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Via US CERTIFIED MAIL
& Courtesy Electronic Mail
William “Chuck” Garrison
Director
Federal Aviation Administration
2200 S 216th St.
Des Moines, WA 98198

RE: Aurora State Airport Master Plan

Dear Mr. Garrison:

The undersigned represents the private aviation stakeholders responsible for more than \$300 million in investment at the airport who are directly impacted by the State of Oregon’s in-process update to the Aurora State Airport Master Plan. An issue has arisen for which we seek your clarification.

Although a runway extension was included in the 2012 Aurora State Airport Master Plan and the approved Airport Layout Plan, it was never constructed. The runway extension is not meant to serve new aircraft, but rather to ensure the safety of the aircraft currently using the airport.

The Oregon Department of Aviation (ODAV) is claiming that the FAA is requiring—

- (1) Perfect airport design standard compliance before the runway may be extended. And that without perfect design standard compliance, that the FAA will put the airport into “maintenance mode”.
- (2) A septic drain field be moved even though there is no location identified where it can be moved, and there is no dispute that the current drain field can be improved to meet design standards.

Further ODAV is claiming that the FAA is refusing to consider much less approve of any Modification of Standards (MOS) needed for the modest Runway Object Free Area (ROFA) adjustment (32 feet) because state Highway 551 is just 32 feet short of ROFA compliance.

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)).

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.

A MOS ROFA for Highway 551 can be approved because the risk presented is extremely small and far better than the FAA's 100-year occurrence standard as the attached report explains in detail. In sum—

- (A) 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.”
- (B) 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.”
- (C) 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.”
- (D) 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.”

Since the ODAV has provided nothing in writing from the FAA we believe that ODAV is mistaken about the agency's demands and urgently request that you clarify FAA's requirements at your earliest opportunity. This is extremely time sensitive because all of ODAV's actions concerning the master plan update are predicated upon their claimed FAA premise demands.

Very truly yours,



Wendie L. Kellington

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Attachment – UAO Airport Risk Analysis for ROFA Mod to Standards

CC: Shannetta Griffin, PE, FAA Office of the Associate Administrator for Airports,
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John R. Dermody, FAA Office of Airport Safety and Standards, John.Dermody@faa.gov

Clients

Aron Faegre, AIA, PE