BEFORE THE LAND USE BOARD OF APPEALS

FOR THE STATE OF OREGON

FRIENDS OF FRENCH PRAIRIE and BENJAMIN D. WILLIAMS, Petitioners, and CITY OF WILSONVILLE, Intervenor-Petitioner v. OREGON DEPARTMENT OF AVIATION and OREGON AVIATION BOARD, Respondents, and AURORA AIRPORT IMPROVEMENT ASSOCIATION, BRUCE BENNETT, WILSON CONSTRUCTION COMPANY, INC. and ANTHONY ALAN HELBLING Intervenors-Respondent.	LUBA No. 2019-083

BRIEF OF AMICUS CURIAE CITY OF AURORA

Counsel appear on the following page.

BEFORE THE LAND USE BOARD OF APPEALS

FOR THE STATE OF OREGON

FRIENDS OF FRENCH PRAIRIE and BENJAMIN D. WILLIAMS, Petitioners, and CITY OF WILSONVILLE, Intervenor-Petitioner v. OREGON DEPARTMENT OF AVIATION and OREGON AVIATION BOARD, Respondents, and AURORA AIRPORT IMPROVEMENT ASSOCIATION, BRUCE BENNETT, WILSON CONSTRUCTION COMPANY, INC. and ANTHONY ALAN HELBLING Intervenors-Respondent.	LUBA No. 2019-083

BRIEF OF AMICUS CURIAE CITY OF AURORA

Counsel appear on the following page.

Jeffrey L. Kleinman
Attorney at Law
1207 SW Sixth Avenue
Portland, OR 97204
(503) 248-0808
KleinmanJL@aol.com
Attorney for Petitioners

Lucinda D. Jackson
Oregon Department of Justice
1162 Court St NE
Salem, OR 97309
(503) 947-4530
lucinda.d.jackson@doj.state.or.us
Attorney for Respondents

Sara Kendrick
Kendrick Law, LLC
317 Court St. NE #203
Salem, OR 97301
(503) 369-8323
sara@sekendricklaw.com
Attorney for Amicus Curiae

Wendie Kellington
Kellington Law Group
PO Box 159
Lake Oswego, OR 97034
(503) 636-0069
wk@klgpc.com
Attorney for Intervenors-Respondent

Barbara Jacobson
City of Wilsonville
29799 SW Town Center Loop E
Wilsonville, OR 97070
(503) 570-1507
jacobson@ci.wilsonville.or.us
Attorney for Intervenor-Petitioner

I. INTRODUCTION

This appeal involves two issues. The first is a jurisdictional question. Is the Department of Aviation's August 21, 2019 letter a final land use decision that approved the Aurora State Airport Master Plan ("Master Plan")? Regardless of the answer, the larger issue is whether the Master Plan is in effect, even though the new Board of Aviation process for adoption of land use

findings is not complete.

The City of Aurora ("City") understands that Petitioners think that the Department of Aviation's August 21, 2019 letter is a land use decision that adopted the Master Plan, and that the Master Plan was not previously adopted. It understands that Intervenors-Respondent believe the Master Plan was lawfully adopted in 2011 or 2012 and thus the opportunity for a LUBA appeal has long since passed. It understands that Intervenor-Petitioner's position is that the Master Plan does not comply with Goal 1 and Goal 2. The City as of this writing is not clear on the Respondents' position on these issues, and in particular whether the Respondents think the Master Plan can be in effect without the land use findings.

The City does not have argument that bears directly on these issues. Instead, this brief is intended to inform LUBA about the relevant context and questions surrounding this appeal, and to encourage LUBA to issue a thorough decision that resolves all of the issues presented by the parties. ORS 197.835(11)(a).

II. LAND USE CONTEXT

The City and Marion County have acknowledged comprehensive plans which "identify and separate urbanizable land from rural land." *1000 Friends of Oregon v LCDC (Curry County),* 301 Or 447, 455, 724 P2d 268 (1986), (quoting the then-current Goal 14). The Master Plan describes the conversion of resource land to urban uses outside the City's urban growth boundary: "not all property within the Airport Environs – the footprint of the land nearby the Airport within the boundaries of the four surrounding roads – is zoned in a

manner suitable for airport-related development recommended in this Master Plan." (Appendix 1). The Master Plan describes potential annexation into the City, although without explanation of the sequence of urban development and the annexation. "While ODA recognizes the complexities of Oregon's land use system and potential need for upgrades to City of Aurora utilities prior to annexation, ODA is generally supportive of annexation of the Airport by the City of Aurora[.]" (Appendix 2). The City's prior written comments on the prior draft Master Plan also contemplate annexation. (Appendix 3-5).

The City understands that Goals 3, 11, 14 and others compel the annexation to occur prior to the development of additional urban uses on resource land near the airport. It agrees with the Department of Aviation that the existing zoning is not "suitable for airport-related development." However, the Master Plan does not acknowledge that annexation must necessarily precede urban zoning. This discrepancy is a land use conflict identified in the Master Plan that has not yet been resolved. Annexation is the best method for resolving it consistent with the goals.

For this appeal, the purpose of the City's amicus participation is to offer this context and a framework for analyzing whether and to what extent the Master Plan is in effect.

III. THE AURORA STATE AIRPORT MASTER PLAN

The City actively participated in the Master Plan process; however its files do not include a notice of decision or a similar notification that the Master Plan was adopted by the Board of Aviation circa 2011 and 2012, or at a subsequent time. The City acknowledges that its records from many years ago

may be incomplete; however, it also does not see indicia of adoption in the Master Plan documents available on the Department of Aviation's web site. https://www.oregon.gov/aviation/Airports/Pages/AIRPORTS/UAO.aspx. The City is hopeful that this appeal will both make the documentation available, if it exists, and determine whether the Master Plan is in effect. A thorough analysis of these issues in the decision by LUBA will allow the City to understand its rights and responsibilities as an affected governmental unit.

To decide whether this appeal is a collateral attack on a final land use decision, LUBA may need to decide whether the Board of Aviation's actions in 2011 and 2012 resulted in a final land use decision. OAR 661-010-0010(3) indicates that "a decision becomes final when it is reduced to writing and bears the necessary signatures of the decision maker(s)[.]"

The August 21, 2019 letter that is the subject of this appeal reports that the Master Plan "was printed in final form" in December, 2012 following revisions made to the draft that was approved for submittal to the FAA in October, 2011. The letter does not reveal whether the revisions had a material effect on land use issues, or whether the December, 2012 version was ever approved or signed by the Board of Aviation.

It is possible the Board of Aviation approved the Master Plan in a manner that was not consistent with the requirements of OAR 660-010-0010(3), such that its circa 2011 and 2012 action(s) do not comprise a final land use decision. This invites the question whether a final land use decision was required; that is, whether the Board of Aviation was required by ORS 197.180(1), a SAC, or other authority to follow the customary land use procedures when it adopted the Master Plan, including without limitation OAR 661-010-0010(3).

It also may be possible that the circa 2001 and 2012 Master Plan is not a final land use decision because it did not apply the statewide land use planning goals. *See* ORS 197.015(10)(a)(B); 197.180(1). LUBA should also consider deciding whether the Board of Aviation was required to expressly apply the statewide land use planning goals and acknowledged comprehensive plans and land use regulations in the decision to adopt the Master Plan. ORS 197.180(1). If the answer to that question is yes and the Board of Aviation did not do so, then LUBA may need to decide whether the Master Plan approval is a nullity from the land use perspective.

Alternatively, LUBA may decide the Master Plan is a final land use decision that is immune from collateral attack. If LUBA makes that decision, the parties will benefit from an explanation of the effect of the current process for adoption of findings on the statewide land use planning goals, local comprehensive plans and land use regulations. It may not be possible for the Master Plan to be valid without those findings. ORS 197.180(1).

The City respectfully requests that LUBA decide whether the Master Plan is in effect. If it is, the City would appreciate some explanation of precisely what that means in the interim pending the outcome of the process in which the Board of Aviation intends to adopt the necessary land use findings.

///

///

///

///

///

///

///

IV. CONCLUSION

As an affected governmental unit and the future provider of municipal governance and services, the City of Aurora is challenged by the uncertainties regarding whether the Master Plan is currently in effect, and respectfully requests that LUBA consider and decide as many of the issues presented by the parties as possible.

Dated this 30th day of September, 2019.

By: SKendrick
Sara Kendrick, OSB #164169

CERTIFICATE OF COMPLIANCE

Brief Length

I certify that (1) this brief complies with the word-count limitation in OAR 661-010-0030(2); and (2) the word count of this brief as described in OAR 661-010-0030(2) is approximately 1600 words.

Type Size

I certify that the size of the type in this brief is not smaller than 14 point for both the text of the brief and footnotes as required by OAR 661-010-0030(2).

DATED: September 30th, 2019.

SKendrick

Sara Kendrick, OSB #164169

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on the date shown below, I filed the original and 4 copies of the foregoing BRIEF OF AMICUS CURIAE CITY OF AURORA by first class mail, postage prepaid, on:

Oregon Land Use Board of Appeals
775 Summer Street NE, Suite 330
Salem OR 97301-1283

I further hereby certify that on the date shown below, I served a true and correct copy of the foregoing Petition for Review by first class mail, postage prepaid, on:

Jeffrey L. Kleinman
Attorney at Law
1207 SW Sixth Avenue
Portland, OR 97204
(503) 248-0808
KleinmanJL@aol.com
Attorney for Petitioner

Lucinda D. Jackson
Oregon Department of Justice
1162 Court St NE
Salem, OR 97309
(503) 947-4530
lucinda.d.jackson@doj.state.or.us
Attorney for Respondents

Barbara Jacobson
City of Wilsonville
29799 SW Town Center Loop E
Wilsonville, OR 97070
(503) 570-1507
jacobson@ci.wilsonville.or.us
Attorney for Intervenor-Petitioner

Wendie Kellington
Kellington Law Group
PO Box 159
Lake Oswego, OR 97034
(503) 636-0069
wk@klgpc.com
Attorney for Intervenors-Respondent

DATED: September 30th, 2019.

SKendrick

Sara Kendrick, OSB #164169

Inner Portion of the Runway 17/35 Approach Surfaces (Sheet 4)

This drawing provides plan and profile views of the portions of approach surfaces that are closest to the runway, encompassing the existing and ultimate RPZs.

Terminal Area Plan (Sheet 5)

The Terminal Area Plan drawing provides a large-scale view of the terminal area, so that features such as aprons, buildings, hangars, and parking lots are easier to discern.

Land Use and Noise Contours (Sheet 6 and 7)

A land use map has been developed for the Airport and the surrounding area. This map includes the land uses on and around the Airport according to Marion and Clackamas Counties, as applicable.

Land uses around airports should be compatible with airport operations. Land use compatibility issues that are of the greatest concern at airports include:

- Aircraft Noise
- Nearby Lighting
- Glare, Smoke and Dust Emissions
- Bird Attractions and Landfills
- Airspace Obstructions
- Electrical Interference
- Concentrations of People

Current zoning on Airport Property is listed as Public and is compatible with airport operations. However, not all property within the Airport Environs – the footprint of the land nearby the Airport within the boundaries of the four surrounding roads – is zoned in a manner suitable for airport-related development recommended in this Master Plan. Marion County has land use jurisdiction over the subject property and any private developer would have to work with the County to ensure proper zoning is in place prior to any development.

Noise contours were developed for the Airport, based on existing and forecasted aircraft operations, in accordance with FAA regulations using the Integrated Noise Model (INM) version 7.0. INM produces contours representative of average weighted sound exposure levels. According to FAA guidance, 65 dBA is the threshold for aircraft noise incompatibility with some land uses. [2] The three noise contour sets modeled for the Airport are:

- Existing Conditions (2010) - At present, the 65 dBA contour line extends off Airport Environs to the north, south and west. Some residential areas west of the Airport are within the 65 dBA and the 70 dBA lines.
- Displaced Threshold Option (2020) - The forecasted increase in operations and changes in aircraft fleet, cause the 65 dBA contour line to extend further off airport by 2020; however, the eastern 65 dBA noise contour line remains nearly all within the Airport Environs. More

[2] For more information about land use incompatibility with airport noise, see FAA Advisory Circular 150/5020-1, *Noise Control and Compatibility Planning for Airports.*

Appendix 1

For example, the lack of sewer service is a major constraint for having a restaurant at the Airport. While ODA recognizes the complexities of Oregon's land use system and potential need for upgrades to City of Aurora utilities prior to annexation, ODA is generally supportive of annexation of the Airport by the City of Aurora due to the economic growth potential for the Airport if it were connected to City services.

Airport neighbors are also concerned about noise and other possible Airport impacts that could degrade the rural character, quality of life, and natural environment of the area.

Calm Wind Runway Change

When winds are calm, pilots are advised to use Runway 35 (northerly traffic flow) to reduce noise impact on surrounding areas. However, the favored instrument approach is to Runway 17 (southerly traffic flow), which results in conflicting traffic patterns and safety concerns. Several Airport users support designating Runway 17 as the calm wind runway, as it once was. Noise impact would move with the traffic, a concern for Airport neighbors. Residents from the Charbonneau area report the calm wind runway has never lessened their noise exposure, so reverting the calm wind runway is not a major concern.

Precision Instrument Approach

Business aviators especially would like to see the Airport's instrument approach capability upgraded from nonprecision to precision. A precision approach would allow them to land in lower visibility conditions. A precision approach could change the size of some FAA-required safety clearances, particularly at runway ends, which might affect Airport neighbors.

Helicopter Operations

Aurora State Airport has a large number of based and transient helicopter operations. Helicopters operating close to small fixed wing aircraft can be a concern, because of the potential damage to the fixed wing airplanes from rotorwash. Currently, most helicopters takeoff and land on tenant or private property. An area available to the public for the takeoff, landing, and parking of helicopters on ODA land may be needed. Airport users and businesses are likely not to agree on a location or need for a new public helicopter area.

Other Airport Improvements

Suggestions for Airport improvements have been made through the Airport user survey and interviews. These suggestions include internal road improvements, a run-up area for Runway 17, improved runway lighting, a restaurant, and radar/approach control coverage in the area. These improvements are not contentious, and will be analyzed later in the planning process, along with improvements resulting from the analysis of Airport capacity vs. demand, FAA design standards, TSA guidance, and industry standards. The PAC, Airport users, and others will have the opportunity to review the full range of Airport improvements that ODA considers in this Master Plan Update.

Appendix 2

City of Aurora

FOUNDED 1856

"National Historic Site"

April 15, 2011

Mitch Swecker, Interim Director
Oregon Department of Aviation
3040 25th Street SE
Salem, OR 97302

Dear Mr. Swecker:

The City of Aurora, Marion County, and Oregon Department of Aviation (ODA) have identified the Aurora State Airport and lands surrounding the Aurora State Airport as an area of special interest and planning area of mutual concern. In 2008, Marion County, ODA, and the City of Aurora signed an Intergovernmental Agreement (IGA) acknowledging the need for coordination in managing growth of this area while encouraging and supporting the continued operation and vitality of the Aurora State Airport.

The City has been pleased to work alongside the Oregon Department of Aviation and Marion County in the continuation of efforts to encourage economic vitality of the airport while managing the impacts of growth upon surrounding communities. We have been satisfied with ODA's effort to involve our community in the planning process and appreciate the efforts to meet with community members. With this in mind, we would appreciate your consideration of the following comments/concerns in response to the DRAFT Chapter Five Airport Development Alternatives-Preferred Alternative.

- The City of Aurora cannot support the Preferred Alternative to designate the Aurora State Airport as an ARC C-II. The increased Runway Object Free Area (ROFA) and (RPZ) would have direct negative consequences upon the stated interest and intent of the City of

Appendix 3

21420 Main Street • Aurora, OR 97002 • (503) 678-1283 • Fax (503) 678-2758

Aurora and local land owners to work toward annexation of the Airport and lands located between the Airport and Aurora Urban Growth Boundary.

- Any expansion of the capacity of the airport, whether this includes strengthening the runway, extending the runway length, or an airport reclassification, is premature when the infrastructure to serve current demands upon the Aurora State Airport are yet unmet.

- Reclassification to CII and reducing the visibility minimums of runway 35 to ¾ mile or greater will expand the RPZ to the south beyond the airport boundary which has similar impacts to an expansion of the runway to the south and the City feels that the impacts of either of these options is not acceptable.

- The Preferred Alternative does not appropriately address or mitigate the fact that a revision to the Airport Reference Code from B-II to C-II would have a significantly higher noise impact on the City of Aurora and its surrounding communities. Indeed, even the No Build Alternative would result in growth at the Airport within its current boundary and increased noise upon surrounding communities. Expansion of the runway to the south, or reclassification to C-II and reducing visibility minimums of runway 35 to ¾ mile or greater, will expand the RPZ to the south beyond the current airport boundary and will clearly impact a higher number of residences and future development opportunities.

- If the airport is reclassified and the runway strengthened, justification for larger planes landing at the airport is provided which in turn could provide additional supporting data for a runway extension. The city feels that any changes to the airport classification, runway length, and/or strength should only be considered after the current transportation and water and sewer infrastructure needs are satisfied.

The City of Aurora is supportive of the ODA's efforts in the Master Planning process and is sensitive to the important economic impacts that the Aurora State Airport has upon surrounding communities. We are concerned that the annexation of the Airport into the City of Aurora, as previously discussion, is not included under any of the weighed Alternatives.

Thank you for your time and consideration.

Regards,

James Meirow, Mayor

Cc: Sarah Lucas, WH Pacific
Rainse Anderson, WH Pacific
Sandra Larsen, Oregon Department of Aviation

Inner Portion of the Runway 17/35 Approach Surfaces (Sheet 4)

This drawing provides plan and profile views of the portions of approach surfaces that are closest to the runway, encompassing the existing and ultimate RPZs.

Terminal Area Plan (Sheet 5)

The Terminal Area Plan drawing provides a large-scale view of the terminal area, so that features such as aprons, buildings, hangars, and parking lots are easier to discern.

Land Use and Noise Contours (Sheet 6 and 7)

A land use map has been developed for the Airport and the surrounding area. This map includes the land uses on and around the Airport according to Marion and Clackamas Counties, as applicable.

Land uses around airports should be compatible with airport operations. Land use compatibility issues that are of the greatest concern at airports include:

- Aircraft Noise
- Nearby Lighting
- Glare, Smoke and Dust Emissions
- Bird Attractions and Landfills
- Airspace Obstructions
- Electrical Interference
- Concentrations of People

Current zoning on Airport Property is listed as Public and is compatible with airport operations. However, not all property within the Airport Environs – the footprint of the land nearby the Airport within the boundaries of the four surrounding roads – is zoned in a manner suitable for airport-related development recommended in this Master Plan. Marion County has land use jurisdiction over the subject property and any private developer would have to work with the County to ensure proper zoning is in place prior to any development.

Noise contours were developed for the Airport, based on existing and forecasted aircraft operations, in accordance with FAA regulations using the Integrated Noise Model (INM) version 7.0. INM produces contours representative of average weighted sound exposure levels. According to FAA guidance, 65 dBA is the threshold for aircraft noise incompatibility with some land uses. [2] The three noise contour sets modeled for the Airport are:

- Existing Conditions (2010) - At present, the 65 dBA contour line extends off Airport Environs to the north, south and west. Some residential areas west of the Airport are within the 65 dBA and the 70 dBA lines.
- Displaced Threshold Option (2020) - The forecasted increase in operations and changes in aircraft fleet, cause the 65 dBA contour line to extend further off airport by 2020; however, the eastern 65 dBA noise contour line remains nearly all within the Airport Environs. More

[2] For more information about land use incompatibility with airport noise, see FAA Advisory Circular 150/5020-1, *Noise Control and Compatibility Planning for Airports.*

Appendix 1

For example, the lack of sewer service is a major constraint for having a restaurant at the Airport. While ODA recognizes the complexities of Oregon's land use system and potential need for upgrades to City of Aurora utilities prior to annexation, ODA is generally supportive of annexation of the Airport by the City of Aurora due to the economic growth potential for the Airport if it were connected to City services.

Airport neighbors are also concerned about noise and other possible Airport impacts that could degrade the rural character, quality of life, and natural environment of the area.

Calm Wind Runway Change

When winds are calm, pilots are advised to use Runway 35 (northerly traffic flow) to reduce noise impact on surrounding areas. However, the favored instrument approach is to Runway 17 (southerly traffic flow), which results in conflicting traffic patterns and safety concerns. Several Airport users support designating Runway 17 as the calm wind runway, as it once was. Noise impact would move with the traffic, a concern for Airport neighbors. Residents from the Charbonneau area report the calm wind runway has never lessened their noise exposure, so reverting the calm wind runway is not a major concern.

Precision Instrument Approach

Business aviators especially would like to see the Airport's instrument approach capability upgraded from nonprecision to precision. A precision approach would allow them to land in lower visibility conditions. A precision approach could change the size of some FAA-required safety clearances, particularly at runway ends, which might affect Airport neighbors.

Helicopter Operations

Aurora State Airport has a large number of based and transient helicopter operations. Helicopters operating close to small fixed wing aircraft can be a concern, because of the potential damage to the fixed wing airplanes from rotorwash. Currently, most helicopters takeoff and land on tenant or private property. An area available to the public for the takeoff, landing, and parking of helicopters on ODA land may be needed. Airport users and businesses are likely not to agree on a location or need for a new public helicopter area.

Other Airport Improvements

Suggestions for Airport improvements have been made through the Airport user survey and interviews. These suggestions include internal road improvements, a run-up area for Runway 17, improved runway lighting, a restaurant, and radar/approach control coverage in the area. These improvements are not contentious, and will be analyzed later in the planning process, along with improvements resulting from the analysis of Airport capacity vs. demand, FAA design standards, TSA guidance, and industry standards. The PAC, Airport users, and others will have the opportunity to review the full range of Airport improvements that ODA considers in this Master Plan Update.

Appendix 2

City of Aurora

FOUNDED 1856

"National Historic Site"

April 15, 2011

Mitch Swecker, Interim Director
Oregon Department of Aviation
3040 25th Street SE
Salem, OR 97302

Dear Mr. Swecker:

The City of Aurora, Marion County, and Oregon Department of Aviation (ODA) have identified the Aurora State Airport and lands surrounding the Aurora State Airport as an area of special interest and planning area of mutual concern. In 2008, Marion County, ODA, and the City of Aurora signed an Intergovernmental Agreement (IGA) acknowledging the need for coordination in managing growth of this area while encouraging and supporting the continued operation and vitality of the Aurora State Airport.

The City has been pleased to work alongside the Oregon Department of Aviation and Marion County in the continuation of efforts to encourage economic vitality of the airport while managing the impacts of growth upon surrounding communities. We have been satisfied with ODA's effort to involve our community in the planning process and appreciate the efforts to meet with community members. With this in mind, we would appreciate your consideration of the following comments/concerns in response to the DRAFT Chapter Five Airport Development Alternatives-Preferred Alternative.

- The City of Aurora cannot support the Preferred Alternative to designate the Aurora State Airport as an ARC C-II. The increased Runway Object Free Area (ROFA) and (RPZ) would have direct negative consequences upon the stated interest and intent of the City of

Appendix 3

21420 Main Street • Aurora, OR 97002 • (503) 678-1283 • Fax (503) 678-2758

Aurora and local land owners to work toward annexation of the Airport and lands located between the Airport and Aurora Urban Growth Boundary.

- Any expansion of the capacity of the airport, whether this includes strengthening the runway, extending the runway length, or an airport reclassification, is premature when the infrastructure to serve current demands upon the Aurora State Airport are yet unmet.

- Reclassification to CII and reducing the visibility minimums of runway 35 to ¾ mile or greater will expand the RPZ to the south beyond the airport boundary which has similar impacts to an expansion of the runway to the south and the City feels that the impacts of either of these options is not acceptable.

- The Preferred Alternative does not appropriately address or mitigate the fact that a revision to the Airport Reference Code from B-II to C-II would have a significantly higher noise impact on the City of Aurora and its surrounding communities. Indeed, even the No Build Alternative would result in growth at the Airport within its current boundary and increased noise upon surrounding communities. Expansion of the runway to the south, or reclassification to C-II and reducing visibility minimums of runway 35 to ¾ mile or greater, will expand the RPZ to the south beyond the current airport boundary and will clearly impact a higher number of residences and future development opportunities.

- If the airport is reclassified and the runway strengthened, justification for larger planes landing at the airport is provided which in turn could provide additional supporting data for a runway extension. The city feels that any changes to the airport classification, runway length, and/or strength should only be considered after the current transportation and water and sewer infrastructure needs are satisfied.

The City of Aurora is supportive of the ODA's efforts in the Master Planning process and is sensitive to the important economic impacts that the Aurora State Airport has upon surrounding communities. We are concerned that the annexation of the Airport into the City of Aurora, as previously discussion, is not included under any of the weighed Alternatives.

Thank you for your time and consideration.

Regards,

James Meirow, Mayor

Cc: Sarah Lucas, WH Pacific
Rainse Anderson, WH Pacific
Sandra Larsen, Oregon Department of Aviation