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First, it should be noted that the Aurora State Airport runway is 5,003 feet and has a strength rating of 45,000 pounds. As we now know from a Public Records Request submitted to the Oregon Dept. of Aviation, there is over a decade-long history of granting overweight waivers to large jets.

This not only includes what most of the public think of as corporate jets, such as Gulfstream or Citation or Falcon jet aircraft, but also the much heavier Bombardier Global Express. The larger Gulfstreams have manufacturer specified minimum runway lengths at maximum takeoff weight that exceed 6,000 feet and have a maximum takeoff weight of 70,000 pounds. However, the most eye-opening aircraft receiving regular overweight waivers is the Global Express that has a maximum takeoff weight of 92,500 pounds, a minimum take off distance of 6,170 feet and weighs 50,200 pounds when empty.

These facts are important because much of Chapter 3, Aviation Activity Forecasts is based on the **2019 Aurora State Airport Constrained Operations Runway Justification Study** which determined that aircraft operating at Aurora experienced 645 constrained operations in 2018. It should be noted that this number was based on pilot surveys which were not validated against flight plans, and did not take into consideration that the practice of allowing more and more oversized aircraft to operate at Aurora was the major factor driving the number of constrained operations. Further, that number of 645 was a 33% increase over that reported in the unapproved 2012 master plan, in spite of there being a 24% reduction in Total Operations since 2010. That increase can only be attributed to allowing more and more oversize jets to operate at Aurora which drives the increase in constrained operations.

That though is not the most troubling fact about the Constrained Operations study. What is most troubling are facts illustrating a faulty methodology and inaccuracy. For instance, the Minimum Takeoff Distances listed for the four jets with the most constrained operations are higher than the published Minimum Takeoff Distances from the manufacturers. For instance, the Falcon 50 which had the single largest number of constrained operations in 2018 at 160, is shown on Page 16 of Chapter 1 to have a Minimum Takeoff Distance of 5,413 feet when, in fact, the published manufacturer's spec is 4,935 feet.

On top of that, in the data listing annual operations and constrained operations, the Falcon 50 is shown to have had 226 operations at Aurora in 2018, of which 160 were constrained. That is almost 71% constrained operations for a jet with manufacturer's minimum takeoff distance shorter than the runway at Aurora.

To make matters worse, though, and to question the accuracy of the data presented in the entire study, the Falcon 900 was listed as having 68 operations at Aurora in 2018, of which 75 were constrained. That is to say, they had 110% of their operations constrained, which seems to be mathematically impossible.

The number of Falcon 900 constrained ops of 75 (from the survey) is found on page 3-18. The actual operations of 68 for the Falcon 900 is found in TFMSC IFR Data table on page 1-16 of the Constrained Operations Study.

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