From:	Brent Neely
To:	Oregon Department of Aviation
Subject:	Public Comment, November 5 meeting: Joseph State Airport fuel and winter maintenance
Date:	Wednesday, November 4, 2026 1:54:34 PM
Attachments:	2026-11-04 Neely letter to ODAV - Joseph State Airport questions.pdf

You don't often get email from brent@neelypi.com. 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.

Members of the Board,

My name is Brent Neely. I live in Lostine and I'm a pilot at Joseph State Airport.

Today I sent Director Sugahara and Tony Beach the attached letter with 19 questions about Joseph: why fuel was stopped, the DEQ permit, the tank, federal funding, the maintenance position and volunteers. I've asked for written answers by November 20. Every pilot and airport user I've shared it with has asked to be added, including members of the Wallowa County Pilots Association and the Chief Joseph Flying Club.

What I'm asking the Board for:

- **Fuel:** resume 100LL from the existing tank, or let a private operator sell from it. The 2025 inspection found the tank "Suitable for Continued Service," and ODAV has said in writing it could lease the tank and dispenser to an FBO.
- **The DEQ permit:** ODAV has nothing in writing from DEQ about Joseph. DEQ wrote me on November 2 that coverage requires both a listed activity and the potential for stormwater to reach surface water, and that deciding is the owner/operator's responsibility. ODAV's own master plan says Joseph has no stormwater systems. Please ask ODAV to put its determination in writing before the permit is cited again as a reason to keep fuel off.
- **The seasonal maintenance position:** post it for open recruitment, with the scope of work and season dates, so local people can apply.
- **Volunteers:** put the October 7 permission to plow with the 1961 International in writing, so there's coverage before the first storm.

I'd also ask that Joseph be an agenda item at the December 3 meeting, so the Board can hear ODAV's answers.

Thanks,
Brent

Brent Neely
Lostine, OR
Pilot, Joseph State Airport
(208) 502-1859 | brent@neelypi.com

November 4, 2026

Kenji Sugahara, Director
Tony Beach, State Airports Manager
Oregon Department of Aviation

Re: Joseph State Airport (JSY): questions on fuel, maintenance and volunteers

Kenji and Tony,

Joseph pilots and users have raised these questions by email, by phone and at the October 7 meeting. This letter puts them in one place. Each section gives the background, then numbered questions.

Please answer each numbered question in writing by **Friday, November 20**. If an answer isn't known yet, please tell us who is responsible for it and when to expect it. The related documents are the subject of a separate public records request.

A. Why fuel was stopped

ODAV stopped selling 100LL at Joseph when the tank ran dry in August. The July 15 notice (Exhibit A) gave as reasons *"slow fuel sales, high fuel prices and the high cost of delivering fuel to Joseph, the lack of profit to maintain and replace the fuel system, and new costly permit requirements,"* and said ODAV would replace the system by *"seeking FAA funds once/if eligible."*

1. Please list every reason ODAV stopped selling fuel at Joseph and say which was decisive. Which must be resolved before fuel can resume from the existing tank, what would resolve each, and what is the target date?

2. Who made the decision, and on what date? Did the Aviation Board approve it?

B. The DEQ stormwater permit

ODAV cites a new DEQ stormwater permit (the 1200-Z) as a cost of selling fuel at Joseph.

- Tony, October 23 (Exhibit B): *"I don't have anything in writing from DEQ about Joseph."* He said the need was raised by ODAV's contractor and verified in a meeting between ODAV and DEQ.
- DEQ's stormwater program wrote on November 2 that coverage requires both a listed activity and the potential for stormwater to reach surface water or a conveyance that discharges to it: *"Coverage is based on both triggers."* It also wrote that deciding whether coverage is required is *"the owner/operator's responsibility"* (Exhibit J).
- ODAV's 2022 Master Plan: *"There are no stormwater systems located on-airport"* (Exhibit C).

- I sent Tony a memo on October 23 explaining why the permit doesn't apply (Exhibit D). Tony, October 28: *"I've sent your memo over for review, I will let you know when I hear back."*

3. Which contractor told ODAV that Joseph needs the permit, and when? On what date did ODAV meet with DEQ about Joseph, and who attended?

4. Has ODAV, as owner and operator, determined that Joseph requires coverage?

5. Where does ODAV believe stormwater at Joseph reaches surface water, or a conveyance that discharges to surface water?

6. Who reviewed my October 23 memo, and what did they conclude?

C. Fuel quality and the tank

ODAV has pointed to past fuel quality complaints and the tank's condition. The 2025 inspection Tony sent on October 14 (Exhibit E) found *"the Tank is Suitable for Continued Service,"* no certification deficiencies, and *"The Baffle is deemed intact,"* with the next formal inspection due by July 2045.

ODAV's October 7 summary says *"replacing the fuel tank will resolve ongoing maintenance and repair issues as well as fuel quality concerns"* (Exhibit F). Water in avgas usually comes from condensation, which routine sumping and filter changes remove.

7. Given that the inspection found the tank suitable for continued service, has ODAV considered that gaps in routine servicing, not the tank, caused the fuel quality problems, and what was done to address that possibility?

8. What has ODAV done to correct the servicing, and how is the tank being maintained while it sits empty?

D. Federal funding for a new tank

ODAV has said it will seek FAA money to replace the tank, but has not said when.

- May 2025 summary: *"The FAA will only fund new fuel tanks"* (Exhibit H).
- October 7 summary: ODAV met with FAA at Joseph on October 6 about using FAA funds to replace the fuel system and *"is waiting on a response from the FAA"* (Exhibit F).
- ODAV's capital plan for Joseph, attached to the May 2025 summary, lists every planned federal project through 2030. **It has no fuel tank in it** (Exhibit H, last page).
- FAA funds a replacement fuel facility based on need and added capacity (FAA Order 5100.38D, Table C-2).

9. Is it ODAV's position that the tank must be out of service for a period before ODAV can apply for an FAA grant to replace it? If so, for how long, and what FAA rule or guidance

says so?

10. Has a fuel tank been added to the capital plan since May 2025? If so, for what year, at what cost and with what funding source? If not, how and when will ODAV fund a replacement, and what is the plan for fuel at Joseph until then?

11. Has FAA responded since the October 6 meeting, and what did it say?

E. FAA grant assurances and restarting fuel

ODAV accepts federal grants at Joseph, and each grant carries written assurances to FAA (Exhibit G).

- Assurance 40 (2024): if 100LL was available at an airport at any time in 2022, the sponsor *"may not restrict or prohibit the sale of, or self-fueling with"* 100LL until 2030 or until an FAA-approved unleaded replacement exists. FAA says this covers any action, *"or fail[ure] to take action,"* that restricts access to 100LL. Joseph sold 100LL throughout 2022.
- Assurance 19: facilities *"necessary to serve the aeronautical users of the airport"* must be *"operated at all times in a safe and serviceable condition,"* and the sponsor must provide for *"Promptly notifying pilots of any condition affecting aeronautical use of the airport."*
- The FAA airport record and Chart Supplement still list 100LL self-serve at Joseph, three months after the fuel ran out.
- October 7 summary: one path is *"Resuming 100LL sales with the existing tank when the budget deficit and other factors are resolved"* (Exhibit F).
- Tony, October 29 (Exhibit B): *"Yes we could lease the existing tank and dispenser to an FBO, provided they meet the minimum standards. Yes we have had FBOs lease state-owned tanks."*
- Under OAR 738-035-0020(2), the Director may waive or modify the minimum standards when it's *"in the best interest of the public."*

12. Does ODAV consider Assurance 40 to apply at Joseph, and if so, how is stopping 100LL sales consistent with it? Does ODAV consider the fuel facility "necessary to serve the aeronautical users of the airport" under Assurance 19? If not, why not?

13. Did ODAV notify FAA when it stopped fuel sales, and when will it correct the FAA airport record and Chart Supplement?

14. For someone to offer fuel at Joseph, which minimum standards would the Director waive under OAR 738-035-0020(2), and what requirements would remain?

F. The maintenance position

Joseph's maintenance position ended September 30.

- Tony, October 28 (Exhibit B): the work *"will be seasonal for snow removal, inspections, and reporting,"* and *"Temp positions do not require an open recruitment."*
- Tony, October 29 (Exhibit B): *"There will not be a position at the airport outside of the winter season."* Mowing and other maintenance will be *"handled by our Salem staff."*
- ORS 240.306 requires state hiring by *"open competition"* with *"adequate public notice."* ORS 240.309: temporary appointments *"shall not be used to defeat the open competition and consideration system."*
- ODAV announced the November restart on October 7, which left time to post.
- Wallowa Memorial is a critical access hospital, and its medical flights depend on an open runway in winter.

15. How is filling work ODAV describes as seasonal by temporary appointment, without an open recruitment, consistent with ORS 240.306 and 240.309? Will ODAV post the position for open recruitment?

16. After a snowfall, how soon will the runway be plowed, and who should pilots and the hospital call?

17. How often will Salem staff mow and spray at Joseph?

G. Volunteers

ODAV has said for more than a year that volunteers would be able to help maintain the airport. It hasn't happened yet.

- May 2025 summary (Exhibit H): a volunteer program *"is still a priority for ODAV, but has been delayed due to staffing limitations."*
- October 7 meeting: Tony told the group volunteers could plow this winter with the 1961 International, with training and a waiver: *"I'm going to make an executive decision, you can use the international."*
- October 7 summary (Exhibit F): *"maintenance can be done by volunteers with permission and coordination from ODAV staff."*
- When I asked, Tony sent the AIRO form (Exhibit I), which covers inspection and reporting only and tells volunteers not to work in ice, snow or fog. On October 29 he wrote (Exhibit B): *"We don't have the complete volunteer program set up yet, and we'll be handling volunteer efforts on a case by case basis until that program is established. This is the only waiver form we have at this time."*
- In 2021, Tony signed a volunteer agreement with the Friends of Pacific City covering routine maintenance at that airport.
- A large group of local pilots is ready to train and help with plowing, mowing and other maintenance at Joseph.

18. What must a volunteer do to be authorized to plow or mow at Joseph this winter, and what training is required? Will ODAV put the 1961 International permission in writing, and by what date?

19. When will ODAV's statewide volunteer program be established? Until then, will ODAV sign a volunteer agreement for Joseph like the Pacific City one? We can provide a draft.

These questions aren't coming from me alone. Every pilot and airport user I've shared this letter with has asked to have their name added, including members of the Wallowa County Pilots Association and the Chief Joseph Flying Club. Given the short timeline, I haven't gathered signatures from everyone who has voiced support. Signatures are available on request.

We'll let the Board know on November 5 that these questions are with you. We're glad to meet in person or by Teams to go through them.

Thanks,

Brent Neely
Pilot, Joseph State Airport
(208) 502-1859 | brent@neelypi.com

cc: Oregon State Aviation Board (mail.aviation@odav.oregon.gov)
Brad Schuster, AOPA Northwest Mountain Region
Bill Ables, Recreational Aviation Foundation
Tait Carroll, Chief Joseph Flying Club

Exhibits

- **A.** ODAV fuel suspension notice, July 15, 2026
- **B.** Tony Beach's emails, October 14 to 29, 2026
- **C.** 2022 JSY Airport Master Plan, stormwater pages
- **D.** JSY 1200-Z applicability memo, October 23, 2026
- **E.** 2025 tank inspection report (sent by Tony October 14), excerpts: cover, baffle finding, suitability findings, deficiencies and conclusion
- **F.** ODAV's written summary of the October 7, 2026 tenant meeting
- **G.** FAA Grant Assurances 19, 29 and 40 (April 2025) and FAA's Assurance 40 Q&A (updated December 10, 2025)
- **H.** ODAV's written summary of the May 16, 2025 tenant meeting
- **I.** ODAV AIRO volunteer form (ODA_FORMS_015-1)
- **J.** DEQ stormwater program's reply on 1200-Z applicability, November 2, 2026

Email from Tony Beach to Joseph State Airport tenants and users, with copies to the Governor's office, Rep. Levy, Director Sugahara, ODAV staff and the Aviation Board chair. Text as received.

Subject: Joseph State Airport - Fuel Suspension
From: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>, July 15, 2026, 2:54:46 PM PDT
Cc: CROWELL Courtney (GOV), Rep Levy B, whitley.schiller@oregonlegislature.gov, SUGAHARA Kenji (ODAV), MORRIS Alexis (ODAV), RICHCREEK Don (ODAV), PILCHER Marlin (ODAV), STURIS Gerry (ODAV), cathryn.e.stephens@ci.eugene.or.us, BROOKS Kelly S (GOV)

Good afternoon tenants and users of the Joseph State Airport,

I am sending this email so that you would receive this information from me first.

Fuel Suspension at JSY

Due to several factors, ODAV will suspend dispensing fuel at the Joseph State Airport when the remaining fuel in the tank has sold. Following the fly-in event last weekend, we estimate approximately 1,000 to 1,500 gallons of fuel remaining.

I regret that we could not provide more advanced notice. Circumstances leading up to this decision at the end of June, slow fuel sales, high fuel prices, and wanting to avoid panic before the early July fly-in all contributed to this short notice.

As mentioned, there are several factors that have lead to this decision. These include slow fuel sales, high fuel prices and the high cost of delivering fuel to Joseph, the lack of profit to maintain and replace the fuel system, and new costly permit requirements. While fuel sales are already slow, our sale price has consistently been below our cost to order new fuel deliveries in recent months, meaning that a new delivery would not sell. Adding new costs to meet DEQ permit requirements on top of other recent fuel storage maintenance and repairs means there are no returns to sustain this operation.

Not a Permanent Change

We believe there are pathways to fund replacement of the current fuel storage system, but those will take some time. These include seeking FAA funds once/if eligible, as well as other state, local, or private funding. ODAV will continue to pursue these options with the goal of restoring fuel as quickly as possible.

If someone is interested in operating an FBO at Joseph, that is an option as well. Please contact me directly.

Continued Investment in JSY

ODAV continues to invest in maintenance and improvements at the Joseph State Airport. We are currently in the middle of a full surface seal project to maintain the runway, taxiways, and apron. We will be replacing the AWOS with an entirely new system later this year. We continue

to work toward apron expansion and obstruction removal projects as identified in the recent master plan.

We are working with legislators, an industry work group, and other state officials on several proposals to address a forecasted agency budget shortfall and stagnating revenues. We continue to work toward our mission of enabling and advocating for a safe and efficient aviation system that connects communities and drives economic growth. As a small department of 15 people, and the 3rd largest operator of airports in the US, we do as much as we can for Oregon's aviators and communities that rely on their local airports.

I apologize if I missed anyone in this email, we will be following up with additional notices to reach as many people as possible. In the meantime, please don't hesitate to reach out with any questions. I will be in Joseph in August, and will follow up with dates and times that we can meet to discuss this directly.

Thank you for your understanding, and I look forward to working on solutions to keep this suspension as short as possible.

Anthony Beach, C.M., ACE
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER

Tony's messages as received, in date order. Quoted earlier messages and signature contact lines omitted. Times Pacific.

October 14, 2026, 10:22 AM

From: Tony Beach, State Airports Manager
To: Brent Neely
Subject: RE: Joseph State Airport - DEQ permit and tank inspection report

> Hi Brent,
>
> It is the 1200-Z Industrial Stormwater permit. As stated in the meeting, the need to obtain the permit or cease fueling at Joseph was a management decision that needed to be made on fairly short notice. We obtained cost estimates for $17,500 up front and every 5 years in additional costs to obtain and comply with the permit, as well as $1,500 additional annual costs.
>
> Also mentioned in the meeting, our margins on fuel are very low, typically less than $1/gallon. We sell around 8K gallons per year. Even $8k in fuel sale profits, along with $9,224.93 in local annual lease revenue per year does not cover the costs associated with the recent tank inspection, any necessary repairs or improvements, and ongoing maintenance. That is before taking the additional permit costs into consideration. Combined with the Department's budget deficit that we discussed, we could not absorb the additional operating costs, especially while we're seeing our fuel delivery costs escalate beyond $8/gallon. Our last fuel load did not move quickly when it was priced at $6.80/gallon, even during the final months after the announcement was made. I know the loss of fuel at JSY is a hardship for everyone in that community, and we will continue to pursue the 4 ways to make fuel more sustainable as outlined in the recent meeting summary.
>
> I've attached the draft tank inspection report from last year. I still have not heard a response from the consultant about a final report. Again, the final version may not have been completed as the person working on this report is no longer with the company. I've reached out to them to see if a final version is available.
>
> As stated in the recent meeting summary, the fuel issue is compounded by multiple factors. We have had to make drastic and difficult changes in response to our budget deficit. The tank and permit are additional factors that contributed to this decision.
>
> I hope to share better news soon, and look forward to when we can announce fuel sales being available at JSY again.
>
> Tony Beach

OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER

October 23, 2026, 3:15 PM

From: Tony Beach, State Airports Manager
To: Brent Neely
Subject: RE: Joseph State Airport - DEQ permit and tank inspection report

Hi Brent, I am sorry I have not been able to follow up with these emails sooner.

- I don't have anything in writing from DEQ about Joseph.
- As stated earlier, the need to obtain the permit was communicated by our contractor, and then verified directly in a meeting between ODAV and DEQ.
  - In this meeting, we discussed:
    - Triggers for the permit with outdoor fuel storage and dispensing
    - How other state agencies with multiple sites are covered (we're continuing to look into this)
    - If covering fueling areas would alleviate the need for the permit (we were told the entire fueling area would need to be covered, not just the fuel storage tank)
    - No-exposure certification and tenant responsibilities
- I have forwarded my correspondence with the meeting summary to you, I am sorry you were not included in the original email.

I appreciate your patience and concern with the loss of fuel at Joseph. Please know that we are working to address the range of issues affecting the recent decision to cease fuel sales at JSY.

Tony Beach
OREGON DEPARTMENT OF AVIATION
STATE AIRPORTS MANAGER

October 28, 2026, 3:02 PM

From: Tony Beach, State Airports Manager
To: Brent Neely
Subject: RE: Joseph State Airport - seasonal maintenance position posting

Hi Brent,

I appreciate your input and wanting to help point people in the right direction to apply for the position. I haven't heard from anyone directly about applying for the position.

Because it is almost November already, we are planning to direct appoint Wup who is already

> familiar with plowing and reporting surface conditions at the Joseph State Airport. As mentioned in the recent tenant meeting, this position will no longer be filled year-round, and will be seasonal for snow removal, inspections, and reporting.
>
> Temp positions do not require an open recruitment, and are hour-limited. However, I am happy to post the position for the next season. All job postings can be found at https://www.oregon.gov/jobs/Pages/index.aspx. Anyone can set alerts so they are notified of new postings.
>
> Thanks again,
>
> Tony Beach
> OREGON DEPARTMENT OF AVIATION
> STATE AIRPORTS MANAGER

October 28, 2026, 3:49 PM

From: Tony Beach, State Airports Manager
To: Brent Neely (replying to Brent's October 23 email attaching the 1200-Z applicability memo, Exhibit D)
Subject: RE: Joseph State Airport - DEQ permit and tank inspection report

> Hi Brent,
>
> I appreciate your discussion on this, I know it is a difficult and sudden change at the airport.
>
> I've sent your memo over for review, I will let you know when I hear back.
>
> Tony Beach
> OREGON DEPARTMENT OF AVIATION
> STATE AIRPORTS MANAGER

October 29, 2026, 4:19 AM

From: Tony Beach, State Airports Manager
To: Brent Neely
Subject: RE: Joseph State Airport - seasonal maintenance position posting

> Hi Brent,
>
> I haven't heard from anyone directly about being interested in the position in the time I've been here, including since it's been unfilled this last month.
>
> I appreciate your suggestion, I am sorry we will not be posting the position this season.

> Recruiting for positions takes a lot more than 10-day posting runs. I am in the middle of recruiting for another position that, among other things, will take the better part of my time over the next couple of months.
>
> Wup has the experience and familiarity to jump into this winter season to keep JSY safe and operational without any delay. We will post the position earlier in the summer next year to allow plenty of time to get someone up to speed to do the same.
>
> There will not be a position at the airport outside of the winter season. As mentioned in the meeting earlier this month, mowing and other airport maintenance for JSY will be handled by our Salem staff.
>
> That's great that you're interested in volunteering! Here's the form: https://www.oregon.gov/aviation/agency/documentation/Documents/Form/ODA_FORMS_015-1.pdf . Please return a filled out form to us and we'll be in touch with next steps/basic requirements.
>
> Tony Beach
> OREGON DEPARTMENT OF AVIATION
> STATE AIRPORTS MANAGER

October 29, 2026, 1:57 PM

From: Tony Beach, State Airports Manager
To: Brent Neely, cc Don Richcreek (replying to Brent's question of how volunteers get authorized to plow and mow, since the AIRO form covers reporting only)
Subject: RE: Joseph State Airport - seasonal maintenance position posting

> Hi Brent,
>
> Of course you can circulate that form, it is published on our website. As mentioned, our volunteer program has historically been just for information reporting. We don't have the complete volunteer program set up yet, and we'll be handling volunteer efforts on a case by case basis until that program is established. This is the only waiver form we have at this time.
>
> Tony Beach
> OREGON DEPARTMENT OF AVIATION
> STATE AIRPORTS MANAGER

October 29, 2026, 2:01 PM

From: Tony Beach, State Airports Manager
To: Brent Neely, cc Kevin Olsen (answering Brent's three questions: would ODAV lease the existing tank and dispenser to an operator; is there anywhere an FBO runs on State-owned tanks; would the

Director approve a self-serve cardlock with conditions or waivers)
Subject: RE: Joseph State Airport - commercial fuel operator application forms

> Hi Brent, just a couple quick answers to your questions.
>
> 1. Yes we could lease the existing tank and dispenser to an FBO, provided they meet the minimum standards.
> 2. Yes we have had FBOs lease state-owned tanks.
> 3. When you're ready, let's set up a meeting to talk about the standards and what you have in mind.
>
> Thank you,
>
> Tony Beach
> OREGON DEPARTMENT OF AVIATION
> STATE AIRPORTS MANAGER

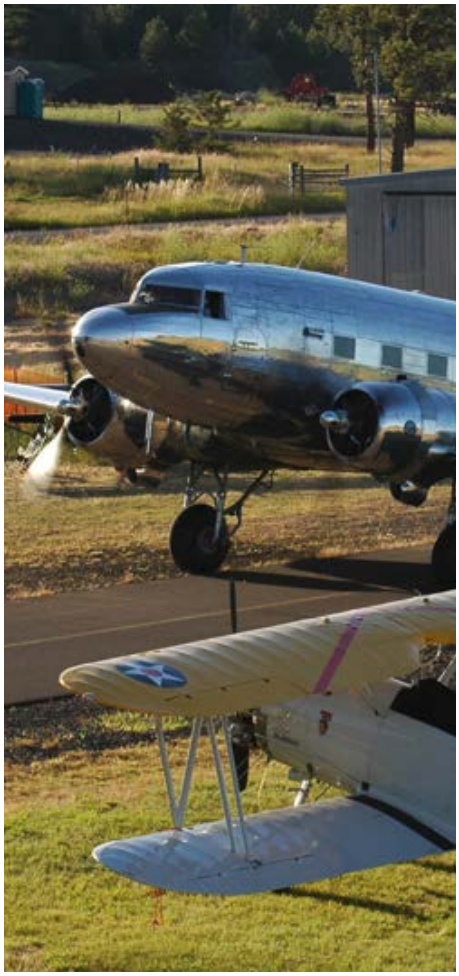
JOSEPH STATE AIRPORT

AIRPORT MASTER PLAN

Joseph, OR
January 2022







CENTURY WEST ENGINEERING

Waterways

The Airport APE is located in the Wallowa Lake-Wallowa River Watershed. There are three streams surrounding the Airport including Hurricane Creek, the Wallowa River, and Newby Creek, and all three are classified as perennial. The Wallowa River feeds into Hurricane Creek at river mile (RM) 39.8, west of the Town of Enterprise, and ultimately flows to the Grand Ronde River.

Floodplains

The Airport APE is located in an upland area on a broad, gently sloping plain and the FEMA NFHL does not identify mapped floodplains, floodways, or other flood hazard areas within the APE. According to FEMA Flood Insurance Rate Map[7], the airport is located in Flood Hazard Zone X. Zone X denotes areas that are determined to be outside the 500-year floodplain.

Stormwater

Stormwater treatment and conveyance infrastructure within the APE is limited to sheetflow conveyance to on-airport ditches and grassed infield and runway safety areas. No direct discharge points to nearby waterways or ditches draining to waterways occur or are associated with airport stormwater conveyance.

Water Quality

Hurricane Creek and the Wallowa River are listed as water quality limited on the DEQ's list. The Wallowa River is listed as water quality limited for sedimentation, fecal coliform, pH, and dissolved oxygen, with TMDLs approved. Hurricane Creek is listed as water quality limited for sedimentation with TMDL needed; however, the Oregon Department of Environmental Quality (DEQ) Integrated Report Assessment Database List recommends no action.

The Airport APE is located within the City of Enterprise watershed. A variety of state and federal laws exist to govern activity within this area to protect water quality. Wallowa County has also created an overlay zone for this area to protect the watershed.

Air Quality

The Airport is outside of designated air quality maintenance and air quality non-attainment areas as regulated and administered by the DEQ.

Hazardous Materials & Cleanup Sites

A query of the DEQ Leaking Underground Storage Tank (LUST) Database identified one previous record of a leaking underground storage tank at Joseph State Airport. During a February, 1995 Phase I site investigation in support of airport expansion, an underground storage tank was identified and the previous property owner was required to decommission the tank prior to airport acquisition of the property. A Phase II site assessment following decommissioning identified gasoline or diesel contamination at the former tank location. The site subsequently underwent remediation and on June 13, 2006, DEQ issued a letter determination that No Further Action is required and the incident is now closed.

A query of the Oregon DEQ database for Environmental Cleanup Site Information was conducted on July 7, 2019, which identified no records of environmental cleanup sites within or adjacent to the Airport APE. However, several suspected contamination sites were identified as detailed in **Table 2-9.**

7 FEMA Flood Insurance Rate Map (FIRM) number 41063C0614B, effective February 17, 1988.

AIRCRAFT FUEL

Joseph State Airport has 100-octane low lead (100LL) aviation gasoline (AVGAS) available. ODA owns and maintains the fuel storage and dispensing system that includes one above ground double-wall tank (10,000 gallons) and a 24-hour credit card payment system for self-fueling. The fixed-point fueling system is located north of the hangar area and south tiedown apron. The tank has a 50/50 internal partition that allows for storage of two separate grades of fuel. Airport management reports that the split tank has been configured with both AVGAS and jet fuel in the past, but is currently used only for AVGAS storage. The aircraft fueling system includes a containment area for the tank, a Portland cement concrete (PCC) fueling apron, and overhead lighting.

A Spill, Prevention, Control, and Countermeasure (SPCC) Plan was prepared for Joseph State Airport in 2010. The SPCC Plan describes measures implemented by ODA to prevent oil discharges from occurring, and to prepare ODA to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge.

HANGARS

Joseph State Airport currently has eight existing hangars, including seven conventional hangars and one multi-unit (4) hangar. The hangars are located along the west side of the south tiedown apron and south taxilane.

Airport maintenance equipment and a snow plow are stored outside, adjacent to the hangars and the south tiedown apron.

Other buildings located in the south landside area include the airport electrical regulator building, a double-wide mobile home used as a pilot lounge/FBO (restroom), and two small sheds.

A memorial plaque and flag pole honoring twenty-seven Wallowa County service members who lost their lives in World War II (1941-1945) is located near the south entrance to the airport (erected by the Joseph Oregon Chamber of Commerce).

UTILITIES

The developed areas of Joseph State Airport have water, electrical, and telephone service. The following text describes and depicts the locations of the major utilities serving the Airport.

POWER

Pacific Power provides electric power to Joseph and the surrounding area. Above-ground power lines extend along Airport Lane and Airway Road, with overhead drops connecting to each hangar and building. The airport's electrical regulator building is located adjacent to Airport Lane and is also served with an overhead supply connection. Underground electrical supply lines extend from the regulator building the runway lighting, airport beacon, AWOS, and lighted wind cone.

WATER

The Airport is located approximately .25 to 1-mile outside of the City of Joseph's service area for water. An existing on-airport well provides water to the mobile home/pilot building and commercial hangars.

SANITARY SEWER

Joseph State Airport is not served by Sanitary Sewer. The nearest City of Joseph service point is about 1 mile north/east of the Airport. The Airport has a single septic tank/drain field installed adjacent to the mobile home/pilot lounge located at the south apron. There are currently eight individual hangars located in the area immediately west of the south apron; some of these hangars may have restrooms and individual septic systems.

STORMWATER

There are no stormwater systems located on-airport. The runway and taxiways are designed for stormwater to run off the edges of the pavement into adjacent swales.

NATURAL GAS

Natural gas is not available at the Airport. Several tenants use propane heat; tanks are filled locally by either Wallowa County Grain Growers or Ed Staub and Sons.

Joseph State Airport Fuel Facility — 1200-Z Applicability Review

Prepared by: Brent Neely, Joseph State Airport tenant applicant · brent@neelypi.com · (208) 502-1859 **Date:** October 23, 2026 **Purpose:** For review by ODAV and its stormwater contractor

Why I wrote this

I want fuel back at Joseph, and I know ODAV does too. The 1200-Z Industrial Stormwater permit has been identified as one of the obstacles. Having read the permit and the documents ODAV has shared, my honest reading is that coverage is not triggered at this facility. I may be missing something, and the fastest way to find out is to put the reading in writing and ask the people who reached the opposite conclusion to point at what I've missed.

Everything below cites either the permit text or ODAV's own documents. I'd appreciate this being passed to the contractor who raised the permit question, with a request for specific feedback: if coverage applies here, which listed activity triggers it, and what discharge point does the facility have?

How 1200-Z coverage is triggered

The 2026 permit (issued July 1, 2026, page 1) applies to a facility that **may discharge stormwater to surface waters or to a conveyance that leads to surface waters, AND conducts an industrial activity listed in Table 1 or Table 2.** The test is conjunctive. If either condition is not met, the facility is not a covered source. My reading is that Joseph's fuel facility meets neither.

Condition 1 — a listed industrial activity

- Air transportation facilities (SIC 45) are not covered outright. They sit in Table 1's conditional group, where coverage attaches only to facilities *"which have vehicle maintenance shops, equipment cleaning operations, or airport deicing operations"* (permit page 3, tracking 40 CFR 122.26(b)(14)(viii)).
- Joseph has none of the three. There is no maintenance shop, no equipment cleaning operation, and no deicing operation on the field. The FAA's facility record for JSY, which is reported by the sponsor, lists no airframe or powerplant service.
- ODAV's own stormwater plan for Aurora State Airport describes the trigger the same way: vehicle maintenance, equipment cleaning operations, and airport deicing operations. Fueling is not among them.
- Fuel distribution and sales does appear in the permit as its own listed activity, but only in Table 2 (page 4), which by its heading applies to *"Discharges to Columbia Slough and Portland Harbor."* Joseph is not in either geography.

Condition 2 — a discharge to surface waters

The airport's FAA-funded 2022 Master Plan addresses this directly, in three separate places:

- *"There are no stormwater systems located on-airport. The runway and taxiways are designed for stormwater to run off the edges of the pavement into adjacent swales."* (p. 2-36)
- *"No direct discharge points to nearby waterways or ditches draining to waterways occur or are associated with Airport stormwater conveyance."* (p. 2-21, repeated in the 2021 environmental memo at §3.9, which adds that runoff infiltrates into the ground without directly discharging to nearby waterways)
- The plan's environmental review table flags creek proximity for the South Apron and East Hangar areas, and describes the fuel apron as *"not in proximity to known wetlands, streams or other critical habitat."* (Table 5-9)

The fuel facility itself is consistent with that. It sits at the high end of the field and sheds inward, toward the taxiway and grass infield. The July 2025 tank inspection ODAV commissioned describes the refueling area draining **into** the secondary containment structure through a one-way flapper, with water removed by manual sump pumps, and states *"No surface water drainage issues were observed."* A facility engineered to capture its runoff into containment, on soils the master plan describes as deep gravelly outwash, is the opposite of one discharging to a waterway.

The history is consistent with this reading

DEQ's own registration record shows ODAV obtained 1200-Z coverage for Aurora and Independence in November 1997 and Mulino in March 1998, and never registered Joseph in the roughly 25 years this tank has operated since. EPA's public permit database shows no 1200-Z coverage of any kind for any facility in Wallowa County. And no written DEQ determination applying the permit to Joseph exists, by ODAV's own account. Twenty-plus years of consistent treatment is not proof, but it is exactly what you'd expect if coverage was never triggered here.

What would change my mind

I'm asking for feedback, not agreement. Three specific things would resolve this quickly:

- **An activity:** if there is a vehicle maintenance shop, equipment cleaning, or deicing operation at Joseph that I've missed, name it.
- **A discharge point:** if the fuel apron discharges to a surface water or to a conveyance that reaches one, identify where. The master plan says there isn't one; if the contractor found otherwise, that finding is the single most useful thing they could share.
- **A DEQ document:** if DEQ has applied the permit to this facility in writing in any form, a copy settles it.

If any of those exist, I'll stand corrected. If none do, then the permit cost shouldn't be counted among the obstacles to restoring fuel at Joseph, and that's good news for everyone.

Thanks for taking the time, and please thank the contractor for theirs.

Brent Neely

SP001 Inspections of the KJSY 10K Fuel Tank at the Joseph State Airport

Joseph, Oregon



August 26, 2025

Prepared for:

envirosafe
ABOVE-GROUND FUEL SYSTEMS
1789 E C 48
Bushnell, FL 33513

Prepared by:

Environmental Compliance Associates, LLC
372 S Eagle Road, Suite 146
Eagle, ID 83616

14. ***If present*, inspect electrical systems for intrinsically safe (ignition-free) conditions.**
15. **Obtain ultrasonic thickness testing (UTT) measurements over accessible tank surfaces**, to determine material thicknesses and corrosion rates, as needed (*see next paragraph*). Refer to the UTT Datasheet in **Appendix C**.

3.1 UTT Measurements

Item 15 in **Section 3.0** was performed by ECA, in accordance with Section 4.3.3.1 of the SP001 Standard (see Certificate of Training in **Appendix F**). The Olympus 38DL Plus UTT instrument utilized during this project was calibrated on April 24, 2024. Additionally, the instrument was checked several times each day, using calibrated thickness test standards and adjusted to within 0.001-inch accuracy, before being utilized for the UTT work on the Tank.

During the collection of 130 UTT measurements (including 14 percent repeats), the measurement accuracy averaged 99.8 percent, as shown in the UTT Datasheet. Observed paint thicknesses, ranging from 0.012 to 0.027 inches, were automatically removed from the UTT instrument, via a proprietary Thru-Coat™ probe (sensor).

Items 2, 8, 10, 11, 14, 15 are criteria that determine the tank's *"Suitability for Continued Service"*. They are discussed in Sections 4.0 and 5.0.

4.0 INSPECTION SUMMARY

The following table lists major findings and issues regarding the above inspection items.

1[a]	2-3[b]	4-7[c]	8[d]	9[e]	10[f]	11[g]	12-13[h]	14[i]	15[j]
✓	✓	NW	✓	✓	✓	✓	NW	✓	✓

✓ = Acceptable NW = Needs work ***See notes below.***

a = **No issues identified.** No known historical issues or other events appear to have occurred during each tank's lifetime, regarding the structural integrity thereof.

b = **No issues identified.** No *structural* tank supports exist. However, there is no tank settlement, because the tank rests ***directly upon*** a Flexible Membrane Liner (FML) supported by a soil sub-base foundation that is protected by a 6-inch layer of pea gravel. The concrete wall for the Tank's secondary containment structure (SC Structure) has no significant (only hairline) cracks and/or spalling throughout its extent. **See Photos 6 and 11 (Appendix B)**.

c = **Issues identified.** No surface water drainage issues were observed and no cathodic protection systems were identified. A tank-grounding system is in place, where all tank-to-wire connections should be cleaned and tested. The attachments, appurtenances and piping / valve connections for all tanks are in good condition, with no leaking observed. Both tank manways lack adequate, leak-free seals, but have tight, slightly painted fastening bolts, which should be replaced with unpainted stainless-steel bolts. **See Photos 10, 32, 5 and 12**.

d = **No issues identified.** Observed no leaks, dents (due to *ballooning / buckling*) or cracks in welds or the surfaces within the tank shell or ends. **See Photos 1-5 and 20**.

e = **No issues identified.** The paint coating is in good condition, with no significant occurrences of rust (corrosion) and/or peeled paint. **See Photos 1-5**.

f = **No issues identified.** No tank-bottom water was detected inside the two *fuel-storage compartments*. The absence of tank-bottom water eliminates concerns regarding MIC. **See Photos 42 and 43.** Water was encountered within the *interstitial space* for the *intact*, two-sided Baffle that separates the two tank compartments (**see Photo 44**). The Baffle is deemed intact, due to the lack of fuel intrusion from either of the adjoining compartments. This is discussed further in **Section 7.0**.

g = **No issues identified.** The Pressure / Vacuum (Normal) Vent for the E-end compartment and the Updraft Vent for the W-end compartment are adequately sized and functional, as the 2-inch

diameter risers equal or exceed the inlet (N/A fill port) and 2-inch diameter outlet piping, in accordance with Section 8.2 of UL 142 (2). **See Photos 5, 13-16 and 19**.
Both compartments have excessively-sized and functioning Emergency Vents rated at 462,000 CFH, where the required capacity is 276,960 CFH for each compartment (3). **See Photo 17**.

h = **Issues identified.** Both compartments lack functional liquid-level (Clock) gauges and Overfill Alarms. No Overfill (prevention) Valves exist for either compartment. **See Photos 28 and 29**.

i = **No issues identified.** All tank-based electrical systems and wiring were found to be intrinsically safe. **See Photo 30**.

j = **No issues identified.** All shell and end thickness measurements satisfy Section 10.3.4 of SP001, regarding *Suitability for Continued Service* (1). See the UTT Datasheet (**Appendix C**) and the Material Thicknesses Summary (**Appendix D**).

5.0 SUITABILITY FOR CONTINUED SERVICE

A tank is deemed *"Suitable for Continued Service"* when it satisfies the following criteria.

5.1 Suitability Criteria

Item 2 criterion – SP001 Section 10.3.6.2
No *"other tank damage"* (ie, excessive settlement) to the tank shells / ends exists.

Item 8 criterion – SP001 Section 10.2 and 10.3.6.2
No *"other tank damage"* (ie, buckling / ballooning distortions or dents, cracks, leaks or exposure to fire, floods and/or high winds) to the tank shells / ends / appurtenances exists.

Item 10 criterion – SP001 Section 10.3.1.1
No evidence of MIC is observed within tank interior.

Item 11 criterion – SP001 Section 10.2
Adequate ***emergency*** relief venting exists for the tank.

Item 14 criterion – SP001 Section 10.2
Electrical systems are not an imminent ignition source to stored fuel.

Item 15 criterion – SP001 Sections 10.3.4 - 10.3.5
Tank structural integrity is good, as determined by *insignificant* corrosion and *minimum* shell and end thicknesses that significantly *exceed* 50 percent of nominal (T_{max}) material thicknesses.

5.2 Suitability Findings

✓ **Item 2 findings**
There is no excessive or minor settlement beneath the Tank.

✓ **Item 8 findings**
No *significant* damage to the tank shell / ends / appurtenances exists, as revealed by the 1) lack of buckling / ballooning / dents in the *shell* or *ends*), 2) no signs of past fire exposure or being lifted by floods and/or high winds and/or 3) cracks or leaks from appurtenances or from the tank shell or ends.

✓ **Item 10 findings**
Both fuel storage compartments lack bottom water, thereby precluding concerns about MIC.

✓ **Item 11 findings**
Emergency vents meet or exceed requirements and appear to be functional.

✓ **Item 14 findings**
All electrical tank-based systems are safely encased within intrinsically safe, rust-resistant metal conduit.

✓ **Item 15 findings**

The structural integrity of both compartments is good, as determined by measured shell / end thicknesses that *exceed* 50 percent of T_{max} (T½) values. Predicted 20-year (T_{20}) shell and end material thicknesses for the Tank exceed T½ by 37 to 74 percent.

ITEM 2	ITEM 8	ITEM 10	ITEM 11	ITEM 14	ITEM 15
✓	✓	✓	✓	✓	✓

✓ = Meets certification criterion NW = Needs work

6.0 IDENTIFIED SP001 CERTIFICATION DEFICIENCIES

None observed during the SP001 tank inspections.

[Remainder of page omitted: recommended maintenance and items outside SP001 certification.]

9.0 Recommended Best Management Practices

When made part of the Facility's operational routine, best management practices (BMPs) can reduce maintenance costs and provide a safer work environment. The following BMPs are recommended:

1. Implement the above Recommended Maintenance measures.
2. Perform the *informal* (by Facility staff) monthly / annual tank inspections specified in your SPCC Plan, to identity and resolve incipient Tank integrity and maintenance issues.
4. Install Tank supports having a minimum height of 12 inches, as per UL 142 requirements (2).
5. Periodically inspect the existing Class B fire extinguisher for proper recharge and function.
6. Ensure that tank placards / labels are kept in good condition (see **Appendix E** for guidance):
   - Diamond-shaped multi-colored **HAZMAT** placards.
   - Diamond-shaped, red-colored **FLAMMABLE / COMBUSTIBLE** placards.
   - Red-colored **NO SMOKING** signs are prominently displayed at fuel transfer locations.
7. Keep the Spill Kit adequately supplied (see www.newpig.com).

10.0 Conclusions

Notwithstanding the above Recommended Maintenance, the possible Fire Code Deficiency and the BMPs, the Tank is ***Suitable for Continued Service***, due to adequate (as per UL 142) construction and emergency venting, insignificant tank material loss, an absence of foundation settlement and no tank-bottom water or associated MIC issues.

11.0 References

1. Steel Tank Institute SP001 *Standard for the Inspection of Aboveground Storage Tanks*, February 2024.
2. UL 142 (2010, 9th Edition) Underwriters Laboratories Inc. *Standard for Safety, Steel Aboveground Tanks for Flammable and Combustible Liquids*, December 2006 (with revisions through 2/12/2010).
3. Morrison Brothers Company *Venting Guide for Aboveground Storage Tanks*, December 2016.
4. NFPA 30 *Flammable and Combustible Liquids Code*, 2012 Edition.

12.0 Certification

I personally performed this SP001 inspection (and the Annual Inspection in **Appendix A2**) for the Tank discussed in this Report, utilizing methods and procedures consistent with good commercial or customary practices designed to conform to acceptable industry standards. All findings are true and accurate.

Provided that 1) the owner attestations in **Section 13.0** are satisfied, 2) the Tank maintains its Category 1 status, 3) it does not incur significant neglect, damage or chronic water retention and 4) it undergoes proper periodic inspections (as per the SPCC Plan), the next required formal SP001 inspection may occur on/by the following date:

JULY 2045



Brett D. Smith, PE
SP001 Cert # AST R11171 (expires June 2026)

August 26, 2025
Date

Oregon Department of Aviation – Joseph State Airport Tenant Meeting

Date/Time: October 7th, 2026 – 10am

Meeting Summary

1. Recent Changes
    a. 100LL at JSY
        i. The primary concern and topic of discussion was the recent ending of 100LL fuel sales at the Joseph State Airport (JSY).
        ii. This change was noticed to tenants and airport users on 7/15/2026, and was a result of multiple factors including a significant operating budget deficit for the Department, new costly permit requirements related to fuel storage and dispensing, ongoing fuel maintenance and repairs, as well as high fuel prices and slow fuel sales at JSY.
        iii. Fuel ran out and was NOTAMed out of service on 8/31/2026
        iv. Tenants and airport users voiced extensive concerns about the loss of fuel at Joseph, and expressed the need for fuel to return. Each of the factors contributing to the loss of fuel were discussed at length.
        v. ODAV continues to pursue opportunities to restore and/or improve fuel sales at JSY as soon as possible, including:
            1. Meeting with potential FBOs to privatize fuel sales
            2. Using FAA funds to replace and improve fuel storage by adding capacity for 100LL and potentially adding Jet A
            3. Using SOAR funds when available to replace the existing 100LL tank
            4. Resuming 100LL sales with the existing tank when the budget deficit and other factors are resolved
        vi. While addressing the budget deficit is ODAV's most urgent concern, replacing the fuel tank will resolve ongoing maintenance and repair issues as well as fuel quality concerns. It will also add economies of scale to keep fuel prices low to better sustain the operation.
    b. Temp Position
        i. Without fuel, there is no longer need for the ground's worker position year-round at the airport. The position was ended on 9/30 and will resume seasonally throughout the winter to plow and report surface conditions as it has done previously.
        ii. ODAV staff, though already spread thin, will add Joseph to the maintenance rotation throughout the rest of the year.

c. Other Impacts

i. The Department's budget deficit is affecting all state airports and other department programs, including the pilot lounge building at the Mulino State Airport, herbicide and other maintenance supplies for all state airports, pavement maintenance is being cut for all public-use airports, vacant positions are being left unfilled, and ASAP funds are being redirected to cover department operating and maintenance costs. There was significant discussion at the State Aviation Board on potentially redirecting SOAR funds for a project at the Pacific City State Airport.

ii. Staffing challenges have impacted new programs such as the volunteer program, and other levels of service across the 28 state airports. Volunteer service continues to be a concern/interest for users of state airports, especially JSY. Volunteering was discussed and is summarized in more detail in item 7.

2. Federal Funding and Changes to Eligibility

a. Funding shortfalls – BIL ending

i. ODAV used federal Bipartisan Infrastructure Law (BIL) funds for the 2026 pavement maintenance project on all surfaces at JSY. There is no replacement for BIL, and we will rely more on entitlements and competitive discretionary and state apportionment funding from the FAA for future projects and maintenance. General Aviation Entitlements have not adjusted for inflation in 26 years, and the scale of projects that can be completed are significantly less as a result.

b. Staffing Challenges/Delays

i. FAA staffing has taken a significant hit in recent years, the FAA has several positions unfilled, and most existing staff are handling multiple positions/duties. Oregon does not have a dedicated Environmental Processing Specialist, and we are seeing delays with environmental processing for hangar developments and projects.

c. Eligibility

i. Fuel Tanks (FAA funds new only)

1. ODAV met with the FAA on 10/6/2026 at JSY and discussed using FAA funds to replace the fuel system at the airport. ODAV is waiting on a response from the FAA.

ii. SRE ("Broom" MTE)

1. ODAV has been working through an eligibility issue using FAA funds to acquire multi-function equipment for snow removal. ODAV has continued with using state funds (SOAR) to acquire a new tractor and plow to continue plowing until new multi-function equipment can be acquired.

3. State Funding

a. Operating Deficit

i. The Department's operating revenues primarily come from a tax on aviation fuels, most of which is generated from less than $0.01 on Jet A. A revenue work group made up of legislators, industry stakeholders, and airports was established to address the Department's revenue stagnation and budget deficit issue. ODAV continues to pursue ways to address the deficit and not only maintain levels of service, but improve them as well.

b. State-Owned Airport Reserve (SOAR)

i. There was a significant ask for SOAR funding for projects and maintenance this year. Those funds were approved, but funding is not sufficient for a long list of deferred maintenance and projects. The Department will continue to monitor needs for all 28 state airports and prioritize requests in a future cycle. Restoring fuel at JSY remains a top priority for these funds when available.
ii. SOAR funds were approved for a new tractor mower and plow attachment to keep the airport operational and maintained year-round.

4. Other Funding?

a. Doublewide replacement?

i. There is no change with this topic, ODAV does not have funding to replace the doublewide/pilot lounge building. ODAV continues to pursue other funding, and encourages the local community to pursue funding/replacement options as well. In the 2021 master plan, a new pilot lounge building is proposed in a different location that would allow for 3 new hangars to be constructed when the current building is removed.

5. Project Updates

a. Instrument Approach Procedures – Obstruction Removal

   i. Work on the obstruction removal project continues. This will allow for night operations to the current instrument approach procedures at JSY.

b. Snow Removal Equipment / Building / Tractor

   i. ODAV does not have funds or plans to construct a Snow Removal Equipment building. However, ODAV is working on acquiring new equipment for snow removal with the recently approved SOAR funds. This equipment should be ready for service for the 27-28 winter season.

c. Pavement Maintenance / Apron Expansion

   i. ODAV recently completed pavement maintenance with the 2026 surface seal project using BIL funds. An apron rehab and expansion project from the 2021 master plan is in the Capital Improvement Plan (CIP) to begin environmental review and design within the next 5 years. This project will facilitate additional hangar construction around the main apron as shown in the master plan.

6. Maintenance Issues / Updates

   a. AWOS

      i. The AWOS is being replaced at the time of this meeting. The contractor is finishing installation of the equipment and working through data connection, shortly after which the new system will be commissioned. The new AWOS completely replaces the 2010 equipment which was no longer supported by the manufacturer and no longer had replacement parts available.

7. Volunteer Opportunities

   a. ODAV appreciates those who currently volunteer at state airports, and the level of interest, enthusiasm, and engagement from local pilots, tenants, members of local communities and groups that seek to help maintain and improve state airports. Due to previously discussed budget and staffing issues, ODAV not only appreciates volunteers, but will increasingly rely on them to help maintain the 28 state airports.
   b. ODAV continues to prioritize the statewide volunteer program that will help enable broader volunteer service at all 28 state airports once a vacant airport position is filled.

c. In the meantime, maintenance can be done by volunteers with permission and coordination from ODAV staff. Safety of the volunteers and flying public is the primary objective for ODAV. Other factors such as FAA approval authority and meeting ODAV's federal obligations are also considerations with volunteerism and improving state airports.
d. Those interested in volunteering were encouraged to reach out to the State Airports Manager to coordinate training and maintenance activities.

8. Other Airport Issues and Opportunities?

    a. A question was asked about when the PAPI/REILs will be repaired.

        i. The PAPIs were replaced and commission in early 2024. They were inspected and operational during this visit. The REILs are quite a bit older, ODAV will look into repairs/replacement for this aging equipment.

    b. It was asked if placing a roof over the fuel tank would resolve the permit requirement for the fueling operation.

        i. This was asked of DEQ and the short answer was no it is still out-door fuel storage and the permit requirements still apply.

    c. There were prior attempts by tenants to place obstruction balls on the power lines near the south end of the runway, but nothing came of it.

        i. ODAV has not participated in those discussions in recent years, but is happy to reach out and pursue that with the utility companies.

    d. Can Critical Oregon Airport Relief (COAR) funds be used for state airports?

        i. When the Aviation System Action Program (ASAP) was established in 2015, there were different funds set aside for different purposes. These are explained on the department's website at (https://www.oregon.gov/aviation/airports/planning-and-programs/Pages/Airport-Grants.aspx).
        ii. SOAR is a set aside of funds specifically for state airports. State airports have not received COAR funds. COAR funds are ineligible for projects or programs that are funded with other Department funds.

9. Open Discussion / Feedback

    a. General consensus was continuing with meetings like this one annually. The State Airports Manager expressed interest to visit the airport more than once per year, but would keep an annual tenant meeting at a minimum. Of course

tenants and airport users are encouraged to reach out to ODAV anytime with concerns and questions.

b. ODAV appreciates everyone's input and time in participating in this meeting.

17. Construction Inspection and Approval.

It will provide and maintain competent technical supervision at the construction site throughout the project to assure that the work conforms to the plans, specifications, and schedules approved by the Secretary for the project. It shall subject the construction work on any project contained in an approved project application to inspection and approval by the Secretary and such work shall be in accordance with regulations and procedures prescribed by the Secretary. Such regulations and procedures shall require such cost and progress reporting by the sponsor or sponsors of such project as the Secretary shall deem necessary.

18. Planning Projects.

In carrying out planning projects:

a. It will execute the project in accordance with the approved program narrative contained in the project application or with the modifications similarly approved.

b. It will furnish the Secretary with such periodic reports as required pertaining to the planning project and planning work activities.

c. It will include in all published material prepared in connection with the planning project a notice that the material was prepared under a grant provided by the United States.

d. It will make such material available for examination by the public and agrees that no material prepared with funds under this project shall be subject to copyright in the United States or any other country.

e. It will give the Secretary unrestricted authority to publish, disclose, distribute, and otherwise use any of the material prepared in connection with this grant.

f. It will grant the Secretary the right to disapprove the sponsor's employment of specific consultants and their subcontractors to do all or any part of this project as well as the right to disapprove the proposed scope and cost of professional services.

g. It will grant the Secretary the right to disapprove the use of the sponsor's employees to do all or any part of the project.

h. It understands and agrees that the Secretary's approval of this project grant or the Secretary's approval of any planning material developed as part of this grant does not constitute or imply any assurance or commitment on the part of the Secretary to approve any pending or future application for a Federal airport grant.

19. Operation and Maintenance.

a. The airport and all facilities which are necessary to serve the aeronautical users of the airport, other than facilities owned or controlled by the United States, shall be operated at all times in a safe and serviceable condition and in accordance with the minimum standards as may be required or prescribed by applicable Federal, state, and local agencies for maintenance and operation. It will not cause or permit any activity or action thereon which would interfere with its use for airport purposes. It will suitably operate and maintain the airport and all facilities thereon or connected therewith, with due regard to climatic and flood conditions. Any proposal to temporarily close the airport for non-aeronautical purposes must first be approved by the Secretary. In furtherance of this assurance, the sponsor will have in effect arrangements for:

1. Operating the airport's aeronautical facilities whenever required;
2. Promptly marking and lighting hazards resulting from airport conditions, including temporary conditions; and
3. Promptly notifying pilots of any condition affecting aeronautical use of the airport. Nothing contained herein shall be construed to require that the airport be operated for aeronautical use during temporary periods when snow, flood, or other climatic conditions interfere with such operation and maintenance. Further, nothing herein shall be construed as requiring the maintenance, repair, restoration, or replacement of any structure or facility which is substantially damaged or destroyed due to an act of God or other condition or circumstance beyond the control of the sponsor.

b. It will suitably operate and maintain noise compatibility program items that it owns or controls upon which Federal funds have been expended.

20. Hazard Removal and Mitigation.

It will take appropriate action to assure that such terminal airspace as is required to protect instrument and visual operations to the airport (including established minimum flight altitudes) will be adequately cleared and protected by removing, lowering, relocating, marking, or lighting or otherwise mitigating existing airport hazards and by preventing the establishment or creation of future airport hazards.

21. Compatible Land Use.

It will take appropriate action, to the extent reasonable, including the adoption of zoning laws, to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with normal airport operations, including landing and takeoff of aircraft. In addition, if the project is for noise compatibility program implementation, it will not cause or permit any change in land use, within its jurisdiction, that will reduce its compatibility, with respect to the airport, of the noise compatibility program measures upon which Federal funds have been expended.

22. Economic Nondiscrimination.

a. It will make the airport available as an airport for public use on reasonable terms and without unjust discrimination to all types, kinds and classes of aeronautical activities, including commercial aeronautical activities offering services to the public at the airport.

b. In any agreement, contract, lease, or other arrangement under which a right or privilege at the airport is granted to any person, firm, or corporation to conduct or to engage in any aeronautical activity for furnishing services to the public at the airport, the sponsor will insert and enforce provisions requiring the contractor to:

1. Furnish said services on a reasonable, and not unjustly discriminatory, basis to all users thereof, and
2. Charge reasonable, and not unjustly discriminatory, prices for each unit or service, provided that the contractor may be allowed to make reasonable and nondiscriminatory discounts, rebates, or other similar types of price reductions to volume purchasers.

28. Land for Federal Facilities.

It will furnish without cost to the Federal Government for use in connection with any air traffic control or air navigation activities, or weather-reporting and communication activities related to air traffic control, any areas of land or water, or estate therein as the Secretary considers necessary or desirable for construction, operation, and maintenance at Federal expense of space or facilities for such purposes. Such areas or any portion thereof will be made available as provided herein within four months after receipt of a written request from the Secretary.

29. Airport Layout Plan.

a. The airport owner or operator will maintain a current airport layout plan of the airport showing:

1. boundaries of the airport and all proposed additions thereto, together with the boundaries of all offsite areas owned or controlled by the sponsor for airport purposes and proposed additions thereto;

2. the location and nature of all existing and proposed airport facilities and structures (such as runways, taxiways, aprons, terminal buildings, hangars and roads), including all proposed extensions and reductions of existing airport facilities;

3. the location of all existing and proposed non-aviation areas and of all existing improvements thereon; and

4. all proposed and existing access points used to taxi aircraft across the airport's property boundary.

b. Subject to subsection 49 U.S.C. 47107(x), the Secretary will review and approve or disapprove the plan and any revision or modification of the plan before the plan, revision, or modification takes effect.

c. The owner or operator will not make or allow any alteration in the airport or any of its facilities unless the alteration—

1. is outside the scope of the Secretary's review and approval authority as set forth in subsection (x); or

2. complies with the portions of the plan approved by the Secretary.

d. When the airport owner or operator makes a change or alteration in the airport or the facilities which the Secretary determines adversely affects the safety, utility, or efficiency of any federally owned, leased, or funded property on or off the airport and which is not in conformity with the airport layout plan as approved by the Secretary, the owner or operator will, if requested, by the Secretary:

1. eliminate such adverse effect in a manner approved by the Secretary; or

2. bear all costs of relocating such property or its replacement to a site acceptable to the Secretary and of restoring the property or its replacement to the level of safety, utility, efficiency, and cost of operation that existed before the alteration was made, except in the case of a relocation or replacement of an existing airport facility due to a change in the Secretary's design standards beyond the control of the airport sponsor.

enforcement under 18 U.S.C. § 1001 and/or the Program Fraud Civil Remedies Act of 1986 (31 U.S.C. §§ 3801-3809, 3812).

38. Hangar Construction.

If the airport owner or operator and a person who owns an aircraft agree that a hangar is to be constructed at the airport for the aircraft at the aircraft owner's expense, the airport owner or operator will grant to the aircraft owner for the hangar a long term lease that is subject to such terms and conditions on the hangar as the airport owner or operator may impose.

39. Competitive Access.

a. If the airport owner or operator of a medium or large hub airport (as defined in 49 U.S.C. § 47102) has been unable to accommodate one or more requests by an air carrier for access to gates or other facilities at that airport in order to allow the air carrier to provide service to the airport or to expand service at the airport, the airport owner or operator shall transmit a report to the Secretary that:

   1. Describes the requests;
   2. Provides an explanation as to why the requests could not be accommodated; and
   3. Provides a time frame within which, if any, the airport will be able to accommodate the requests.

b. Such report shall be due on either February 1 or August 1 of each year if the airport has been unable to accommodate the request(s) in the six-month period prior to the applicable due date.

40. **Access to Leaded Aviation Gasoline**

a. If 100-octane low lead aviation gasoline (100LL) was made available at an airport, at any time during calendar year 2022, an airport owner or operator may not restrict or prohibit the sale of, or self-fueling with 100-octane low lead aviation gasoline.

b. This requirement remains until the earlier of December 31, 2030, or the date on which the airport or any retail fuel seller at the airport makes available an unleaded aviation gasoline that has been authorized for use by the FAA as a replacement for 100-octane low lead aviation gasoline for use in nearly all piston-engine aircraft and engine models; and meets either an industry consensus standard or other standard that facilitates the safe use, production, and distribution of such unleaded aviation gasoline, as determined appropriate by the FAA.

c. An airport owner or operator understands and agrees, that any violation of this grant assurance is subject to civil penalties as provided for in 49 U.S.C. § 46301(a)(8).

Federal Aviation Administration

Questions/Answers on Grant Assurance 40, *Access to Leaded Aviation Gasoline*

1. Can a federally obligated airport prohibit the sale/self-fueling of 100-octane low lead (100LL)?

If 100LL was made available at an airport, any time during 2022, an airport owner or operator may not restrict or prohibit the sale of, or self-fueling with, 100LL.

An airport sponsor may not take action (or fail to take action) that would directly or indirectly prohibit or restrict access by airport users to 100LL. This includes but is not limited to adopting or changing municipal codes, airport rules and regulations, minimum standards, leasing policies, permits, licenses, and airport planning actions. An airport sponsor's actions shall not result in unreasonable or unjustly discriminatory requirements (including fees) that have the effect of restricting a service provider or an operator from acquiring, storing, transporting, dispensing, or selling 100LL, as the case may be (commercially or self-service).

2. What about banning 100LL at an airport that discontinued prior to 2022?

Prohibition of an FAA authorized fuel at a federally obligated airport may place the sponsor in violation of Grant Assurance 22, Economic Nondiscrimination, or 23, Exclusive Rights.

Long-held FAA policy and precedent is that airport sponsors are not required to offer any particular or specific aeronautical service, including fueling. However, that discretion does not extend to airport sponsors banning the use or sale of FAA authorized fuels. Likewise, a sponsor must also reasonably consider a proposal by an existing or potential aeronautical user seeking to provide services at the airport.

3. What airports does Section 770 and Grant Assurance 40 apply?

Section 770 creates a statutory grant assurance that applies to all airport sponsors that accept federal airport development grant funding as of the date the updated grant assurances are published in the Federal Register and/or as included as a condition in a grant agreement already entered into by the sponsor with the FAA.

4. Do any of the high-octane unleaded fuels meet the criteria in Section 770?

No. As of December 2025, there is no fuel that meets the criteria of 47107(22)(B)(i) and (ii). For example, a fuel would have to be authorized for nearly all aircraft, and no fuel has been authorized for the rotorcraft fleet. The FAA will provide additional information when the criteria is met.

5. How will the FAA enforce the Grant Assurance?

Education is the primary tool for achieving sponsor compliance with all grant assurances. In order to maintain Airport Compliance Program integrity, FAA personnel may participate in limited oversight to detect recurring deficiencies, system weaknesses, or prohibited actions by sponsors. After education, investigation, and resolution of complaints are the most prominent compliance program tools. For Grant Assurance 40, specifically, Congress included a civil penalty option to be considered during any alleged violation investigation.

Oregon Department of Aviation – Joseph State Airport Tenant Meeting

Date/Time: May 16th, 2025 - 4pm

Meeting Summary

1. Federal Funding and Changes to Eligibility

    a. The FAA is 2+ months behind on getting airport grants out nationwide.
    b. Some new changes to the grant application/template may conflict with state law/affect our ability to fund projects on schedule.
    c. $2 Million in FAA funding that was previously planned for a project at a state airport was no longer available for the project. To keep that important runway project funded, other projects will be delayed.
    d. The FAA has had a high amount of recent staffing losses, affecting workload and turnaround time for remaining staff. Environmental reviews/follow up are especially impacted.
    e. Eligibility
        i. Fuel Tanks – The FAA will only fund new fuel tanks. Their Airport Improvement Program (AIP) Handbook states that once a fuel tank is installed, profit from fuel sales should sustain maintenance and replacements. For an airport that operates at a net loss, yet relies on fuel for the critical access that the Joseph State Airport provides, we believe replacement tanks should be eligible. We have been working with the National Association of State Aviation Organizations (NASAO) on efforts to make this change.
            1. Andrew Kilgore offered to sell his 2-year old 15K gallon fuel tank. Depending on availability of funds for the tank and site prep, ODAV would consider the acquisition.
        ii. Snow Removal Equipment (SRE) – This has been a challenge as ODAV has been working to acquire SRE for Joseph for years. Most airport equipment is oversized for JSY. Right sized equipment can range from $200,000 to $1M. However, with limited space for buildings/storage, ODAV has pursued equipment that can perform multiple tasks. According to the FAA, “Multi-Task Equipment” are only eligible for commercial service airports. We believe this is an unintended and burdensome restriction for an airport like JSY. We are working with NASAO to change this as well.

2. State Funding

    a. Revenues have stabilized and mostly recovered from COVID impacts. However, there is a backlog of deferred maintenance and equipment/other needs that we do not have sufficient funding for.
    b. ODAV is working to increase the aviation fuel tax that comprises the majority of the department's revenues. In this legislative session we have a bill to raise the Jet A fuel tax by $0.03/gallon. $0.01/gallon would go to the department's operating expenses which have not seen an increase since 1955. $0.02/gallon would go to the Aviation System Action Program (ASAP) which funds grants for public-use airports (including state airports like Joseph) in Oregon.
    c. Aircraft registration revenue goes toward ODAV's match for federal grants, such as the obstruction removal project and other projects which are usually funded 90% by the FAA, and 10% by the state.
    d. SOAR – This is the portion of ASAP that funds state airports. ODAV has been working through a backlog of priority projects such as repaving the runway at Cape Blanco and Prospect. There is currently approximately $750K in approved but unfunded projects, including the $100,000 for equipment for JSY. We will be working through that backlog before making new non-priority requests.
    e. Industrial Property Acquisition – The County has approached ODAV with their legislative effort to acquire the industrial use property east of the airport. They indicated the portion of the property identified as "hangar development reserve" would be deeded to ODAV for development.

3. Other Funding?

    a. Doublewide replacement?

        i. Funding a replacement for the doublewide has been a topic for years. The building is in poor condition and ODAV does not have funding for a replacement. Attendees were encouraged to seek other funding, as ODAV will continue to do. Attendees were asked whether keeping the building in use is preferred over making way for additional hangar development as shown in the master plan. Attendees asked if an external restroom and potentially a meeting space could be included in a private hangar development. This could be a solution, if the developer is willing.

    b. Other improvements?

        i. Given the current funding situation, other funding will be critical for non-essential airport improvements.

4. Project Updates
    a. Instrument Approach Procedures – Obstruction Removal
        i. This work is ongoing and will take time. The environmental component was recently completed. Now, ODAV and our contract project engineers are working on appraisals and easement acquisition, which may take another year or two to complete. Once easements are acquired, then we can remove the obstructions which will provide night minimums for the circling approach.
    b. Snow Removal Equipment / Building / Tractor
        i. In addition to the "MTE" issue mentioned previously, the FAA requires storage for SRE before the equipment may be acquired. The SRE Building shown on the master plan can happen when funding is available, will be easier when the south apron expansion project is completed. The new tractor will be acquired when funding is available.
    c. Pavement Maintenance / Apron Expansion
        i. These projects are on the Capital Improvement Plan (CIP) for Joseph, which is included in the meeting agenda handout. Project delays and funding issues notwithstanding, we are planning to complete a runway and taxiway surface seal project by 2026, and design the apron expansion project by 2030.
5. Maintenance Issues / Updates
    a. Fuel Tank and Equipment
        i. ODAV is contracting to have an independent inspection of the fuel tank. This work should be completed in the coming weeks, results will be shared with the group. Otherwise, we will continue to inspect and maintain the fuel system to the same standard as other airports. We are planning for a delivery to top off the tanks prior to the fly-in in July.
    b. AWOS
        i. The AWOS is now 15 years old, which is the FAA's minimum useful life for weather reporting equipment. Now that it has reached that threshold, we may replace it with FAA funds, which is what we are working on doing. We should have a replacement in 2026. The current model was

discontinued in 2016, and some censors/parts are no longer available, necessitating the replacement.

c. Pavement and Markings

   i. In addition to the pavement work shown on the CIP, JSY will have routine crack seal as part of our Pavement Maintenance Program. Additionally, ODAV has new equipment for airfield markings, and we are planning to refresh all of the airfield markings prior to the fly-in in July. This is a new level of service is made possible with equipment purchased with SOAR funds, and we will keep all of our markings fresh on a routine (4-year) basis.

6. Volunteer Opportunities

   a. Establishing a more robust volunteer program is still a priority for ODAV, but has been delayed due to staffing limitations. We will be recruiting for an open position very soon, and this is one of the main priorities for that position. Our current volunteer program, Airport Information Reporting for Oregon (AIRO), is primarily focused on reporting conditions to ODAV, rather than maintenance or working on improvements. The new program will incorporate guidelines to enable communities to help maintain and improve their local state-airport.

7. Other Airport Issues and Opportunities?

   a. Can you explain what's going on with Through-The-Fence (TTF)?
      i. ODAV has TTF agreements at several airports, and continue to receive new requests for TTF access. However, there is no framework, policy, or rule establishing how ODAV should provide for TTF, except for 1 rule banning TTF at airports not currently providing TTF until there is no more land for hangars on state property. Right now ODAV is pausing new TTF until a framework/process for reviewing and approving TTF is created. This process may take a year or more.
   b. The hose rack is a pain, can we get a hose reel?
      i. This has been discussed before, there are a few issues other than funding. The current hose is too long. Reels still require rewinding after each use, and if not done carefully, it will bind and get stuck. If people aren't using the rack, how do we know they'll use the reel? Attendees expressed desire for a hose reel with a shorter hose.
   c. The fuel ladder is breaking/splintering, can we get a replacement?
      i. Yes we will get a new ladder.
   d. We need a better system for parking/removing vehicles

i. This was discussed in 2023. A parking permit system was proposed, but had mixed responses and was not pursued further. Attendees suggested modeling after the Enterprise airport's parking verbiage, and setting short and long-term parking options. Signage is easy to print, but it may require some rulemaking to provide for any enforcement capabilities.

e. Can the apron gate be power operated?
   i. The sliding gate on the south apron was installed with powered operation in mind. Depending on funding, this can be accomplished.

f. When will the tie downs be put out?
   i. Now that we are out of winter conditions, tie down ropes will be put out.

g. Can we do something about the rocks in the infields?
   i. This would be a great project for volunteers. ODAV does not have funding to grade/smooth infields with equipment, though this could be included in a future project at a later date.

h. Deer continue to be present on the airfield
   i. Unfortunately this is common, and Wup is hazing them off the airfield continuously. A "wildlife deterring" fence is 10+ feet tall with 4 feet of buried fabric and are very costly to install. Even then, deer may still find their way inside the fence, especially when gates are left open.

8. Open Discussion / Feedback

a. Instrument Approach Procedures (IAP) are for runway 15 only? Or 33 as well?
   i. The current IAP is for 15 only, removing obstructions on the north end will provide night minimums for 15.

b. What happened to 30-year lease terms?
   i. ODAV still provides 30-year lease terms for new construction. When a hangar sells or an existing lease expires, ODAV is granting 5 to 15 years for renewal leases depending on the condition of the improvement/premises, and any recent or planned renovations.

c. Can you put improvements in your lease setbacks?
   i. The allowed improvements and uses are stated in your land lease. Setbacks are a spacing/separation requirement, so no improvements are allowed in your setbacks. If you would like to make improvements or include new items in your lease premises, we can evaluate and include the new premises if/when possible.

d. What do the Friends of Pacific City State Airport (PFC) have an agreement for?
   i. The Friends of PFC and ODAV have a Memorandum of Understanding (MOU) to establish mutual understandings of responsibilities and

commitments for PFC. The document addresses communication, meetings, legislative direction/protection of the airport, and routine maintenance tasks and list of volunteers. ODAV will share the MOU with the group.

4S3 (Joseph State Airport)

Fiscal Year	Project	Beginning of Year BIL Balance	BIL Amount for Fiscal Year	Estimated Total Project Cost	Total Sponsor Match Funds Needed	Total FAA Grant Funds Needed	Grant Funds Remaining
2022	Carryover	$ -	$ 159,000	$ -	$ -	$ -	$ 159,000.00
2023	Carryover	$ 159,000	$ 113,000	$ -	$ -	$ -	$ 272,000.00
2024	Carryover	$ 272,000	$ 113,000	$ -	$ -	$ -	$ 385,000.00
2025	Runway and Taxiway Surface Seal - Phase I - Design	$ 385,000	$ 113,000	$ 80,000.00	$ 4,000.00	$ 76,000.00	$ 322,000.00
2026	Runway and Taxiway Surface Seal - Phase II - Construction	$ 322,000	$ 113,000	$ 563,157.89	$ 28,157.89	$ 535,000.00	$ -
2027		$ -					

4S3 (Joseph State Airport)

Fiscal Year	Project	Beginning of Year NPE Balance	NPE Amount for Fiscal Year	Estimated Total Project Cost	Total Sponsor Match Funds Needed	Total FAA Grant Funds Needed	Grant Funds Remaining
2024	Carryover	$ 450,000	$ 150,000	$ -	$ -	$ -	$ 450,000.31
2025	AWOS Replacement	$ 450,000	$ 150,000	$ 350,000.00	$ 17,500.00	$ 332,500.00	$ 267,500.31
2026	IAP Obstruction Removal - Phase I Easement Acquisition and Design	$ 267,500	$ 150,000	$ 260,000.00	$ 13,000.00	$ 247,000.00	$ 170,500.31
2027	IAP Obstruction Removal - Phase II - Construction	$ 170,500	$ 150,000	$ 150,000.00	$ 15,000.00	$ 135,000.00	$ 185,500.31
2028	South Apron Rehabilitation and Expansion - Environmental Assessment	$ 185,500	$ 150,000	$ 260,000.00	$ 26,000.00	$ 234,000.00	$ 101,500.31
2029	Carryover	$ 101,500	$ 150,000	$ -	$ -	$ -	$ 251,500.31
2030	South Apron Rehabilitation and Expansion - Phase I - Design	$ 251,500	$ 150,000	$ 255,000.00	$ 25,500.00	$ 229,500.00	$ 172,000.31

OREGON DEPARTMENT OF AVIATION
3040 25TH STREET SE
SALEM, OR 97302
(503)378-4880
WWW.OREGON.GOV/AVIATION

AIRPORT INFORMATION REPORTING FOR OREGON (AIRO)

PROGRAM OVERVIEW

Oregon Department of Aviation (ODA) offers volunteers an opportunity to contribute their aviation expertise to assist with reporting on the safety, security and maintenance conditions at a state sponsored airport.

A new approach in supporting Oregon's State Airports

Given budgetary challenges and government spending restrictions, This program forms public/private partnerships to ensure we enhance safety and improve the physical conditions at public-use airports listed in this document.

MISSION STATEMENT

To promote operational excellence at Oregon's airports through active participation inpublic/private partnerships. We will work together to support Oregon Department of Aviation's mission by embracing the values of ethical conduct and fiscal responsibility witha "safety first" approach.

AIRPORTS

Alkali Lake State Airport
Cascade Locks State Airport
Crescent Lake State Airport
McDermitt State Airport
Oakridge State Airport
Prospect State Airpor
Toketee State Airport
Aurora State Airport
Chiloquin State Airport
Independence State Airport
McKenzie Bridge State Airpor
Owyhee Res. State Airport
Rome State AirporT
Toledo State Airport
Bandon State Airport
Condon State Airport
Joseph State Airport
Mulino State Airport
Pacific City State Airport
Santiam Junction State Airport
Wakonda Beach State Airport
Cape Blanco State Airport
Cottage Grove State Airport
Lebanon State Airport
Nehalem Bay State Airport
Pinehurst State Airport
Siletz Bay State AirporT
Wasco State Airport

REQUIREMENTS

In order to participate in the AIRO program we have a few requirements you must meet:

- Age 21 or older.
- Able to make 1, 2 or 3 year commitment
- Able to attend 1 of 2 scheduled safety/training events a year. (Spring/Fall)
- Willing to travel around Oregon (at own expense) for training and/or inspections at assigned airport(s).
- If, in the judgment of the volunteer or ODA, it is found the AIRO volunteer is not meeting the terms and conditions of the agreement, upon 30 days notice, the volunteer or ODA may terminate the agreement.

ODA reserves the right to modify or cancel the program at any time.

POINTS OF CONTACT

Oregon Department of Aviation
3040 25th Street South
Salem, OR 97302
(503)378-4880
(503)373-1688 (FAX)

Don Hankwitz
ODA Airport Safety Inspector
Donald.E.Hankwitz@state.or.us
(503)378-4176

Matthew Maass
ODA State Airports Manager
Matthew.D.Maass@state.or.us
(503)378-2523

VOLUNTEER APPLICATION

LAST | FIRST | MI

MAILING ADDRESS | CITY | STATE | ZIP CODE

PHONE NO. | ALTERNATE PHONE NO. | EMAIL ADDRESS

INITIALS | DATE

AIRPORT INFORMATION REPORTING FOR OREGON (AIRO)

PROGRAM GUIDELINES

VOLUNTEER NAME DATE OF APPOINTMENT

The volunteer agrees to accept the assignment of State Airport for a period of year(s).

THESE GUIDELINES are established in order to provide information to AIRO Volunteers working at State-Sponsored airports in Oregon.

VOLUNTEER OBLIGATIONS:

1. Conduct monthly inspections in order to report on conditions of safety, security and maintenance at their designated airport. Forward completed checklist to Oregon Department of Aviation (ODA) within the month of inspection. Immediately report to ODA all items related to safety and/or security at their designated airport.
2. Attend initial volunteer training and once-yearly follow-up training.
3. Conduct activities in a safe manner and comply with all airport rules and regulations while performing AIRO activities at designated airport. Review safety literature prior to each airport inspection. Exercise extreme caution at all times.
4. Notify ODA prior to making airport visits.
5. Report any injuries incurred while completing AIRO duties, to an ODA representative within two working days of the injury.

IN ORDER TO ENSURE YOUR OWN PERSONAL SAFETY, ODA RECOMMENDS THAT THE VOLUNTEER PROVIDE THE FOLLOWING ITEMS:

1. First Aid Kit
2. Drinking Water
3. VHF Radio tuned to the airports CTAF/UNICOM frequency or Personal Cell Phone
4. Sturdy leather shoes or boots and appropriate clothing for the weather
5. Personal vehicle for transportation to and from the airport. Vehicle should be parked in appropriate areas when at the airport. Remain clear of aircraft operation areas.

VOLUNTEER GUIDELINES:

1. Wear ODA-supplied safety vest when at the airport.
2. Discontinue work in inclement weather and during times of reduced visibility. Do not work in ice, snow or fog.
3. Furnish and arrange for your own transportation to and from the airport.
4. Do not possess or consume alcoholic beverages while at the airport.
5. Pick up litter around the airport during monthly visits as time allows. Litter bags and ties will be provided by ODA.
6. Take appropriate precautions to avoid hazardous materials/substances. Report location and description of the material/substance to an ODA representative.

Volunteer arrangement may be terminated by either party at any time upon notification of the other party. Volunteer must return ODA-owned equipment and materials upon request.

By signing this form, I acknowledge understanding of these obligations and guidelines. Additionally, I have received a copy of aforementioned obligations and guidelines for my reference.

VOLUNTEER

SIGNATURE

PRINT NAME

DATE

PARENT OF GUARDIAN SIGATURE (IF UNDER THE AGE OF 18)

SIGNATURE

PRINT NAME

RELATIONSHIP DATE

FOR OFFICE USE ONLY

APPROVING SIGNATURE DATE

TITLE

OREGON DEPARTMENT OF AVIATION
3040 25TH STREET SE
SALEM, OR 97302
(503)378-4880
WWW.OREGON.GOV/AVIATION

LIABILITY RELEASE FORM

STATE AIRPORT

INDIVIDUAL	PRIVATE ORGANIZATION	PUBLIC AGENCY

Release for

between and the Oregon Department of Aviation.

I, , shall be responsible and liable for all damage or injury to any persons or property resulting from

I, , shall idemnify, hold harmless and release the State of Oregon, Oregon Department of Aviation, its employees, agents and representative, against any and all damages, claims, demands, actions, causes of action, costs, and expenses of whatsoever nature for or because of any matter or thing done, omitted or suffered to be done by

For public agencies this release applies only to the extent permitted by Article XI, Section 7 of the OregonConstitution and by the Oregon Tort Clamis Act

Dated this day of 20

SIGNATURE

TITLE

ADDRESS

CITY

STATE ZIP COUNTY

PARENT OF GUARDIAN SIGATURE (IF UNDER THE AGE OF 18)

RELATIONSHIP

ADDRESS

CITY

STATE ZIP COUNTY

FOR OFFICE USE ONLY

APPROVING SIGNATURE DATE

TITLE

DEQ's reply as received. DEQ answered inline beneath each point of Brent Neely's October 23 email; those answers are shown below, each under the point it responds to. Brent's original text is in italics; DEQ's answers are in red. Both are verbatim. Signature contact lines omitted. Time Pacific.

November 2, 2026, 3:57 PM

From: Krista Ratliff, DEQ Stormwater
To: Brent Neely
Cc: Emmy Wolf, DEQ; Lizz Caviness, DEQ
Subject: RE: 1200-Z applicability question - small state-owned general aviation airport, Wallowa County

> Hello Brent,
>
> I have been made aware of your public records request. Please see answers below and please let me know if you would like this email chain included in your request.
>
> Industrial stormwater permit requirements are based on two main factors:
>
> • Potential for stormwater to discharge to surface waters and
> • Associated SIC code or industrial activity included in Table 1 or Table 2 (for discharges to Portland Harbor and Columbia Slough)
>
> When it comes to transportation sector, an airport must engage in vehicle maintenance shops (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication), equipment cleaning operations, or airport deicing operations in order to be eligible for coverage (and have potential for stormwater to reach surface waters.)
>
> Region 10 NPDES MSGP questions and answers (page 9 Question 1.18)
>
> Thanks,
>
> Krista Ratliff (she, her), DEQ Stormwater

DEQ's inline answers

> *State-owned public-use general aviation airport, roughly 3,800 operations a year.*
> SIC code would likely fall under SIC code 4581 Description for 4581: Airports, Flying Fields, and Airport Terminal Services | Occupational Safety and Health Administration – SIC code listed in Table 1 of the 1200-Z.
>
> *One 10,000-gallon aboveground tank dispensing 100LL at retail through an unattended self-serve card reader. That is the only fuel-related activity on the field.*
> Any fueling, mobile, manned, or self-service would require coverage.

No airframe or powerplant maintenance shop. The FAA airport record lists none, and none is conducted there.
Vehicle maintenance is a broad term to include vehicle and equipment fluid changes, mechanical repairs, parts cleaning, refinishing, painting, fueling, storage of airplanes waiting for repair, and storage of related material and waste materials, such as oil, fuel, batteries , tires, or oil filters.

No aircraft, vehicle or equipment washing.
This too is a broad term to include wash down, tank washouts and rinsing.

No deicing of aircraft or pavement. No glycol or urea is used or stored.
If no maintenance, equipment cleaning or deicing, coverage for Sector S air transportation is not required.

The tank sits in a lined secondary containment basin.
This is not a factor in industrial stormwater permitting.

The airport's FAA-funded master plan states there are no stormwater systems located on the airport, and that runoff sheet-flows to on-airport ditches and grassed areas without direct discharge to nearby waterways.
If sheet flow does not have the potential to make it to surface waters or conveyance system that discharge to surface waters and there is no maintenance, fueling or equipment cleaning, coverage is not required. Coverage is based on both triggers.

Based on these facts, it does not appear to me that a 1200-Z permit would be required. Would this facility require coverage under the 1200-Z permit?
It is the owner/operator’s responsibility to obtain coverage if required.

If it would, which activity triggers it?
If sheet flow has the potential to make it to surface waters or conveyance system that discharge to surface waters and there is maintenance, fueling or equipment cleaning, coverage is required.

Is there information about the site you'd need before you could say either way?
[No answer given.]