Wilsonville area complain about low-flying and loud aircraft that likely increases with expanded airport for larger, heavier aircraft.

A primary concern pertains to the extremely lopsided membership composition of the Planning Advisory Committee (PAC). The Department of Aviation stacked the Planning Advisory Committee with self-dealing financial interests at the Airport that benefit from taxpayer-funded Airport operations and capital improvements. A review of the PAC membership demonstrates that well over half of the PAC membership is comprised of entities with direct pecuniary interest in furthering airport expansion at taxpayer expense.

Additionally, the same pro-airport expansion entities are represented multiple times on the PAC. Two associations placed on the PAC are composed of a majority of Airport financial interests, including Aurora Airport Improvement Association and Positive Aurora Airport Management association.

By all appearances, the process and committee composition has the appearance of a "tick the box" exercise in public involvement. This led us to conclude that the outcome is predetermined and that the inevitable result will lead to airport expansion regardless of the impacts on safety, the environment and surrounding infrastructure — and surprise, surprise *(not!),* the Master Plan proposes a massive expansion of the Airport.

Another key problem is that ODAV omitted three key state agencies as PAC members: Department of Agriculture (ODA), Department of Environmental Quality (DEQ) and Department of Transportation (ODOT).

- The Aurora State Airport is located in the heart of the Oregon's best "foundation farmland" of French Prairie, which hosts some of Oregon's foremost traded-sector ag producers, nurseries and food processors. Real-estate speculation and uncontrolled urban-level development—as are occurring at the Aurora State Airport area—are harmful to this prime ag-sector economic cluster. By excluding the Department of Agriculture from the public process, the Department of Aviation continues a trend of excluding parties that may provide valuable information or may question the Aviation agency's objectives.

- We read in the media that the US Environmental Protection Agency (EPA) indicates that 750 Oregon sites could expose residents to 'forever chemicals' of per- and poly-fluorinated substances or PFAS, where growing evidence points to their adverse health effects, including some cancers. In Oregon, the state Department of Environmental Quality (DEQ) is testing locations including the Aurora State Airport for known or suspected PFAS use. Again, the Department of Aviation's exclusion of DEQ demonstrates an on-going pattern of discriminatory conduct.

- ODAV has now proposed a $185 Million expansion of the Aurora State Airport that includes moving over a one-mile-long segment of State Highway 551 (Wilsonville-Hubbard Cut-off) and condemning extensive amount of private-property for Airport expansion use. ODAV, however, has had minimal communications with ODOT, an agency having severe budget problems, regarding the proposed relocation of State Highway 551.

We understand that the Governor's Office Executive Order 20-04 on Climate Action "Directing State Agencies to Take Actions to Reduce and Regulate Greenhouse Gas Emissions" (GHG) directs DEQ to develop strategies that "Cap and Reduce Greenhouse Gas Emissions." We are concerned that representatives of the Governor's Office appointed to the State Aviation Board and Department of Aviation staff simultaneously are advocating for major expansion of the Aurora State Airport that results in substantial increases in aviation-gas fossil-fuel consumption and GHG emissions, contrary to the Executive Order on Climate Action.

One of the major reasons stated by aviation interests for Aurora State Airport runway extension is to increase the sale of aviation fuel so that a larger class of aircraft may takeoff from the airport with full tanks of gas. We note that the tax on aviation fuel is the primary source of operational revenue for the Department of Aviation. Thus**,** the Department of Aviation has a direct pecuniary interest in advocating for increased aviation-gas fuel sales that would accompany expansion of the Aurora State Airport, seemingly in direct conflict with the Governor's Executive Order on Climate Action.

Additionally, DEQ data appears to indicate that the NMPDES (National Pollution Discharge Elimination System) permit for the Department of Aviation's Aurora State Airport discharge into Mill Creek-Pudding River watershed expired June 30, 2017. We understand that area residents have expressed concerns for surface-water, ground-water and well-water quality due to prospective airport run-off pollutants, unregulated septic systems and potential ground water pollution. Cumulatively, these all appear to be good reasons from the Department of Aviation's perspective to exclude DEQ from Airport planning efforts.

The Department of Aviation's tightly controlled master planning process fails to meet the test for meaningful public engagement. The Zoom meeting format used by the Department of Aviation does not list or show all participants in the meeting and provide clear labeling of names and affiliations. It is unclear to the public who is attending the meetings and who or what entity that participants represent. At the November 16, 2021, PAC meeting, it was difficult to ascertain from many of the name labels who was attending in what role. Names and affiliations of all PAC members and staff/consultants should be clearly evident.

Additionally, some PAC members were allowed to have two representatives participate in the meeting, while some PAC members were ignored and not allowed to participate in the meeting. These elements indicate a failure of meaningful public process.

The facilitators for the PAC meeting often used a series of unscientific "polls" to gauge participants' thoughts or perspectives; however, it was unclear who was participating — was it PAC members, Aviation staff and consultants, and/or the public? Moreover, the facilitators interpreted the results of the poll that may or may not be an accurate reflection of the participants involved.

The Department of Aviation states that "As the airport sponsor, ODA staff will be the final decision-making authority. They will decide what is included in the Master Plan." Setting aside the fact that this pronouncement at the start of a "public involvement" process sends a message that is contrary to Oregon's Statewide Planning Goal Number 1, we believe this is false information; only the appointed body *(i.e.,* the Oregon Aviation Board) can legally approve a master plan. The failure of the Oregon State Aviation Board to adopt the 2011 or 2012 Aurora State Airport Master Plan was a centerpiece for the Oregon Supreme Court's affirmation of the Court of Appeal's decision against the Department of Aviation for failure to comply with Oregon law.

During the November 16, 2021, PAC meeting, aviation consultants indicated that they would consider nearby external "outside the fence" proposed urban-level developments in the Airport master-planning process — implying that such proposed developments would favor Airport expansion. However, the consultants gave no indication of reviewing such information in light of Oregon's EFU land-use laws, nor the potential reality of such proposed developments ever actually occurring. Additionally, consultants gave no indication of considering the "negative" aspects of proposed developments outside the Airport, such as increased surface-transportation impacts/traffic congestion and potential mitigation, increased land-speculation harming the ag industry, and increased pollution and environmental impacts.

The Department of Aviation has allowed and promoted the dissemination of false information about the seismic resilience of the Aurora State Airport. At the October 6, 2021, Oregon Aviation Board planning session and at the November 16,

2021, PAC meeting, misinformation about the seismic conditions of the Aurora State Airport area was provided without rebuttal. At the October meeting, the Aviation Board had considerable discussion on resilience, and the importance of selling the resilience concept to the public and government officials as a component of building support for state and federal funds for the Aurora State Airport expansion. Aviation Board Chair Meeker indicated a desire to improve "lines of communication" between the Governor's Office and airport businesses to promote resilience.

Contrary to statements that depict the Aurora State Airport as a crucial facility for the projected 9.0 Cascadia Subduction Zone Earthquake, the Aurora State Airport is listed at the lowest-level of Tier 3 airports in the Oregon Resilience Plan. The Tier designations "indicate the priorities for making future investments." In other words, the Department of Aviation is effectively targeting one of the lowest priority airports to prepare for recovery in the Oregon Resilience Plan for potentially one the largest airport capital improvement projects ever planned by the state.

With respect to the airport's ability to withstand a Cascadia Subduction Zone Earthquake, reports by the Oregon Department of Geology and Mineral Industries (DOGAMI) show that the Aurora State Airport is located in an area subject to major potential damage in a projected 9.0 Cascadia Subduction Zone Earthquake. The "Mid/Southern Willamette Valley Geologic Hazards, Earthquake and Landslide Hazard Maps, and Future Earthquake Damage Estimates," DOGAMI publication IMS-24, shows that the Aurora State Airport specifically is located in an area:

- Rated High for Ground Shake Amplification
- Rated High for Amplification Susceptibility
- Rated Moderate to High for Liquefaction Susceptibility

The same deep, fine soils that make the French Prairie area such exemplary foundation farmland also mean these soils are subject to amplification and liquefaction. As a result of such an earthquake, the airport runway would likely be unserviceable for a long period of time (6-12 months) post-earthquake. Rather than allow aircraft to take off or land due to an inoperable runway, the most likely role of the Aurora State Airport will be to accommodate vertical take-off and landing of heavy-lift helicopters with locally-based Columbia Helicopters and Helicopter Transport Services, neither of which require a runway extension to operate.

Attachments:

Attachment 1: Excerpted slides from ODAV and FAA presentations on the Aurora State Airport Master Plan and FAA Modifications of Standards.

Attachment 2: Letter from City of Wilsonville to ODAV and FAA, RE: Comments on Draft 2022 Aurora State Airport Master Plan Chapters 1-3, April 12, 2022

Exhibit A. Letter from Mayors of the Aurora State Airport Communities (Aurora-Wilsonville) to the Office of Honorable Kate Brown, Governor of Oregon, RE: Issues of Public Concern with Oregon Department of Aviation's Aurora State Airport Master Planning Process, December 13, 2021

Letter from Cities of Aurora and Wilsonville to Sen. Lee Beyer and Rep. Susan McLain, Co-Chairs Joint Committee on Transportation, RE Request for Public Hearing on HB 2497 – Proposed Legislation to Create Transparent Public Process for State Aviation Department

Agency Communications and Coordination with Local Governments and Communities on Aurora State Airport Issues of Concern, March 11, 2021

Aurora State Airport in Relation to The Oregon Resilience Plan and DOGAMI Earthquake Susceptibility Maps – 2019

Exhibit B. Letter from City of Wilsonville to Oregon Aviation Board, RE: Public Disenfranchisement by the Oregon Aviation Board for the Proposed 2021-22 Aurora State Airport Master Planning Process, August 4, 2021

Exhibit C. Letter from Cities of Aurora and Wilsonville to Senators Wyden and Merkley, Request for Intervention in Ensuring Proper Award of FAA Grant Funds to the Oregon Department of Aviation for Aurora State Airport Master Plan Update, July 6, 2021

Summary of Court of Appeals Ruling on Aurora Airport Master Plan

Articles about Court of Appeals Siding with Opponents of Aurora Airport Expansion

Exhibit D. Letter from Representative Courtney Neron, HD-26, and Representative Susan McLain, HD-29, to Oregon Aviation Board, RE: 2021 Aurora State Airport Master Planning Process, June 17, 2021

Exhibit E. Letter from City of Wilsonville to Oregon Aviation Board, RE: Proposed 2021-22 Aurora State Airport Master Planning Process, June 14, 2021

Exhibit F. Letter from Clackamas County and City of Wilsonville to Governor Kate Brown, Senate President Peter Courtney and House Speaker Tina Kotek, RE: Request to Cancel Oregon Department of Aviation application to Federal Aviation Administration (FAA) for funds to extend the Aurora State Airport runway, August 8, 2018

Attachment 1

AURORA STATE AIRPORT MASTER PLANNING PROCESS

AIRFIELD DESIGN, NONSTANDARD CONDITIONS AND FAA REQUIRED SAFETY IMPROVEMENTS PRESENTED IN PAC MEETINGS

Prepared by Friends of French Prairie; April 21, 2025

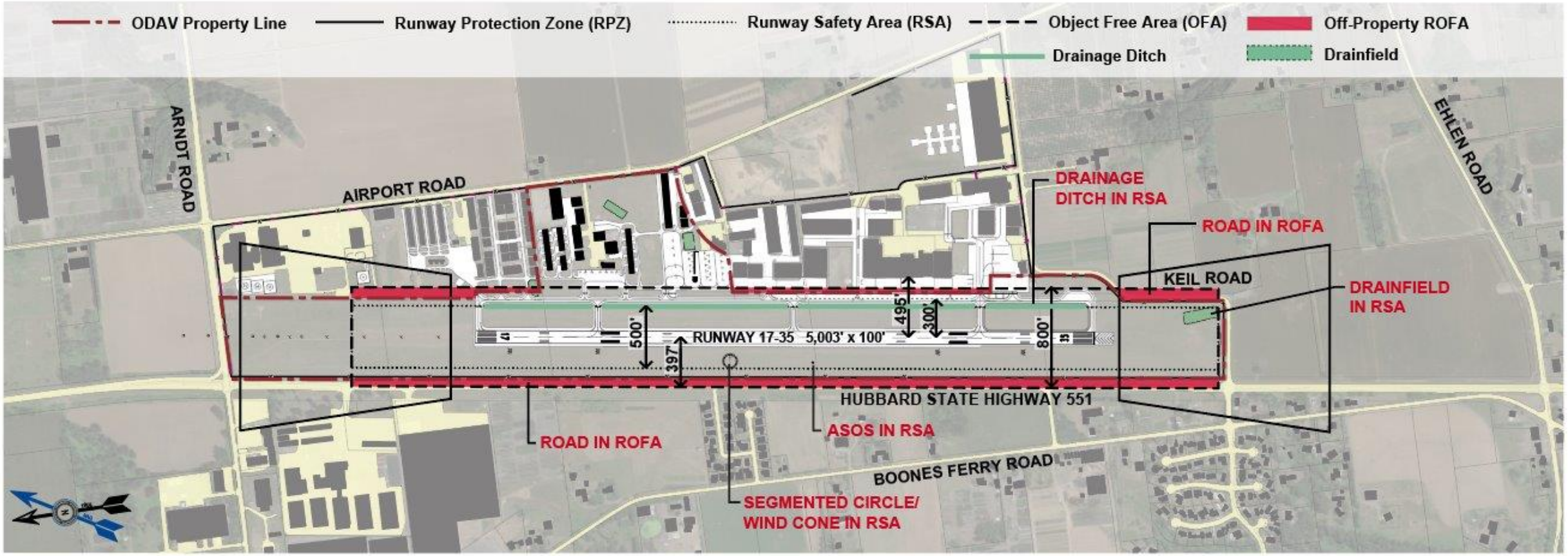
CONDITIONAL USE PERMIT MODIFICATION OF STANDARD

- A Conditional Use Permit (CUP) is a special permission granted by local authorities that allows a property owner to use their land in a way that is not typically allowed under existing zoning laws.
- Modification of Standard (MOS) is any deviation from, or addition to standards, applicable to airport design, material, and construction standards, or equipment projects resulting in an acceptable level of safety, useful life, lower costs, greater efficiency, or the need to accommodate an unusual local condition on a specific project through approval on a case-by-case basis.

Facility Requirements – Summary of Evaluation

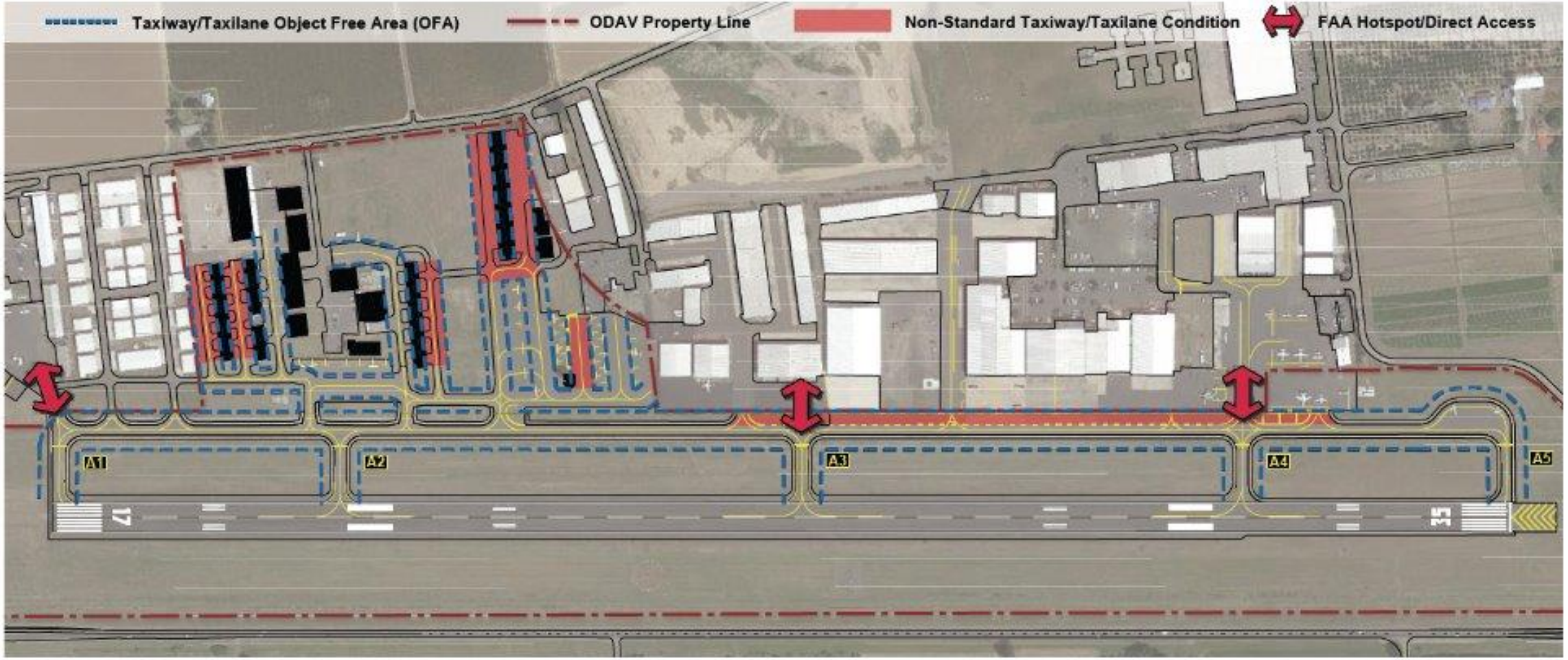
- Existing & Future Design Aircraft – Medium/Large Business Jet
  - C-II standards for runway-taxiway system
  - All airfield components must meet C-II standards
- Runway Length Evaluation: Justified Length: 5,500 feet
  - Based on current and forecast air traffic

Facility Requirements Summary – Airside



Source: Century West Engineering

Facility Requirements Summary – Landside



Source: Century West Engineering

Facility Requirements Review

- Design Standards
  - Runway Object Free Area (ROFA)
    - Non-standard Items: Hubbard Highway, Keil Road, ASOS, Wind Cone
  - Runway Safety Area (RSA)
    - Non-standard Items: Drain field (south end), open ditches
  - Direct Runway Access
    - FAA design guidance: Avoid straight-line direct access taxi routes between aprons/hangars and runway
- Landside Capacity
  - Development/redevelopment of landside areas to accommodate new demand for hangars and aircraft parking

PAC Feedback

Comment Themes - MOS

PAC Meeting 7: Oct. 15, 2024

- Can we request a modification of standards (MOS)?
  - Under current FAA guidance, MOS are temporary and not a permanent solution for non-standard conditions. FAA has indicated they are not providing a MOS for this project.
- Does the 2012 ALP include an approved MOS?
  - No, the ALP noted that a MOS would be requested. Request for MOS is a specific process separate from the ALP approval process and does not guarantee an approval of a MOS.
- Can we move toward conformance by relocating the property fence closer to Hubbard Highway?
  - The fence and a portion of Highway 551 is within the ROFA. Both the highway and fence require relocation outside of the ROFA.

Comment Theme – Drain Fields

- Why are there no proposed locations for relocating the drain fields?
  - Privately-owned drain fields, located on leased ODAV property do not meet C-II runway safety area (RSA) standards and will be removed. Replacement of drain fields will be the responsibility of the owners.
- Were the drain fields approved by FAA in their current locations at the time of construction?
  - We have no record of the depth of FAA involvement in the permitting of these facilities when they were constructed. However, at the time the runway was classified as ARC B-II, which had a smaller RSA that did not conflict with the drain field placement.
- Is it possible to modify the drain fields in place to conform with RSA standards?
  - Structural enhancements have been evaluated by ODAV and FAA and have been found to not meet RSA grading standards and could impede the function of the drain field.

Comment Themes - Additional

- Why is the vehicle service road (VSR) parallel to the taxiway?
  - Many of the recent Vehicle or Pedestrian Deviations (VPD) reported by ATC involved vehicles entering movement areas as they go around parked aircraft on the apron. The VSR, as depicted, provides a safe and clear path free of parked aircraft for ground vehicles to operate while also providing a visual cue to drivers to remain in the non-movement area.

- We object to the depicted acquisition of privately-owned property for aeronautical reserve.
  - It is ODAV's intention to acquire the properties identified for aeronautical reserve from willing sellers if, and when they become available. By depicting the parcels on the ALP, it allows ODAV to pursue FAA funding for property acquisition.

- Can Hubbard Highway be rerouted along Boones Ferry Road?
  - That concept was evaluated and discarded due to necessary ROW acquisition, costs of construction, and greater impacts to residential.

Nonstandard Conditions

The below listed nonstandard conditions are the highest priority to FAA for the Airport (ODAV) to mitigate at Aurora State Airport.

- Runway Object Free Area (ROFA)
  - Acquire property within the ROFA
  - Relocate the ASOS, Windcone, Fencing, Roadways outside of the ROFA
- Runway Safety Area (RSA)
  - Remove drain fields out of RSA
  - Mitigate drainage ditch
- Direct Access Taxiways to Runway
  - Relocate or remove taxiways that connect the apron directly to the

Note – mitigating other nonstandard conditions not listed above will be coordinated with FAA on timing and priority.

Reminder – A modification of standards (MOS) is not a planning level solution for any nonstandard conditions in the Airport Master Plan.

Input received on the Preferred & Refined Preferred Alternative

PAC Meeting 9: Feb. 11, 2025

Opportunities for Feedback:

- PAC Meeting #7- and two-week comment period
- PAC Meeting #8- and two-week comment period
- 1/6/25 Publication of Refined Preferred Alternative and two-week comment period (ending 1/21)

Feedback we've heard:

- A no build alternative should be considered *(note, a no build was presented and discarded as part of the preliminary alternatives)*
- Reduce or eliminate impacts to existing hangars
- A parallel taxilane is not needed
- Depict a vehicle service road on private TTF property *(note, this is a facility plan for on-airport improvements)*
- Improve the drainfield(s) that are in the safety areas to meet standards without requiring relocation
- Shift Hubbard Highway within the ROW to minimize impacts to adjacent properties
- Include the private TTF properties within the airport boundary

Refinements to the Preferred Alternative

Based on input received, ODAV has made the following refinements:

- Removed the Parallel Taxilane
- Removed the Vehicle Service Road (VSR)
  - Eliminates the need to acquire property that would impact existing hangars
  - Aircraft tiedowns and helicopter parking were re-added to the main apron area.
- Reduced required property acquisition to the areas needed to meet FAA ROFA/TOFA and RSA standards
  - Additional property has been identified as “Reserve” and will be included in the ALP to allow for ODAV to use FAA grant funding in the event properties come available for purchase

Refined Preferred Alternative

There was no change in recommendations to the other proposed improvements, including:

- Proposed runway extension to the North
- Removal/relocation of drain fields outside of the RSA/TSA
- Relocation/shift of Hubbard Highway and Keil Road outside of the ROFA
- Relocation of the ASOS and windcone outside of the ROFA
- Reconfigured apron tiedowns to meet standards
- Future depicted hangar sites on state-owned property
- Improve the drainage ditch in the RSA to meet standards

What isn't a MOS

FAA presentation on MOS, Aug. 6, 2020

- **An approved MOS cannot be modified. The airport must submit a new MOS if changes are needed.**

- **MOS is <u>not</u> used for:**
  - Non-standard RSA dimensions.
  - Non-standard Obstacle Free Zone (OFZ) surfaces.
  - Non-standard approach / departure surfaces.
  - To match existing equipment owned by the airport.
  - Impermissible land use within Runway Protection Zone (RPZ) limits.

Attachment 2

April 12, 2022

Sent via email to:

Martha Meeker, Chair, and Oregon Aviation Board — *aviation.mail@aviation.state.or.us*
Betty Stansbury, Aviation Director — *betty.stansbury@aviation.state.or.us*
Sarah Lucas, Aviation Planner — *Sarah.LUCAS@odav.oregon.gov*
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Benjamin Mello, Airport Capacity Program Manager — *Benjamin.j.mello@faa.gov*
Federal Aviation Administration Seattle Airports District Office
FAA Northwest Mountain Region Airports Division

RE: Comments on Draft 2022 Aurora State Airport Master Plan Chapters 1-3

Dear Chair Meeker, Director Stansbury, members of the Oregon Aviation Board, Manager Mellow and Aviation Staff:

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 2022. The City has sought to collaborate with local governments and state agencies to comply with Oregon public-process and land-use laws and engage in coordinated planning.

The following comments review general, structural problems and issues of concern with the current 2022 Draft Aurora State Airport Master Plan and process, and also catalog a set of specific questions pertaining to Chapters 1-3.

1. **Failure to Provide Public Notice of Public Comment Opportunity on Draft Master Plan Chapters 1-3**

ODAV failed to publish any kind of public notice of the public comment opportunity on 2022 Draft Master Plan Chapters 2 through 3 that has a due date of April 12. 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 meeting. This kind of public engagement failure is endemic to how ODAV operates in general, and specifically during the 2022 Aurora State Airport Master Plan process.

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?

2. Reference and Reliance on Invalid 2012 Aurora State Airport Master Plan Taints Current 2022 Draft Master Plan.

During the past 10-years-plus, the City has seen ODAV act without due regard to Oregon land-use and public-process procedures and laws in relation to implementing the invalid Aurora State Airport Master Plan of 2011/2012. The City has been forced by ODAV to file administrative appeals with the state Land Use Board of Appeals (LUBA) and to file lawsuits in state Circuit Court and subsequently file appeals to the Oregon Court of Appeals and Oregon Supreme Court to force the agency to comply with Oregon law. The City and other parties have been successful in various cases seeking judicial remedies to correct unlawful land-use actions by ODAV and county seeking Airport expansion.

On June 16, 2021, the Oregon Court of Appeals ruled that ODAV misapplied state land-use laws in approving the contentious 2012 Aurora State Airport Master Plan; see *Schaefer v. Oregon Aviation Board,* 312 Or App 316 (2021). The Court reversed and remanded to LUBA the decision on the master plan, finding that LUBA erred in excluding the prior critical 2011 master plan work from the record; in erroneously finding that the master plan did not propose airport development on an Exclusive Farm Use (EFU) zoned land; and also erroneously finding that any proposed new uses at the Aurora State Airport are considered rural uses for land-use purposes.

The City of Wilsonville together with the City of Aurora, 1000 Friends of Oregon, Friends of French Prairie and Aurora Planning Commission Chair Joseph Schaefer filed an appeal with the court in March 2021 regarding a LUBA decision that dismissed their appeal challenging the legality of the 2012 master plan. LUBA ruled in December 2020 that it did not have jurisdiction to hear the appeal as land-use decisions of the Department of Aviation's adoption of 'findings of compatibility' and approval of the 2012 Master Plan.

The Oregon Aviation Board, acting contrary to advice from the Oregon Attorney General's Office, elected in September 2021 to appeal the Court of Appeals ruling to the Oregon Supreme Court. Acting in judicially lightning-fast time, on Dec. 9, 2021, the Oregon Supreme Court dismissed an appeal by ODAV and others that resulted in upholding the June 16, 2021, decision by the Court of Appeals, which declared that ODAV misapplied state land-use laws in approving the contentious 2012 Aurora State Airport Master Plan.

The Supreme Court denied review of the Court of Appeals decision that reversed and remanded a December 2020 Land Use Board of Appeals (LUBA) decision approving the master plan, finding that LUBA erred in excluding the prior critical 2011-12 master plan work from the record; in erroneously finding that the master plan did not propose airport

development on Exclusive Farm Use (EFU) land; and also erroneously finding that any proposed new uses at the Aurora Airport are considered rural uses for land-use purposes.

The 10-year-long controversy over the 2012 Aurora State Airport Master Plan originated with a confusing, convoluted process over several years, resulting in an invalid master plan that ignored Oregon public-process and land-use laws. Rather than seek to work with the impacted local communities adjacent to the Airport, ODAV pressed forward with airport expansion efforts contrary to state law, including an unsuccessful attempt in September 2018 to seek legislative permission for a $37 million grant application to the FAA to extend the Airport runway.

And now, after all of this effort at obfuscation by the agency, ODAV staff have finally confirmed what the Oregon Attorney General's Office communicated in March 2021 And acknowledged that there is NO Valid 2012 Aurora State Airport Master Plan — "the State Aviation Board *did not approve* the 2012 Master plan" (emphasis added):

> **From:** PECK Heather <heather.peck@odav.oregon.gov>
> **Date:** April 5, 2022 at 12:10:29 PM PDT
> **To:** LUCAS Sarah <Sarah.LUCAS@odav.oregon.gov>, ben.williams@liturgica.com, brandy.steffen@jla.us.com
> **Cc:** benjamin.j.mello@faa.gov
> **Subject: Re: Comments in advance of PAC Work Session today**
>
> Thank you again, for your comments and we will include them in the record, files and forward to the FAA.
>
> For clarification however, while you are correct that the State Aviation Board did not approve the 2012 Master plan, the FAA did approve the methodology, the data as related to the forecast, the forecast and the final ALP, as also signed and dated by the FAA.
> Kind Regards,
> Heather
>
> HEATHER PECK
> OREGON DEPARTMENT OF AVIATION
> PLANNING & PROGRAMS MANAGER
>
> OFFICE 503-378-3168 CELL 503-881-6966
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By definition, a master plan that is not adopted by the governing body Oregon Aviation Board remains an unapproved draft plan. Thus, ODAV now concedes after losing in the judicial process the absence of a valid 2012 Aurora State Airport Master Plan that was never adopted by the Oregon Aviation Board. As an invalid plan without adopted findings and conclusions, for all practical purposes the 2012 Aurora State Airport Master Plan is an unapproved draft without any standing in law.

The current 2022 Draft Aurora State Airport Master Plan Chapters 1 through 3 reference on over 20 occasions the invalid 2012 Aurora State Airport Master Plan. By referencing a

nonexistent master plan—or more precisely an invalid draft plan—the new 2022 Draft Master Plan becomes tainted.

The only remedy in this instance is remove all references to the invalid, draft 2012 Aurora State Airport Master Plan from the 2022 Draft Aurora State Airport Master Plan. As the next Section 2 discusses, a pertinent question is What Prior Version of the Aurora State Master Plan is valid? Based ODAV's actions—or inaction—it would appear that the 1976 Master Plan is the current, adopted and codified appropriately version.

3. ODAV "Packs the PAC" with Self-Serving Financial Interests Benefiting from Taxpayer-Funded Airport Expansion.

As the City called-out earlier at the start of new master plan process, ODAV's composition of the Master Plan Planning Advisory Committee (PAC) is "packed" with self-serving special interests that benefit from taxpayer-funded expansion of the Aurora State Airport. A review of the PAC members listed on p 1-5 shows that:

- 19 PAC members (59%) represent vested financial interests that have expressed a desire for increased development and expansion of the Airport;
- 7 PAC members (22%) are local governments and public-interest organizations that have expressed issues of concern regarding operations of the Airport'
- 6 PAC members (19%) are neutral state and tribal-government agencies.

As an agency funded primarily by a state tax on aviation fuel, ODAV itself is a financial beneficiary of Airport runway extension and expansion plans that result in increased use and sales of aviation fuel.

ODAV omitted two key state agencies from the PAC—Oregon Department of Agriculture and Oregon Department of Environmental Quality. Each agency is charged with a mission and areas of responsibility that would have benefitted ODAV's Airport master planning effort. The Department of Agriculture could advise on the rural agricultural farming traded-sector component of the regional economy of French Prairie surrounding the Airport, and DEQ could advise on issues of environmental pollution that the Airport emits.

Certainly having a wide representation of various stakeholders is beneficial to the master plan process; however, stacking the PAC with pro-Airport expansionists could appear as though ODAV has manipulated the new 2022 Aurora State Airport master planning process from the outset to ensure that a majority of the PAC members would favor Airport expansion. In a similar fashion, one could surmise that ODAV ensured that local community and public-interest voices would be overwhelmed by being a minority of the PAC membership.

4. ODAV Appears to Manipulate Federal Process to Trump State Law.

The citation above from ODAV staff indicates that while "the State Aviation Board did not approve the 2012 Master plan, the FAA did approve the methodology, the data as related to the forecast, the forecast and the final ALP, as also signed and dated by the FAA." This statement reveals the agency's motive to seek to use a *federal* decision/document as a method to evade *state* land-use and public-process procedures and laws.

That is, in Oregon statutes, a state agency must apply to the land-use jurisdiction for an exception to zoning land uses. In this instance, ODAV is to apply to Marion County for a goal exception to the County Comprehensive Plan that includes adoption of the airport map, assumed to the ALP, or FAA Airport Layout Plan. As was noted at the April 5 PAC Work Session meeting by Matthew Crall, Planning Services Division Manager for the Oregon Department of Land Conservation and Development, ODAV must comply with Oregon land-use laws requiring the agency like any other party apply for a goal exception to the county comprehensive plan that includes adoption of the airport map.

On March 30, 2022, the Oregon Court of Appeals reversed and remanded an October 2021 LUBA determination that a private-property development project near the Airport was exempt from the state's land-use process. LUBA erroneously found Marion County did not need to grant exemptions to state land use goals involving the preservation of farmland, adequate public facilities, and urbanization.

The Court of Appeals ruled in *Schaefer v. Marion County,* 318 Or App 617 (2022), that the rezoning from Exclusive Farm Use (EFU) to an airport use would have to go through state land-use procedures. To do so, a map that includes the expansion of the airport development would have to be adopted by Marion County, which the Court of Appeals determined has not been done since 1976.

The Court of Appeals opinion goes on to say, "The statute itself does not modify the procedure for expanding the airport boundary." *(Id.* at 634). That means the Airport's boundaries cannot be expanded just because ODAV says so in the Airport Master Plan. Rather, the agency must effectuate the proposed Master Plan and follow the law like other parties without assuming that ODAV has an FFA trump card to play that allows the agency to bypass state land-use laws.

The 2022 Draft Aurora State Airport Master Plan Chapter 2, p 2-4, states that "Several planning studies have been completed through the Airport's history, including FAA-funded master plans in 1976, 1988, and 2012." Based on a lack of changes to the Marion County Comprehensive Plan, ODAV failed to apply for a Comprehensive Plan goal exception or Airport ALP Map for any Aurora State Master Plan update conducted in 1998 or 2012. As the Court of Appeals found in *Schaefer v. Marion County,* the last Comprehensive Plan update for the Aurora State Airport Master Plan occurred in 1976. "The 1976 Aurora State

Airport Master Plan, including its airport layout plan, which is a map of the airport, is part of the Marion County Comprehensive Plan." *(Id.* at 620).

Thus, ODAV is unable to use or reference an FAA-approved ALP Map that the agency has failed to gain an exception for in the Marion County Comprehensive Plan. The last such Master Plan to have been done correctly is the 1976 Aurora State Airport Master Plan.

5. Goals of the Draft Master Plan Do Not Relate to the Output of the Plan.

In discussing the "Goals of the Airport Master Plan," ODAV indicates that the "primary goal of the master plan is to provide the framework and vision needed to define future facility needs at Aurora State Airport." The Goals enumerated raise a number of questions, and also demonstrate the Draft Master Plan fails to meet the "primary goal" of "future facility needs" at the Airport.

- 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?

- Goal 8 indicates that the Master Plan is to "Develop an Airport Layout Plan to graphically depict proposed improvements" and "Prepare a supporting Capital Improvement Plan." This goal raises a number of questions, including 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 on the ALP?

  Furthermore, as is discussed later, the "supporting Capital Improvement Plan" (CIP) falls far short of the actual infrastructure needs at the Airport. The CIP portion of Chapters 2 and 3 demonstrate a lack of compliance with Oregon regulations for major new, urban-level development in terms of infrastructure planning and financing, especially in high-value EFU ag lands.

- Goal 9 seeks to "Provide recommendations * * * to remove barriers to appropriate growth at the Airport – 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?

  - How specifically will potential environmental and socioeconomic impacts be measured, weighed or evaluated in the context of 'future development' at the airport?

  - Was the utilization of federal funds to construct projects (air traffic control tower) identified in an un-adopted master plan legal?

6. ODAV's Permissive Attitude Towards Overweight/Oversized Aircraft at Aurora State Airport Creates Constrained Operations.

The 2022 Draft Master Plan cites on multiple occasions the 2019 Constrained Operations Runway Justification Study that "indicated in excess of 500 annual operations," p 2-18. Chapter 3, Aviation Activity Forecasts, is largely based on the 2019 Aurora State Airport Constrained Operations Runway Justification Study, which determined that aircraft operating at the Airport experienced 645 constrained operations in 2018. It should be noted that this number was based on pilot surveys that were *not validated* against flight plans, and did not take into consideration that ODAV's practice of allowing an increasing number of oversized aircraft to operate at the Airport was the major factor driving the number of constrained operations.

Further, that number of 645 purported constrained operations in 2018 represents a 33% increase over that reported in the unapproved 2012 Master Plan, in spite of a 24% reduction in Total Operations since 2010. That increase can only be attributed to ODAV's practice of allowing an increasing number of oversize jets to operate at the Airport which drives the increase in constrained operations.

Thus, the 2022 Draft Master Plan *never* discusses that the constrained operations are caused by ODAV's very actions of granting permission for overweight/oversized aircraft to use the Aurora State Airport. A public records request of ODAV by the City of Wilsonville reveals over a hundred waivers have been granted by ODAV over the past 10 years 2012-2021 to aircraft that are overweight or oversized for the Aurora State Airport runway, also thereby creating a public safety issue.

The Aurora State Airport runway is 5,003 feet and has a strength rating of 45,000 pounds. ODAV has regularly granted permission for aircraft with manufacturer-specified minimum runway lengths at maximum takeoff weight that exceed 6,000 feet and have a maximum takeoff weight of 70,000 pounds. ODAV regularly provides overweight waivers to a Global Express aircraft that has a maximum takeoff weight of 92,500 pounds, a minimum takeoff distance of 6,170 feet and weighs 50,200 pounds when empty. In addition to creating situations that create constrained operations, ODAV creates long-term pavement maintenance problems and public safety concerns by regularly granting permission for overweight and oversized aircraft to use the Airport.

Additionally, the 2019 Constrained Operations Runway Justification Study appears to use a faulty methodology and inaccurate data to arrive at conclusions. For instance, the Minimum Takeoff Distances listed for the four jets listed in the 2022 Draft Master Plan with the most constrained operations are higher than the published Minimum Takeoff Distances from the aircraft manufacturers. The Falcon 50, which had the single largest number of reported constrained operations in 2018 at 160, is shown on p 16 of Chapter 1 to have a Minimum

Takeoff Distance of 5,413 feet when, the published manufacturer's specification is 4,935 feet.

Moreover, in the 2019 Constrained Operations Runway Justification Study data listing annual operations and constrained operations, the Falcon 50 is shown to have had 226 (p 1-16) operations at Aurora in 2018, of which 160 (p 1-18) were constrained. That is almost 71% constrained operations for a jet with manufacturer's minimum takeoff distance shorter than the runway at Aurora.

Compounding questions on the accuracy of the data presented in the 2019 Constrained Operations Runway Justification Study, the Falcon 900 is listed on p 1-16 as having 68 operations at Aurora in 2018, of which 75 were reported from the survey (p 1-18) to be constrained. That is to say, the aircraft is reported to have 110% of the operations constrained, which seems to be mathematically impossible.

We also note that operations flight data of the 2019 Constrained Operations Runway Justification Study and the 2022 Draft Master Plan tables of TFMSC activity operations often do not match for the two plans' years 2012 – 2018. It seems odd for FAA historical TFMSC activity operations data to vary so substantially over a two-year period between 2019 and 2022. For example:

Aircraft: Falcon 50	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**
2022 Draft Master Plan	16	32	108	228	320	332	276
2019 Constrained Operations Study	10	18	96	220	310	316	276
# Variance	6	14	12	8	10	16	0
% Variance	60%	78%	13%	4%	3%	5%	0%

Aircraft: Falcon 900	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**
2022 Draft Master Plan	180	148	48	10	56	82	70
2019 Constrained Operations Study	180	144	48	8	54	80	68
# Variance	0	4	0	2	2	2	2
% Variance	0%	3%	0%	25%	4%	3%	3%

Data sources:
2022 Draft Master Plan, Chapter 3, Table 3-8: Historical TFMSC Activity by ARC (Select Jets), p 3-14
2019 Constrained Operations Runway Justification Study, TFMSC IFR Data - Select Jet Aircraft Operations Table, p 1-16

Furthermore, the Draft Master Plan fails to acknowledge ODAV's financial benefit for providing permission for overweight/oversized aircraft to use the Airport. ODAV's primary funding source is a tax on aviation fuel, of which increased sales benefit the ODAV financially. Thus, ODAV has a motivation to increase the number of constrained operations

in order to justify a longer runway that allow aircraft to take on more fuel, and thereby benefit ODAV financially. ODAV is artificially producing the conditions that create constrained operations by granting permission for overweight/oversized aircraft to use the Aurora State Airport. Based on the public-records review, if the agency did not grant these permissions, the number of constrained operations would be insignificant.

7. ODAV's Push for Urban-Level Development to Expand Aurora State Airport's Footprint Is Contrary to State Law.

ODAV's effort to expand the Aurora State Airport's footprint through an extended runway and new through-the-fence nearby private properties rely on the conversion of surrounding EFU ag farmland and result in new development and increased activity. The agency's effort to extend the Airport runway is well documented, including prior desire for longer runway in the now invalid 2012 Master Plan, 2018 legislative request to apply for $37 million in FAA funds for runway extension, and 2019 Constrained Operations Runway Justification Study.

Airport expansionists ODAV and private developers appear to have elected to not follow Oregon land-use law procedures that call for seeking a Goal exception and Comprehensive Plan amendment to accommodate both public- and private-sector EFU land conversion for development. The Court of Appeals has ruled now in two separate but related cases cited above, *Schaefer v. Oregon Aviation Board,* 312 Or App 316 (2021) and *Schaefer v. Marion County,* 318 Or App 617 (2022), pertaining to land-use procedures by public entities—ODAV and Marion County—and private developers. In both lawsuits, the Court of Appeals reversed and remanded to LUBA the base case for review with compliance with Oregon public process and land-use laws that require Goal exception and Comprehensive Plan amendment.

Oregon land-use law calls for urban-level development that includes new pavement, public and commercial structures, increased jobs and automobile traffic, etc., to be sited in cities that provide municipal governance and public utility infrastructure, including domestic water service, wastewater/sewage processing, stormwater treatment facilities, appropriate surface transportation infrastructure, including safe roadways and alternative bike/ped facilities. Oregon land-use law disfavors urban-level activities outside of cities that occurs in unincorporated county, prime EFU lands, such as the situation with the Aurora State Airport. The 2022 Draft Master Plan fails to address this core issue of compliance with Oregon land-use law and the corresponding need for municipal governance and public infrastructure.

While ODAV may seek to claim that the new 2022 Draft Master Plan deals only with the limited amount of public agency-owned land at the Airport, considerable amount of the Master Plan directly addresses issues associated with adjacent and nearby private-property development that is dependent on a proposed public-use finding of the Master

Plan that is to facilitate EFU land conversion. The Landside Facilities section of Chapter 2, pp 2-37 – 2-39, "includes the landside facilities (depicted in Figure 2-12) designed to support airport operations, including aircraft storage and maintenance. This section of the existing conditions analysis includes a discussion of General Aviation (GA) Terminal Areas and 'Through-The-Fence' (TTF) development, hangars/airport buildings, airport surface roads, vehicle parking, airport fencing, and utilities."

Neither the Landside Facilities section, pp 2-37 – 2-39, nor the Airport Vicinity Zoning/Land Use section, p 2-23, present any analysis for how ODAV is to comply with Oregon land-use law and local zoning ordinances to implement plans for Airport expansion. In a similar manner, the 2022 Draft Master Plan provides no analysis regarding needed public utility infrastructure to support proposed new developments of runway extension and Airport through-the-fence commercial properties.

By advancing Master Plan objectives to lengthen the Aurora State Airport runway and increase the conversion of nearby high-value EFU lands to airport use to accommodate new commercial developments, ODAV is violating a key tenant of Oregon land-use law. The agency appears to rely on the limited FAA federal airport master plan process to evade Oregon land-use law procedures for Airport development.

8. ODAV's Airport Master Plan Fails to Meet Oregon State Standards for Urban-Level Development.

In Oregon, urban-level development plans that propose major new development and infrastructure improvements such as a new air traffic control tower, runway extension, aircraft hangers, public-service facilities, commercial office space and the like that impact land-use zoning, surface transportation facilities, environmental resources, surface and groundwater, emergency-response services, etc. devote considerable study to needed public infrastructure utilities to accommodate new development. The 2022 Draft Aurora State Airport Master plan spends a paltry eight pages on key infrastructure components that directly impact public safety and environmental quality.

Chapter 2 section "Applicable Planning Studies/Documents," p 2-16 through p 2-23, covers in a cursory manner crucial infrastructure issues of public concern, including

- Applicable Planning Studies/Documents, including the Marion County Comprehensive Plan, Marion County Rural Transportation System Plan (RTSP), City of Aurora Transportation System Plan (TSP), Oregon Aviation Plan, Oregon Resilience Plan and 2019 Constrained Operations Runway Justification Study.

- Environmental Data

- Environmental Screening/NEPA Categories, including Air Quality, Biological Resources, Hazardous Materials, Solid Waste and Pollution Prevention, Natural Resources and Energy Supply, Water Resources,

- Local Surface Transportation

- Area Land Use/Zoning, including Airport Vicinity Zoning/Land Use.

The 2022 Draft Master Plan Chapter 2, p 2-16 through p 2-23, reveals a host of environmental problems and issues of public health and safety concerns without addressing mitigation or remediation for infrastructure shortcomings:

- Unsafe public utilities:

  - "[A]bove ground storage tank fueling facility and one recently decommissioned fueling facility with underground storage tanks located on ODAV-owned property that are planned to be removed. There are also other privately-owned facilities surrounding the Airport property that have their own fueling facilities.

  - "Water at the Airport is provided from a system of wells. In the early 2000s, with the assistance of Marion County, the Aurora Airport Water Control District was created to address major fire and life safety needs for privately-owned land adjacent to ODAV property at the Airport. The system included an underground tank system, a pump house, underground water pipes, fire hydrants, and numerous connections for fire sprinkler systems.

  - "Sanitary sewer is provided by individual and shared drain field/septic tank systems. There are at least nine individual drain fields located on ODAV owned property that are shared for both aviation related uses on both private and publicly owned land.

  - "The Airport's stormwater system is made up of a network of edge drain, culverts and surface drainage features which generally flow to the east, west, and south sides of the Airport. Most of the stormwater runoff originating on ODAV-owned property and airfield facilities like the runway, taxiway, and apron flows to the west side of the Airport."

  The Draft Master Plan fails to note that DEQ data appears to indicate that the NPDES (National Pollution Discharge Elimination System) permit for ODAV;'s Aurora State Airport discharge into Mill Creek-Pudding River watershed expired June 30, 2017. Is this information still current? If so, does the Master Plan recommend that ODAV come into compliance with environmental laws?

- Air Pollution:

- "The Aurora State Airport property falls within a census block where all air quality-related environmental hazard indexes are between the 24th and 73rd percentile nationwide. The Airport property scores within the 51st percentile for diesel particulate matter, the 73rd percentile for PM2.5 levels, the 24th percentile for ozone summer seasonal average of daily maximum eight-hour concentrations in the air, the 51st percentile for cancer risk from the inhalation of air toxics, and the 69th percentile nationwide for other respiratory hazards exposure."

- Water Pollution:

  - "Many of the surface waters in the vicinity of the Aurora State Airport property are contaminated and listed on the DEQ 303(d) list. Contaminated surface waters in the vicinity of the Airport include:

    - "A segment of the Pudding River east of the Airport is on the 303(d) list of impaired waterways for guthion, water temperatures, and dieldrin. It is impaired for fish and aquatic life, fishing, and public and private domestic water supplies.

    - "The entire Mill Creek-Pudding River sub-watershed (1st–4th order streams) is listed on the 303(d) list for benthic macroinvertebrates bioassessments and inorganic arsenic. It is considered impaired habitat for fish and aquatic life, fishing, public and private domestic water supplies, and recreational contact with the water.

    - "A segment of the Molalla River that intersects the Pudding River east of the Airport is not a 303(d)-listed waterway but is listed by the EPA's 'How's My Waterway' tool as impaired for fishing due to flow regime modification.

    - "The segment of the Willamette River that the Molalla River flows into north of the Airport is also a 303(d)-listed waterway. It is listed for the following factors: noxious aquatic plants, aldrin, benthic macroinvertebrates bioassessments, temperatures, 4,4'-DDE, 4,4'DDT, dieldrin, and PCBs. It is considered impaired for aesthetic quality, boating, fish and aquatic life, fishing, and public and private domestic water supply.

  - "Compromised waters in the vicinity of the Airport property include critical habitat for federally threatened Upper Willamette River Chinook and steelhead populations. These waters also flow downstream to additional critical habitat areas for other species of federally listed fish species in the Columbia River."

  What is the role of ODAV, FAA and the Aurora State Airport in creating these adverse environmental conditions? How does Airport septic and stormwater

pollution figure into the water pollution issues cited above? Where is the arsenic coming from and what are the ppm compared to the US Environmental Protection Agency (EPA) tolerances?

The Draft 2022 Master Plan also fails to note that the EPA and the Oregon Department of Environmental Quality (DEQ) are reported to be testing locations at the Aurora State Airport for known or suspected use of 'forever chemicals' of per- and poly-fluorinated substances or PFAS, where growing evidence points to their adverse health effects, including some cancers. ODAV elected to omit DEQ from the PAC.

- Endangered species impacts:
  - "[T]he Molalla River (three miles northeast of the Airport), the Pudding River (0.85 mile east of the Airport), and Mill Creek (0.75 mile southeast of the Airport) are designated as habitat for Chinook salmon (federally threatened; state classified sensitive critical), Pacific lamprey (federal species of concern; state classified sensitive vulnerable), and steelhead (federally threatened; state classified sensitive vulnerable) based on records of historic sightings.
  - "Sub-watersheds surrounding the Airport are considered Essential Fish Habitat (EFH) for Chinook and coho salmon. Federal agencies are required to consult with the National Oceanic and Atmospheric Administration (NOAA) Fisheries regarding any action authorized, funded, or undertaken that may adversely affect EFH. Stormwater runoff from the Airport property flows into the Chinook and steelhead critical habitat areas as well as the Chinook and coho EFH areas."
- Airport Vicinity Zoning/Land Use:
  - "The Airport is generally surrounded by Marion County Exclusive Farm Use (EFU) districts, and a few parcels of Acreage Residential (AR) and Industrial (I) located in the immediate vicinity of the property.
  - "The intent of the EFU zone (Marion County Code 17.136) is to provide and preserve the continued practice of commercial agriculture. It is intended to be applied in areas composed of tracts that are predominantly high-value farm soils. EFU zone generally prohibits the construction, use, or design of buildings and structures except for facilities used in agricultural or forestry operations, replacing or restoring a lawfully established dwellings, supporting exploration of geothermal or mineral resources, or supporting agri-tourism destinations and events."

    ODAV's mission to expand the footprint of the Aurora State Airport with a runway extension and additional through-the-fence commercial operations,

> located in prime EFU ag land of French Prairie, would appear to contradict the intent of both Oregon and Marion County's EFU zone, which "prohibits the construction, use, or design of buildings and structures except for facilities used in agricultural or forestry operations."

The 2022 Draft Master Plan provides no analysis of surface transportation impacts of Airport-related operations on area roads. In effect, by advocating for Airport expansion without any infrastructure recommendations to accommodate new development, ODAV is externalizing Airport-related costs onto local roads of Clackamas and Marion Counties and City of Aurora without providing compensation for mitigation. The Draft Master Plan merely notes a couple of relevant transportation plans, including the Marion County Rural Transportation System Plan and the City of Aurora Transportation System Plan, while ignoring the adjacent Clackamas County Transportation System Plan and the Oregon Department of Transportation (ODOT) Region Two/Mid-Willamette Valley Council of Governments Regional Transportation Plan.

The short Local Surface Transportation section indicates that the "Airport is located between Interstate 5 and State Highway 99E. Interstate 5, which is an essential north-south commerce link for the western United States, runs west of the Airport providing access to the Portland metro area. Access to the Airport is also provided by Highway 551 (Canby *(sic)* Wilsonville-Hubbard Highway) from the north and south, Arndt Road from the east and west, and Airport Road from Aurora. Keil Road is located south of the Airport and provides additional airport business access from Highway 551 and Airport Road. State Highway 99E, accessible to the Airport via Ehlen Road off of Highway 551 and Airport Road, provides access to the nearby communities of Canby, and Oregon City." Highway 551 (mislabeled as Canby-Hubbard Highway; actual label is Wilsonville-Hubbard Cut-off) is an ODOT facility, as is Highway 99E and I-5 and the nearby at-capacity I-5 Boone Bridge; segments of Arndt Road, Airport Road and Ehlen Road fall under jurisdiction of Clackamas and Marion Counties.

So while acknowledging the roadways of other jurisdictions that provide access to Airport, the 2022 Draft Master Plan fails to provide any analysis of Airport-related traffic on these roads or impacts to these surface transportation facilities. How do businesses at the Airport use these roads? What is the traffic volumes and capacity of area roadways to accommodate new development at the Airport? None of these questions are answered the Draft Master Plan.

In a similar manner, the 2022 Draft Master Plan provides no strategies to mitigate the impacts of Airport expansion onto local roads, nor potential resources to fund needed roadway improvements to accommodate increased activities at the Airport. For example, the Draft Master Plan cites on p 2-6 "that there are 2,672 direct, indirect and induced jobs at the Airport." Assuming that there are hundreds or thousands of

employees working at public and private employers at the Aurora State Airport, the Draft Master Plan provides no traffic analysis and no origination/destination trip data to determine impacts to surface transportation facilities. Given that there is no public transit service nor sidewalks nor shoulders on roads in the vicinity of the Airport, anyone who works at the Airport must drive in an automobile. So while the 2022 Draft Master Plan is shaping up to recommend runway extension and "through-the-fence" Airport expansion

The 2022 Draft Master Plan acknowledges a host of environmental resource degradation and public safety issues and transportation plans, but then does nothing to address these issues in terms of analysis or mitigation recommendations. On its face, the 2022 Draft Master Plan fails the test for an Oregon land-development master plan.

9. ODAV's Failure to Accurately Communicate to FAA Status of Prior FAA-funded 2012 Aurora State Airport Master Plan Violates FAA Grant Assurances that Should Result in an FAA Finding of Noncompliance that Results in a Denial of Future Funding.

As a component of obtaining the nearly $1 million FAA grant to fund the new 2022 Aurora State Airport Master Plan effort, ODAV made assurances in writing to FAA that all grant procedures were followed to produce a previous final, adopted 2012 Aurora State Airport Master Plan that would qualify agency to receiving funding for a new master plan. However, ODAV now admits that there is no valid, final adopted 2012 Aurora State Airport Master Plan, which is contrary to the grant assurances provided by ODAV to FAA.

The 2020 Draft Master Plan, p 2-42, states:

> "As a recipient of both federal and state airport improvement grant funds, the airport sponsor is contractually bound to various sponsor obligations referred to as 'Grant Assurances', developed by FAA and the State of Oregon. These obligations, presented in detail in federal and state statute and administrative codes, document the commitments made by the airport sponsor to fulfill the intent of the grantor (FAA or state) required when accepting federal and/or state funding for airport improvements. *Failure to comply with the grant assurances may result in a finding of noncompliance and/or forfeiture of future funding."* (Emphasis added).

The 2020 Draft Master Plan, p 2-43, states:

> "Consistency with Local Plans (Assurance #6)
>
> "*All projects must be consistent with city and county comprehensive plans, transportation plans, zoning ordinances, development codes, and hazard mitigation plans.* The airport sponsor should familiarize themselves with local planning

> documents before a project is considered *to ensure that all projects follow local plans and ordinances."* (Emphasis added).

As has been demonstrated and ODAV has conceded, there is no valid adopted Aurora State Airport Master Plan 2012, and neither the Master Plan nor its ALP were submitted to Marion County for amendments to the Comprehensive Plan. Thus, ODAV has failed to follow through on Grant Assurance #6, Consistency with Local Plans.

ODAV also fails to the test to fulfill FAA Grant Assurance #2, Compatible Land Use, which states in 2020 Draft Master Plan, p 2-44:

> "Compatible Land Use (Assurance #21)
>
> "Land uses around an airport should be planned and implemented in a manner that ensures surrounding development and activities are compatible with the airport. Aurora State Airport is located in unincorporated Marion County."

As Figure 2-8: Zoning Map on p 2-22 illustrates, the Aurora State Airport is located in unincorporated Marion County in high-value agricultural land zoned EFU. Oregon land use law seeks to protect EFU lands; ODAV's master-plan analysis seeks to convert EFU lands near Airport into an Airport use, contrary to state law, without a goal exception process that the agency has not pursued.

Thus, there is a question if ODAV has complied with FAA Grant Assurance #2, Compatible Land Use, by failing to ensure that "surrounding development and activities are compatible with the airport." By definition, EFU agricultural land is not compatible with Master Plan development proposals to extend runway and convert nearby EFU lands into Airport use.

ODAV's failure to meet FAA Grant Assurance #6 that "All projects must be consistent with city and county comprehensive plans" and potential lack of compliance with FAA Grant Assurance #21, Compatible Land Use, should prompt the FAA to take action. The appropriate remedy in this situation for ODAV'S failure to comply with one or more of the grant assurances is for FAA to issue a finding of noncompliance that results in the forfeiture of future funding.

10. Chapter 2, "Existing Conditions Analysis," Omits Key Information Needed to Determine Actual Site Conditions.

The 2022 Draft Master Plan cites on p 2-6 the OAP to indicate that there are 2,672 direct, indirect and induced jobs at the Airport. However, this information does not disclose how many jobs are there specifically at the Airport? This kind of data would tend to support the need for municipal governance and the provision of city utilities and transportation alternatives, all of which are missing at Airport.

Chapter 2 contains contradictory information: p 2-6 states that there are 281 aircraft based at the Airport; however, Figure 2-2 states that there are 396 'based aircraft.' What accounts for the difference here?

In a similar fashion, Figure 2-2 shows 94,935 annual operations; however, the Baseline is shown as 76,028 operations. Is Figure 2-2 incorrect?

The text on p 2-10 states that the based aircraft does not include helicopters; however, Figures 2-5 and 3-8 shows 10 helicopters contributing to the 281 based aircraft at the airport. Which is correct?

How many gallons of jet fuel is stored on ODAV property? Has ODAV accounted for any underground fuel-storage tanks? Are there any documented leaks in the underground storage tanks located on ODAV property?

If the 2019 Constrained Operations Study concluded that a runway extension of 7888' was justified, why was the recommendation only for 6002'?

What is the level of accuracy expected from the survey conducted in the 2019 Constrained Operations Study?

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?

Page 2-22 raises the question if 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?

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.

Page 2-23, where exactly are the two areas of residential property that are located under the primary, approach, or transitional surfaces?

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.

Does a runway expansion cause the RPZ to impact other residential homes not currently impacted?

Should the utilities section on page 2-39 address fire and police protection?

What are some examples of 'FAA noncompliance' as described on p 2-41?

11. Chapter 3, Aviation Activity Forecasts, Raises Questions that Are Unanswered.

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, consistent set of years should be used for all data tables and analysis, 2012 thru 2021. In consistent use of comparison years does not provide for the public to be able to determine accurate data, and could be interpreted as agency data/process manipulation.

Page 3-8, if the number of active commercial and private pilots will decline as indicated, how will operations increase? This appears to be contradictory information.

Is there a decibel level that should not be exceeded in residential areas near GA airports?

How many of the total aircraft operations are touch-and-go landings? That is, many members of the public suspect that ODAV is "artificially" inflating the operations count by including pilot training touch-and-go landings, each of which counts as two operations (touching down to runway and then lifting off of runway).

How many of the based aircraft are seasonal – that is, located at Airport more than half the calendar year? How is seasonality measured and through what process? Are there multiple surveys in a year?

12. ODAV's Prior Master Plan Historical Forecasting Track Record Consistently Over Estimates the Projected Number of Based Aircraft and Operations.

A review of prior ODAV master plan work in comparison to current data used in the 2022 Draft Master Plan demonstrates a historical track record of a high rate of error and most often overestimating the forecasted number of based aircraft, fleet mix and operations. Wide divergence between projections estimated 10 years ago and those of 2022 provide substantial reason to doubt the accuracy or validity of new 2022 Master Plan projections.

When comparing the 2012 Aurora State Airport Master Plan Based Aircraft and Fleet Mix Forecast compared to the new Draft 2022 Aurora State Airport Master Plan, the prior forecast for total based aircraft was off by 44%—overestimating the total number of Based Aircraft. Additionally, most of the Fleet Mix Forecast was also off substantially:

2012 and 2022 Master Plans Forecast of Based Aircraft and Fleet Mix Forecast: 2020/2021 Timeframe

	Year	Single Engine	Multiengine Piston	Turboprop	Jet	Helicopter	Other	Total
2012 Master Plan	2020	288	25	20	33	34	5	405
2022 Draft Master Plan	2021	216	6	13	36	10	0	281
# Variance		72	19	7	-3	24	5	124
% Variance		33%	317%	54%	-8%	240%	—	44%

ODAV's historical track record of overestimating the number of Based Aircraft at the Aurora State Airport is reflected in this graph in the new 2022 Draft Master Plan, p 3-15. Only when ODAV conducted an actual inventory of Based Aircraft in 2021 with a "Validated Count" of 218 did the public learn the actual number of Based Aircraft was substantially lower than ever previously reported or estimated.

FIGURE 3-2: HISTORICAL TAF – BASED AIRCRAFT

Source: FAA TAF 2000-2045 (Aurora State Airport) www.taf.faa.gov

When projecting out an additional 10 years to 2030 timeframe, the 2012 forecast margin of error increases by a third—increasing the over-estimate from 44% to 65%—compared to the 2022 forecast. The 2012 Master Plan projected a total 464 based aircraft by 2030, while the new 2022 Master Plan projects 281 based aircraft by 2031, representing a 65% overestimate compared to the new 2022 estimate.

2012 and 2022 Master Plans Forecast of Based Aircraft and Fleet Mix Forecast: 2030/2031 Timeframe

Comparison by Plan of Based Aircraft	Year	Single Engine	Multiengine Piston	Turboprop	Jet	Helicopter	Other	Total
2012 Master Plan	2030	316	27	26	47	43	5	464
2022 Draft Master Plan	2031	240	6	15	15	16	0	281
# Variance		76	21	11	32	27	5	183
% Variance		32%	350%	73%	213%	169%	—	65%

Data sources:
2012 Master Plan Table 3J. Based Aircraft and Fleet Mix Forecast, p 3-22
2022 Draft Master Plan Table 3-14: Forecast Based Aircraft Fleet Mix, p 3-19

The point here is that the prior 2012 Master Plan Based Aircraft and Fleet Mix Forecast was substantially off the mark on most counts. As listed below with the Operations Forecast, it appears that overestimating is common problem with Aurora State Airport Master Plans.

When comparing the 2012 Aurora State Airport Master Plan Operations Fleet Mix Forecast compared to the new Draft 2022 Aurora State Airport Master Plan, the prior forecast overestimated operations by 40% compared to the new 2022 estimate.

2012 and 2022 Master Plans Forecast of Operations Fleet Mix Forecast: 2020/2021 Timeframe

	Year	Single Engine	Multiengine Piston	Turboprop	Jet	Helicopter	Total
2012 Master Plan	2020	37,218	7,444	11,697	15,951	34,028	106,338
2022 Draft Master Plan	2021	60,823	760	3,041	5,322	6,082	76,028
# Variance		-23,605	6,684	8,656	10,629	27,946	30,310
% Variance		-39%	879%	285%	200%	459%	40%

When projecting out an additional 10 years to 2030 timeframe, the 2012 forecast margin of the Operations Fleet Mix continues a pattern of overestimating total operations and mis-estimating the fleet mix operations count.

2012 and 2022 Master Plans Forecast of Operations Fleet Mix Forecast: 2030/2031 Timeframe

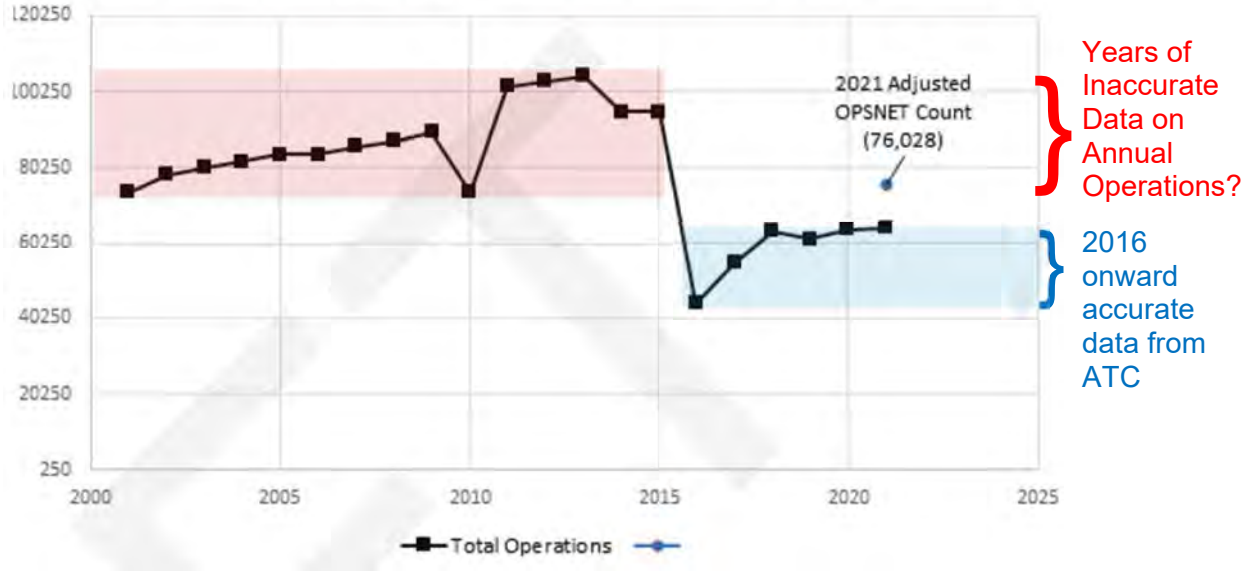
	Year	Single Engine	Multiengine Piston	Turboprop	Jet	Helicopter	Total
2012 Master Plan	2030	37,316	8,707	14,926	22,389	41,047	124,386
2022 Draft Master Plan	2031	75,143	764	4,297	7,638	7,638	95,480
# Variance		-37,827	7,943	10,629	14,751	33,409	28,906
% Variance		-50%	1040%	247%	193%	437%	30%

Data sources:
2012 Master Plan Table 3Table 3M. Operations Fleet Mix Forecast, p 3-29
2022 Draft Master Plan Table 3-16: Operations Fleet Mix, p 3-22

ODAV's historical record of inaccurate, over-estimated Operations count at the Aurora State Airport is reflected in this graph in the new 2022 Draft Master Plan, p 3-15. Only when the Aurora State Airport Air Traffic Control Tower opened in 2015 did accurate operational data become available that showed ODAV's gross overestimation of prior years' annual aircraft operations.

Additionally, despite having FAA Operations Network (OPSNET) Traffic Counts datasets that show 69,742 total operations in 2021 (2022 Draft Master Plan Table 2-6: OPSNET Airport Traffic Counts, p 2-10) ODAV inexplicably inflated the annual aircraft operations count by 6,286 or 9%, providing an even higher starting point for forecast operations.

FIGURE 3-3: HISTORICAL TAF – ANNUAL AIRCRAFT OPERATIONS



The highly inaccurate 2012 Aurora State Airport Master Plan Based Aircraft and Fleet Mix Forecast and Operations Fleet Mix Forecast compared to new Draft 2022 Draft Aurora State Airport Master Plan does not provide confidence in aviation forecasting. This becomes even more so when the Draft 2022 Draft Aurora State Airport Master Plan opts to ignore data contained in the recent 2019 Constrained Operations Study.

13. 2022 Draft Master Plan Ignores Recent 2019 Forecast Operations.

The new Draft 2022 Master Plan appears to ignore ODAV/FAA compiled operational flight data and forecast developed in the 2019 Constrained Operations Runway Justification Study for the Aurora State Airport, funded with a $70,000 ODAV grant. The Draft Master Plan does not justify or explain why the 2022 Draft Master Plan's forecasts vary so considerably from the previously FAA-approved 2019 Constrained Operations Runway Justification Study.

The forecast of operations variance between the new 2022 Draft Master Plan and the already approved FAA 2019 Constrained Operations Runway Justification Study starts with a 6% or 4,315 increase in 2021 and escalates to a differential of 58% or 44,033 annual operations by 2041.

It seems implausible that an FAA-approved aviation operations forecast conducted in 2019 just two years prior to the 2021 baseline date of the 2022 Draft Master Plan could be so utterly incorrect as forecast in the 2022 Draft Master Plan. A more plausible explanation is that ODAV is continuing an established pattern of overestimating operations forecast that result in a decision to extend the runway and expand the Airport's through-the-fence footprint onto prime EFU ag land.

The comparison of Forecast Operations between the new 2022 Draft Master Plan and the 2019 Constrained Operations Runway Justification Study demonstrates a significant variation from the Study's just-published forecast. Rhetorically speaking, if we can't rely on the 2019 forecast, why would we trust the 2022 forecast?

2022 Master Plan and 2019 Constrained Operations Study Forecast of Operations

	2021	2026	2031	2036	2041
2022 Draft Master Plan, p 3-23	76,028	85,201	95,480	107,000	119,909
Constrained Operations Study, p 1-14	71,713	72,706	73,939	74,788	75,876
# Variance	4,315	12,495	21,541	32,212	44,033
% Variance	6%	17%	29%	43%	58%

Data sources:
2022 Draft Master Plan Table 3-16: Operations Fleet Mix, p 3-22
2019 Constrained Operations Runway Justification Study, p 1-14

14. Draft Master Plan Fails to Account for Federal and State Effort to Reduce Climate-Changing Carbon and Greenhouse Gas (GHG) Emissions.

Finally, the 2022 Draft Master Plan makes NO effort to address the highly relevant issue of federal and state effort to reduce climate-changing carbon and greenhouse gas (GHG) emissions. In fact, by advocating for Airport runway extension and increase in fuel flowage that benefits ODAV's coffers, the agency is directly contradicting Oregon Governor's Office Executive Order 20-04 on Climate Action "Directing State Agencies to Take Actions to Reduce and Regulate Greenhouse Gas Emissions" that directs DEQ to develop strategies that "Cap and Reduce Greenhouse Gas Emissions."

The 2022 Draft Master Plan documents that over 4.2 million gallons of fuel have been sold at the Airport between 2016 and 2021 (Table 3-4: Fuel Flowage (Gallons)). Based on a standard conversion factor of 22.38 pounds of CO2 produced by burning a gallon of diesel fuel, the Airport has emitted an estimated 95 million pounds of CO2 during this timeframe. The 2022 Draft Master Plan anticipates generating additional CO2 by advocating development without addressing remediation or reduction strategies.

One of the major reasons stated during OAB meetings and PAC meetings by OAB members, ODAV staff and aviation interests in support of Aurora State Airport runway extension is to increase the sale of aviation fuel so that a larger class of aircraft may takeoff from the airport with full tanks of gas. Again, note that the tax on aviation fuel is the primary source of operational revenue for ODAV. Thus, the agency itself has a direct pecuniary interest in advocating for increased aviation-gas fuel sales that would accompany expansion of the Aurora State Airport, seemingly in direct conflict with the Governor's Executive Order on Climate Action.

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 Draft Master Plan Chapters 1-3. Thank you for your time and consideration.

Sincerely,

Mark Ottenad, Public/Government Affairs Director
City of Wilsonville

Exhibits:

A. December 13, 2021: Mayors of the Aurora State Airport Communities—Aurora and Wilsonville—Letter to The Honorable Kate Brown, Governor of Oregon, c/o Staff of the Office of the Governor, RE: Issues of Public Concern with Oregon Department of Aviation's Aurora State Airport Master Planning Process

B. August 4, 2021: City of Wilsonville Mayor Julie Fitzgerald Letter to Martha Meeker, Chair, Oregon Aviation Board, and Betty Stansbury, Aviation Director, RE: Public Disenfranchisement by the Oregon Aviation Board for the Proposed 2021-22 Aurora State Airport Master Planning Process

C. July 6, 2021: City of Aurora Mayor Brian Asher and City of Wilsonville Mayor Julie Fitzgerald letter to The Honorable Ron Wyden, U.S. Senator, and The Honorable Jeff Merkley, U.S. Senator, RE: Request for Your Intervention in Ensure Proper Award of FAA Grant Funds to the Oregon Department of Aviation for Aurora State Airport Master Plan Update

D. June 17, 2021: Representative Courtney Neron, HD-26, and Representative Susan McLain, HD-29, letter to Martha Meeker, Chair, Oregon Aviation Board, Betty Stansbury, Aviation Director, RE: 2021 Aurora State Airport Master Planning Process

E. June 14, 2021: City of Wilsonville Mayor Julie Fitzgerald Letter to Martha Meeker, Chair, Oregon Aviation Board, and Betty Stansbury, Aviation Director, RE: Concerns with Proposed 2021-22 Aurora State Airport Master Planning Process

F. August 8, 2018: Clackamas County Board Chair Jim Bernard and City of Wilsonville Mayor Tim Knapp letter to the Governor, Senate President and House Speaker: RE: Request to Cancel Oregon Department of Aviation application to Federal Aviation Administration (FAA) for funds to extend the Aurora State Airport runway

cc: Members of the Oregon Congressional Delegation: Senator Wyden, Senator Merkley, Congressman Schrader

Office of Governor Kate Brown

Members of the Oregon Legislature: Speaker Rayfield, Senate President Courtney, Representative McLain, Representative Courtney Neron

Leading Oregon Gubernatorial Candidates Christine Drazan, Tina Kotek, Bud Pierce, Tobias Read, Bob Tiernan, Betsy Johnson

FAA Northwest Mountain Region administrators: Director Fernuik, (Acting) Manager Seattle Airports District Office Manager Ferrell, Planning & Programming Branch Manager Schaffer, Safety & Standards Branch Manager Ritchie

Mayors of the Aurora State Airport Area Communities

Aurora **Wilsonville**

December 13, 2021

The Honorable Kate Brown, Governor of Oregon
c/o Staff of the Office of the Governor — *Submitted via email to:*
Gina Zejdlik, Chief of Staff — *gina.zejdlik@oregon.gov*
Amira Streeter, Policy Advisor–Climate, Energy and Transportation — *amira.streeter@oregon.gov*
Annie McColaugh, Director–Federal Affairs — *annie.mccolaugh@oregon.gov*
Jason Miner, Policy Director–Natural Resources — *jason.miner@oregon.gov*
Leah Horner, Director–Regional Solutions — *leah.horner@oregon.gov*
Jody Christensen, Mid Valley Regional Solutions Coordinator — *jody.christensen@oregon.gov*

RE: Issues of Public Concern with Oregon Department of Aviation's Aurora State Airport Master Planning Process

Dear Governor Brown:

We write to you as the elected leaders of the communities located in closest proximity to the Aurora State Airport to express our profound disappointment at the Oregon Department of Aviation's biased handling of the Aurora State Airport Master Planning process. Our communities bear the brunt of impacts of the airport's operations, and yet the Aviation Department appears to be discounting our concerns and is primarily responsive to vested financial interests at the airport.

This observation is true in general, as Department of Aviation staff and board members indicate meeting constantly with private-sector airport interests, while rarely meeting with local community members, city councilors and staff. Multiple communications from officials at the Cities of Aurora and Wilsonville to the Aviation Department over the past several years are generally ignored and not responded to.

The Cities of Aurora and Wilsonville, along with other Planning Advisory Committee (PAC) members to the Department of Aviation's Aurora State Airport Master Planning process such as 1000 Friends of Oregon and Friends of French Prairie, seek to raise significant issues of public concern. This federally funded master plan has gotten off to a rocky start in a manner that demonstrates the Department's apparent bias and inability at providing fair public processes that meet Oregon's standards for meaningful public engagement.

We are concerned that the Department of Aviation is again making similar mistakes as it did with the 2011 or 2012 Aurora State Airport Master Plan process that both the Oregon Supreme Court and the Oregon Court of Appeals found in 2021 violated Oregon land-use and public-process laws. We request that the Governor's Office demonstrate decisive leadership that provides confidence to local-government officials that federal and state planning processes are

conducted in a legal and ethical manner above reproach, which at this time appears questionable.

A primary concern pertains to the extremely lopsided membership composition of the Planning Advisory Committee (PAC). The Department of Aviation has stacked the Planning Advisory Committee with self-dealing financial interests at the Airport that benefit from taxpayer-funded Airport operations and capital improvements. A review of the PAC membership demonstrates that well over half of the PAC membership is comprised of entities with direct pecuniary interest in furthering airport expansion at taxpayer expense.

The same pro-airport expansion entities are represented multiple times on the PAC. Two associations placed on the PAC are composed of a majority of Airport financial interests:

- The attorney for the Aurora Airport Improvement Association represented at the June 3, 2021, Oregon Aviation Board meeting that most of the businesses at the Aurora State Airport belonged to the Aurora Airport Improvement Association.
- In a similar manner, most of the same airport entities are also members of Positive Aurora Airport Management association, a local airport operations management group.

By all appearances, the process and committee composition has the appearance of a "tick the box" exercise in public involvement. This leaves us to conclude that the outcome is predetermined and that the inevitable result will lead to airport expansion regardless of the impacts on safety, the environment and surrounding infrastructure.

Another key problem is that the Department of Aviation has omitted two key state agencies as PAC members: Department of Agriculture and Department of Environmental Quality (DEQ). The Aurora State Airport is located in the heart of the Oregon's best "foundation farmland" of French Prairie, which hosts some of Oregon's foremost traded-sector ag producers, nurseries and food processors. Real-estate speculation and uncontrolled urban-level development—as are occurring at the Aurora State Airport area—are harmful to this prime ag-sector economic cluster. By excluding the Department of Agriculture from the public process, the Department of Aviation continues a trend of excluding parties that may provide valuable information or may question the Aviation agency's objectives.

We read in the media that the US Environmental Protection Agency (EPA) indicates that 750 Oregon sites could expose residents to 'forever chemicals' of per- and poly-fluorinated substances or PFAS, where growing evidence points to their adverse health effects, including some cancers. In Oregon, the state Department of Environmental Quality (DEQ) is testing locations including the Aurora State Airport for known or suspected PFAS use. Again, the Department of Aviation's exclusion of DEQ demonstrates an on-going pattern of discriminatory conduct.

We understand that the Governor's Office Executive Order 20-04 on Climate Action "Directing State Agencies to Take Actions to Reduce and Regulate Greenhouse Gas Emissions" (GHG)

directs DEQ to develop strategies that "Cap and Reduce Greenhouse Gas Emissions." We are concerned that representatives of the Governor's Office appointed to the Oregon Aviation Board and Department of Aviation staff simultaneously are advocating for major expansion of the Aurora State Airport that results in substantial increases in aviation-gas fossil-fuel consumption and GHG emissions, contrary to the Executive Order on Climate Action.

One of the major reasons stated by aviation interests for Aurora State Airport runway extension is to increase the sale of aviation fuel so that a larger class of aircraft may takeoff from the airport with full tanks of gas. We note that the tax on aviation fuel is the primary source of operational revenue for the Department of Aviation. Thus**,** the Department of Aviation has a direct pecuniary interest in advocating for increased aviation-gas fuel sales that would accompany expansion of the Aurora State Airport, seemingly in direct conflict with the Governor's Executive Order on Climate Action.

Additionally, DEQ data appears to indicate that the NMPDES (National Pollution Discharge Elimination System) permit for the Department of Aviation's Aurora State Airport discharge into Mill Creek-Pudding River watershed expired June 30, 2017. We understand that area residents have expressed concerns for surface-water, ground-water and well-water quality due to prospective airport run-off pollutants, unregulated septic systems and potential ground water pollution. Cumulatively, these all appear to be good reasons from the Department of Aviation's perspective to exclude DEQ from Airport planning efforts.

The Department of Aviation's tightly controlled master planning process fails to meet the test for meaningful public engagement. The Zoom meeting format used by the Department of Aviation does not list or show all participants in the meeting and provide clear labeling of names and affiliations. It is unclear to the public who is attending the meetings and who or what entity that participants represent. At the November 16, 2021, PAC meeting, it was difficult to ascertain from many of the name labels who was attending in what role. Names and affiliations of all PAC members and staff/consultants should be clearly evident.

Additionally, some PAC members were allowed to have two representatives participate in the meeting, while some PAC members were ignored and not allowed to participate in the meeting. These elements indicate a failure of meaningful public process.

The facilitators for the PAC meeting used a series of unscientific "polls" to gauge participants' thoughts or perspectives; however, it was unclear who was participating — was it PAC members, Aviation staff and consultants, and/or the public? Moreover, the facilitators interpreted the results of the poll that may or may not be an accurate reflection of the participants involved.

The Department of Aviation states that "As the airport sponsor, ODA staff will be the final decision-making authority. They will decide what is included in the Master Plan." Setting aside the fact that this pronouncement at the start of a "public involvement" process sends a message that is contrary to Oregon's Statewide Planning Goal Number 1, we believe this is false

information; only the appointed body *(i.e.,* the Oregon Aviation Board) can legally approve a master plan. The failure of the Aviation Board to adopt the 2011 or 2012 Aurora State Airport Master Plan was a centerpiece for the Oregon Supreme Court's affirmation of the Court of Appeal's decision against the Department of Aviation for failure to comply with Oregon law.

During the November 16, 2021, PAC meeting, aviation consultants indicated that they would consider nearby external "outside the fence" proposed urban-level developments in the Airport master-planning process — implying that such proposed developments would favor Airport expansion. However, the consultants gave no indication of reviewing such information in light of Oregon's EFU land-use laws, nor the potential reality of such proposed developments ever actually occurring. Additionally, consultants gave no indication of considering the "negative" aspects of proposed developments outside the Airport, such as increased surface-transportation impacts/traffic congestion and potential mitigation, increased land-speculation harming the ag industry, and increased pollution and environmental impacts.

The Department of Aviation has allowed and promoted the dissemination of false information about the seismic resilience of the Aurora State Airport. At the October 6, 2021, Oregon Aviation Board planning session and at the November 16, 2021, PAC meeting, misinformation about the seismic conditions of the Aurora State Airport area was provided without rebuttal. At the October meeting, the Aviation Board had considerable discussion on resilience, and the importance of selling the resilience concept to the public and government officials as a component of building support for state and federal funds for the Aurora State Airport expansion. Aviation Board Chair Meeker indicated a desire to improve "lines of communication" between the Governor's Office and airport businesses to promote resilience.

Contrary to statements that depict the Aurora State Airport as a crucial facility for the projected 9.0 Cascadia Subduction Zone Earthquake, the Aurora State Airport is listed at the lowest-level of Tier 3 airports in the Oregon Resilience Plan. The Tier designations "indicate the priorities for making future investments." In other words, the Department of Aviation is effectively targeting one of the lowest priority airports to prepare for recovery in the Oregon Resilience Plan for potentially one the largest airport capital improvement projects ever planned by the state.

With respect to the airport's ability to withstand a Cascadia Subduction Zone Earthquake, reports by the Oregon Department of Geology and Mineral Industries (DOGAMI) show that the Aurora State Airport is located in an area subject to major potential damage in a projected 9.0 Cascadia Subduction Zone Earthquake. The "Mid/Southern Willamette Valley Geologic Hazards, Earthquake and Landslide Hazard Maps, and Future Earthquake Damage Estimates," DOGAMI publication IMS-24, shows that the Aurora State Airport specifically is located in an area:

- Rated High for Ground Shake Amplification
- Rated High for Amplification Susceptibility
- Rated Moderate to High for Liquefaction Susceptibility

The same deep, fine soils that make the French Prairie area such exemplary foundation farmland also mean these soils are subject to amplification and liquefaction. As a result of such an earthquake, the airport runway would likely be unserviceable for a long period of time (6-12 months) post-earthquake. Rather than allow aircraft to take off or land due to an inoperable runway, the most likely role of the Aurora State Airport will be to accommodate vertical take-off and landing of heavy-lift helicopters with locally-based Columbia Helicopters and Helicopter Transport Services, neither of which require a runway extension to operate.

In all of our years of government service, we have never seen a state agency act with such disregard to the concerns of the local communities, and appropriate and fair public process. We request your intervention now to provide for an unbiased process that produces trust-worthy results. We believe that if the Department of Aviation were to comply with—rather than seek to evade—the letter and spirit of Oregon's land-use and public-process laws, judicial intervention to set a course correction would not be a necessary remedy that must be pursued by local governments and concerned citizens.

Again, we appreciate your time and consideration of these important issues, and we look forward to your response. Thank you.

Sincerely,

Brian Asher, Mayor
City of Aurora

Julie Fitzgerald, Mayor
City of Wilsonville

Enc:

- Letter from Cities of Aurora and Wilsonville to Sen. Lee Beyer and Rep. Susan McLain, Co-Chairs Joint Committee on Transportation, RE Request for Public Hearing on HB 2497 – Proposed Legislation to Create Transparent Public Process for State Aviation Department Agency Communications and Coordination with Local Governments and Communities on Aurora State Airport Issues of Concern, March 11, 2021
- Aurora State Airport in Relation to The Oregon Resilience Plan and DOGAMI Earthquake Susceptibility Maps – 2019

cc: Oregon Aviation Board
Senator Ron Wyden
Senator Jeff Merkley
Congressman Kurt Schrader
Congresswoman Suzanne Bonamici
House Speaker Tina Kotek
Senate President Peter Courtney
Representative Susan McLain (HD 29)
Representative Courtney Neron (HD 26)
Representative Christine Drazan (HD 39)
Senator Bill Kennemer (SD 20)
Metro Council President Lynn Peterson
Metro Councilor Garrett Rosenthal
Clackamas County Board of County Commissioners
Marion County Board of County Commissioners
FAA Mountain Region staff
Heather Fernuik, Director
Chris Schaffer, Planning & Programming Manager
Warren Ferrell (Acting) Manager, Seattle Airports District Office

March 11, 2021

Senator Lee Beyer, Co-Chair — *Sen.LeeBeyer@oregonlegislature.gov*
Representative Susan McLain, Co-Chair — *Rep.SusanMcLain@oregonlegislature.gov*
Joint Committee on Transportation — *patrick.h.brennan@oregonlegislature.gov*
Oregon Legislative Assembly

RE: Request for Public Hearing on HB 2497 – Proposed Legislation to Create Transparent Public Process for State Aviation Department Agency Communications and Coordination with Local Governments and Communities on Aurora State Airport Issues of Concern

Dear Co-Chairs Beyer and McLain and Members of the Committee:

We are writing to you as the elected leaders of two cities each located near the Aurora State Airport to request your support this legislative session in resolving a decade's-long controversy between the Oregon Department of Aviation (ODA) and our communities regarding the agency's uncooperative attitude with respect to the Aurora State Airport Master Plan and management of the airport.

At the request of the Aurora and Wilsonville City Councils, Representative Courtney Neron (HD-26) has introduced HB 2497 as a "process bill" that does not dictate predetermined results. Rather, the proposed legislation creates an open transparent, public process to establish formal channels of intergovernmental communication and coordination between the state Aviation agency and directly impacted local governments, which has been sorely lacking over the past 10 years.

We believe that ODA circumvented Oregon public-process laws regarding the purported adoption of the *2012 Aurora State Airport Master Plan.* Ever since we began disputing what we view as an illegal process, the state agency has been virtually unresponsive to our local communities. We are alarmed about the agency's efforts to promote increasingly urbanized levels of activity in unincorporated county territory of high-value EFU farmland without inviting meaningful public input and without supporting public infrastructure — all contrary to Oregon Goals for citizen-involvement and land-use planning. The PSU Oregon Solutions' *Aurora State Airport Assessment Report* commissioned by the legislature in 2018 found a host of agency management troubles, improper influence and poor public engagement and communications problems regarding ODA's operations and planning at the Aurora State Airport.

HB 2497 also provides for updating the controversial *2012 Aurora State Airport Master Plan* that has been the subject of significant community concern and litigation, conducting a much-needed environmental assessment of current airport pollution levels, and planning for eventual annexation of the airport by the City of Aurora to provide municipal governance and urban services.

We respectfully request that the Joint Committee on Transportation provide a public-hearing opportunity for HB 2497 as a way to prepare a roadmap forward for resolving the 10-year-long Aurora State Airport conflict between the state agency and local communities. To date, *the only open public forum* on ODA's efforts to expand the Aurora State Airport was held by the Wilsonville City Council in November 2018 that drew 200 attendees.

Sincerely,

Brian Asher, Mayor
Mayor@ci.aurora.or.us

Julie Fitzgerald, Mayor
Mayor@ci.wilsonville.or.us

cc: Senate President Peter Courtney; House Speaker Tina Kotek; Gina Zejdlik, Governor's Chief of Staff

Aurora State Airport in Relation to The Oregon Resilience Plan and DOGAMI Earthquake Susceptibility Maps - 2019

The Oregon Resilience Plan

Reducing Risk and Improving Recovery for the Next Cascadia Earthquake and Tsunami

Report to the
77th Legislative Assembly

from
Oregon Seismic Safety Policy
Advisory Commission (OSSPAC)

Salem, Oregon
February 2013

Air Transportation

The state of Oregon has an extensive aviation system that provides valuable transportation options for the public, ranging from small airports in remote regions of the state to large commercial service airports. Ninety-seven public-use airports provide support to the economic health and vitality of Oregon and contribute to the quality of life for its citizens and visitors.

- Fifty-seven public-use airports are partially supported by FAA and included in the National Plan of Integrated Airport System (NPIAS).
- Sixteen public-use airports are either owned by other municipalities or are privately owned.
- Over 400 private airports and landing strips are located within Oregon.

The 2007 Oregon Aviation Plan established five categories of airports, based on the definitions outlined within the National Plan of Integrated Airports System (NPIAS), the design criteria outlined by the Airport Reference Code (ARC), and the facilities inventory.

CATEGORY I: COMMERCIAL SERVICE AIRPORTS

These airports support some level of scheduled commercial airline service in addition to a full range of general aviation aircraft. This includes both domestic and international destinations.

CATEGORY II: URBAN GENERAL AVIATION AIRPORTS

These airports support all general aviation aircraft and accommodate corporate aviation activity including business jets, helicopters, and other general aviation activity. The primary users are business related and service a large geographic region, or they experience high levels of general aviation activity.

CATEGORY III: REGIONAL GENERAL AVIATION AIRPORTS

These airports support most twin and single engine aircraft, may accommodate occasional business jets, and support regional transportation needs.

CATEGORY IV: LOCAL GENERAL AVIATION AIRPORTS

These airports primarily support single engine, general aviation aircraft, but are capable of accommodating smaller twin-engine general aviation aircraft. They also support local air transportation needs and special use aviation activities.

CATEGORY V: REMOTE ACCESS AND EMERGENCY SERVICE AIRPORTS

These airports primarily support single-engine, general aviation aircraft, special use aviation activities, and access to remote areas; or they provide emergency service access.

The following list identifies airports within each category that have the potential to maintain or quickly restore operational functions after a major earthquake. The Transportation Task Group arranged these 29 airports into a tier system to indicate the priorities for making future investments. Tier 1 (T1) is comprised of the essential airports that will allow access to major population centers and areas

considered vital for both rescue operations and economic restoration. Tier 2 (T2) is a larger network of airports that provide access to most rural areas and will be needed to restore major commercial operations. Tier 3 (T3) airports will provide economic and commercial restoration to the entire region after a Cascadia subduction zone event.

Category I	Category II	Category III	Category IV	Category V
*Redmond (T1)	Scappoose (T2)	Tillamook (T2)	Mulino State (T3)	Independence State (T3)
PDX (T1)	Troutdale (T3)	Roseburg (T1)	Albany (T3)	Siletz Bay State (T2)
Salem (T1)	Hillsboro (T2)	Bandon State (T2)	Lebanon (T3)	Cape Blanco State (T2)
Eugene (T1)	Portland Heliport (T3)	Grants Pass (T3)	Florence (T3)	
Rogue Valley Medford (T1)	Aurora State (T3)		Creswell (T3)	
Klamath Falls (T1)	McMinnville (T3)		Cottage Grove State (T3)	
	Newport (T2)		Myrtle Creek (T3)	
	Corvallis (T3)		Brookings (T2)	

*Primary emergency response airport for FEMA Region X: Redmond municipal airport, centrally located in central Oregon, is ideally situated to be the primary FEMA emergency response airport.

Figure 5.16: Oregon Airports (Source: Oregon Department of Aviation)

The Portland International Airport (PDX) is one of Oregon's vital transportation network links. As the state's major airport, PDX will play a key role in re-establishing our economy by facilitating the movement of people, goods, and services after a major statewide emergency event. Other airports in Oregon will also play a vital role during the post-disaster emergency response and initial recovery phase. During the emergency response, for example, displaced residents, injured people, and the elderly may need to be evacuated by means of airports; and airports will also provide a staging area for needed supplies (such as water, food, medical supplies, and materials for temporary housing). Until highway and rail transportation can be fully restored, air transportation, along with ships off the coast, will be the lifelines for Oregon's citizens.

Oregon Transportation Resiliency Status

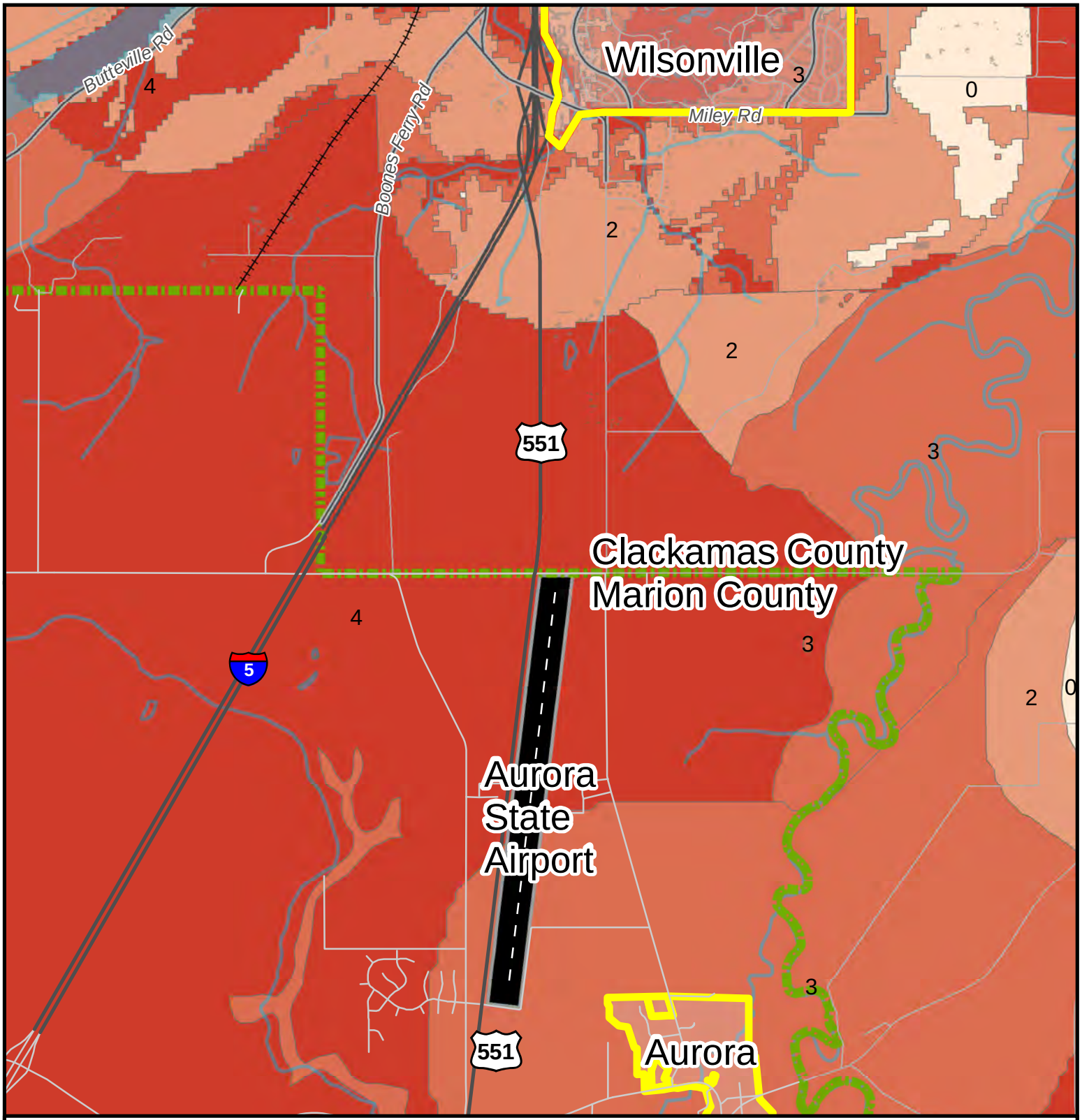
***Key to the Table**

TARGETS TO ACHIEVE DIFFERENT LEVELS OF RECOVERY:	
Minimal: (A minimum level of service is restored, primarily for the use of emergency responders, repair crews, and vehicles transporting food and other critical supplies.)	R
Functional: (Although service is not yet restored to full capacity, it is sufficient to get the economy moving again—e.g. some truck/freight traffic can be accommodated. There may be fewer lanes in use, some weight restrictions, and lower speed limits.)	Y
Operational: (Restoration is up to 90% of capacity: A full level of service has been restored and is sufficient to allow people to commute to school and to work.)	G
ESTIMATED TIME FOR RECOVERY TO **60%** OPERATIONAL GIVEN CURRENT CONDITIONS:	S
ESTIMATED TIME FOR RECOVERY TO **90%** OPERATIONAL GIVEN CURRENT CONDITIONS:	X

Comparison of Target States and Estimated Time for Recovery

Infrastructure Facilities	*Event Occurs*	*0 – 24 hours*	*1 – 3 days*	*3 – 7 days*	*1 – 4 weeks*	*1 – 3 months*	*3 – 6 months*	*6 – 12 months*	*1 – 3 years*	*3+ years*
Central Oregon Zone										
▶OREGON STATE HIGHWAY SYSTEM										
State Highway System - Tier 1 SLR [1)]			R	Y	G			S	X	
Roadways			R	Y	G/S		X			
Bridges			R	Y	G		S	X		
Landslides			R	Y	G			S	X	
State Highway System - Tier 2 SLR			R		Y	G			S	X
Roadways			R		Y	G/S		X		
Bridges			R		Y	G		S	X	
Landslides			R		Y	G			S	X
State Highway System - Tier 3 SLR				R		Y	G		S	X
Roadways				R		Y	G/S		X	
Bridges				R		Y	G		S	X
Landslides				R		Y	G		S	X
State Highway System - Other Routes					R		Y	G	S	X
Roadways					R		Y	G	X	
Bridges					R		Y	G	S	X
Landslides					R		Y	G	S	X
▶AIRPORTS & AIR TRANSPORTATION										
Tier I - Oregon Airports System										
Redmond Municipal Roberts Field Airport - FEMA		R	S		Y	G	X			
Klamath Falls Airport		R	S		Y	G	X			
FAA Facility			R	Y	G					
▶OREGON RAIL TRANSPORTATION										
UPRR										
CA/OR State Line to Bieber Line Jct. (Klamath Falls)			Y	G	S	X				

Infrastructure Facilities	*Event Occurs*	*0 – 24 hours*	*1 – 3 days*	*3 – 7 days*	*1 – 4 weeks*	*1 – 3 months*	*3 – 6 months*	*6 – 12 months*	*1 – 3 years*	*3+ years*
Bieber Ln Jct. (Klamath Falls) to Chemult (Shared			Y	G	S	X				
Chemult to Eugene					Y	G	S	X		
BNSF										
CA/OR State Line to Bieber Line Jct. (Klamath Falls)		G	S	X						
Chemult to Redmond		G	S	X						
Redmond to O.T. Jct. (connection with UP at Columbia			Y	G	S	X				
►**OREGON PUBLIC TRANSIT**										
Admin & Maintenance Facilities [2)]						R	Y	G	S	X
Local Area Paratransit On-Demand Service (critical				R	Y	S	G	X		
Local Area Paratransit On-Demand Service (full						R	Y	G	S	X
Local Roadway Fixed Route Service (emergency				R	Y	S	G	X		
Local Roadway Fixed Route Service (regular						R	Y	G	S	X
Intercity & Commuter Bus [4)]						R	Y	G	S	X
Willamette Valley Zone										
►**OREGON STATE HIGHWAY SYSTEM**										
State Highway System - Tier 1 SLR [1)]			R	Y	G			S	X	
Roadways			R	Y	G		S	X		
Bridges			R	Y	G			S	X	
Landslides			R	Y	G			S	X	
State Highway System - Tier 2 SLR			R		Y	G			S	X
Roadways			R		Y	G	S	X		
Bridges			R		Y	G			S	X
Landslides			R		Y	G			S	X
State Highway System - Tier 3 SLR				R		Y	G		S	X
Roadways				R		Y	G	S	X	
Bridges				R		Y	G		S	X
Landslides				R		Y	G		S	X
State Highway System - Other Routes					R		Y	G	S	X
Roadways					R		Y	G	S	X
Bridges					R		Y	G	S	X
Landslides					R		Y	G	S	X
►**AIRPORTS & AIR TRANSPORTATION**[5)]										
Tier I - Oregon Airports System										
Portland International Airport (PDX) (Tier 1)		R			Y	S		G	X	
Salem McNary Field		R			Y	S		G	X	
Eugene Mahlon Sweet Filed		R			Y	S		G	X	
Rogue Valley International Medford		R			Y	S		G	X	
Roseburg Regional Airport		R			Y	S		G	X	
Tier III Oregon General Aviation Airport System										
Troutdale			R		S	Y		G		X
Portland Heliport			R		S	Y		G		X
Aurora State			R		S	Y		G		X
McMinnville Municipal			R		S	Y		G		X
Corvallis			R		S	Y		G		X



The City of Wilsonville, Oregon

Clackamas and Washington Counties

Liquefaction Susceptibility

0 1 2 3 4 5

Lower → Higher

County Boundary

City Limits

Aurora State Airport Area Earthquake Liquefaction Susceptibility

0 **Miles** 0.5

WILSONVILLE OREGON

M:\projects\2018\100918_Liq\Liq.mxd

Summary: This map shows liquefacction susceptibility for Oregon calculated following the methods of FEMA's 2011 HAZUS-MH MR4 technical manual. The map was prepared in support of a series of ground motion and ground failure maps for a scenario Magnitude 9.0 Cascadia Subduction Earthquake developed by the Oregon Department of Geology aand Mineral Industries. The scenario maps were prepared for the Oregon Sesimic Safety Policy Advisory Commission for its use in preparing a report to the 77th Oregon Legislative Assembly entitled " The Oregon Resilience Plan; Reducing Risk and Improving Recovery for the Next Cascadia Earthquake and Tsunami".

OREGON DEPARTMENT OF GEOLOGY AND MINERAL INDUSTRIES
INTERPRETIVE MAP SERIES 24

GEOLOGIC HAZARDS, EARTHQUAKE AND LANDSLIDE HAZARD MAPS, AND FUTURE EARTHQUAKE DAMAGE ESTIMATES FOR SIX COUNTIES IN THE MID/SOUTHERN WILLAMETTE VALLEY INCLUDING YAMHILL, MARION, POLK, BENTON, LINN, AND LANE COUNTIES AND THE CITY OF ALBANY, OREGON

APPENDIX E:
MARION COUNTY

CRUSTAL EARTHQUAKE SCENARIO
- Scenario Details
- Ground Motion Map

SUBDUCTION ZONE EARTHQUAKE SCENARIO
- Scenario Details
- Ground Motion Map

GEOLOGIC HAZARD MAPS
- Relative Ground-Shaking Amplification Susceptibility Map
- Relative Liquefaction Hazard Susceptibility Map
- Relative Earthquake-induced Landslide Susceptibility Map
- Identified Landslide Areas Map

HAZUS-MH GLOBAL REPORT FOR CRUSTAL SCENARIO
HAZUS-MH GLOBAL REPORT FOR SUBDUCTION ZONE SCENARIO

CRUSTAL EARTHQUAKE SCENARIO DETAILS FOR MARION COUNTY

Crustal Earthquake Scenario: A magnitude 6.9 earthquake on the Mount Angel Fault.

For the magnitude 6.9 earthquake on the Mount Angel Fault scenario, we defined the fault source using the "deterministic seismic source" option within HAZUS-MH (Figure E1) (FEMA, 2003b). The fault and earthquake event were chosen by examination of USGS (2004) data and data in the Geomatrix Consultants, Inc. (1995) *Seismic Design Mapping, State of Oregon* report prepared for the Oregon Department of Transportation. In general, a likely worst-case scenario was selected. Figure E1 has the location of the fault, shown as the dark line, and the census tracts within Marion County. Figure E2 displays the peak ground acceleration (PGA) for the crustal scenario.

Scenario Name	Mount Angel M6.9
Type of Earthquake	Source
Fault Name	Mount Angel Fault
Historical Epicenter ID #	67
Probabilistic Return Period	NA
Longitude of Epicenter	−122.83
Latitude of Epicenter	45.05
Earthquake Magnitude	6.90
Depth (km)	0.00
Rupture Length (km)	30.69
Rupture Orientation (degrees)	0.00
Attenuation Function	Project 2000 West - Non Extensional

Crustal Earthquake Scenario Ground Motion Map

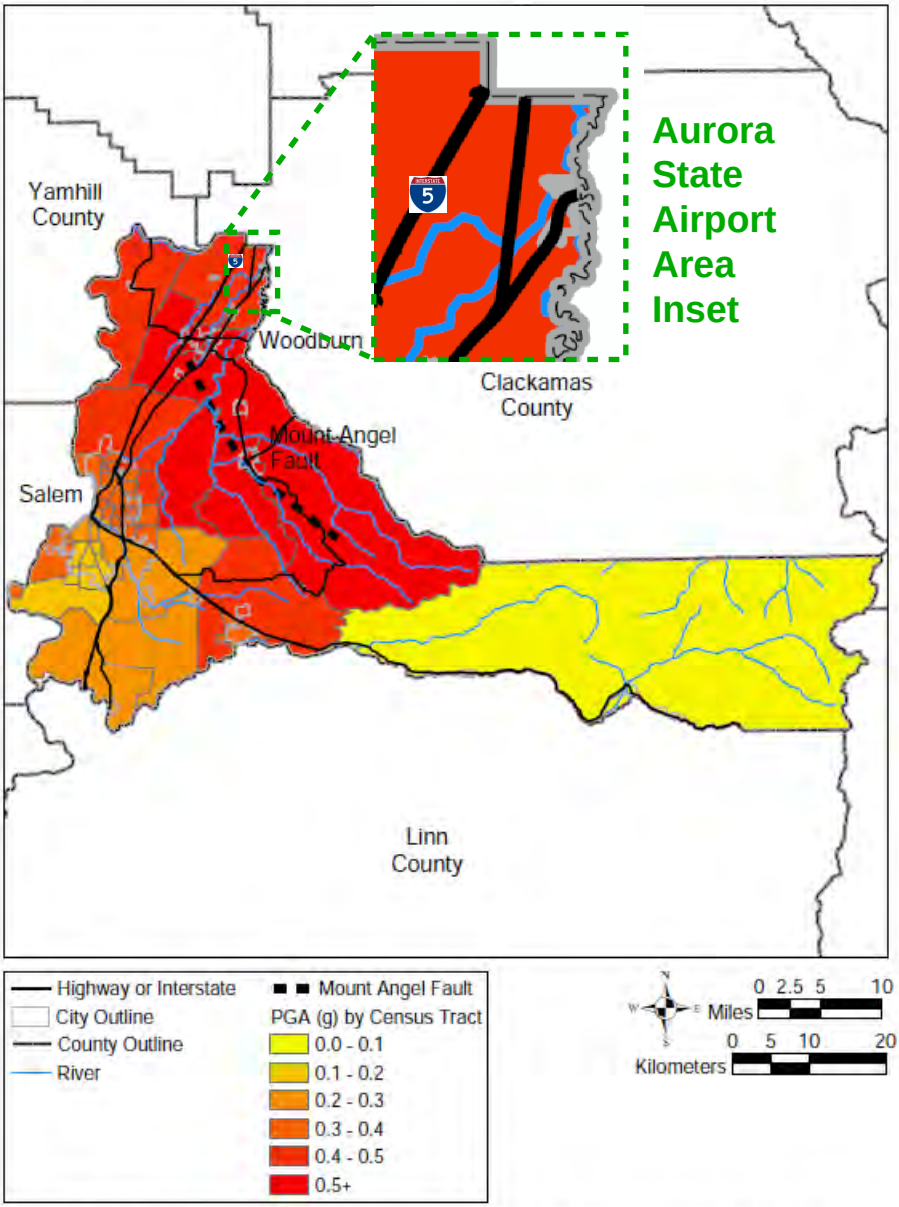


Figure E2. Peak ground acceleration (PGA) by census tracts map for the crustal earthquake scenario, Marion County, Oregon (FEMA, 2003b)

GEOLOGIC HAZARD MAPS

Relative Ground-Shaking Amplification Susceptibility Map

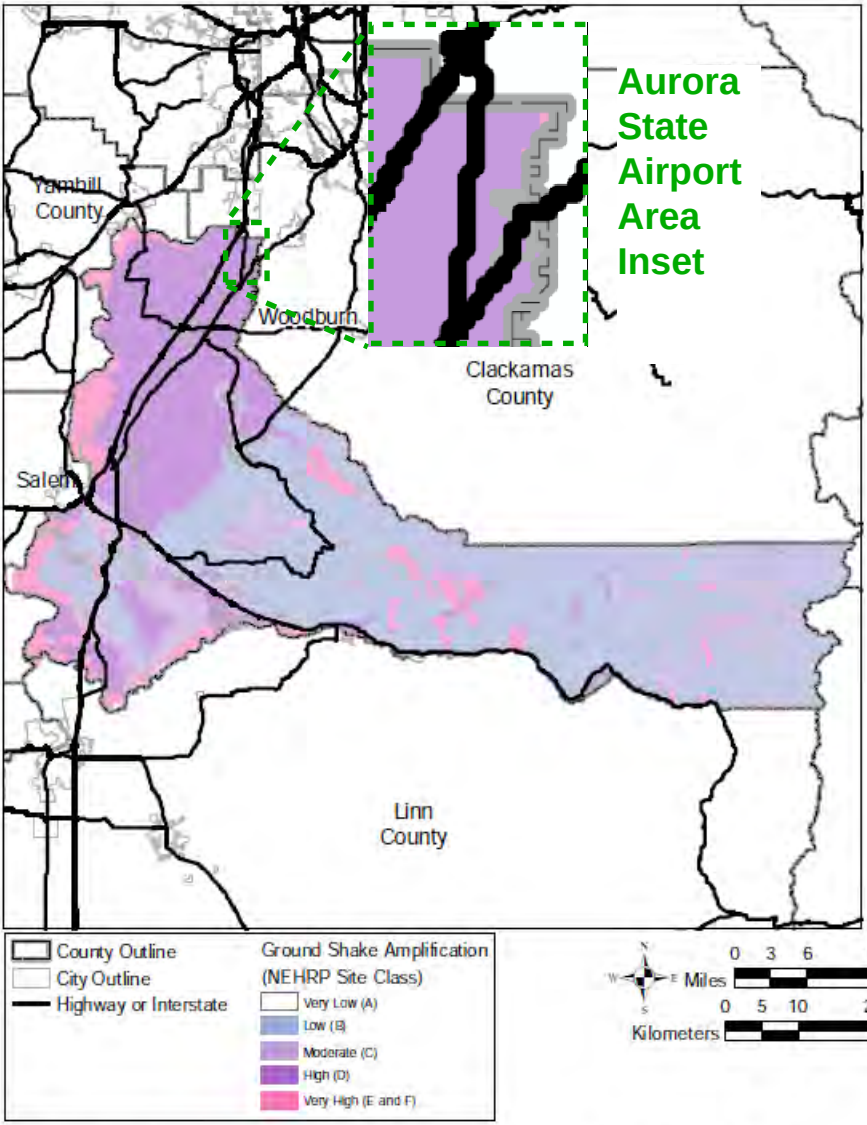
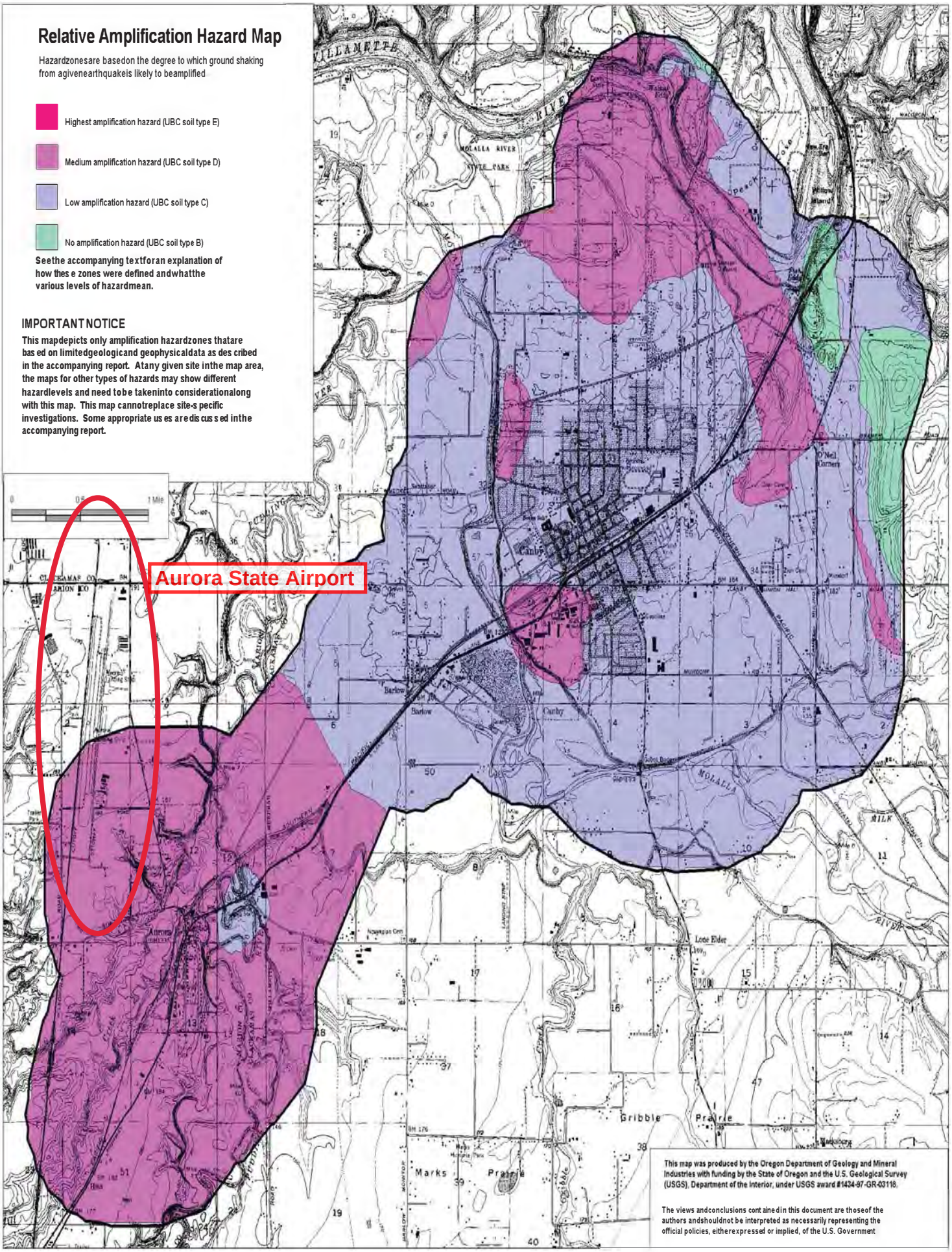
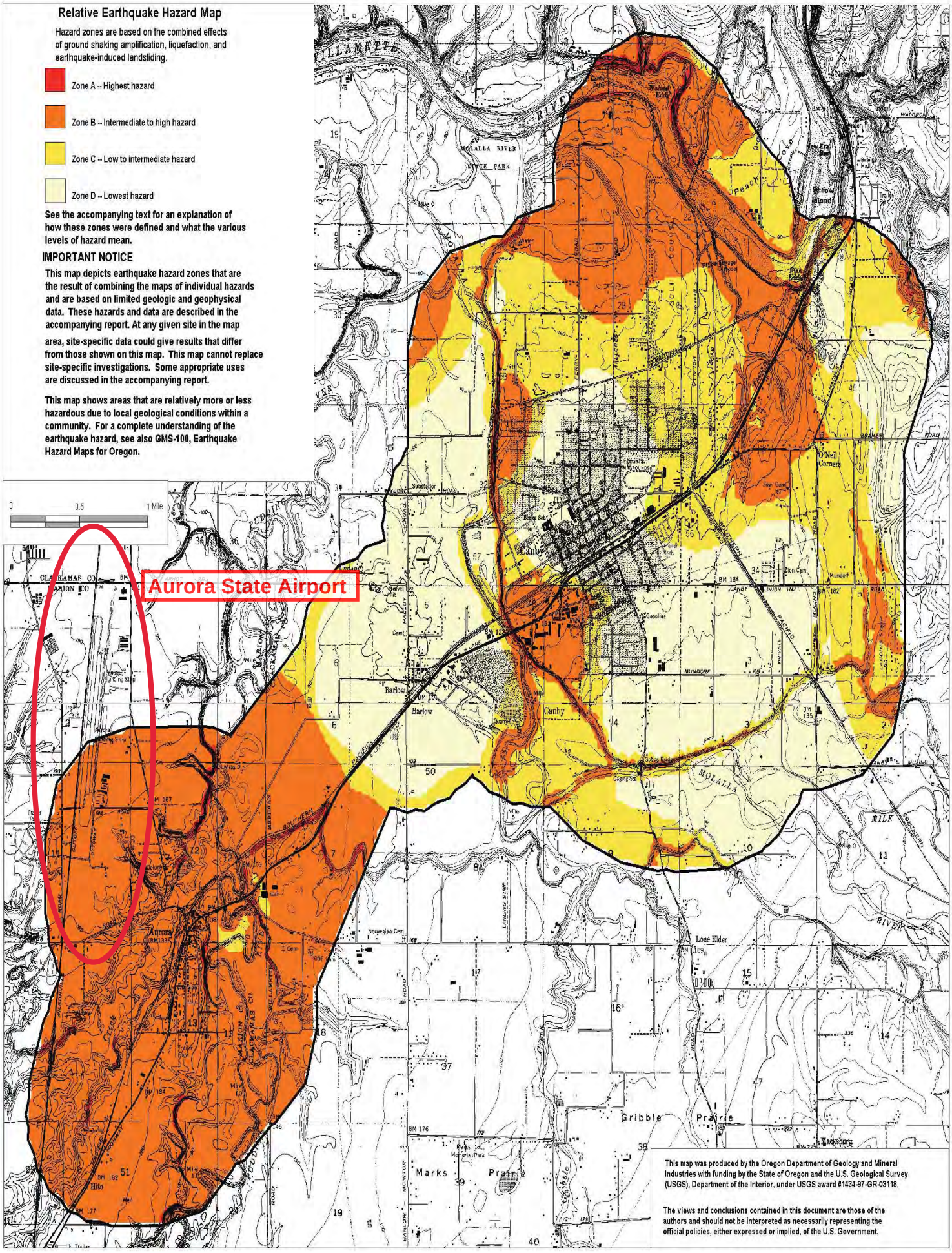


Figure E5. Relative ground-shaking amplification susceptibility map for Marion County, Oregon.


Relative Amplification Hazard Map
Hazard zones are based on the degree to which ground shaking from a given earthquake is likely to be amplified
Highest amplification hazard (UBC soil type E)
Medium amplification hazard (UBC soil type D)
Low amplification hazard (UBC soil type C)
No amplification hazard (UBC soil type B)
See the accompanying text for an explanation of how these zones were defined and what the various levels of hazard mean.
IMPORTANT NOTICE
This map depicts only amplification hazard zones that are based on limited geological and geophysical data as described in the accompanying report. At any given site in the map area, the maps for other types of hazards may show different hazard levels and need to be taken into consideration along with this map. This map cannot replace site-specific investigations. Some appropriate uses are discussed in the accompanying report.
Aurora State Airport
Canby
Barlow
Gribble
Prairie
Marks
Prairie
This map was produced by the Oregon Department of Geology and Mineral Industries with funding by the State of Oregon and the U.S. Geological Survey (USGS), Department of the Interior, under USGS award #1434-97-GR-03118.
The views and conclusions contained in this document are those of the authors and should not be interpreted as necessarily representing the official policies, either expressed or implied, of the U.S. Government



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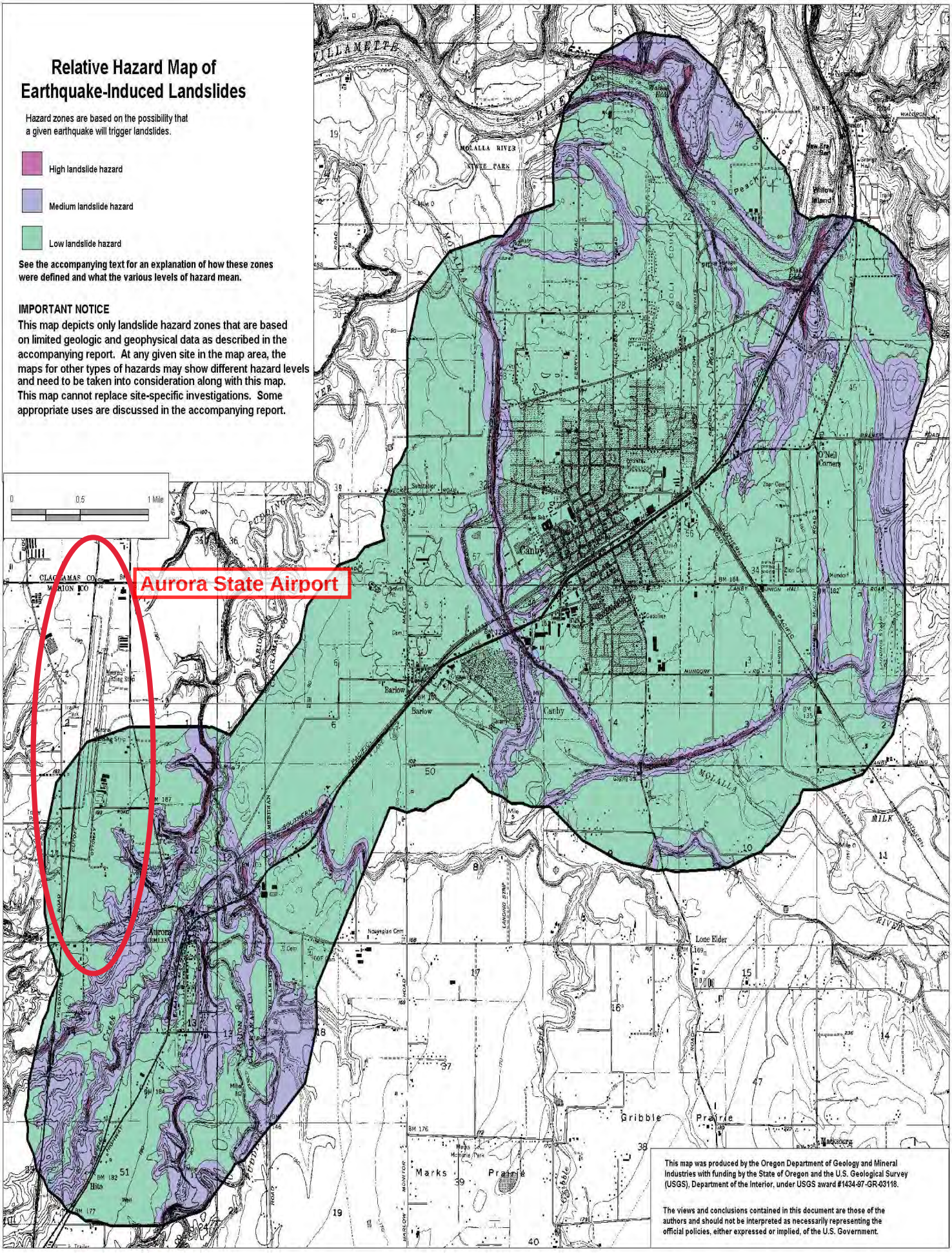
Relative Hazard Map of
Earthquake-Induced Landslides
Hazard zones are based on the possibility that a given earthquake will trigger landslides.
High landslide hazard
Medium landslide hazard
Low landslide hazard
See the accompanying text for an explanation of how these zones were defined and what the various levels of hazard mean.
IMPORTANT NOTICE
This map depicts only landslide hazard zones that are based on limited geologic and geophysical data as described in the accompanying report. At any given site in the map area, the maps for other types of hazards may show different hazard levels and need to be taken into consideration along with this map. This map cannot replace site-specific investigations. Some appropriate uses are discussed in the accompanying report.
0
0.5
1 Mile
Aurora State Airport
Canby
Barlow
Aurora
Gribble Prairie
Marks Prairie
Lone Elder
This map was produced by the Oregon Department of Geology and Mineral Industries with funding by the State of Oregon and the U.S. Geological Survey (USGS), Department of the Interior, under USGS award #1434-97-GR-03118.
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STATE OF OREGON
DEPARTMENT OF GEOLOGY AND MINERAL INDUSTRIES
JOHN D. BEAULIEU, STATE GEOLOGIST

Canby-Barlow-Aurora Urban Area

IMS-8

Relative Earthquake Hazard Maps
for Selected Urban Areas in Western Oregon

By Ian P. Madin and Zhenming Wang

CANBY-BARLOW-AURORA

Relative Liquefaction Hazard Map

Hazard zones are based on the likelihood that liquefaction will occur in a given earthquake.

- Highest liquefaction hazard
- Medium liquefaction hazard
- Low liquefaction hazard
- No liquefaction hazard

See the accompanying text for an explanation of how these zones were defined and what the various levels of hazard mean.

IMPORTANT NOTICE

This map depicts only liquefaction hazard zones that are based on limited geologic and geophysical data as described in the accompanying report. At any given site in the map area, the maps for other types of hazards may show different hazard levels and need to be taken into consideration along with this map. This map cannot replace site-specific investigations. Some appropriate uses are discussed in the accompanying report.

0 0.5 1 Mile

Aurora State Airport

This map was produced by the Oregon Department of Geology and Mineral Industries with funding by the State of Oregon and the U.S. Geological Survey (USGS), Department of the Interior, under USGS award #1434-97-GR-03118.

The views and conclusions contained in this document are those of the authors and should not be interpreted as necessarily representing the official policies, either expressed or implied, of the U.S. Government.

WILSONVILLE
OREGON

August 4, 2021

Sent via email to:
aviation.mail@aviation.state.or.us
betty.stansbury@aviation.state.or.us
cathy.rb.clark@aviation.state.or.us

Martha Meeker, Chair
Oregon Aviation Board
Oregon Department of Aviation
3040 25th Street SE
Salem, OR 97302

RE: Public Disenfranchisement by the Oregon Aviation Board for the Proposed 2021-22 Aurora State Airport Master Planning Process

Dear Chair Meeker and Aviation Board Members:

I listened with pronounced disappointment to Aviation Board members and staff conversations concerning the proposed new Aurora State Airport Master Plan, following public testimony, at the last public Oregon Aviation Board (OAB) meeting on July 15, 2021.

The majority of the meeting discussion was devoted to efforts by airport business interests to pressure the OAB into filing an appeal of the Court of Appeals decision—finding several errors and violations of state law by the Aviation Department in the adoption of the 2011 or 2012 master plan—to the Oregon Supreme Court.

As we saw today in *Schaefer v. Oregon Aviation Board,* 313 Or App 725 (2021), the Court of Appeals roundly rejected the appeal by the airport business interests of the Court's reversal and remand of the Land Use Board of Appeals decision that upheld the flawed master plan.

What was not discussed at the July 15 OAB meeting was citizen testimony, once again, requesting a more balanced and inclusive Planning Advisory Committee (PAC) for this new master plan update. In fact, the only discussion we heard on this topic was a rhetorical question by Board Member Granato to Chair Meeker asking, even if the parties requesting a seat at the table were not granted one, couldn't they still attend all the meetings? The response from Chair Meeker response was a delighted, why of course they could!

Citizens have repeatedly asked to be equitably represented with a balance of seats on the Planning Advisory Committee. Instead, they are effectively told by OAB that they can silently attend and sit at the back of the room. This action demonstrates more of the same attempts by the OAB to hear only from those they wish to hear from, to the exclusion of the greater community public interest.

The PAC does *not* need a representative for every airport business, to the exclusion of those citizens whose lives and properties will be most impacted by the proposed airport expansion and runway extension. At the June 3 and July 15 OAB meetings, the attorney for the Aurora Airport Improvement Association indicated that she represented all or a vast majority of

businesses at the airport; the appointment of an Association representative satisfies any and all needs for airport business representation on the PAC.

We are still disappointed that the Aviation Department still has not responded to my letter of June 14, 2021, and prior City of Wilsonville communication attempts to the Department.

Thank you for your consideration.

Sincerely,

Julie Fitzgerald
Mayor, City of Wilsonville

Enc. (1)
cc: Members of the Oregon Congressional Delegation:
- Senator Ron Wyden
- Senator Jeff Merkley
- Congressman Kurt Schrader

Aurora Mayor Brian Asher
Members of the Oregon Legislature:
- Speaker Tina Kotek
- Senate President Peter Courtney
- Representative Susan McLain (HD 29)
- Representative Courtney Neron (HD 26)
- Representative Christine Drazan (HD 39)
- Senator Bill Kennemer (SD 20)

Clackamas County Board of County Commissioners
Charbonneau Country Club
Aurora-Butteville-Barlow Citizens Planning Organization
Friends of French Prairie
1000 Friends of Oregon

Presentation Slides from July 15, 2021, Oregon Aviation Board Meeting

This slide shows the lopsided composition of the PAC that seats a majority of vested airport financial interests to advise on Aurora State Airport Master Planning process.

Planning Advisory Committee (PAC) Membership: To Date

AABC/TLM Holdings - Ted Millar
AAIA - Bruce Bennett
Aurora ATC - TBD
Aurora CTE, Inc - Bill Graupp
City of Aurora - Brian Asher
City of Canby - TBD
City of Wilsonville - Julie Fitzgerald
Clackamas County - Tootie Smith
Columbia Helicopters - Rob Roedts
DLCD - Matt Crall
Lynx Aviation, FBO - Tristan Dorian
Marion County - Danielle Bethell
Marion County Planning Dept. – Austin Barnes
ODA - Tony Beach, Airport Manager
ODOT - Naomi Zwerdling
Oregon Aviation Board - John Barsalou
Oregon Farm Bureau - Mary Anne Cooper
PAAM - Tony Helbling
Governor's Office - Regional Solutions - Jody Christensen
Vans Aircraft - Rian Johnson
Willamette Aviation, FBO - David Waggoner
Wilsonville Chamber of Commerce - Kevin O'Melley

This slide appears to show how community organizations and public interest groups may be relegated to a "second class" Citizens Advisory Committee (CAC).

Citizen Groups Requesting to Participate as PAC/CAC Member(s)

Charbonneau Country Club - TBD
Deer Creek Estates - TBD
Prairie View Estates - TBD
Aurora-Butteville-Barlow CPO - TBD
1000 Friends - TBD
Friends of French Prairie - TBD
Seismic/Wildfire/Emergency Management –DEOM – TBD
Local Farmer's Representative - TBD

July 6, 2021

The Honorable Ron Wyden, U.S. Senator
The Honorable Jeff Merkley, U.S. Senator

RE: Request for Intervention in Ensuring Proper Award of FAA Grant Funds to the Oregon Department of Aviation for Aurora State Airport Master Plan Update

Dear Senators Wyden and Merkley:

We write to you collectively, representing the local communities of over 27,000 residents in closest proximity to the Aurora State Airport (Airport), to request your assistance. The update to the Airport Master Plan provides an opportunity for improved relations among the Airport and the communities it directly impacts. This must be an integral goal of the pending master plan update. It is vital that the Scope of Work for the update be sufficient to carry out this goal. We are, however, concerned that the presently proposed Scope of Work is inadequate to achieve that goal or to bring the Airport into land use compliance. We therefore respectfully request that your offices intervene on our behalf with the Federal Aviation Administration (FAA) Northwest Region to either place on hold or add specific conditions to the award of a pending grant to the Oregon Department of Aviation (ODA) for the Airport Master Plan update in order to provide ODA with the opportunity to adopt a Scope of Work appropriate to the task.

We support and agree with the FAA's requirement that a new master plan for the Airport is past due and necessary, but the Scope of Work proposed by ODA is inadequate and does not comply with key elements of federal and state law and public processes. Rather, ODA's proposed Scope of Work for this new update is based on the legally flawed and, we contend, never legally adopted 2011 or 2012 Master Plan, as noted in more detail below. Furthermore, ODA has already publicly announced an intent to complete the new plan in as short a time frame as possible and with as little environmental due diligence and traffic analysis (air and ground) as possible. This is all being done at the urging of private airport businesses with significant speculative financial stakes in a major Airport expansion.

We believe that the legal status of the 2011 or 2012 Airport Master Plan is invalid due to failure to comply with Oregon public process and land use laws. In June, the Oregon Court of Appeals agreed. The court reversed and remanded Land Use Board of Appeals (LUBA), in our favor, for admission of critical evidence that had not been produced and reconsideration of key legal issues in accordance with the Court's direction.

As summed-up by the Salem *Statesman Journal* on June 23, 2021:

> "Oregon's aviation authority tried to circumnavigate the state's land-use system in adopting a plan to extend the runway at Aurora State Airport, the state's Court of Appeals determined.
>
> "The state's Land Use Board of Appeals' decision to uphold the aviation board's plan was flawed because "there is no evidence in the record to support LUBA's erroneous findings" in the case, the court said in reversing and remanding the body's decision.
>
> "The court said that the Land Use Board of Appeals "misunderstood its task" and mistakenly relied on testimony from Department of Aviation staff and associated businesses around the airport when making its decision."

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As a result of the apparent undue influence of private businesses and jet owners, ODA has consistently demonstrated a failure to follow the law, including the FAA Grant Assurance around land use compliance, nor the capacity and an unwillingness to undertake appropriate public processes, we believe that it is imperative that the FAA ensure that ODA rigorously follows the FAA Grant Assurance requirements regarding land use, which previously did not happen.

On June 3, 2021, the Oregon Aviation Board (the Board) approved, without any documentation, accepting nearly $1 million of FAA grant funds to update the Airport master plan. There was no staff report, no resolution of adoption, and no proposed Scope of Work provided to the Board. The Board voted to accept the FAA grant to perform the master plan update but has delayed awarding the consultant's contract to do that work because of the omission of the proposed Scope of Work and the then pending Court of Appeals decision.

As necessary as a new master plan is, it is equally necessary that it be updated correctly. We obtained the proposed Scope of Work in response to a public records request. Among other things, the Scope of Work does not consider the impact of the Court of Appeals decision or pending LUBA and judicial review proceedings. Additionally, ODA has stacked the new Master Plan Public Advisory Committee with a clear majority of vested financial aviation and commercial interests, to the exclusion of impacted neighborhood associations, property owners, and conservation and public interest organizations. A momentary pause in funding the master plan update may help provide ODA with the incentive necessary to ensure an adequate Scope of Work and to provide all stakeholders a seat at the table.

Thank you for your time and consideration of our request. The favor of a response would be most appreciated.

Sincerely,

Brian Asher, Mayor
Mayor@ci.aurora.or.us

Julie Fitzgerald, Mayor
Fitzgerald@ci.wilsonville.or.us

encl: Media reports and Summary on the Oregon Court of Appeals decision on *Schaefer v. Oregon Aviation Board,* 312 Or App 316 (2021).

cc: Oregon Department of Aviation

SUMMARY OF COURT OF APPEALS RULING ON AURORA AIRPORT MASTER PLAN

prepared by Ben Williams, Friends of French Prairie

1. The 2012 Master Plan was not properly approved and adopted.
Therefore the current 2012 Master Plan is invalid and cannot be updated, requiring a new master plan!

…it is impossible to tell from the 2012 Master Plan what material was added and what was removed after 2011. LUBA erred in concluding that the 2012 Master Plan includes the 2011 Master Plan… the board never formally approved or adopted the 2012 Master Plan after October 27, 2011.

2. The master plan was never adopted into Marion County's Comprehensive Plan, and achieving compliance in itself does not provide an exemption from statewide planning goals.
Therefore airport master plans must comply with statewide planning goals to be valid!

The Master Plan proposes airport development on EFU land… LUBA misunderstood its task… But the question is not what the [Aviation] board's development plans are; the question is what development the Master Plan proposes, and whether that development is consistent with the MCCP and the goals... the Board of Commissioners "acknowledges and supports" the 2012 Master Plan… is not a determination, formal or otherwise, of the plan's compliance with the MCCP.

3. The airport and the proposed development (runway extension) are not rural uses.
Therefore, ORS statutes cannot be misapplied to achieve desired outcomes!

ORS 836.640 does not apply… LUBA misconstrued the statute… The text does not suggest that the legislature intended any section of ORS 836.642 to affect how land use requirements apply to the programs or uses of land at the identified airports; to the contrary, it explicitly makes the programs subject to "applicable statewide land use requirements.

4. The development proposed (runway extension) permits service to a larger class of airplanes.
Therefore, airport sponsors may not misrepresent FAA regulations for their benefit!

LUBA adopted the reasoning in the response briefs and concluded, without elaboration, that the improvements contemplated by the 2012 Airport Plan do not permit service to a larger class of airplanes… an upgrade to design standards for a greater ARC or a longer runway to serve planes with greater MTOW [Maximum Take Off Weight] is an expansion or alteration that permits—authorizes—service to a larger class of airplanes. Accordingly, the Master Plan proposes an alteration or expansion of the airport that permits service to a larger class of airplanes.

Summary of the Ruling [*Schaefer v. Oregon Aviation Board, 312 Or App 316 (2021)]*

To summarize, LUBA erred in excluding the 2011 Master Plan—the Master Plan document that was before the board on October 27, 2011—from the record; in holding that the 2012 Master Plan did not propose airport development on EFU land; in relying on ORS 836.642 to conclude that proposed new uses at the Aurora State Airport are rural uses for land-use purposes; and in determining that OAR 660-012-0065(3)(n) applied.

Reversed and remanded.

Court of Appeals Sides with Opponents of Aurora Airport Expansion

BY TYLER FRANCKE, CANBY NEWS -

JUNE 16, 2021

https://canbyfirst.com/court-of-appeals-sides-with-opponents-of-aurora-airport-expansion/

The Oregon Court of Appeals handed down a sweeping ruling Wednesday in favor of the cities of Aurora and Wilsonville, the land-use advocacy groups Friends of French Prairie and 1000 Friends of Oregon and others who had joined together to oppose further expansion of the Aurora State Airport.

Airport opponents hailed the ruling as a "sweeping victory" in their battle to stop a proposed 1,000-foot runway extension that supporters say is needed to safely accommodate the numbers and classes of aircraft currently using the airport.

But opponents fear the runway extension and other planned upgrades will bring larger, louder aircraft — and more of them.

Most recently, the complicated land-use case has centered on the 2012 Aurora Airport Master Plan, which is a necessary prerequisite to the expansion, and which — opponents discovered in 2019 — may have never been formally adopted by the Oregon Department of Aviation.

Aurora airport supporters, along with the state aviation board itself, maintained that the plan was approved in October 2011 — but were unable to produce any minutes, final orders or other records verifying this.

An audio recording of the October 2011 meeting — which Friends of French Prairie President Ben Williams obtained through a public records request — appeared to confirm opponents' suspicions that the master plan was never given a final stamp of approval.

The board attempted to skirt the issue in a controversial meeting held on Halloween 2019 in Sunriver, in which it attempted to formalize its version of events by approving a statement saying it had "adopted the Master Plan at its October 27, 2011, meeting."

Opponents challenged the move to the Oregon Land Use Board of Appeals, or LUBA, which dismissed the case last year, saying it did not have jurisdiction.

But the Court of Appeals disagreed, saying LUBA wrong on both the law and procedure. What's more, the court sided with appellants on the matter of the master plan, concluding "the board never formally approved or adopted the 2012 Master Plan after October 27, 2011."

The decision sends the case back to LUBA, which will now have to decide the original appeal on the merits, with no shortage of input from the appellate court. The Aviation Board and Oregon Department of Aviation may also appeal the ruling to the Oregon Supreme Court.

Opponents hailed Wednesday's ruling as a long-awaited vindication of their claims that airport backers had ignored public input, established procedure and even state law in their efforts to push through the expansion.

"This decision is a major victory for Oregon land use, affirming that even a state agency cannot create methods to circumvent the state land-use system, especially by trying to do so through

simply asserting without proof compatibility with a county comprehensive plan," Williams said in an email.

"It specifically negates the Department of Aviation's attempt to claim it was not expanding onto [exclusive farm use] land when its own master plan for Aurora shows it does, and further negates their attempt to argue that increasing the airport classification will not bring in larger aircraft when that, in fact, is precisely what airport classifications are designed to do."

"The city was right on the issues and right to act to preserve citizens' role on land use in Oregon," said Aurora Mayor Brian Asher. Aurora Planning Commission Chair Joseph Schaefer and the city had been the first to enter the fray, before being joined by Wilsonville and the Friends groups. "The decision agrees with everything we have long been saying without being heard. We have now been heard."

Wilsonville Mayor Julie Fitzgerald also weighed in a statement to *The Canby Current*, saying the June 16 decision validated her city's longstanding concerns that "the controversial 2012 Aurora State Airport Master Plan does not comply with state land-use laws."

"This ruling mandates that the state aviation agency should seek to pilot for a pending new 2021-22 Aurora State Airport master plan update a transparent, fair and equitable public process in accordance with Oregon land-use laws," she said.

"The city looks forward to the Department of Aviation balancing the new master plan advisory committee with representatives of local-area community planning organizations, homeowners associations and other conservation/public-interest organizations so as to avoid having a majority of vested airport financial interests."

But airport backers appeared unfazed by the setback.

"Supporters and businesses of the airport are still looking into the court's ruling and how it impacts the long-planned safety improvements," Friends of the Aurora State Airport spokesman Dylan Frederick said. "Regardless, the ruling doesn't distract our airport or our businesses from doing what we've always done best: conducting work that is mission-critical to local communities.

"It has long been the mission of the Aurora State Airport to be the safest and most emergency-ready general aviation airport in the state. We will keep striving toward that every day."

Aviation board accepts grant funding for Aurora plan update

By Corey Buchanan, Woodburn Independent

June 15 2021

https://pamplinmedia.com/wbi/152-news/511984-409065-aviation-board-accepts-grant-funding-for-aurora-plan-update

Improvement association lawyer asks board to move forward with disputed runway extension project rather than update plan

The Oregon Aviation Board accepted 100% funding from the Federal Aviation Administration to complete an Aurora Airport master plan update during a meeting on June 3.

However, the board agreed to wait to hire a contractor for the update until the Oregon Court of Appeals makes a decision this month on whether to uphold a Land Use Board of Appeals ruling that dismissed complaints from the city of Wilsonville and other entities about the most recent airport master plan update in 2012.

Along with the unanimous vote to accept the funding, the meeting included a plea from attorney Wendie Kellington with the Aurora Airport Improvement Association, which represents businesses and pilots at the airport, asking the board to greenlight a 1,000-foot runway extension — the main source of controversy for the past decade — without completing the master plan update. The Wilsonville government has vigorously opposed the runway extension project as well as the process that led to its addition to the 2012 plan.

She relayed a message from an airport pilot saying the extension is crucial for ensuring safe flights there. She indicated the state hasn't reciprocated the considerable investments the private sector has put into the airport.

"Isn't it worth a discussion that this runaway extension doesn't need yet another alternatives analysis and really what we need to do is move forward?" she said.

OAB Chair Martha Meeker said she understood Kellington's concern about safety, but that the department and board had no choice: They must complete the master plan update to receive FAA grant funding for airport projects.

"The bottom line is the ODA can't pay for the extension unless we have FAA money. End of story," she said.

Kellington also suggested that the master plan update likely will lead to another legal challenge from groups that oppose the extension, such as the cities of Wilsonville and Aurora and Friends of French Prairie.

Meeker and ODA Director Betty Stansbury noted that the majority of master plan updates are not legally challenged while Meeker indicated that a letter Stansbury sent early in her tenure stating that the 2012 master plan update had not been finalized (she later reversed her stance) precipitated the current litigation.

"Litigation is the exception rather than the norm," Stansbury said. "We will do everything we can to do it right and limit the potential for litigation."

Stansbury also said during the meeting that she doesn't expect the Oregon Supreme Court to take up the current airport litigation if the OCOA decision is appealed.

While the runway extension project likely will be delayed at least until after the master plan update and a subsequent environmental assessment is finalized, Stansbury expressed motivation to move quickly on a tree removal project, which Kellington said pilots also desire to improve safety.

"Those trees shouldn't be there. I will personally direct efforts to get them down as quickly as we can," she said.

The city of Wilsonville will have a seat on an advisory committee for the plan update that will have 22 other members. The department hopes to complete the update by the end of 2022.

Oregon Court of Appeals reverses Aurora Airport ruling

By Corey Buchanan, Wilsonville Spokesman

June 17 2021

https://pamplinmedia.com/wsp/134-news/512473-409771-oregon-court-of-appeals-reverses-aurora-airport-ruling

The Land Use Board of Appeals will take on the case again after initially dismissing it.

After appealing an unfavorable opinion levied by the Oregon Land Use Board of Appeals, the cities of Wilsonville and Aurora — and other groups that have objected to planning efforts at the Aurora State Airport — received the validation they wanted from the Oregon Court of Appeals.

The court not only reversed LUBA's decision to dismiss the case and remanded it for another examination by the land use body, but documented deficiencies in the 2012 airport master plan update in a decision released Wednesday, June 16. The court determined that the master plan was changed following its purported adoption in 2011 and that, contrary to LUBA's ruling, projects added to the plan would encroach on agricultural land.

Along with the cities of Wilsonville and Aurora, 1000 Friends of Oregon (with Friends of French Prairie) and Aurora Planning Commissioner Joseph Scheader, filed the litigation to contest the Oregon Aviation Board's 2019 decision to adopt the findings of compatibility and compliance with statewide planning goals, which essentially validated the plan update. The Oregon Department of Aviation and Oregon Aviation Board defended the case.

Despite the decision, the legal process will likely continue as LUBA now must revisit its original case while taking the OCOA's findings into account.

The city of Wilsonville has concerns about a runway extension project that could lead to more flights flying into the airport — potentially exacerbating noise and traffic — while the city of Aurora wants the airport to be annexed into its jurisdiction. The mayors of both cities rejoiced in the ruling in separate press releases.

"The Court of Appeals decision validates the city of Wilsonville's long-stated concerns that the controversial 2012 Aurora State Airport Master Plan does not comply with state land-use laws," Wilsonville Mayor Julie Fitzgerald said. "This ruling mandates that the state aviation agency should seek to pilot for a pending new 2021-22 Aurora State Airport master Plan update a transparent, fair and equitable public process in accordance with Oregon land-use laws."

"The city was right on the issues and right to act to preserve citizens' role on land use in Oregon," said city of Aurora Mayor Brian Asher. "The decision agrees with everything we have long been saying without being heard. We have now been heard."

On the other hand, ODA Director Betty Stansbury did not comment on the decision and said starting the new master plan update, which will begin soon, is her primary focus. The Federal Aviation Administration stipulated restarting the process as a requirement for the department to receive grant funding.

Bruce Bennett, the owner of Aurora Aviation and intervenor in the case, said the decision was disappointing but felt that it was based on technicalities and wouldn't considerably affect airport planning moving forward. He also felt that LUBA had a better understanding of land use law than the OCOA.

"Projects will continue to be done," he said. "There's not a huge change coming."

In its opinion, LUBA ruled that the ODA did not have to simultaneously comply with the Marion County Comprehensive Plan and statewide planning goals. This point alone nullified many of the arguments established by petitioners. The body also said it lacked jurisdiction in the case.

The OCOA disagreed with LUBA's opinion regarding county and statewide law.

"The agency respondents do not explain, and we do not perceive, how ODA's ability to deem the draft plan compatible with the MCCP (Marion County Comprehensive Plan) affects the board's obligation to "adopt findings of compatibility with the acknowledged comprehensive plans of affected cities and counties and findings of compliance with applicable statewide planning goals when it adopts the final facility plan," OCOA's ruling reads.

Though she knew the restarting of the master planning process was imminent months ago, city of Wilsonville Attorney Barbara Jacobson has said the local government decided to appeal LUBA's decision in large part because they felt that it would create a dangerous precedent where local control usurps state law. OCOA's ruling also states that Marion County didn't perform an analysis of the master plan's compliance with its own laws, but simply acknowledged and supported the plan.

"If LUBA's ruling would have been allowed to stand the kind of approval Marion County did for this master plan means any county could have done a resolution for any airport without any analysis and skipped over land use planning goals and analysis, which would have been really bad land use law," Jacobson said.

While LUBA did not include the original master planning document (which has yet to be produced) for the record for the case, the OCOA disagreed with that decision and expressed that the plan had been modified between the time the document was approved and when it was sent to the Federal Aviation Administration. Wilsonville has long argued this point and Jacobson said that LUBA would not need to include the document, if it exists, in the record when it revisits the case.

"That document indisputably was substantially modified after Oct. 27, 2011, by -- for example -- identifying a different development option as the preferred alternative (for the runway extension) and omitting some of the discussion and documentation relating to the original preferred alternative," OCOA wrote.

The ruling also objected to LUBA's conclusions that future projects at the airport should be considered "rural" rather than urban use and that projects listed in the plan would not extend onto land zoned for exclusive use. It asserted that LUBA must now examine whether the document complies with Marion County agricultural land policies.

"We've contended for years that the long-term consequence of the intended expansion, meaning the 35 acres of ag land, would set all the other ag land south of Keil Road and north of Ellen Road up for rezoning as commercial or light industrial aviation-related development," Friends of French Prairie President Ben Williams said.

Finally, the court rejected defendants' argument that projects in the master plan did not need to comply with certain land use goals because projects were not expansionary, i.e. would not "permit service to a larger class of airplane." Jacobson said the airport had already brought in larger planes but that improvements will make that easier and potentially more prevalent. Airport proponents have advocated for the runway extension to improve flight safety.

What this ruling means for the current master planning process remains to be seen. However, the city of Wilsonville, Rep. Courtney Neron, D-Wilsonville, and Rep. Susan McLain, D-Hillsboro, have already voiced displeasure about the composition of the advisory committee that will help oversee the update, which has fewer citizen interest groups and more business interests involved in the process than during the controversial 2011 update. Officials have posited that business interests have undue influence over airport planning.

"I don't have a high level of confidence," Williams said about the potential for an improved planning process. "What has happened so far looks very much like starting the same troubled process that began in 2009 all over again."

He also felt that the prospect for legal battles to continue after the completion of the new plan update was highly likely.

Stansbury said she did not close the door on the possibility of amending committee representation.

"We tried to get a balanced group that represented all types of interest in the airport and surrounding communities," she said. "We tried to include agriculture and education, Marion County, Clackamas County, the cities of Wilsonville and Aurora; we tried for a broad representation. If there needs to be any tweaks to that I'll consider Rep. Neron and Rep. McLain's letter."

The Spokesman could not reach attorneys representing airport businesses, which intervened in the case, for comment.

Charbonneau Country Club wants placement on Aurora Airport committee

By Corey Buchanan, Wilsonville Spokesman

June 22 2021

https://pamplinmedia.com/wsp/134-news/512842-410217-charbonneau-country-club-wants-placement-on-aurora-airport-committee

The homeowners association says it will bear the consequences of decisions made.

Local organizations, including the Charbonneau Country Club homeowners association, are lobbying the Oregon Department of Aviation to reserve spots for them on a committee that will oversee the upcoming Aurora State Airport master planning process.

Friends of French Prairie, an organization focused on farmland preservation, and the Aurora-Butteville-Barlow Community Planning Organization have joined CCC in sending letters to ODA Director Betty Stansbury asking for inclusion on the Planning Advisory Committee for the formulation of the master plan update. The committee will advise the planning effort but doesn't have decision-making power.

The department is undergoing the effort after the Federal Aviation Administration stipulated that it needed to do so to receive federal grants. The process will include assessing current and future facility needs.

Last week the city of Wilsonville, Rep. Courtney Neron, D-Wilsonville, and Rep. Susan McLain, D-Hillsboro, raised concerns that the proposed committee wouldn't have representation from community groups. The committee is also slated to have a higher percentage of business-interest representatives than the committee that advised the 2012 master plan, which has faced legal challenges from the city of Wilsonville, Aurora and others for the past two years. Stansbury told the Spokesman last week she was open to tweaking committee representation but hadn't decided yet.

Charbonneau has a strong contingent of folks who have aired concerns about noise and pollution from the airport and vehemently disagree with plans for expansion, especially a proposed and long-disputed runway extension project. The CCC also said they're concerned about property values, traffic and road construction.

"The greatest number of people, approximately 3,000 residents (1,627 residences), live in our well-planned and popular community less than 9,000 feet from the north end of the Aurora Airport runway. Take-offs and landings are increasingly disruptive to the quality of life in our community, local roads are increasingly congested and concerns about air and water pollution are increasing among area residents," CCC homeowners association president Gary Newbore wrote in a letter. "For these facts alone, Charbonneau's strong voice should be heard regarding proposed changes that impact the quality of their lives, health or property values, and the effect on our 13 neighborhood homeowners associations. We will be the ones who will live with the consequences of the decisions made about the future of the Aurora State Airport and the use of federal taxpayer funds to make changes at this airport."

As currently proposed, the cities of Wilsonville, Canby and Aurora are included in the committee along with Clackamas and Marion counties, seven businesses, the business-affiliated Aurora Airport Improvement Association and Positive Aurora Airport Management groups, the

Wilsonville Area Chamber of Commerce, four state agencies and the North Marion School Board.

Along with CCC, McLain and Neron also wanted Deer Creek Estates (a mobile home park in Aurora) to be involved in the process.

"While we appreciate that the department has accounted for business and economic interests with nine representatives, we believe the nearby communities of Charbonneau and Deer Creek Estates, community planning organizations (CPOs), conservation and land-use groups, seismic safety, wildfire and emergency management experts need to be included in the Public Advisory Committee (PAC) representation, as well," Neron and McLain wrote in a letter to Stansbury. "We note their absence in the current PAC composition and hope you will consider adding their diverse perspectives to the process."

Appeals court halts efforts to extend runway at Aurora Airport

Bill Poehler, Salem Statesman Journal

June 23, 2021

https://www.statesmanjournal.com/story/news/2021/06/23/oregon-appeals-court-halts-efforts-extend-runway-aurora-airport/5312110001/

Oregon's aviation authority tried to circumnavigate the state's land-use system in adopting a plan to extend the runway at Aurora State Airport, the state's Court of Appeals determined.

The state's Land Use Board of Appeals' decision to uphold the aviation board's plan was flawed because "there is no evidence in the record to support LUBA's erroneous findings" in the case, the court said in reversing and remanding the body's decision.

The court said that the Land Use Board of Appeals "misunderstood its task" and mistakenly relied on testimony from Department of Aviation staff and associated businesses around the airport when making its decision.

The airport, located just outside the Aurora city limits, is the third busiest in Oregon and one of 28 the state owns.

For years, the state and associated businesses advocated to extend the runway to 6,004 feet from its current 5,004 feet, arguing it wouldn't be used for allowing bigger aircraft, but would allow the planes that currently use it to fly out with larger fuel loads.

The appeal of the December 2020 ruling by LUBA was brought by Aurora planning commission chair Joseph Schaefer, who was joined by land-use advocacy groups and the cities of Aurora and Wilsonville, against the state's Department of Aviation and the Aviation Board. Several businesses that are based out of the airport joined the case on the state's side.

The Court of Appeals reversed LUBA on issues including:

- The airport's 2011 master plan was not in the state or LUBA records.
- The expansion can't be justified solely because the airport is in a rural area.
- The board incorrectly construed state law by saying the proposed changes wouldn't allow a larger class of airplane and that the plan complies with the state's land-use goals.

"It is a pretty important case because it does talk about the relationship of this state agency and (the associated businesses). It is remarkable," said Edward J. Sullivan, former legal counsel to Gov. Bob Straub and professor in planning and land use law at Willamette, Lewis & Clark and Portland State.

The plan that was never completed

The case stems from the Department of Aviation starting a new master plan for the airport in 2009.

In 2011, the state's aviation board adopted the new master plan. But the Federal Aviation Administration rejected the "displaced threshold" option for the runway extension in that plan, and the master plan was modified in 2012.

The state applied to the Federal Aviation Administration for over $30 million in 2018 to extend the airport without it being in the most recently legally adopted master plan, which came in 2000. It wasn't awarded the funds.

In 2019, the Aviation Board voted to adopt the findings from the 2012 airport plan after Department of Aviation director Betty Stansbury backtracked on a letter in which she stated the plan had not been submitted for adoption.

The 2012 master plan was never formally approved or adopted by the Oregon Aviation Board, the Court of Appeals found, rejecting that the 2019 adoption was a component of the final decision.

In its December opinion, LUBA excluded the 2011 master plan from the record and found the 2012 master plan did not propose development on exclusive farm use.

But the Court of Appeals found that LUBA "misunderstood its task" and relied on testimony from associated businesses that the state did not intend to extend the runway on land zoned for farm use.

"There's all this stuff trying to undercut the land-use system. At least this time these guys got called out on it," said Ben Williams, president of land-use advocacy group Friends of French Prairie, one of the petitioners in the case.

The state argued that the master plan was not a land-use decision, and that component would be determined later by Marion County.

As the 2012 master plan was not properly adopted, Williams said, the airport will be required to have a new master plan.

Oregon Department of Aviation planning and projects manager Heather Peck told the Marion County commissioners in May the state is at the beginning of updating the Aurora Airport master plan and will be seeking money for that.

The Court of appeals found that airport development is not an allowed use on land zoned for farm use.

What's next?

With the decision, LUBA is required to reconsider its 2020 decision and determine whether the master plan complies with Oregon's agricultural lands policies.

The Department of Aviation and the Oregon Aviation Board have 35 days, until July 14, to file a notice of intent to appeal the ruling to the Oregon Supreme Court.

"The grounds for taking something up to the Supreme Court, is it just merely wrong or is it important and wrong? If a party who did not prevail tries to take it up they bear that burden," Sullivan said.

"I would say that maybe 1 out of 20 cases is accepted for review. It's a hard sell."

It's unclear whether the defendants will appeal.

“Supporters and businesses of the airport are still looking into the court’s ruling and how it impacts the long-planned safety improvements,” the Friends of Aurora Airport, which represents business interests involved as defendants in the case, said in a statement.

“Regardless, the ruling doesn’t distract our airport or our businesses from doing what we’ve always done best — conducting work that is mission-critical to local communities. It has long been the mission of the Aurora State Airport to be the safest and most emergency-ready general aviation airport in the state. We will keep striving toward that every day.”

Unless the Supreme Court takes the case and overturns the latest ruling, the long-sought runway extension has to go back to the drawing board.

“We won round two with a knockout,” Williams said.

June 17, 2021

Sent via email to:

Martha Meeker, Chair, Oregon Aviation Board — *aviation.mail@aviation.state.or.us*
Betty Stansbury, Aviation Director — *betty.stansbury@aviation.state.or.us*
Oregon Department of Aviation

RE: 2021 Aurora State Airport Master Planning Process

Chair Meeker and Director Stansbury:

As the State Representative for one of the impacted communities and as Chair of the Joint Committee on Transportation, we write to you with both appreciation for the task at hand and with counsel for a smooth and inclusive process aligned with Oregon Land Use Goal 1 for Citizen Involvement and Goal 2 for Land Use Planning.

We appreciate that on June 3, 2021 the Aviation Board approved acceptance of an FAA AIP Grant for funding of the Aurora State Airport Master Plan update. This aligns with proposed legislation introduced in the 2021 session (HB 2497) that, among other provisions, would have required the Department to develop a new master plan update for the Aurora State Airport. We are pleased to see that the Department is advancing the new master plan update in a timely manner without the need for legislative mandate. As legislators, we hope to look to the work you are embarking on as a model for how a master planning process should proceed.

We believe the State Master Plan process should create an inclusive table for a comprehensive conversation. Best standards and practices must make sure that those that are part of the dialogue feel heard and respected. Thoughtfully adding diverse voices from impacted communities will assist in this goal and show the Oregon Department of Aviation is committed to hearing all voices. Community impact, environmental impact, economic impact and emergency preparation, must be part of the robust planning and conversation and planning. Effective collaboration will result in a resilient, strategic, and functional airport plan that is responsive to its state and local roles.

It is our sincere hope and expectation that the Oregon Department of Aviation will incorporate additional components of HB2497 relative to public engagement and collaborative state and local intergovernmental planning throughout the process, in order to ensure the best possible service to our communities, honor existing land use goals, produce an agreeable outcome, and avoid the need for future legislation.

Elected leaders of Aurora and Wilsonville, located closest to the Aurora State Airport facility and

flight paths, have indicated their concerns to the legislature regarding the need for the Department to consider important issues impacting local communities. The mayors of Aurora and Wilsonville seek to discuss land-use planning, surface transportation impacts, public infrastructure provision, agriculture-sector effects, environmental concerns and quality-of-life issues pertaining to noise and overflights with the Department. The new master-planning process is a logical place for such conversations and we hope that the Department will take full advantage of the opportunity to improve agency communications in a public forum.

While we appreciate that the Department has accounted for business and economic interests with nine representatives, we believe the nearby communities of Charbonneau and Deer Creek Estates, community planning organizations (CPOs), conservation and land-use groups, seismic safety, wildfire and emergency management experts need to be included in the Public Advisory Committee (PAC) representation, as well. We note their absence in the current PAC composition and hope you will consider adding their diverse perspectives to the process.

Being mindful of the PSU Oregon Solutions' "Aurora State Airport Assessment Report", commissioned by the legislature in 2018 that found a number of issues relative to agency planning efforts and public engagement, we anticipate that the Oregon Department of Aviation has plans to correct these issues. It is our sincere hope that the Department moves forward with an understanding of the importance of conducting an open public process for the Aurora State Master Plan that engages local communities and all stakeholders.

Given the amount of public interest and significant issues of local concern regarding the Aurora State Airport, we request that the Department undertake a transparent, inclusive and comprehensive public process with model structure that complies with Oregon's Land Use Planning Goals.

Thank you for your consideration of our concerns and expectations. We stand ready to support the process and we welcome further dialogue with the Oregon Department of Aviation throughout the phases of planning and implementation.

Sincerely,

Representative Courtney Neron, HD-26

Representative Susan McLain, HD-29

WILSONVILLE
OREGON

June 14, 2021

Sent via email to:
aviation.mail@aviation.state.or.us
betty.stansbury@aviation.state.or.us

Martha Meeker, Chair, Oregon Aviation Board
Betty Stansbury, Aviation Director
Oregon Aviation Board
Oregon Department of Aviation
3040 25th Street SE
Salem, OR 97302

RE: Proposed 2021-22 Aurora State Airport Master Planning Process

Dear Chair Meeker and Director Stansbury:

Several members of Wilsonville City staff attended the June 3, 2021 Oregon Aviation Board meeting, wherein the board accepted the FAA's AIP Grant for the funding of a new comprehensive Aurora State Airport Master Plan update. Needless to say, Wilsonville is pleased to hear that an updated Master Plan will be done, using what you both stated will be an all-inclusive and transparent process.

What Wilsonville is not pleased to see, however, is the proposed composition of the Master Plan Public Advisory Committee (PAC), which appears to be packed with self-serving special interests. In the past, both Wilsonville and Aurora, the two host communities located closest to the Aurora State Airport, have found the Department's lack of responsive communications and unwillingness to consider important issues impacting the local communities extremely troublesome. During this new Master Plan process, the mayors of Aurora and Wilsonville certainly hope to have an open dialogue with you concerning land-use planning, surface transportation impacts, public infrastructure provision, ag-sector effects, environmental concerns, and quality-of-life issues pertaining to noise and overflights. While we are hoping this will be an open, fair, and transparent process, it is not getting started that way. Wilsonville, its citizens, and its constituents are extremely concerned about the lopsided representation of vested financial interests in the proposed composition of the proposed PAC.

ODA has certainly accounted for airport business interests, with 10 representatives that constitute the majority of the PAC. The PAC, however, lacks any representation from other important members of the area community, including the nearby HOAs of Charbonneau, Prairie View Estates, and Deer Creek Estates, as well as public-interest bodies, including community planning organizations (CPOs) such as Aurora-Butteville-Barlow CPO and conservation/land-use groups, including 1,000 Friends of Oregon and Friends of French Prairie. A fair and open process requires equitable representation of both sides of any given interest. Therefore, we ask that you please add the above participants to equitably counter balance all of the airport special interest groups and also think about removing some of the duplicative special interest members. If Wilsonville is going to find this to be a fair and open process, there need to be voices on the PAC without direct financial interests at stake in expanding airport operations and extending the runway.

It is interesting to compare the composition of the proposed PAC for this 2021 Master Plan to the last go-around:

Composition of Proposed 2021-22 Public Advisory Com (PAC):

- 10 business interests reps – 43%
- 6 local gov't reps – 26%
- 5 state gov't reps – 21%
- 1 federal gov't rep – 5%
- 1 public interest rep – 5%
- **0 citizen interest reps – 0%**

Composition of 2010-12 Planning Advisory Com (PAC):

- 6 business interest reps – 38%
- 5 local-gov't reps – 31%
- **4 citizen interests reps – 25%**
- 1 state gov't rep – 6%

At the June 3 Board meeting there were several statements made about trying to push this Master Plan through in 18 months or less, rather than the standard 24-month time frame. There was also a discussion of whether an environmental assessment of any kind could be avoided. Rushing this Plan and avoiding the critical environmental work is not a good idea if ODA is hoping to avoid future litigation.

Cumulatively, between ODA's packing the PAC with airport special interests and rushing the Master Planning process, we are getting a negative sense of déjà vu. I attach, for your reference, a letter written by some of the PAC members from the last 2010-12 Master Plan, who expressed "grave concerns" that participation in the process was not intended to be meaningful:

> "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.
>
> * * * * *
>
> "[W]e 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.
>
> * * * * *
>
> "This is not the meaningful public-input practice that the Federal Aviation Administration (FAA) recommends for stakeholders in the master-planning process."

On a final note concerning the June 3, 2021 meeting, it was surprising to find that at a meeting that did not advertise or invite public testimony, an attorney who claimed to represent all of the airport businesses was allowed to present a lengthy argument about how a Master Plan

update was not needed, nor was any environmental assessment, but rather ODA should instead focus on getting that runway extended now. Fortunately, Chair Meeker clearly articulated that ODA has no funds to do so without going through the FAA's required Master Plan update first. That being said, providing the lawyer for one side of the Aurora State Airport controversy unfettered time to lobby the Board appears to demonstrate, once again, ODA's apparent airport expansion bias, as opposed to advancing a fair and equitable Master Plan process.

As this new and hopefully more open and transparent process begins, we are especially mindful of the PSU Oregon Solutions' "Aurora State Airport Assessment Report," commissioned by the legislature in 2018, that found a number of problems with agency planning efforts and public engagement. We anticipate and expect that the Department's leadership intends to correct these deficiencies and understands the importance of conducting an open public process for the Aurora State Airport Master Plan that engages local communities and all stakeholders.

I understand one of your Board members expressed concern that the new Master Plan update might just generate more protracted litigation. We certainly hope not. Given the great amount of public interest and significant issues of local concern regarding the Aurora State Airport, we expect that the Department will, in fact, seek to undertake an open, transparent public process for all interests, that is not rushed and that complies with Oregon's Planning Goals, specifically Goal 1 Citizen Involvement and Goal 2 Land Use Planning.

Thank you for your consideration.

Sincerely,

Julie Fitzgerald
Mayor, City of Wilsonville

Enc. (1)

cc: Oregon Aviation Board
Members of the Oregon Congressional Delegation:
Senator Ron Wyden
Senator Jeff Merkley
Congressman Kurt Schrader
Aurora Mayor Brian Asher
Members of the Oregon Legislature:
Speaker Tina Kotek
Senate President Peter Courtney
Representative Susan McLain (HD 29)
Representative Courtney Neron (HD 26)
Representative Christine Drazan (HD 39)
Senator Bill Kennemer (SD 20)
Clackamas County Board of County Commissioners

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

CLACKAMAS COUNTY
2051 Kaen Road
Oregon City, OR 97045

WILSONVILLE OREGON
29799 SW Town Center Loop E
Wilsonville, OR 97070

August 8, 2018

Honorable Kate Brown
Governor
900 Court Street, Suite 254
Salem, OR 97301-4047

Honorable Peter Courtney
Senate President
900 Court St. NE, S-201
Salem, Oregon 97301

Honorable Tina Kotek
House Speaker
900 Court St. NE, Rm. 269
Salem, Oregon 97301

RE: Request to Cancel Oregon Department of Aviation application to Federal Aviation Administration (FAA) for funds to extend the Aurora State Airport runway

Dear Governor Brown, President Courtney and Speaker Kotek:

We have just learned that the Oregon Department of Aviation ("ODA") intends to apply today for federal funding for a $33 million project to extend the runway by 1,000 feet of the Aurora State Airport. As the elected leaders of Clackamas County and the City of Wilsonville, we believe that this application is premature until the proposed project undergoes the required public-involvement process to assess potential impacts of a major airport expansion and mitigation strategies to address those impacts. We therefore request your assistance to table the pending application by ODA as referenced in a July 27, 2018, letter to the Senate President and House Speaker.

In June 2010 ODA agreed to exclude Clackamas County and the City of Wilsonville from the Intergovernmental Agreement on the Coordination of Growth Management and Transportation Issues ("IGA") pertaining to the Aurora State Airport. The IGA contained an exhibit showing a "gerrymandered" Aurora Airport Impact Area map where the 10,000-foot impact area from the airport runway intentionally excludes lands under the jurisdiction of the County and City.

The subsequent 2012 Aurora State Airport Master Plan failed to follow state law in terms of public process and resulted in an Oregon Aviation Board decision to extend the runway that was contrary to the findings and conclusions in the plan. A project of this magnitude with potential, substantial impacts to nearby surface transportation facilities, area quality-of-life, and a vital agricultural economic cluster requires a robust public-input process. Due to a lack of public review of the proposed runway extension, neither impacts nor mitigation strategies have been considered.

The County and City have a valid public interest in protecting the welfare of our residents and businesses. We respectfully request that the proposed ODA grant application to the FAA be withdrawn and a new IGA be drawn-up that includes all of the local jurisdictions in the airport impact-area and the Oregon Department of Transportation. Furthermore, we call for a new Aurora State Airport master plan to be developed that meaningfully engages the public. We can state unequivocally that the County and City are committed to working with all of the stakeholders surrounding the Aurora State Airport in an open and transparent manner. Thank you for your time and consideration.

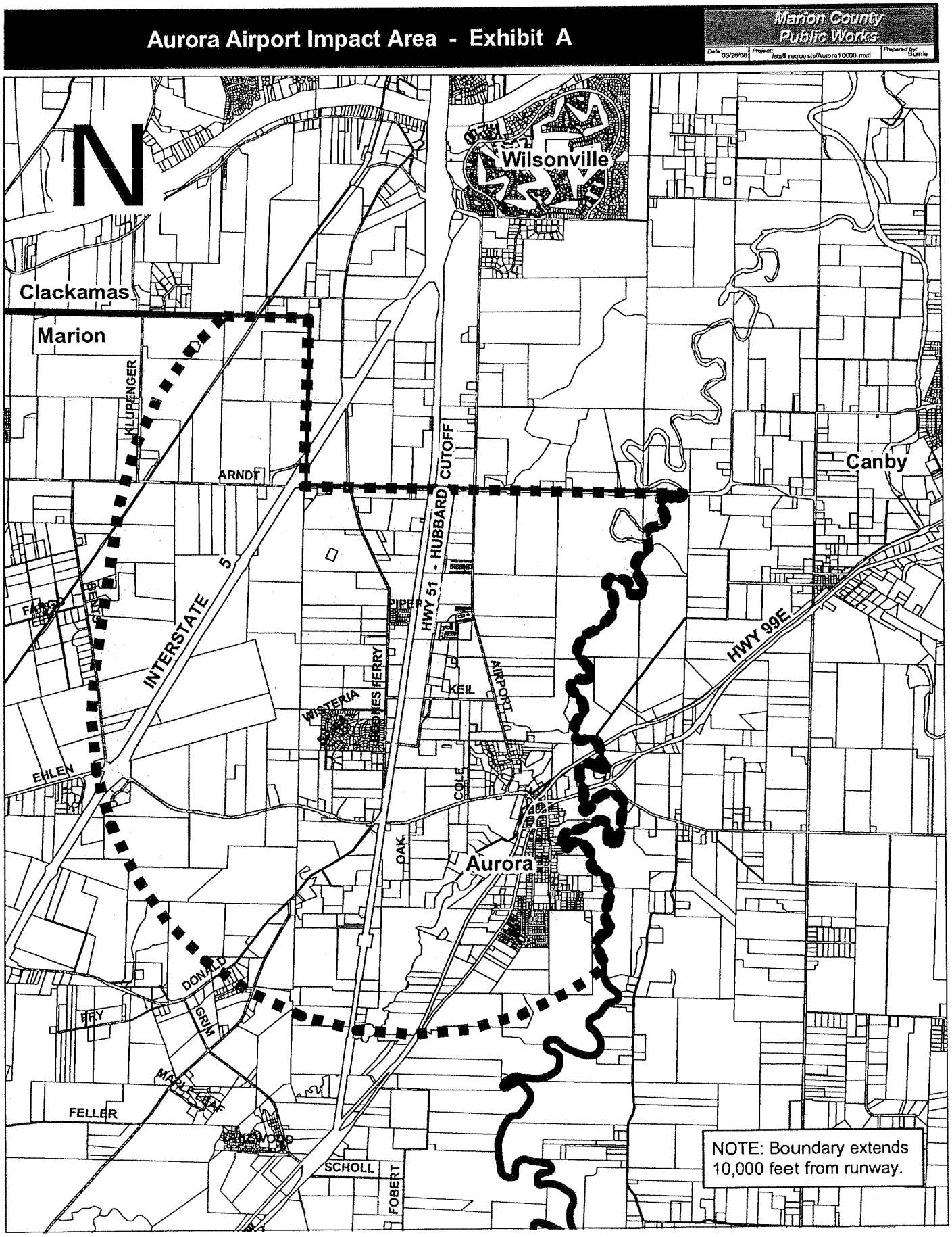
Sincerely,

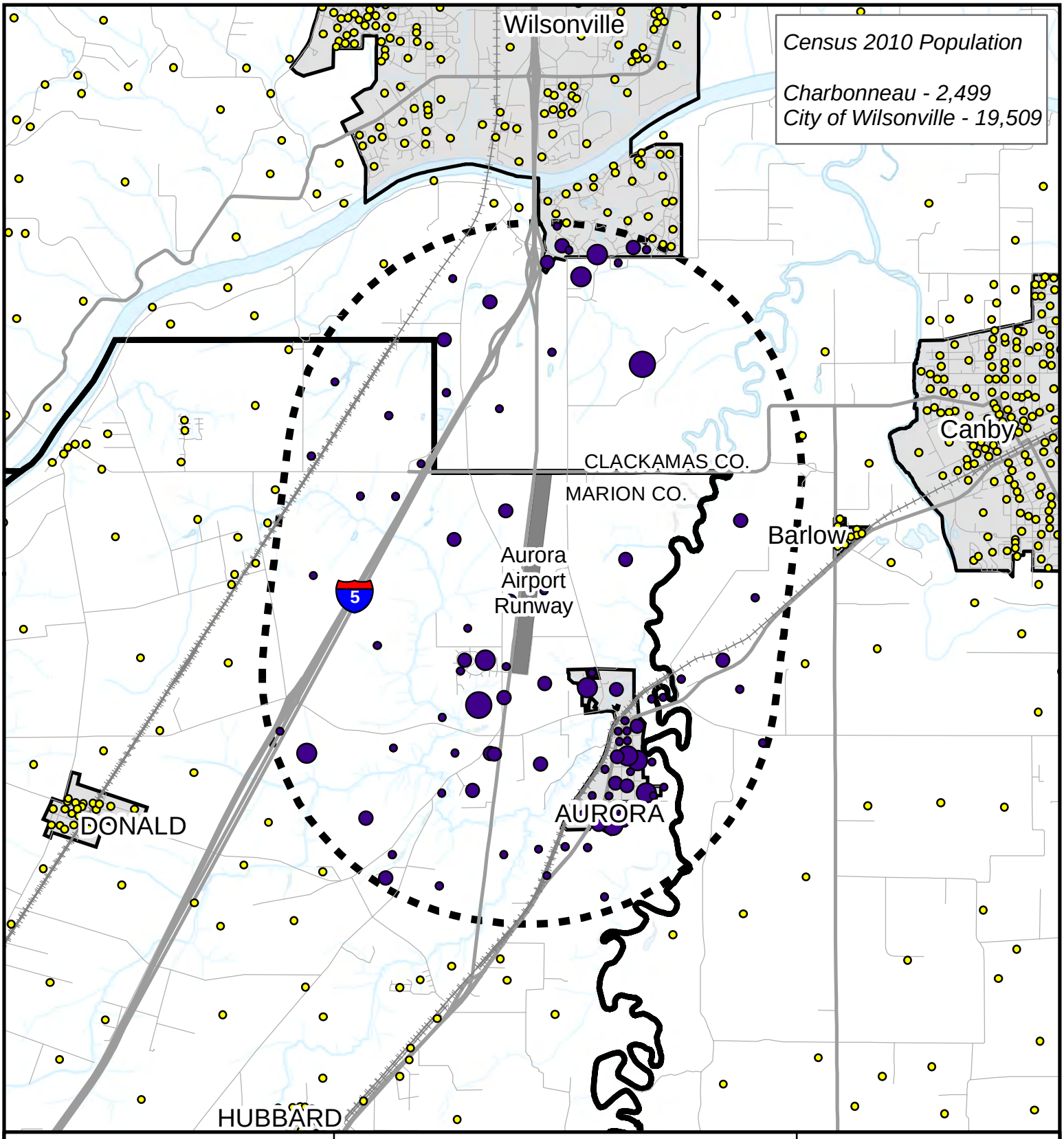
Jim Bernard, Chair
Clackamas County Board of Commissioners

Tim Knapp, Mayor
City of Wilsonville City Council

Enclosures (6)

cc: FAA—Randall Fiertz, NW Mountain Region Airports Div. Director; Joelle Briggs, Seattle Office Dist. Manager
ODA—Martha Meeker, Oregon State Aviation Board Chair; Brian DeForest, Interim Director


Aurora Airport Impact Area - Exhibit A
Marion County Public Works
Date: 03/26/08
Project: Staff requests/Aurora10000.mxd
Prepared by: Stumle
N
Wilsonville
Clackamas
Marion
Canby
Aurora
KILDRENGER
ARNDT
CUTOFF
HUBBARD
HWY 51
INTERSTATE 5
HWY 99E
PIPER
FERRY
KEIL
AIRPORT
WISTERIA
COLE
OAK
EHLEN
DONALD
GRIM
FELLER
SCHOLL
FOBERT
NOTE: Boundary extends 10,000 feet from runway.



The City of Wilsonville, Oregon

Clackamas and Washington Counties

Aurora Airport

Census 2010 Population
in 10,000 Ft. Radius = 2978

10,000 Feet from Runway

Census Block Centers

Wilsonville 183
Aurora 860
Rural Clackamas County 623
Rural Marion County 1312

Population 2010

- 0 - 22
- 23 - 64
- 65 - 138
- 139 - 346
- 347 - 579

WILSONVILLE GIS Geographic Information Systems

3/17/2015

0 **Miles** 1

M:\projects\2015\030615_Airport\AAirport2015_10.mxd

Lynn Peterson
Chair

Commissioners
Bob Austin
Jim Bernard
Charlotte Lehan
Ann Lininger

CLACKAMAS COUNTY

BOARD OF COUNTY COMMISSIONERS

PUBLIC SERVICES BUILDING
2051 KAEN ROAD | OREGON CITY, OR 97045

November 3, 2009

Mr. Gregg Del Ponte
Acting Administrator
Oregon Department of Aviation
3040 25th SE
Salem, OR 97302-1125

Honorable Jim Meirow, Mayor
City of Aurora
21420 Main Street
Aurora, OR 97002

Honorable Patti Milne, Commissioner
Marion County Commission
Courthouse Square
555 Court Street N.E.
P.O. Box 14500
Salem, OR 97309-5036

Dear Director Del Ponte, Commissioner Milne and Mayor Meirow:

Consistent with our discussion concerning the Aurora Airport over the last several years, we are formally requesting that Clackamas County be added to the Aurora Airport Intergovernmental agreement as currently written.

With the commencement of the Aurora Airport Master Plan, the timing is good to have all of the local governments adjacent to the Aurora Airport at the table to discuss issues related to the Aurora State Airport planning and development.

We appreciate your favorable consideration of our request to join the Aurora Airport Intergovernmental agreement.

Sincerely,

CLACKAMAS COUNTY BOARD OF COMMISSIONERS

Lynn Peterson, Chair
On Behalf of the Clackamas County Board of Commissioners

LAP/sp/kjb

City of
WILSONVILLE
in OREGON

29799 SW Town Center Loop E
Wilsonville, Oregon 97070
(503) 682-1011
(503) 682-1015 Fax Administration
(503) 682-7025 Fax Community Development

November 20, 2009

Mr. Gregg Del Ponte, Acting Administrator
Oregon Department of Aviation
3040 25th SE
Salem, OR 97302-1125

Honorable Patti Milne, Commissioner
Marion County Commission
P.O. Box 14500
Salem, OR 97309-5036

Honorable Jim Meirow, Mayor
City of Aurora
21420 Main Street
Aurora, OR 97002

RE: **Request to Join Aurora Airport Intergovernmental Agreement**

Dear Director Del Ponte, Commissioner Milne and Mayor Meirow:

Consistent with our discussions concerning the Aurora Airport over the last several years, we are formally requesting that the City of Wilsonville be added as a partner jurisdiction along with Clackamas County to the April 2008 "Intergovernmental Agreement on the Coordination of Growth Management and Transportation Issues" pertaining to the Aurora Airport area ("Aurora Airport Intergovernmental Agreement").

With the commencement of the Aurora Airport Master Plan process, the timing is good to have all of the local governments adjacent to the Aurora Airport at the table to discuss issues related to the Aurora State Airport planning and development.

We appreciate your favorable consideration of our request to join the Aurora Airport Intergovernmental Agreement. Thank you for your time and consideration.

Sincerely,

Tim Knapp
Mayor

cc: Honorable Lynn Peterson, Commission Chair, Clackamas County

Marion County
OREGON

Rec'd 6/22/10 SCL

(503) 588-5212
(503) 588-5237 - FAX

BOARD OF COMMISSIONERS

Janet Carlson
Sam Brentano
Patti Milne

CHIEF ADMINISTRATIVE OFFICER

John Lattimer

June 21, 2010

Commissioner Lynn Peterson
Clackamas County
Board of Commissioners, Chair
2051 Kaen Road
Oregon City, Oregon 97045

Mayor Tim Knapp
City of Wilsonville
29799 SW Town Center Loop E
Wilsonville, Oregon 97070

Dear Lynn and Tim:

On behalf of Marion County, the Oregon Department of Aviation and the City of Aurora, I would like to present to you an updated, revised, and signed Intergovernmental Agreement regarding communications relating to the Aurora State Airport.

Over the past couple of years we have built strong working relationships that have allowed us to successfully face challenging issues that are of mutual interest to each of our individual jurisdictions. Maintaining open channels of communication will be critical as we continue to work together and face new challenges.

This revised agreement requires the signing jurisdictions to communicate with Wilsonville and Clackamas County about land use actions that affect the airport or are impacted by the airport.

As we all know, the state will begin the master plan process for the Aurora Airport with the first PAC meeting on July 22, at 6:00 p.m. in Charbonneau. We would like to invite you attend a meeting with Marion County, the City of Aurora and the Department of Aviation prior to that meeting. Please let me know your availability and we will schedule the meeting.

Please do not hesitate to contact me if you have any questions or suggestions.

Sincerely,

Patti Milne
Commissioner

cc: James Meirow, City of Aurora
Doug Hedlund, Oregon Department of Aviation

INTERGOVERNMENTAL AGREEMENT ON THE COORDINATION OF GROWTH MANAGEMENT AND TRANSPORTATION ISSUES BETWEEN CITY OF AURORA, MARION COUNTY, AND THE OREGON DEPARTMENT OF AVIATION

This Agreement is entered into by and between the City of Aurora ("Aurora"), Marion County ("Marion County"), and the Oregon Department of Aviation ("ODA"), pursuant to ORS 190.003 to 190.110, which allows units of government to enter into agreements for the performance of any or all functions and activities which such units have authority to perform.

RECITALS

WHEREAS, the Aurora Airport Impact Area ("Impact Area") – Exhibit A is expected to experience substantial population and employment growth by the year 2050; and

WHEREAS, anticipated growth within the Impact Area will affect land areas within the jurisdictional boundaries of the City of Aurora, Marion County, and the State of Oregon Department of Aviation; and

WHEREAS, Aurora, Marion County, and the ODA wish to coordinate growth management and transportation related development processes and decisions within the Impact Area to ensure an appropriate opportunity is given for affected parties to review and address anticipated impacts; and

WHEREAS, to achieve this coordination, Aurora, Marion County, and the ODA are interested in identifying the Impact Area and establishing a process for coordination and cooperation; and

WHEREAS, Statewide Planning Goal 2 - Land Use Planning, requires that local government comprehensive plans and implementing measures be coordinated with the plans of affected governmental units and that local government, state and federal agency and special district plans and actions, relating to land use, be consistent with the comprehensive plans of cities and counties and regional plans adopted under ORS Chapter 197; and

WHEREAS, OAR 660, Division 12 requires coordination of state, regional and local transportation system plans establishing a coordinated network of transportation facilities to serve state, regional and local transportation needs; and

WHEREAS, ORS Chapter 836 and OAR 660, Division 13 requires planning and coordination of local, state and federal agencies to encourage and support the

continued operation and vitality of Oregon's airports and recognizes the interdependence between transportation systems and the communities on which they depend.

NOW, THEREFORE, Aurora, Marion County, and ODA agree as follows:

AGREEMENT

I. Purpose

The parties agree that they are mutually interested in and will work together to:

A. Establish and amend, as necessary, the Aurora Airport Impact Area ("Impact Area") as identified on Exhibit "A" attached to this Agreement.

B. Identify and resolve issues and concerns related to transportation and growth management in and around the Impact Area for the benefit of the parties as well as affected adjacent landowners, airport users, and other interested parties.

C. Coordinate on growth management and transportation development decisions within the Impact Area.

D. Encourage and support the continued operation and vitality of the Aurora Airport and recognize the interdependence between air and ground transportation systems within the Impact Area and the communities on which they depend.

E. Provide notice and an opportunity to comment on land and transportation developments within the Impact Area which may reasonably affect the parties.

F. Nothing in this Agreement shall be construed to require the parties to exercise jurisdiction beyond that which is required by state law.

II. Definitions

"Aurora Airport" means that area of land located at what is commonly known as the Aurora Airport that is designed, used or intended for use for the landing and take-off of aircraft, and any public or privately owned appurtenant areas and structures, including open space, used for airport buildings or other airport facilities or rights-of-way or which is located on lands located within the Marion County Public Zone.

"Impact Area" means the Aurora Airport, the Aurora Airpark, and those portions of North Marion County the development of which impacts the parties to this Agreement

and existing residents and businesses within each party's jurisdiction, as shown on the Aurora Airport Impact Area Map, attached as Exhibit A.

III. Amendment of Aurora Airport Impact Area Boundaries

A. Impact Area boundaries may be amended by Marion County upon its own initiative or upon the written request of Aurora and/or the ODA.

B. When amending boundaries, Marion County shall give notice to and work in cooperation and coordination with Aurora and the ODA, and shall consider the following factors:

1. Existing and future land development;

2. Existing and future local and state transportation corridors;

3. Existing and future Aurora Airport usage and flight patterns; and

4. Each affected jurisdictions' Comprehensive Plan boundaries and related goals and policies.

IV. Comprehensive Planning within the Impact Area

A. Existing Comprehensive Plan designations and zoning, as currently designated by each party to lands within its jurisdiction, shall continue to apply to those lands within the Impact Area.

B. Any party formally considering a Comprehensive Plan Amendment for lands within Impact Area boundaries shall provide for notice and opportunity for comment to the other parties to this Agreement in a manner provided in Article VI below.

C. Special plans and studies undertaken that involve lands within the Impact Area such as infrastructure, environmental, or economic planning shall be shared amongst the parties.

V. Land Use Development and Coordination within the Impact Area

A. This Agreement shall have no effect on the current local and statutory zoning and regulatory authority of each jurisdiction within the Impact Area boundaries, nor any existing intergovernmental agreements between the parties.

B. Aurora and Marion County respectively agree to provide ODA, Wilsonville, and Clackamas County, with notice and an opportunity to comment, in the same manner as currently required for affected property owners by their

respective development codes for land use applications within the Impact Area. The parties shall provide each other with requested data, maps, and other information in hard copy or digital form in a timely manner.

C. ODA shall provide Aurora, Wilsonville, Clackamas County, and Marion County with notice and opportunity to comment for all Airport Master Plan amendments, new access agreements (through-the-fence agreements), and for proposed development or infrastructure improvements, relative to the Aurora Airport.

D. The parties shall discuss and work cooperatively to determine whether specific uses which would otherwise be permitted within existing exception areas under County zoning should be prohibited or restricted within the Impact Area to implement the purposes of this Agreement.

VI. Notice and Coordination Responsibilities

A. Aurora and Marion County each shall provide ODA, Wilsonville, and Clackamas County with notice and an opportunity to comment prior to the first scheduled public hearing, in the same manner provided to property owners in their applicable codes, for all of their respective legislative plan amendments, zone changes, or new land use regulations and amendments affecting property within the Impact Area.

B. Aurora and Marion County each shall provide ODA, Wilsonville, and Clackamas County with notice and an opportunity to comment prior to all of their respective administrative or public hearing actions, in the same manner provided to property owners in their applicable codes, for any quasi-judicial development applications (including, but not limited to, plan and zoning code amendments, conditional use permits and design review) within the Impact Area.

C. ODA shall provide reasonable notice and opportunity to comment to Aurora, Wilsonville, Clackamas County, and Marion County for all Airport Master Plan amendments, new access agreements (through-the-fence agreements), and for its proposed development or infrastructure improvements, relative to the Aurora Airport.

D. In order to fulfill the cooperative planning provisions of this Agreement, Aurora, Marion County, and ODA shall provide each other with all requested reasonable data, maps, and other information in hard copy or digital form in a timely manner.

VII. Amendments to this Agreement

This Agreement may be amended in writing by the agreement of all parties and may be reviewed by the parties at any time.

VIII. Termination

This Agreement may be terminated by any party as to the rights and responsibilities of that party within 60 days written notice to the other parties. Termination of the rights and responsibilities of one or more parties does not affect the rights and responsibilities of the remaining parties as to each other.

IX. Reservation of Rights and Authorities

This Agreement is intended only to achieve the purposes set forth in Section I of the Agreement and is not intended to create any right or responsibility which is legally enforceable by any person or entity against any Party and creates no rights in third parties or the right to judicial review regarding the acts or omissions of any Party. Each Party reserves all rights or authorities now or hereafter existing and nothing in this Agreement waives or forecloses the exercise of any such rights or authorities.

X. Severability

If any section, clause or phrase of this Agreement is invalidated by any court of competent jurisdiction, any and all remaining parts of the Agreement shall be severed from the invalid parts and shall remain in full force and effect.

XI. Effective Date

This Agreement is effective on the date it is fully executed.

IN WITNESS THEREOF, the respective parties have caused this Agreement to be executed by their authorized officer or representative on their behalf:

CITY OF AURORA

_____ 6/8/10
James Meirow Date
Mayor, City of Aurora

ATTEST:

By: _____
City Recorder

MARION COUNTY

Janet Carlson 6/7/10
Janet Carlson Date
Chair, Board of Commissioners

ATTEST:

By: _____
Recording Secretary

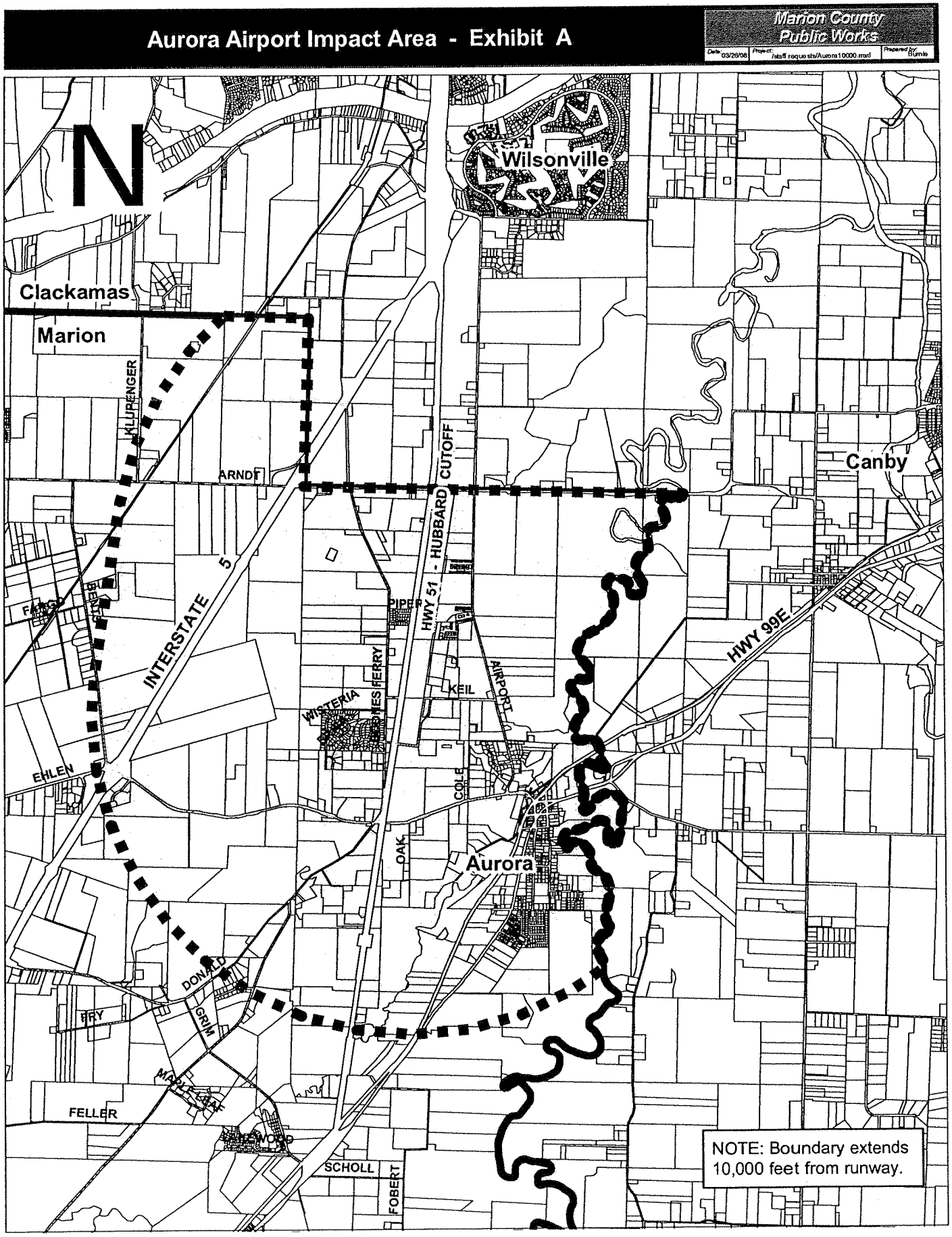
Approved as to form:

Gloria M. Roy 06/07/10
Legal Counsel

APPROVED AS TO FORM:
Legacy Mitchell 6/7/10
Marion County Contracts Date

OREGON DEPARTMENT OF AVIATION

WDH 6/8/10
Doug Hedlund Date
Director, Oregon Department of Aviation


Aurora Airport Impact Area - Exhibit A
Marion County Public Works
Date: 03/26/08
Project: Staff requests/Aurora10000.mxd
Prepared by: Stumle
N
Wilsonville
Clackamas
Marion
Canby
Aurora
KILDRENGER
ARNDT
CUTOFF
HUBBARD
HWY 51
INTERSTATE 5
HWY 99E
PIPER
FERRY
KEIL
AIRPORT
WISTERIA
COLE
OAK
EHLEN
DONALD
GRIM
FELLER
SCHOLL
FOBERT
NOTE: Boundary extends 10,000 feet from runway.

A LETTER OF CONCERN

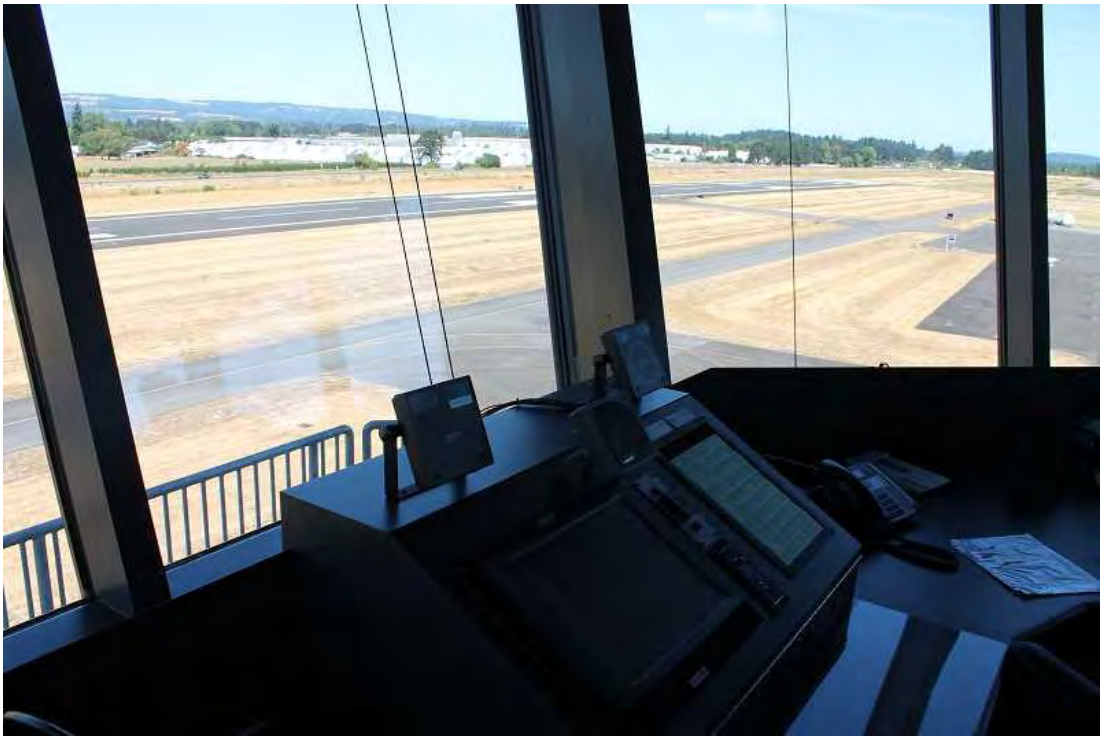
WilsonvilleSpokesman

Corey Buchanan, Wilsonville Spokesman

Tuesday, January 16, 2018

https://portlandtribune.com/wsp/134-news/384055-272627-a-letter-of-concern

City of Wilsonville expresses uneasiness about Aurora Airport legislation and the potential traffic impacts it might bring



SPOKESMAN FILE PHOTO -
A legislative bill that would expedite the process for the implementation of an Aurora Airport extension could be introduced at the Oregon State Legislature February session.

Potentially in unison with Clackamas County, the City of Wilsonville is expected to deliver a draft letter this month to Oregon Senate President Peter Courtney (D-Salem) and House Speaker Tina Kotek (D-Portland) expressing concern about a bill — which could be introduced in the Oregon State Legislature's February "short" session — that would "circumvent standard Oregon land-use and public process laws to allow a special interest to 'carve-out' to extend the runway at the Aurora State Airport," according to a draft of the letter obtained by the Spokesman.

The City of Wilsonville approved the letter Jan. 4 and sent it to the Clackamas County Board of Commissioners — which will then review the letter and determine whether to sign on. The letter could be revised before it's sent to state legislators.

Wilsonville City Council discussed the concept bill at length during a meeting Dec. 18.

"I have met with several different entities and communicated the opinion that we think it's not appropriate to have a legislative action to make an end run around Oregon land use process that would normally allow stakeholders to be part of the decision process but that's exactly what this legislation proposes," Knapp said at the meeting.

Multiple city councilors expressed concern that an airport extension could lead to increased traffic in the Wilsonville area.

"On a basic level I think back to our community survey that we do every year. The big theme from that is people are concerned about traffic. So that's all of the people that live in Wilsonville and come into work in Wilsonville, commute in, commute out. I think that has to be carefully considered, what this issue might do," Councilor Kristin Akervall said.

The legislative concept, which was put forth by Rep. Rick Lewis (R-Silverton), posits that the Aurora Airport, which is the largest state-owned airport in Oregon and employs 1,200 people, needs additional investment in order to "maintain aviation safety and commercial viability" and that the current runway is "inadequate and unsafe."'

The current runway is 5,004 feet and, according to the Aurora Airport Improvement Association, the airport is the state's third busiest and ranks 31st in terms of runway length. This plan has been in the works since the 1976 Aurora Airport Master Plan proposed increasing the runway length to 6,000 feet — which is also the proposed length in the updated master plan.

The concept bill proposes to extend the airport's boundaries, add or expand airport taxi areas and add new or expand facilities for aviation related equipment.

The letter from the City of Wilsonville says the proposed bill would set a precedent that parties who "seek special treatment" should go directly to the legislature rather than go through the goal exception process in order to pass legislation.

Lewis said he wasn't sure exactly what legislative steps the bill would be avoiding but that he assumes the process would include public hearings.

Ben Williams of Friends of French Prairie was not happy when he caught wind of the bill's legislative concept when he spoke with the Spokesman in December.

"If the public was fully informed about A, what has happened, and B, the scope of the consequences, you can bet that the majority would be opposed to it because of the consequences and the precedent," he said.

Lewis, however, says that an extensive public process took place during the crafting of the Aurora Airport Master Plan, which was updated in 2013, and would rather not use more state money and prolong the project's implementation.

He added that additional public hearings will take place if the legislative concept becomes a bill and is assigned to a committee.

"Had the state not done a recent master plan update and this bill hadn't had public hearings, there would need to be more of a public process involved but that's all been done," Lewis said.

According to the Aurora Airport Master Plan, the current runway of 5,004 feet accommodates all small aircrafts with fewer than 10 passenger seats but larger aircraft require a longer runway. Also, the runway's shorter length constrains about 500 flights a year and forces them to "eliminate fuel and cargo to take off and land," according to the Aurora Airport Improvement Association.

The airport extension could allow corporate jets to take off at the airport. According to the master plan, the extension would cost over $3 million.

Lewis is not sure why Wilsonville has raised concerns.

"As far as Wilsonville, I don't know (why) because they stand to benefit if larger corporate jets are able to land there. Corporate jets are less noisy. I would think people would look for lodging, restaurants in Wilsonville, so I'm not really sure what their issues are," he said.

Before the bill had been released, Wilsonville Chamber of Commerce CEO Kevin Ferrasci O'Malley said the WACC would likely support it.

"The Aurora Airport is a member in good standing of the Wilsonville Chamber of Commerce. Our stated WACC vision is to create and promote economic vitality for business in the south metro region," the chamber wrote in a statement. "Historically, the WACC has fully supported efforts to help the Aurora airport realize its potential. It's a powerful local generator of economic development and jobs to Wilsonville and the surrounding local area."

O'Malley says talks of massive changes regarding the airport are overblown.

"There are comments being made about it becoming an Orange County Airport by simply having a runway safety zone," he said. "That's not happening. It's fear mongering. This is allowing the small business aircrafts that are landing and taking off to do so more efficiently. That's what it's about."

Aurora Airport Improvement Association board member Tony Helbing, says the airport currently provides ample economic benefits to surrounding communities and the extension will increase the positive impact. Helbing also says businesses are more likely to use the Aurora Airport if a safer runway is implemented.

"It's important to know that as we want this runway extension, it has to do with our choice to be in business and that business we choose to do here has big ripple impacts into the surrounding community," Helbing said.

Williams believes the benefits of the expansion are more limited. "At the end of the day, the beneficiaries are developers who can have larger airport, larger jets, sell more fuel and more hangars," Williams said. "A few people are going to make a lot of money and there will be a few employment jobs working at aircraft hangars or pumping fuel but that doesn't translate to a lot of benefits for say Wilsonville or the city of Aurora. Most of the economic benefit goes to a small number of businesses and developers."

The Wilsonville letter also addresses concerns regarding "a lack of transportation options in the area," "unfair competition to adjacent jurisdictions," "environmental concerns" and "potential harm to the important agriculture economic cluster brought about by increased land-speculation and difficulty in conducting farming operations."

Additionally, the letter posits that the proposed legislation is too large and significant to be deliberated at the "short" 35-day February session, which will begin Feb. 5.