

AURORA STATE AIRPORT



RESPONSE TO COMMENTS SUBMITTED BY THE CITY OF WILSONVILLE ON CHAPTERS 1-4

CHAPTER 1

Comment/Question	ODAV Response
<p>1 The Oregon Attorney General has indicated in a filing on the LUBA Aurora State Airport case that there is no adopted 2011 or 2012 Aurora State Airport Master Plan. Can an Airport Master Plan reference an un-adopted document? The current draft contains many references to the 2012 Master Plan, clarification on the status of the 2012 master plan is needed in the 2022 master plan.</p>	<p>Please see the FAQ “Can you explain the validity of the 2012 Airport Master Plan (AMP)?” on the project website.</p>
<p>2 How does 2012 baseline aircraft and operations projections compare to actual 2021 data?</p>	<p>2021 baseline operations are 76,028, the 2020 forecasted operations from the 2012 plan were 106,338. The 2021 baseline based aircraft count is 281, the 2020 forecasted based aircraft number was 405.</p>
<p>3 A laypersons explanation of the concept of constrained operations and how that relates to runway length is needed. What is the relationship between the two?</p>	<p>Constrained operations are operations where the pilot must adjust parameters from the typical aircraft configuration (i.e. reduce take off or landing weights in the form of fuel or passengers) to allow them to safely operate in certain conditions such as in hot temperatures. Constrained operations may be used to support a longer runway to allow aircraft to operate in a preferred configuration. This Airport Master Plan is not considering constrained operations in the runway length analysis.</p>
<p>4 AAMP Goal 6 states “identify potential environmental and land use requirements that may impact development”. What are some examples of both environmental and land use requirements in this context?</p>	<p>Environmental and land use goals and requirements are discussed in detail in “Regional Setting Goals and Requirements” section on page 4-7 of Chapter 4, “Facility Goals and Requirements”.</p>
<p>5 Goal 8 – Will there be a new ALP created as part of this process? If not, why? What ALP will be used? When was it created? Was there an opportunity for public input? If it is a goal of the master plan to develop an ALP, it needs to be done with the master plan update. ore detail on the City’s concerns appear on page .</p>	<p>Once a preferred alternative has been selected, a new ALP will be developed depicting the Airport’s current configuration and any future improvements identified, which will be submitted for FAA approval. Public input on the ALP content has been ongoing throughout the project through the existing conditions analysis, forecast development, facility goals and requirements, and development alternatives process, all of which feed into the ALP. The ALP will be presented and discussed in future PAC meetings and in Chapter 6, “Airport Layout Plan” in the draft working paper. PAC members and the public are invited to provide input at meetings and on draft deliverables.</p>

<p>6 Goal 9 – What are some examples of recommendations to improve land-use and zoning oversight to “remove barriers to appropriate growth at the airport”? How is “appropriate growth” measured in this context?</p>	<p>Environmental and land use goals and requirements are discussed in detail in “Regional Setting Goals and Requirements” section on page 4-7 of Chapter 4, “Facility Goals and Requirements”.</p>
<p>7 How specifically will potential environmental and socioeconomic impacts be measured, weighed or evaluated in the context of ‘future development’ at the airport?</p>	<p>The evaluation of environmental and socioeconomic impacts are discussed in the “Environmental Screening/NEPA Categories” section under “Socioeconomics, Environmental Justice, and Children’s Environmental Health and Safety Risks” on page 2-25.</p>
<p>8 Is the utilization of federal funds to construct projects (air traffic control tower) identified in an un-adopted master plan legal?</p>	<p>The 2012 AMP was approved by FAA and therefore projects identified on the ALP are eligible for FAA funding. The UAO air traffic control tower (ATCT) was constructed using Connect Oregon funding.</p>

CHAPTER 2

Comment/Question	ODAV Response
<p>9 The 2019 constrained operations study is based on the 2012 master plan, which has no legal standing and therefore needs to be redone after completion of the 2022 Master Plan.</p>	<p>The 2019 Constrained Operations Runway Justification Study was completed to justify the runway extension proposed at the time. The airport master plan that is currently underway has evaluated the runway length that is justified for the current fleet in the Facility Goals and Requirements. See Working Paper #1, Chapter 2.</p>
<p>10 Should there be a section on accurate airport master plan history, including the most recent court rulings?</p>	<p>See the “Applicable Planning Studies/Documents” section in Chapter 2 of Working Paper #1.</p>
<p>11 Page 2-6 states that there are 2,672 direct, indirect and induced jobs. How many jobs are there specifically at the airport — not the total employment count of employers that may be located at the Airport? The City’s information indicates that a majority of employees that ODAV lists “at the Airport” is actually the total employment count reported by businesses at the Airport, of which many businesses such as Columbia Helicopter, HTC and Wilson Construction have a majority of their employees located off-site, working in remote locations not at the Airport.</p>	<p>Thank you for your comment. The employment data presented in the Working Paper are based on the best information available. ODAV does not have access to employment records for businesses located on the Airport.</p>
<p>12 Page 2-6 states that there are 281 aircraft stored at the airport. Figure 2-2 states that there are 396 ‘based aircraft’. What is the difference here?</p>	<p>281 is the validated based aircraft count approved by FAA as the 2021 base number. As stated in the last paragraph of page 2-6, the data presented in Figure 2-2 and Table 2-4 present FAA Airport Master Record (Form 5010) data: “The most recent FAA Airport Master Record Form (5010) data available is presented for these airports to provide common reporting of activity. It is noted that the FAA 5010 data listed for Aurora State Airport is obsolete, but will be revised to reflect the 2021 baseline data developed in the Airport Master Plan. Current</p>

	based aircraft and aircraft operations data for Aurora State Airport are provided later in this chapter and will be used to develop the aviation activity forecasts (Chapter 3).”
13 Figure 2-2 shows 94,935 annual operations. Baseline is 76,028 operations. Is Figure 2-2 incorrect?	76,028 is the FAA approved operations base number for 2021. As stated in the last paragraph of page 2-6, the data presented in Figure 2-2 and Table 2-4 present FAA Airport Master Record (Form 5010) data: “The most recent FAA Airport Master Record Form (5010) data available is presented for these airports to provide common reporting of activity. It is noted that the FAA 5010 data listed for Aurora State Airport is obsolete, but will be revised to reflect the 2021 baseline data developed in the Airport Master Plan. Current based aircraft and aircraft operations data for Aurora State Airport are provided later in this chapter and will be used to develop the aviation activity forecasts (Chapter 3).”
14 Text on 2-10 states that the based aircraft does not include helicopters. Figure 2-5 (and 3-8) shows 10 helicopters contributing to the 281 based aircraft at the airport. Which is correct?	The text states: “The reduction in the Airport’s based aircraft total reflects a more precise verification of aircraft and removal of previously-counted aircraft (helicopters) located at two private heliports adjacent to the Airport.” The helicopters counted in the table are located on the airport or access the airport via a through the fence (TTF) agreement. Only helicopters from Columbia Helicopters and HTS were removed from the count.
15 How many gallons of jet fuel is stored on ODAV property?	Atlantic Aviation has a 20,000 gallon tank for Jet A on leased ODAV property. See “Fuel Services” the “Airport Support Services” section in Chapter 2 of Working Paper #1.
16 If the constrained operations study (2019) concluded that a runway extension of 7888’ was justified, why was the recommendation only for 6002’?	This is a new airport master plan. Please refer to the 2019 Constrained Operations Runway Justification Study for details about that study.
17 Since the 2019 Constrained Operations Study (COS) was based on the 2012 MP, should it not now be redone to reflect more accurate conditions and process?	The 2019 Constrained Operations Runway Justification Study was completed to justify the runway extension proposed at the time. The airport master plan that is currently underway has evaluated the runway length that is justified for the current fleet in the Facility Goals and Requirements. See Working Paper #1, Chapter 2.
18 What is the level of accuracy expected from the survey conducted in the 2019 COS?	This is a new airport master plan. Please refer to the 2019 Constrained Operations Runway Justification Study for details about that study.
19 What are ‘constrained operations’ and why do they matter?	Constrained operations are operations where the pilot must adjust parameters from the typical aircraft configuration (i.e., reduce take off or landing weights in the form of fuel or passengers) to allow them to safely operate in certain conditions such as in hot temperatures. Constrained operations may be used to support a longer runway to allow aircraft to operate in a preferred configuration. This Airport Master Plan is not

		considering constrained operations in the runway length analysis.
20	Page 2-21 notes the presence of arsenic in the water. Where is the arsenic coming from and what are the ppm compared to EPA tolerances?	<p>The text we believe you are referencing is on page 2-23. We believe you are referencing a previous version of the working paper. Please reference the current version of the working paper available on the project website.</p> <p>Please review the Environmental Screening Report in Appendix 2. Further environmental review/analysis is outside the scope of this project.</p>
21	Page 2-20 states that Columbia Helicopter is identified by EPA as a RCRA Corrective Action Site. What does that mean exactly? What was found there? Were there any fines? Is the site in compliance now?	<p>The text we believe you are referencing is on page 2-23. We believe you are referencing a previous version of the working paper. Please reference the current version of the working paper available on the project website.</p> <p>Please review the Environmental Screening Report in Appendix 2. Further environmental review/analysis is outside the scope of this project.</p>
22	Pages 2-19 – 2-20 address the issue of resilience in terms of a major earthquake. However, there is no analysis or review of the Oregon Department of Geology and Mineral Industries (DOGAMI) data and the potential impacts to Airport and runway. There is merely a note that the Oregon HazVu Statewide Geohazards Viewer “shows that the southern half of the airfield is classified as a Moderate hazard area and the north half is classified as a High hazard area.” The lack of serious data review of the earthquake hazard and potential impacts to Airport is a major shortcoming of the plan.	The Oregon Resilience Plan is summarized on pages 2-19 and 2-20. Existing published data will be considered as it pertains to development various development alternatives. A detailed geotechnical analysis is outside the scope of this project. Geotechnical analysis is commonly required as part of a project design.
23	Page 2-22, does FAR Part 77 overlay airspace extend over any part of the city of Wilsonville? Why is the FAR 77 overlay not included inside the Wilsonville corporate limits on figure 2-8?	<p>Figure 2-9 on page 2-27 depicts zoning districts surrounding the Airport. We believe you are referencing a previous version of the working paper. Please reference the current version of the working paper available on the project website.</p> <p>While the Part 77 surfaces do extend over the City of Wilsonville, our research found that the City of Wilsonville has not adopted airport overlay zoning districts, so they are not depicted on the map. See the note under Figure 2-9.</p>
24	Figure 2-8 does not properly identify city of Wilsonville zoning, it would appear to be a generic categorization. That should be noted, or changed.	<p>Figure 2-9 on page 2-27 depicts zoning districts surrounding the Airport. We believe you are referencing a previous version of the working paper. Please reference the current version of the working paper available on the project website.</p> <p>The zoning data presented in the figure were downloaded from Metro RLIS and are presented without alterations. See source under Figure 2-9.</p>

25	Are there any documented leaks in the underground storage tanks located on ODAV property according to DEQ?	Oregon DEQ lists no active projects for leaking underground storage tanks on Airport property.
26	Page 2-23, where exactly are the two areas of residential property that are located under the primary, approach, or transitional surfaces?	<p>The text we believe you are referencing is at the end of page 2-28. We believe you are referencing a previous version of the working paper. Please reference the current version of the working paper available on the project website.</p> <p>As the text states, “At Aurora State Airport, two areas of residential property are located beneath the west transitional surface”. These areas are visible in Figure 2-9 as yellow areas west of Highway 551.</p>
27	Is pavement condition a consideration in allowing operations that exceeding weight limits? Who approves such requests? Are all requests granted? How many requests are granted versus denied? Please provide numbers.	Pavement condition as well as other factors are considered in evaluating requests for overweight waivers. Requests are approved or denied at the discretion of ODAV. Data on overweight aircraft requests have been requested.
28	Does a runway expansion cause the RPZ to impact other residential homes not currently impacted?	It is possible. Relocating a runway end would also relocate the RPZ. As the RPZ is moved some areas will no longer be within the zone and others will enter the zone.
29	Should the utilities section on page 2-39 address fire and police protection?	<p>The Utilities section is found on page 2-46 in the current version of Working Paper #1. We believe you are referencing a previous version of the working paper. Please reference the current version of the working paper available on the project website.</p> <p>Fire and Police services at the airport are summarized on page 2-43 in the Airport Support Services” section under “Emergency Services”.</p>
30	What are some examples of ‘FAA noncompliance’ as described on page 2-41.	<p>The FAA Compliance Overview is found on page 2-48 of the current working paper. We believe you are referencing a previous version of the working paper. Please reference the current version of the working paper available on the project website.</p> <p>Please see the bulleted list under FAA Compliance Overview on page 2-48.</p>
31	Draft Chapter 3 lists Annual Aircraft Operations only for the years 2016 thru 2021; however, the same chapter uses 2012 thru 2021, for example Aurora State Airport Instrument Flight Operations. The same set of years should be used for all data tables and analysis, 2012 thru 2021.	The Annual Aircraft Operations history from 2016 to 2021 that you referenced are based on counts from the air traffic control tower (ATCT) which has only been in operation since October of 2015. These counts include all traffic at Aurora State Airport. The other set of data ranging from 2012 to 2021 that you referenced are from Traffic Flow Management System Counts (TFMSC) which are available for a longer time period but only include Instrument Flight Rule (IFR) flights with a filed flight plan on record. These are two different and distinct datasets used for two different purposes which are described in detail in Working Paper #1.
32	Page 3-8, if the number of active commercial and private pilots will decline, how will operations increase?	While nation-wide annual growth of licensed commercial and private pilots is projected to decline slightly (-0.1% and -0.4% respectively), the number of

	active GA pilots as a whole (all ratings, excluding student pilots) are projected to grow slightly at a rate of +0.2%. Also, the rates cited in Table 3-2 reflect national averages and may not reflect the exact conditions at individual airports, including Aurora State Airport.
33	<p>Is there a decibel level that should not be exceeded in residential areas near GA airports?</p> <p>Code of Federal Regulations (CFR) Part 150, Airport Noise Compatibility Planning provides guidance for land-use compatibility around airports. Under these guidelines, all land uses, including residential, are considered compatible with noise exposure levels of 65 dB DNL and lower.</p>
34	<p>What are the considerations taken into account when recommending a runway expansion when there are already conflicts with residential neighborhoods regarding noise? What elements are balanced?</p> <p>In the case of any project proposing a change in runway geometry, multiple factors are considered. These include: the characteristics of the current and future fleets using the runway; environmental factors (dominant wind direction, airfield elevation, and temperature); site constraints; on- and off-airport land use; and noise impacts.</p>
35	<p>Is there ever consideration given to the off airport impacts associated with the recommendations for airport expansion?</p> <p>Yes, it is standard practice to consider off-airport impacts in the master planning process including potential noise impacts to neighboring properties; review of incompatible off-airport land uses; and other environmental impacts. Detailed environmental studies are required by FAA for individual development projects, and are beyond the scope of work for airport master plans.</p>
36	<p>How many of the total aircraft operations are touch and go landings?</p> <p>The Aurora ATCT estimates that 40-45% of the total operations are related to flight training. Nearly all of the local flight training operations are runway related movements including touch-and-go or stop-and-go landings. Please see the “Flight Training” section on page 3-9.</p>
37	<p>How many of the based aircraft are seasonal (located at airport more than half the calendar year)? How is seasonality measured and through what process? Are there multiple surveys in a year?</p> <p>For an aircraft to count toward an airport’s based aircraft count, it must reside at that airport for at least half a year. Aircraft that reside at the airport for less than half a year are not counted toward the airport’s based aircraft total. Generally, FAA requests that airports evaluate and update their based fleets at least once a year. This updated information was reflected in the 2021 “validated count” of based aircraft used as the baseline for the master plan’s FAA-approved aviation activity forecasts.</p>
38	<p>Pages 3-10 et seq indicate that ODAV does not plan to use actual flight operations at the Airport and instead to substitute other methodologies to determine an operations forecast. It seems suspicious that real, actual operations data is not being used, and instead other, older data is being used to determine operations forecast. Rather than use the 10 years of actual Airport operations data collected by the ATCT, ODAV uses only data from 2016 -2021; however, Airport operations data is available up until 2023, as the FAA has provided to</p> <p>A model based on historic operations counts from the Aurora ATCT was developed and evaluated, but discarded based on the short time period in which data were available and from which to develop meaningful trends. Furthermore, the annual growth rate that the Aurora Historic Counts Trend yielded (3.6%) was not considered sustainable as it is over three times higher than nearly every other model evaluated. Please see the “Historical Operations Data Challenges” section on page 3-14 in Working Paper #1 and Appendix 8 – Discarded Forecast models.</p>

<p>the City. No adequate justification is provided for not using real, actual Airport operations data.</p>	
<p>ODAV indicates that it is using the combined average annual population growth of Clackamas and Marion Counties to determine Airport operations. This appears ridiculous, as there is No correlation or relationship between Airport operations and general population growth of counties, especially for an airport that does not offer commercial aviation services.</p>	<p>As noted in Working Paper 1, several aircraft operations models were considered through multiple rounds of review with the FAA Seattle Airports District Office (ADO) and FAA Headquarters over several months. Through their extensive review process, the combined county model was identified by FAA as the model that most closely resembles nationwide trends by airports of similar operational characteristics as those of Aurora State Airport. At the conclusion of the review, FAA found that the forecasts were reasonable and developed using acceptable forecasting methods, which led to their approval of the forecasts.</p>
<p>ODAV also appears to have miscalculated the combined average annual population growth of Clackamas and Marion Counties: ODAV indicates a growth rate of 0.9%; however the PSU data actually shows a growth rate of 0.7%. At the very minimum the growth rate should be changed to match the actual populations projections.</p>	<p>The FAA-approved aircraft operations forecast (Combined County Population Growth Model) was derived from current population forecasts for Clackamas and Marion Counties from Portland State University – Population Research Center (PSU-PRC). For consistency between the two counties (with different base years), the 2021 value for each was interpolated from the reported 2020 and projected 2025 values. The PSU-PRC forecasts are presented in 5-year intervals. The 2041 values were interpolated between 2040 and 2045 projections. Based on these data, the Compound Annual Growth Rates (CAGR) for the period were 0.74% for Marion County and 0.96% for Clackamas County. The CAGR of the combined county populations (Clackamas Population + Marion Population) for the same period is 0.86%. In the working paper, that rate was presented as 0.9% (rounded to nearest 0.1%) to match table formatting. However, all calculations were based on the growth rate 0.86%.</p> <p>The PSU-PRC growth rates vary over the forecast period. As it is unlikely that aircraft operations will track population growth year over year, the approved forecast assumes a linear 20-year growth rate from 2021 to 2041. It should also be noted that local and regional population forecasts are updated more frequently than airport master plan forecasts and are regularly adjusted up and down to account for a variety of conditions.</p>

QUESTIONS FROM JANUARY 2023 PAC MEETING

Comment/Question	ODAV Response
<p>39 From the FAA approval of the Airport Forecast: “This forecast was prepared at the same time as the evolving impacts of the COVID-19 public health emergency. Forecast approval is based on the methodology, data, and conclusions at the time the document was prepared. However, consideration of</p>	<p>As is noted in the next paragraph of the Forecast Approval Letter: “...Justification for future projects will be made based on activity levels at the time the project is requested for development. Documentation of actual activity levels meeting planning activity levels will be necessary to justify AIP funding for eligible projects.”</p>

	<p>the impacts of the COVID-19 public health emergency on aviation activity is warranted to acknowledge the reduced confidence in growth projections using currently-available data.”</p> <p>What is the solution to the above issue?</p>	<p>This means that prior to initiating a future project identified in the Airport Master Plan, activity levels at that time will be evaluated to ensure that the planned project meets the activity criteria required to justify the project.</p>
<p>40 “Accordingly, FAA approval of this forecast does not constitute justification for future projects. Justification for future projects will be made based on activity levels at the time the project is requested for development. Documentation of actual activity levels meeting planning activity levels will be necessary to justify AIP funding for eligible projects.”</p> <p>What kind of documentation is being referenced?</p>	<p>Updated activity data that will be evaluated to justify future projects at the time of programming include, but are not limited to, based aircraft counts, aircraft operation counts, fleet mix, and environmental data.</p>	

ODAV PAC MEETING #5; APRIL 30, 2024 - QUESTIONS ON DRAFT MASTER PLAN CHAPTER 4

Comment/Question	ODAV Response
<p>41 The existing Runway Design Code (RDC) defines the standards used for runway construction. Page 4-3 notes that “the approach visibility component may change within AAC/ADG C-II”. Can you please explain exactly what that comment means?</p>	<p>As noted in the chapter, approach visibility minimums are determined independently from the RDC, based on visual or instrument approach capabilities. Changes to the current approach visibility minimums (defined by FAA instrument approaches or through a separate FAA-issued “Notice to Air Missions” (NOTAM)), could be accomplished for a variety of reasons. This section notes that RPZ dimensions are determined by the approach visibility minimums for each runway end, therefore a change in minimums could change RPZ dimensions for AAC/ADG C-II.</p>
<p>42 Page 4-9 notes that comments regarding environmental concerns raised by PAC members will be included in Appendix 9 in the master plan, for future consideration by FAA during the completion of any environmental assessment required by NEPA. When will that documentation will be available on the project web site?</p>	<p>A summary of comments and responses, including for environmental concerns, will be posted on the project website to document review of each draft work chapter or full working paper. Comments and responses provided during the review of Working Paper 1, are currently provided on the project website. Comments provided after individual comment periods conclude are reviewed with responses posted on the project website when available. During the ongoing development of master plan chapters, responding to current chapter review is the highest priority and responses to previous chapters will be documented in preparation of the draft master plan document. At draft final all meeting</p>

	<p>summaries, PAC and public comments, and responses will be summarized in Appendix 9.</p>
<p>43 Page 4-9 notes that the City of Wilsonville and other jurisdictions will need to update their comprehensive plans to “remain compliant with state land use laws”. City recently updated the Comprehensive Plan to address airport issues. ODAV was notified of these proceedings. What is exactly involved in the city’s future Comprehensive Plan update? What exactly will be required of the City?</p>	<p>This section is intended to summarize Oregon land use regulations that apply to local governments. ORS 836.610 Local government land use plans and regulations to accommodate airport zones and uses.</p>
<p>44 Page 4-9 notes that the city should “develop overlay zone ordinance for airspace protection”. What exactly does that mean for existing land uses? How does this overlay zone work? What is being effected? Please provide specific information regarding this comment.</p>	<p>This section is intended to summarize Oregon land use regulations that apply to local governments. ORS 836.610 Local government land use plans and regulations to accommodate airport zones and uses. Additional technical information may be found in the Oregon Department of Aviation Airport Land Use Compatibility Handbook.</p>
<p>45 Page 4-10 notes that noise evaluations will be conducted in the Airport MP. When will those be created? Which Chapter addresses noise impacts?</p>	<p>Noise contours will be developed for the 65 DNL noise contour identified for the current conditions as well as the twenty-year contour. Noise contour modeling will use the forecasts and fleet mix identified in the forecast chapter for each run to analyze impacts of airport modifications as it relates to noise. Noise contours will be prepared following the selection of a preferred alternative.</p>
<p>46 Page 4-16 notes a runway length of 5,500 lineal feet. Which direction, N or S will the additional runway be extended, if approved?</p>	<p>Future decisions about runway configuration will be made by ODAV at the conclusion of the airside alternatives evaluation.</p>

ORIGINAL LETTER



May 14, 2024

Kenji Sugahara, Aviation Director
Alex Thomas, Planning and Programs Manager
Oregon Department of Aviation

Sent via email to:
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Timothy House, Lead Airport Planner
Federal Aviation Administration Seattle Airports District Office
FAA Northwest Mountain Region Airports Division

timothy.a.house@faa.gov

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

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

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

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

Chapter 1 questions/comments

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

3. A laypersons explanation of the concept of constrained operations and how that relates to runway length is needed. What is the relationship between the two?
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7. How specifically will potential environmental and socioeconomic impacts be measured, weighed or evaluated in the context of ‘future development’ at the airport?
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Chapter 2 questions/comments

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Chapter 3 questions/comments

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36. How many of the total aircraft operations are touch and go landings?
37. How many of the based aircraft are seasonal (located at airport more than half the calendar year)? How is seasonality measured and through what process? Are there multiple surveys in a year?
38. Pages 3-10 *et seq* indicate that ODAV does not plan to use actual flight operations at the Airport and instead to substitute other methodologies to determine an operations forecast. It seems suspicious that real, actual operations data is not being used, and instead other, older data is being used to determine operations forecast. Rather than use the 10 years of actual Airport operations data collected by the ATCT, ODAV uses only data from 2016 -2021; however, Airport operations data is available up until 2023, as the FAA has provided to the City. No adequate justification is provided for not using real, actual Airport operations data.

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

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

Questions from the January 2023 PAC meeting

39. From the FAA approval of the Airport Forecast:

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

What is the solution to the above issue?

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

What kind of documentation is being referenced?

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

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

Can you please explain exactly what that comment means?

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Chris Neamtzu
Community Development Director
City of Wilsonville

Mark Ottenad
Public/Government Affairs Director

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

