

Gardiner Aurora Master / Oregon Aviation Written Comments  
October 2, 2019

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I served as the Chair of the Oregon Aviation Board during the entire period of, and was a very active direct participant in, the development of the 2012 Aurora State Airport Master Plan. This plan was approved by the Oregon Aviation Board and the relevant approvals from the FAA and Marion County were also received.

These official actions, which are the legal basis for the UAO Master Plan were:

OFFICIAL ACTION	FORM	DATE
FAA approval of Aeronautical Activity Forecast (required to initiate subsequent steps of the Master Plan process)	FAA Letter	September 29, 2010
Oregon Aviation Board approval of Draft Master Plan with preferred alternative and add-on options	Unanimous OAB vote	June 23, 2011
Oregon Aviation Board approval of the Master Plan for submission to the FAA	Unanimous OAB vote	October 27, 2011
FAA approval of proposed southern runway extension option under the Master Plan	FAA Letter	March 14, 2012
FAA Approval of the Aurora State Airport Layout Plan (ALP)	FAA Letter	October 19, 2012
Marion County Acknowledgement & Support of the Aurora Master Plan	Unanimous Board Resolution	May 8, 2013

These OAB, FAA and Marion County approvals were the culmination of a three year process (starting in 2009) which included extensive and significant public involvement and more than ample opportunity for participation by all interested parties – including specifically those parties then (and now) opposed to the State’s efforts to maintain the Aurora State Airport as a critical element of Oregon’s aviation infrastructure and the South Metro area’s economy.

Since none of the Oregon Aviation Board members involved in the 2012 Plan remain on the Board, and since some individuals now involved are unaware of that process, I will outline it briefly in this letter.

### **Mandated FAA Master Plan Process**

- The FAA requires a rigorous process for the development, review and approval the master plan for any airport comparable to UAO.
- That process builds from goals, background and history, through projected aircraft traffic, facility needs, alternative means of meeting those needs (including a “no build” alternative), then to a specific airport layout plan and capital improvement plan.
- The chapter structure of the UAO Master plan reflects this logical process of gathering information, analyzing the information, developing alternative plans, deciding on a plan and detailing that plan:
  1. Goals & Issues Identified for the Plan
  2. Airport Inventory
  3. Aeronautical Activity Forecast
  4. Facility Requirements
  5. Airport Development Alternatives
  6. Airport Layout Plan
  7. Capital Improvement Plan

### **Public Involvement in the UAO Master Plan**

- ODA’s process for the UAO Master Plan was managed by a team of professionals with extensive experience and expertise in the development of FAA airport master plans – including specifically sub-consultants charged with optimizing public involvement and input.
- A Planning Advisory Committee with roughly 20 members oversaw the planning process.
- The PAC members represented interested and potentially affected parties, including neighbors, airport users and local governments. All of the key opponents of the plan were represented by Members of the PAC.
- The PAC process included seven well-attended PAC meetings, five of which were open-houses for the public:
  - 11/3/2009
  - 7/22/2010
  - 9/30/2010
  - 12/9/2010
  - 3/10/2011
  - 6/7/2011
  - 9/15/2011

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- Dozens of people attended each of the meetings, with one meeting having almost 100 attendees.
- The PAC and ODA's Master Plan team also receive hundreds of public comments (paper, email, dedicated website) regarding various elements of the master plan.
- In addition to the formal PAC process, ODA and the team presented elements of the plan before governing bodies of local governments and civic groups.

### **The UAO Master Plan Process and Controversial Issues**

- Any airport master planning process will face issues and UAO was certainly no exception. The Master Plan process (as designed by the FAA and implemented with additional elements by ODA) intentionally deals head-on with potential issues.
- Examples of issues raised and dealt with in the UAO Master Plan included:
  - Noise
  - Land use & farm-land preservation
  - Ground traffic impacts
- One example of a specific issue raised was the concern expressed by some airport opponents that "... any expansion at UAO will cause major traffic issues on the Boone Bridge (I-5)". The UAO Master Plan team worked with ODOT to analyze the current and projected traffic generated by activities at UAO and determined that the road traffic impacts were de minimis relative to the ~120,000 vehicles per day using that route.
- The Master Plan process also evaluated the potential impacts of alternatives on land use and farm land – and incorporated those concerns into the plan. This issue also related to decisions regarding potential extensions of the UAO runway – more on that later in this letter.
- The Master Plan process also involved considerable research and analysis on potential noise impacts – with the resulting conclusion that the "preferred alternative" would actually reduce noise impacts on the areas most concerned (Charbonneau and Wilsonville) vs. the "no build" alternative.
- The other major issue raised by parties opposed to any further development at UAO was that somehow the Master Plan would open the door to completely changing the nature of the mission and uses of UAO. For example, there were rumors spread that ODA was planning to convert UAO to a FedEx cargo hub, and/or that ODA was conspiring with the property owner to incorporate the Langdon Farms golf course into the airport's employment area. The Master Planning process dealt with these concerns – as documented in the Airport Layout Plan, which is the official legal document governing the development of the airport itself. To further underline the State's commitment not to change the nature of the airport, the Oregon Aviation

Board passed resolutions committing to maintain UAO as a general/business aviation facility. Additionally, of course, the reality is that the only way Langdon Farms could be developed would be by regulatory actions of Clackamas County.

### **Complications in the Master Planning Process – Runway 17/35**

The Master Plan included an extensive alternatives analysis and decision-making process regarding the layout plan for UAO's Runway 17/35.

Based on all of the information and analysis in the first four steps of the Master Plan process, the UAO master planning team came up with four basic alternatives (with some variants as sub- alternatives). The analysis of these alternatives included a dedicated sub-set of the public involvement process – with separate public input time windows, Oregon Aviation Board hearings and significant public testimony. Of particular interest to all parties were the alternatives that either extended “displaced thresholds/ overrun areas” on the UAO runway or actual extensions of the runway.

The OAB-approved Master Plan final chapters provided for OAB approved options to be enabled based on feedback and decisions by the FAA. Roughly, these options involved:

- Extension of the full runway to the north
- Addition of “displaced thresholds” at both ends of the runway
- Extension of the full runway to the south

After a lengthy process of FAA/ODA information sharing, analysis and evaluation, the FAA approved one of OAB's already approved Master Plan / Airport Layout Plan options: the 1,000- foot runway extension to the south. This option was anticipated in the OAB approved Master Plan – both in the Airport Layout Plan and the Capital Improvement Plan.

### **Oregon Aviation Board Actions to Adopt the 2012 Master Plan**

Of course, the meetings of the Oregon Aviation Board at which elements of the plan were presented and decisions were made were also open public meetings and allowed for additional public comment, testimony and written input.

And, it is also clear from the record that all the relevant stakeholders were involved, had many opportunities to provide input, and were aware of the approvals in 2011, including, explicitly, the planned runway extension as reflected in the Master Plan itself (on p.6-1):

"On June 23, 2011 the Oregon Aviation Board recommended the ALP include an 800-foot northward extension of runway pavement and 800-foot displaced threshold to Runway 17. The Board determined additional runway length is justified at the Aurora State Airport and the use of declared distances is the most advantageous and neighborly method of increasing the runway's usable length. However, if the FAA's National Office does not approve the displaced threshold,

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the Board recommends pursuing an extension to Runway 35. As a result, both the northern displaced threshold and southern extension are shown on the ALP drawing set. Only one of these projects will be pursued, as is reflected in the capital improvement plan in Chapter Seven. It is emphasized the preferred action, based on the Board's recommendation, is to pursue the displaced threshold to mitigate the runway length deficiency at the Airport."

Thus, in addition to the PAC meetings and other public meetings noted earlier, there were two very well attended Oregon Aviation Board meetings - one in June 2011 and one in October 2011 which provided opportunity for public input on the full Master Plan.

The June meeting was focused on the runway extension options and the October meeting was a review and unanimous approval of the full Master Plan.

### **Correction of Recent Misinformation from Airport Opponents**

Airport opponents apparently claimed - at ODA's September 24, 2019 meeting - that I (as Aviation Board Chair) somehow sneaked the runway extension into the Master Plan "at the last minute". These comments are (knowingly) factually incorrect on both points:

- **Process:** The south runway alternative was developed by the ODA team of expert professionals - consultants and staff - who were responsible for developing and analyzing all of the substantive elements of the plan. There was simply no way that any single individual could move an alternative surreptitiously through the FAA-mandated planning process.
- **Timing:** The south runway alternative was included in the facility alternatives that we extensively discussed at PAC meetings on March 10, 2011, June 7, 2011 and September 15, 2011. The Aviation Board approved the Master Plan on October 27, 2011 - **seven months** after the first major public meeting discussing that (and all the other) alternatives. And, again, all of the potentially affected parties - specifically Friends of French Prairie, Clackamas County, Marion County, the City of Aurora, the City of Wilsonville and Charbonneau (and sometimes their contract lobbyist), Deer Park and other neighbors - attended all of these PAC meetings.

### **Approvals Subsequent to Oregon Aviation Board Approval**

As itemized in the table on Page 1, the FAA and Marion County also took appropriate action to approve (FAA) and "acknowledge and support" (Marion County) the Master Plan.

**Conclusion**

The public, legal record clearly demonstrates that the Oregon Aviation Board, the FAA and Marion County have approved the 2012 Aurora State Airport Master Plan, following a prescribed planning and public involvement process - with many opportunities for input and involvement by interested parties - and that there is no reason ODA should not continue to implement that plan.

Regards,

Mark Gardiner  
Former Chair, Oregon Aviation Board (July 1, 2008 – August 1, 2016)