



Oregon

John A. Kitzhaber, MD, Governor



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February 22, 2012

Mr. Stan Allison
Cc: Ms Carol Soumi

Federal Aviation Administration
Northwest Mountain Region
Seattle Airports District Office
1601 Lind Avenue S.W., Suite 250
Renton, Washington 98057-3356

Dear Mr. Allison,

In response to your letter of November 18th, 2011, I respectfully appeal your decision to disapprove the Modification to Design Standards for a Declared Distance modification north of Runway 17 at the Aurora State Airport and ask for your reconsideration. If the FAA still maintains the 800 ft declared distance is not a valid option, the Board Of Aviation reiterates the request to grant an extension of 1,000 ft to the south as requested in the original submission. The Department of Aviation (ODA) recognizes the desire to make use of all land at the north end of the Aurora State Airport as a valid concern. However, due to obstructions to the north, the Departure Surface, RPZ and TERPS issues, there are physical constraints that limit the extension to no more than 400 ft north. This option combined with an extension of 600 feet to the south is the most costly option for runway extension. ODA and consultant, WHPacific Inc, extensively analyzed all possible options and vetted them through a lengthy public process including a Planning Advisory Committee (PAC) that included all local communities (a complete list is included at the end of this document) in an open and transparent process. The conclusion of the Chapter 3 aviation forecast (accepted by the FAA) is that constrained operations clearly demonstrate an extension of a minimum of 800-1,000 feet is warranted for the updated Master Plan.

The option to extend the runway in any direction is controversial and several organizations opposed to any growth of the airport remain vocal in their opposition. ODA held six Planning Advisory Committee meetings and worked diligently with airport tenants, businesses and the local community to gather input from all perspectives. Based on these inputs, the Oregon Aviation Board (OAB) voted to approve an Airport Layout Plan (ALP) utilizing an 800 ft declared distance to the north designed to heed public input while still developing a Master Plan that addressed the 500 constrained operations identified and accepted by the FAA in Chapter 3 of the Master Plan process.

After the OAB voted to make the 800 ft declared distance the preferred option, it was vetted informally with FAA Airports Division. When it became clear that option would not be approved by the FAA, the OAB voted to continue forward with an 800 ft declared distance to the north as the preferred option for runway extension and seek formal determination by FAA. The Board also voted a second (alternative) preferred option based on expected disapproval of the 800 ft

declared distance. The Board unanimously voted in favor of the alternative preferred option of a 1,000 ft. extension to the south. This southern extension exclusively will confine all runway extension inside airport property but will require relocation of Keil Road, a minor farm and airport access road at the south end of airport property. Additionally, ODA will be required to either purchase or obtain an easement for land to protect the off-airport Runway Protection Zone (RPZ) to the south.

Simultaneously with the master planning Process, FAA and ODA completed an AFTIL process to identify the location for an air traffic control tower to be constructed with Oregon State Funds. The AFTIL process did not look at ANY extension options to the North. The AFTIL team only looked at a 1,000 ft extension south option with future tower location and height based on the results of that study.

Consequently, when the Master Plan/ALP was submitted for FAA approval, it was an unexpected surprise when the FAA letter response narrowly focused on only the issue of denying the 800 ft declared distance and directed a full 800 ft extension to the north. The letter further declared the FAA would not support funding any extension to the south until all available on-airport land was used for unrestricted extension to the north. The requirement to make all runway development to the north as a prerequisite to any further development was not identified prior to the November 18th letter. The FAA letter did not give due regard to OAB/ODA’s substantial public process involvement that went into the decision to support the recommended ALP runway extension changes. Below is a summary of the rationale for OAB/ODA determination of preferred option:

1. Total cost of a 400 ft extension to North combined with 600 ft extension to south is estimated at \$9,606,000. A 1,000 ft extension to the south is estimated at \$7,169,000.. **The least expensive option is the 1,000 ft extension to the south by over \$2,000,000.** Analysis by consultant, WHPacific Inc

See charts below:

Northern Extension Option					
#	Year	Description	Total Cost	ODA share	FAA Share
Runways 17 (400') and 35 (600') Extension					
14A	2018	Avigation Easement Acquisition (R17 RPZ)	\$ 36,000.00	\$ 1,800.00	\$ 34,200.00
19A	2018	Property Acquisition (R17 and R35 RPZ)	\$ 3,963,000.00	\$ 198,150.00	\$ 3,764,850.00
20A	2019	Keil Road Relocation	\$ 1,427,000.00	\$ 71,350.00	\$ 1,355,650.00
21A	2020	Runway Extension (R17 - 400' Ext, R35 - 600' Ext)	\$ 4,180,000.00	\$ 209,000.00	\$ 3,971,000.00
Runways 17 (400') and 35 (600') Extension Capital Costs			\$ 9,606,000.00	\$ 480,300.00	\$ 9,125,700.00

Southern Extension Alternative					
#	Year	Description	Total Cost	ODA share	FAA Share
Runway 35 (1000') Extension					
14	2018	Avigation Easement Acquisition (R17 RPZ)	\$ 44,000.00	\$ 2,200.00	\$ 41,800.00
19	2018	Property Acquisition (R35 RPZ)	\$ 2,561,000.00	\$ 128,050.00	\$ 2,432,950.00
20	2019	Keil Road Relocation	\$ 1,427,000.00	\$ 71,350.00	\$ 1,355,650.00
21	2020	Runway Extension (R35 - 1000')	\$ 3,116,000.00	\$ 155,800.00	\$ 2,960,200.00
22	2020	Install Runway 17 PAPIs	\$ 65,000.00	\$ 3,250.00	\$ 61,750.00
Runway 35 (1000') Extension Capital Costs			\$ 7,169,000.00	\$ 358,450.00	\$ 6,810,550.00

2. The current FAA decision did not take into account the AFTIL process for the Aurora Air Traffic Control Tower. (ATCT). The AFTIL process was based only on 1,000 ft extension to the south and did not consider any extension to the north. Any extension to the north would apparently require a new and separate AFTIL process, delaying construction and adding cost to the ATCT. The ATCT is a significant safety issue based on the high number of operations and different categories of aircraft. Justification for the tower is also strongly supported by an FAA approved Benefit/Cost analysis. A recent mid-air collision close to Aurora State Airport demonstrates the safety concerns about separation of high density traffic arriving and departing Aurora are well placed. Any delays to conduct additional studies of north extensions could prevent the safety benefits of ATCT traffic separation and communication.
3. The current FAA decision disregards Marion County's unwillingness to grant future permits or authorization that negatively impact Columbia Helicopters (at the north end of the runway). Columbia Aviation is a significant employer and long-term occupant of land affected by any extension to the north. Marion County Commissioner Patty Milne was an active member of the Planning Advisory Committee.
4. The current FAA decision does not consider potential cost of opposition from Columbia Helicopters, an aviation business that provides over 350 jobs in Oregon and more specifically, a tax benefit to Marion and Clackamas Counties. Any development to the north would require ODA and/or FAA to negotiate compensation with Columbia Helicopters for approximately 2 acres of land and compromise their planned future development of their private property. Columbia Helicopters was represented on the Planning Advisory Committee throughout the master planning process.
5. Any extension to the north also affects both approach and departure surfaces by moving them closer to the buildings and helicopter ramp of Columbia Aviation. This effectively brings them more into play as instrument approach obstacles that could require raising minimum descent altitudes. This would be counterproductive to the aviation community and business tenant interest in lowering the minimum descent altitude or even develop a precision approach with even lower Decision Height.
6. The current FAA decision also does not consider road and above ground telephone lines as hazards that limit Runway 17-35 extension to the North to only 400 feet. The Department of

Aviation recognized early in the Master Planning process that Arndt Road sits approximately 1,800 feet to the North of the departure end of Runway 35 and two sets of high voltage power lines that stand approximately 28 feet high sit on both north and south sides of Arndt Road. These obstructions will be prohibitively expensive to move. In a study of the airport instrument approach from 2005, the cost to lower the instrument minimums was estimated at approximately 15 million dollars. Although the itemized cost of burying the power lines is not broken out in the study, it is estimated that burying both sets of power lines could be as high as 5 million dollars.

7. Any extension to the north moves the noise contours closer to the Charbonneau community. The community of Charbonneau vehemently opposes any development to the north. A Representative of Charbonneau was a participant in the PAC process and also expressed the opposition of any extension of the runway. ODA worked diligently to mitigate Charbonneau concerns about noise and growth. ODA was able to work with the FAA Flight Procedures to establish four Standard Instrument Departure (SID) procedures that effectively avoided most departures over Charbonneau as well as the populated communities around the city of Aurora to the south.
8. In an effort to be inclusive, ODA invited participation of elected officials of the local counties of Marion and Clackamas, the cities/townships of Canby, Wilsonville, Aurora, as well as airport tenants, businesses and neighborhood representatives from Charbonneau and Deer Creek Estates. To force a north extension disregard the work product of the Master Planning process and the Aviation Board's due diligence in developing acceptable options. It also discounts well as over a year's worth of public participation and would be perceived as a breach of trust and risks opening the door to additional public meetings and add costs of additional vetting of any option to the north.

To summarize; If the FAA still maintains the 800 ft declared distance is not a valid option, the Board of Aviation reiterates the request to grant an extension of 1,000 ft to the south as requested in the original submission. We appreciate your re-consideration and look forward to working to identifying a mutually agreeable solution. Please contact me if you have any questions.

Sincerely,



Mitchell T. Swecker,
Director

Attachment (A) is analysis completed by Consultant WHPacific Inc used as basis of analysis.

List of PAC participants:

Chairperson Patti Milne - Marion County Board of Commissioners
Commissioner Jim Bernard - Clackamas County Board of Commissioners
Mayor James Meirow - City of Aurora
Councilor Steve Hurst - City of Wilsonville
Mr. Ray Phelps - Wilsonville Chamber of Commerce
Mr. John Henri - City of Canby
Mr. Fred Netter - Aurora Fire District
Mr. David Waggoner - Willamette Aviation (FBO)
Mr. Bruce Bennett - Aurora Aviation (FBO)
Mr. Craig Wilmes - Aurora Jet Center (FBO)
Mr. Mitch Swecker - Oregon Department of Aviation
Mr. Dan Riches - Columbia Helicopters
Mr. Tony Holt - Charbonneau Country Club
Mr. Rick Kosta - Deer Creek Estates
Mr. Nick Kaiser – Local Community
Mr. Jim Hansen - On-Airport / Tenant
Mr. Tony Helbling - Off-Airport / Tenant & Business - Wilson Construction Co.
Mr. Ted Millar - Aurora State Airport Business - Southend Airpark
Mr. Roger Kaye - Friends of Marion County