
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 FAA's 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

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