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This letter offers my comments and suggestions about the ongoing Airport Master Plan process (and drafts that will lead to the eventual finalized document) for the Aurora State Airport. Please accept this letter and add it to the public record so that it hopefully aids in a better public understanding of this airport while also guiding sound and equitable decision-making.

I attended the Zoom webinar held on 15 November 2022, for PAC Working Session #2. I have also studied all of the materials presented online at the airport master plan website. I am concerned that both the process and the product can be done far better than what we are seeing at this time. I am concerned that the current effort, though very well funded with public money, is driven too much towards a pre-determined, pro-growth outcome, and burdened too much by a chronic laziness that tends to repeat the same old stale disinformation. We can do better, and if we are to serve *EVERYONE* (not just aviation interests), *we MUST do better*.

I have studied airport master plans for more than thirty years. I am a retired FAA air traffic controller, including years working at the Salem and Troutdale airports. I also served on numerous airport committees related to impacts at the Aurora, Mulino, and Portland airports. My experiences afford me a clear insight into the politics of airport development – how aviation interests work to suppress airport expansion opposition and force their own self-serving pro-expansion agenda. Aurora Airport is a classic case study.

We are at a critical point in the current Aurora Airport Master Plan process. We are at that point where the first three chapters are to be finalized. This is critical because, if these finalized chapters are not done well, they are like loose sand under a tall skyscraper; i.e., Chapters 1 through 3 are the foundation upon which Chapters 4 onward can be built, to fail or to fall. The current draft is doomed to fail because it lacks the key elements needed for any good master plan: depth, precise data, and objectivity.

A Master Plan is supposed to achieve two valuable results: a robust process, and a documented record, all equitably delivered. The process is all about assuring meaningful community engagement; and the product – the eventual document – is about depth and precision of data. To be truly equitable, those framing and leading the process (Century West & JLA, ODAV, and FAA) must work hard to ensure all parties are engaged and cooperating across boundaries. The aviation interests stand to benefit from federal investments that increase corporate profits and bestow user subsidies; the non-aviation parties stand to lose, if these investments expand risks and diminish health and quality of life.

Improving the Master Plan Process:

Here are a few points on how you can improve the current Master Plan process:

1. **Use Zoom better.** Thank you for setting these meetings up so that citizens can participate via Zoom. But, can you please do a little better, in how you use Zoom? Specifically, a Zoom participant should be able to know who the other participants are, both those who are officials (PAC members, presenters) and those others who are just ‘other viewers’. We should be trying to replicate the ‘all-in-the-same-room experience’ of a physical meeting, and this includes the ability of participants to gauge the ‘balance’ and initiate new contacts. Why was this last meeting showing video of Ted Millar and Bruce Bennett, but not Ben Williams and others against excessive development? Why was there no simple list/tab so a Zoom participant could view who was ‘participating’ at any one time, ‘*reading the room*’ while listening to presenters?
2. **Drop the pro-airport bias, and be more objective.** As reflected in the current draft for Chapters 1 through 3, the narrative of this Draft Aurora Airport Master Plan is carefully crafted, in pursuit of a pro-airport agenda. Any critical reader will recognize this agenda, despite the fact the writers are cautious to never mention it. That agenda is to extend the runway and accommodate ever-increasing aircraft size and annual operations. That agenda provides zero consideration for the real impacts on human health, community quality of life, and environmental degradation below.
3. **Protect the democratic process.** We need to accept the reality that the issues around how Aurora Airport is managed and potentially expanded create a clear division into two opposite sides: one side for airport status quo power and expansion, the other side for airport moderation and a better managed and less impactful airport environment. Look at the PAC membership list online. The ‘impactors’ heavily outnumber the ‘impactees’. Under these conditions, no amount of thoughtful analysis and commentary, by even the most intelligent and virtuous citizens, can compensate for the pro-airport bias sham, as imposed by regulators (FAA and ODAV) and the airport authority (ODAV). Shame on FAA, especially; you have the authority to lead; you could choose to nudge ODAV and Century West toward voluntarily assuring a more democratic process; instead, you are enabling and perpetuating these undemocratic injustices, assuring conflict and disagreement will forever persist around the Aurora Airport.
4. **Assure the PAC is balanced, with full disclosure by all PAC members.** When done right, a Master Plan aids in a thorough community discussion and ultimate decisions mirroring an effective democratic process. When we stack the PAC with a surplus of aviation stakeholders but a dearth of impacted non-aviation stakeholders, we only guarantee that the process will result in failure: an inequitable process and a biased final Master Plan document. Please expand the PAC listing online. As a starting point, each listed member should provide a short bio that includes three key details: their background or connection to aviation, their connection to Aurora Airport (operator, tenant, investor, etc.), and how they stand on the key question: ‘*for or against runway extension*’. Please collect this data, about the PAC members, and share it online.

Improving the Master Plan Document:

Beyond improving the Master Plan process, the contents of the document itself need to become more robust. Here are some suggestions:

1. **Ensure the Master Plan goes deep on the unique features of Aurora Airport.** The history and layout (public lands versus private lands) makes this a very unique airport. The public needs a detailed compilation of all the relevant facts and data related to not just the actual state-

owned ‘Aurora Airport’, but also the larger ‘non-airport’ facilities that feed into the airport ‘through-the-fence’ (TTF). There has been a series of sophisticated state legislative efforts focused specifically on benefiting airport users. A good Master Plan would provide well written details and data presenting the TTF history as well as the legislative history. A good Master Plan would also ensure presentation of facts and data to thoroughly document the existing surrounding communities, the airport-related impacts on residents and properties, and the context of this one airport in relation to the regional ‘system of airports’.¹ At this time, Century West’s goal should be to expand the data and present it for public consumption, so as to enable readers to efficiently validate or rebut statements and data being refined into the eventual Master Plan document.

2. **Expand the Master Plan data to include Airport Emergency Services.** KUAO has minimal emergency services, yet nearby KPDX is a severely underutilized major airport with expansive runways (11,000ft and 9,825ft!) and the highest level of round-the-clock emergency services, ARFF-E. Note, too, ARFF-E is a rarity for ‘medium hub’ airports, most of which are rated lower, ARFF-D. In the Constrained Ops surveys, many pilots noted the value of KPDX as a preferred airport when operating at maximum fuel loads and during wet runway conditions. KSLE also offers ARFF services. Either KPDX or KSLE offers pilots a far safer operating environment. If ODAV and FAA are truly concerned about safety, they should insist that ODAV cease blanket waivers for overweight aircraft. They should also strongly advocate for larger corporate aircraft to be based at KPDX.
3. **Cleanup ODAV’s overstated Based Aircraft figures.** ODAV has a long history of severely overstating based aircraft figures at KUAO. This is to be expected, though, as ODAV has always been a ‘through-the-fence’ (TTF) airport, making it impossible for ODAV to manage the list of actual airport users.

This Airport Master Plan needs to document not just how many aircraft allegedly are based, but also the **BASING CAPACITY**. And, this needs to clearly differentiate between aircraft based on ODAV lands, and those on adjacent private lands (TTF). There needs to be a table that precisely defines hangars, hangar sizes, location, whether on or off ODAV lands, plus a list of all aircraft based there, plus a list of all pilots who operate from that hangar.²

The ‘through-the-fence’ (TTF) condition has evolved for decades, and has even been the subject of legislation. We need precise figures, by year, showing how many aircraft, what groups, detailing whether on airport or TTF. Also, figures showing the precise, documented revenue and cost figures for these TTF agreements. Does this data show a TTF problem, and is it expanding? What is ODAV doing to get this under control, if anything? Is it fair to conclude, instead,

1 The ‘Regional Airport System’ includes these eight airport codes (used in this letter, from this point forward): KUAO (Aurora Airport); KPDX (Portland International); KHIO (Hillsboro); KSLE (Salem); KTTD (Troutdale); KMMV (McMinnville); 4S9 (Mulino); and, KSPB (Scappoose).

2 If needed for ‘privacy’ reasons, it seems OK for names of hangar owners, names of lease-holders, names of sublease-holders, and names of other quasi-tenants to be redacted. But, the redactions should still enable others to clearly define the extent of connection and concentration across multiple hangars; i.e., if multiple hangars share the same name (owner, lease, sublease, tenant, etc.), that data fact should be readily viewable in the tables and other report contents.

ODAV is merely accommodating a tiny few aviation interests in return for fuel tax and under-sized TTF access fee revenues?

The root of this based aircraft data bias is FAA. For decades, FAA has promoted nationwide reports that claim growth in based aircraft figures that are almost always missed by significant amounts. And, FAA's failure goes one step further: every time an airport authority spends a half million or even a million on a new Airport Master Plan, they offer drafts to FAA's Airport Office ... and the inflated projections reliably lack any critical review or challenge by FAA.

Lastly, on the subject of 'based aircraft', the Master Plan needs to provide some narrative about 'Functional Basing' ... i.e., the fact that Aurora is being used as a 'garage' for corporate and charter operators. How many of the heavier jets added in the last two decades are used for personal flights versus corporate flights versus charter operations? What are the typical destinations for these aircraft, and which of those destinations are potentially 'constrained' and at what specific weather conditions? Which of these larger aircraft would be better served and more safely operated, if based at another already fully developed airport, such as KPDX? The Master Plan data and narrative needs to compare operating costs (hangar rates, fuel rates), to identify if Aurora has an unfair pricing advantage over other airports in the regional airport system, due to its TTF situation. The Master Plan also needs to inform so that we can develop regional strategies to manage these inequities, so as to ensure the federal investment in each airport produces a maximum overall benefit-cost ratio and optimized efficiency.

4. **Add data (and narrative) on fuel consumption and revenues.** Fuel consumption is a valuable proxy metric for airport operations and impacts. The Master Plan should include a table with data on KUAO fuel consumption: Jet-A vs avgas, total gallons sold by year, by which fuel vendor(s); total fuel flowage revenues collected by year. The precise agreements at the airport need to be fully summarized. Are there any fuel sales or fueling activity that are not subject to a fuel flowage fee? If so, what are these arrangements, who are the signatories, and what are the fuel flowage amounts by year for these non-revenue fueling operations? Obviously, these data need to include both on-airport and TTF properties.

Additionally, the Master Plan should go a bit further, looking at fuel prices and annual fuel flowage at other airports within the 'Regional Airport System'. It is beyond dispute that a lengthening of the runway, to allow larger and heavier fuel loads, benefits an elite core of operators and adjacent landowners who sell aviation fuel. Their goal is clearly to make more money selling larger volumes of fuel... and ODAV collects more airport revenues in the process. But, are Aurora fuel sales given an unfair pricing advantage over KHIO, KPDX, and others, who are 'managed' by the Port of Portland? Is it possible that fuel price inequities are strongly influencing this campaign to spend millions expanding the Aurora runway, while other airports with longer/safer existing runways remain severely underutilized?

5. **Cleanup ODAV's overstated operations levels and forecasts.** ODAV has a long history of severely overstating operations levels at KUAO. This is to be expected, though, as ODAV has never had a meaningful and active day-to-day management presence at Aurora Airport. This has always been a 'through-the-fence' airport, making it nearly impossible for ODAV to manage the list of actual airport users.

Exaggeration of future operations levels is an industry-wide problem. It starts with FAA, who produces exaggerated TAF (Terminal Area Forecast) figures cited within Master Plans and other reports. The problem is worsened by FAA's failure to critically assess figures offered by airport authorities within their airport Master Plan drafts. Consequently, there is a strong bias toward higher operations figures. The larger numbers impress Congress and a fair number of otherwise uninformed citizens; furthermore, these exaggerated numbers make it that much harder for activists to generate support for development alternatives that moderate or even stop airport expansion.

The pressure to exaggerate figures persists. At last week's Zoom webinar, both Bruce Bennett and Ted Millar, arguably the two largest financial beneficiaries of airport expansion this century, spoke about a perceived need to supplement the operations figures. Why is there so much emphasis, in this Master Plan draft, on adding a few more operations during hours when the ATC tower is closed?³ I've studied lots of airports and lots of Master Plans, in the last three+ decades, and I have never seen this before. The tower ops count, as compiled in OPSNET/ATADS, does not need to be supplemented. These are the objective data; they precisely gauge airport activity during specific time-frames, and they also quantify how operations are evolving from one year to the next. Plus, they enable objective comparison of one airport to other, nearby airports. In the current Master Plan draft, it appears ODAV is overly sensitive. When the tower opened in 2015, the ATC precise daily counts quickly showed an astonishingly low traffic count, compared to past rough estimates by ODAV. After decades of biased exaggeration and inaccuracy, ODAV is now scrambling to obscure their past sloppiness and imprecision.

Lastly, operations data need to continue to include helicopter departures and arrivals off-airport, at Columbia and HTS. These operations are counted by the tower, as tower airspace 'overflights'; i.e., everytime one of these helicopters wants to land or takeoff from these off-runway, airport-adjacent properties, the pilots have to get approval from the tower, at which time the controller adds the flight to the 'overflight' counter. There is no practical reason that the tower manager would be unable to provide a fair estimate of the fraction of 'overflights' that are actually HTS or Columbia operations.

6. **Clarify the data and operational changes related to opening the ATC tower in late 2015.**

Opening of the tower was a major change. It enabled us to rely on real operations data, instead of ODAV's shoddy operations estimates. But, it also imposed changes that would at least temporarily alter how the airport is used by pilots. Here's some insight on that...

When towers are opened, they add a layer of accountability and regulation. Under the control of an ATC tower, pilots are issued specific ATC instructions, and may face regulatory consequences if they fail to comply. Thus, opening an ATC tower adds one more layer of potential risk of regulatory non-compliance. Most pilots like to feel they are enjoying 'freedom' while flying, but the structure of ATC diminishes that feeling. This has a significant impact, especially on General Aviation (GA) operators.

³ This tower is open 13-hours per day, from 8AM to 9PM. KPDX is open 24-hours per day; other towers at KHIO, KSLE and KTTD are open 16-, 14-, and 15-hours per day. There are guidelines for expanding tower hours, based on activity levels. There should also be guidelines allowing the airport authority to NOTAM the airport closed – to effectively impose nighttime usage curfews – so as to minimize risks and impacts during selected times of each day.

Illustrating this effect, look at the tower operations history, especially the figures for annual local operations (round-and-round the pattern). The actual ATC tower counts are compiled in the table to the right. A reasonable analysis of this data suggests:

- The total traffic count has averaged far below what was anticipated in all Airport Master Plans, dating back to 1976.

	2016	2017	2018	2019	2020	2021	2022 (12-months thru SEP)	2016-2022 averages
TOTAL Ops	48,377	58,152	63,193	62,850	65,949	72,549	64,146	64,473
Itinerant Ops	33,195	34,641	36,763	34,252	31,777	37,267	36,675	35,229
Yr-to-yr Itinerant change		4%	6%	-7%	-7%	17%	-2%	1.8%
Local Ops	15,182	23,511	26,430	28,598	34,172	35,282	27,471	29,244
% Local	31%	40%	42%	46%	52%	49%	43%	45%
Yr-to-yr Local change		55%	12%	8%	19%	3%	-22%	13%
					...2.0% average last 4yrs			

For an analysis

of this, please see **Attachment-1, ‘Aurora State Airport Master Plans: Timeline 1976-2022’**.

- The Itinerant traffic count has proven to be relatively steady, averaging 35K ops/year, and a 1.8% average annual growth rate.
- Local operations plummeted in the first year (2016) but have grown at excessive annual rates in most years since. Most likely, this pattern was due to GA pilot concern about the new tower; i.e., it is common for pilots to avoid local flying until they develop a comfort with the controllers at the new tower.
- Local operations spiked upwards in 2020, then spiked downwards in 2022. These patterns would be attributable to two economic impacts: first, in 2020, the pandemic onset included fiscal stimulus as well as remote work and other job changes, plus the fact social distancing was not enforced in flight training; and, second, in 2022, steep fuel prices and the end of COVID fiscal stimulus and remote-work would reduce demand for flight instruction.
- A closer inspection of the local ops figures, looking solely at the last four years, shows an average 2.0% annual growth rate; this is a very plausible figure, and mirrors the itinerant ops annual growth rate. Thus, the 2020 up-spike and 2022 down-spike, may be roughly offsetting.
- Further inspection of the KUAO tower data shows local ops levels that are consistent with other comparable GA airports. Salem local ops average ~35% of total ops; Hillsboro averages ~58%⁴; Aurora averages ~43%.

As another impact, consider how weather accountability changes when a tower opens. A bit of background first... the two most critical weather observations dictating if a pilot can use the Aurora Airport are visibility (how far the pilot can see) and ceiling (how high above the runway is the lowest significant cloud layer). If there is no tower ATC and no automated weather observation, pilots are trusted to do their own weather estimates; thus, they can assess ceilings higher and visibilities further than they really are. When a tower is added, even if there is automated weather, the controllers are certified to take official ‘tower observations’ that override the automated observations. Controllers are human, so their observations vary widely; more conserva-

4 KHIO is one of the busiest (and most impactful) flight training airports in the U.S.; in fact, the busiest flight school’s business model is to grow profits by importing many students from around the world, to fly closed patterns burning leaded avgas. For variation, many of these students will fly to close-in destination airports like Aurora, and do a few touch-and-goes.

tive controllers (more risk-averse) tend to reduce the official cloud ceiling or visibility, thus shutting down operations; more liberal controllers (less risk-averse) tend to declare higher cloud ceilings and visibility levels, to allow continued operations.

It has been reported within Constrained Operations studies that, at Aurora, when the tower opened, there was a drop in operations using larger aircraft. These are commonly commercial and IFR operations; with these pilots no longer able to call their own numbers, they conservatively changed flight plans, using other airports on marginal days.

7. **Add an analysis and overview of the ‘Constrained Operations’ issue.** Since 2009, there has been a considerable amount of time and money expended trying to justify a runway extension, based on a claim that there are at least 500 annual ‘constrained operations’. In April 2011, to override the March 2011 ‘Preferred Alternative’ of no runway extension, ODA’s ‘Constrained Operations Survey’ was used; the sample below, submitted by Bruce Bennett, declared that he alone could account for approximately 500 operations already requiring a runway extension:

3. What is the maximum stage length for each of the aircraft listed above? ___240 NM, 450 NM, 600 NM, 950 NM and 1200 NM_____

4. If aircraft operations at the Aurora State Airport are constrained (i.e., reduced payload for takeoff), identify those constraints: ___Yes, but not currently (see below)_____

5. Identify the number of annual operations at the Aurora State Airport that require a runway extension (this can be a cumulative number based on constrained operations of multiple aircraft, if you have a fleet of various aircraft):
 ___Approx. 500 (See below)_____

6. Does your insurance company require a minimum runway length for operations? ___X___ Yes ___ No

a. If you responded Yes to #6, please provide a letter from your insurance company stating the minimum runway length requirement. Our Policy is voluminous but requires a balanced field length.

7. Do you currently operate at the Aurora State Airport? ___X___ Yes ___ No

a. If you responded No to #7, can you assure that your company intends on operating at the Aurora State Airport, if a runway extension that meets your criteria is constructed?
 ___X___ Yes ___ No

8. Are there any other comments/suggestions you have for improving the Aurora State Airport?
 ___We have operated off here since 1968 including Commercial Air-Carrier (“on call –charter under FAR 135) since 1980, from 2003 to 2007 this included Jet Charter (RA-390, BE-400, HS-125 & DA-900) which was constantly limited by runway length, resumption of this service would be expedited by an improved runway. Our jet fuel sales are currently limited by runway length and strength.____

Optional - Please provide your contact information, in the event we have follow-up questions for you:

Name: Bruce Bennett Company: Aurora Aviation, Inc.

Phone: 503-678-1217 E-Mail: Bruce@AuroraAviation.com

This was absurd, of course, because most of Bruce’s fleet were (and remain) single engine aircraft too small to be constrained. Nonetheless, neither WHPacific (the Master Plan contractor then) nor ODAV (or ODAV’s State Aviation Board) nor FAA went back to Bruce and requested

he provide a real and verifiable constrained ops estimate.⁵ Clearly, these so-called ‘constrained ops’ figures needed validation then, and should not be used today, without validation.

As always, the fairest and most effective way to move forward is transparency: share the factual data. Century West reported in an earlier draft that they had data obtained via FOIA, and expected further data to complete what was needed. Here’s a screencap (from p22 of 83p PDF):

Instrument Aircraft Flight Activity
FAA Traffic Flow Management System (TFMS) records were obtained through a Freedom of Information Act (FOIA) request. These records provide Instrument Flight Rules (IFR) flight plan arrivals and departures for all airports nationwide and include information on each aircraft, departure and arrival airports, and departure and arrival dates and times, among other data. Nearly 10 years of Aurora State Airport records were available for analysis—January 1, 2012 through August 16, 2021. Consultants have requested the remaining 2021 data through the FOIA process and will incorporate the data when available to complete the 2021 counts.

We need ODAV to instruct Century West to share the raw TFMSC dataset, in the appendix, or at least as a file obtainable by request or online. This is one way parties can cooperate. We also need cooperative participation from operators who report alleged constrained ops. These operators have the logbooks and can provide a scenario that validates all legitimate claimed constrained ops. If they cannot validate at least some of their claims, and given the contentious history around the fight to extend the Aurora runway, it remains quite reasonable for many to believe those claims are just an ongoing fraud, aided and abetted by ODAV and FAA.

The beauty of the TFMSC data is it is objective, and it goes back many years. A few critical questions need to be answered, too: (1) does TFMSC data include all IFR flight plans, including tail-numbers on the ‘blocked list’?; and, (2) does the dataset include flight plans that are filed but never activated or flown (clearly, if it does, they need to be removed, as they are not valid for constrained ops counting). Once the dataset is reviewed, it becomes possible to validate potential constrained ops by conferring with operators, and getting them to consult the appropriate aircraft logbooks. It is important, too, to validate a claimed ‘constrained operation’ is truly a constrained op; i.e., if an operator is flying to the East Coast on a hot day, and if the range of the aircraft is not enough to get to their East Coast destination non-stop, then a single fuel-stop that day does NOT qualify as a constrained op. Logbooks will show the sequence of airport destinations, thus can validate or disqualify any claimed constrained op. We only need cooperation from at least some of the KUAO operators, to assess the constrained ops data.

8. **Add detailed narrative on the existing Nonstandard Conditions.** One of the more significant requests by FAA, when they reviewed the Draft chapters of the Master Plan, was the need for Century West to focus on nonstandard conditions. These are the current airport conditions for which minimum aviation safety standards are not met. One of these is the fact that trucks (or even small vehicles) on the Hubbard Cutoff highway are closer to the jets on the runway than is allowed by aviation safety standards.

5 One more thing to consider is the poor quality of the survey question. Read it again, carefully: “Identify the number of annual operations at the Aurora State Airport that require a runway extension...” This does not bind the respondent in any way to identifying aircraft that are truly constrained; instead, it allows a respondent to arbitrarily declare, if he had his druthers, that any little single-prop puddle-jumper would require a longer runway solely as an added safety buffer. This was the ambiguity, in ODAV’s survey language, that enabled Bruce to declare ‘approx. 500 ops’.

Modifications to Standards	
Standard Being Modified	Proposed Action
1 Advisory Circular (AC) 150/5300-13, para 307 (Runway Object Free Area)	The standard runway object free area (OFA) for Airport Reference Code C-II airports is 800 feet. Highway 551 runs north/south parallel to Runway 17/35; the approximate distance from the Runway 17/35 centerline to the Highway 551 centerline is 400 feet. As the airport geometry is not changing from the current condition, the Oregon Department of Aviation (ODA) requests a modification of the OFA design standard to allow the runway and highway to remain in their current positions.

This is a significant limitation at Aurora. As efforts are pressed to approve larger jets, the size of the protected areas (in this example, the runway OFA, or ROFA) increases. Simple geometry causes that expanded ROFA to eventually overtake other land uses, such as traffic on Highway 551. Similarly, as pilots press for new approaches to be allowed in lower weather conditions (less visibility, lower cloud heights), the size of the protection zones must be increased. So, the bottom line is this: if we continue down this path of extending runways and lowering approach minima, we eventual will have to either relocate Highway 551 (and remove a few homes), or just cross our fingers and pray the noncompliance does not result in additional ground fatalities. Aurora Airport is constrained by other uses of the land, a point that argues strongly against any further expansion of the runway or reduction of approach minima... especially when better and safer options are already available at the Portland and Salem airports.

9. **Add detailed narrative on the history of airport Master Plans.** The 2012 Master Plan was hugely contentious. So much so that Oregon Solutions was retained to do a report and try to present facts to enable parties to smooth over relations. The website for this Master Plan process includes a copy of the Oregon Solutions 57-page report, as a reference document. That's a good move by Century West and JLA. But, a better move would be to go a bit further: add a narrative of facts that succinctly outlines the entire 'Airport Master Plan' history of Aurora Airport.

A good Master Plan helps bridge differences. The pro-expansion side needs to become able to understand and respect the anti-expansion, and vice versa. If those differences are not bridged, they are like an uncleaned wound: an opening for infection and far worse damages.

Facts are always the best way to bridge differences. Century West has a contract to create the current Master Plan, thus has an opportunity to craft a narrative of facts that can help each side to meet the other. If not now, when?



10. **Add precise narrative and data on 'Economic Costs and Benefits'.** There is a bias towards exaggerating the economic benefits while ignoring economic costs. Commonly, airport Master Plans include many pages of figures alleging a positive economic stimulus by the very existence of the airport, and implying 'the bigger the airport, the more money flows into local households'. Uncritical readers are misled to perceive the airport as a virtual printing press for cash. But, if a large corporate jet chooses to use the longer and safer runways at KPDX for a flight to Europe, is the net spending in the Portland area reduced? Does a PDX departure really do any harm to the economy around Wilsonville and Canby? Probably not. And, actually, net spending

may be increased, because the FBO at KPDX may assess higher fuel and service costs, and the Port of Portland may collect a higher fuel surcharge, at Portland versus Aurora. Realistically, the ‘economic engine’ potential of an airport should only be offered as a regional figure. In this Master Plan, data for the entire group of airports (KPDX, KHIO, KSLE, KMMV, KTTD, KSPB, 4S9 and KUAO) needs to be presented, collectivizing the costs and benefits of all airports in the airport system of the Portland-Salem geographic area. Such data would reveal an important fact: extending the KUAO runway may increase ODAV revenues and profits for the Willamette and Atlantic FBOs, but it does so at a net reduction of regional economic benefit.

11. **Sharpen ODAV’s role at Aurora Airport, to ensure the airport is optimally managed.** The public would become better informed if the Master Plan provided narrative and data on ODAV’s role as airport operator. We need precise data and tables, showing KUAO revenues and costs, by year, for at least the last 20-years. Also, include columns showing what percentages KUAO annual revenues and annual costs are as a fraction of the total state airport system ‘managed’ by ODAV.⁶

Going forward, everyone (airport users, and airport neighbors) will be best served if ODAV establishes an on-site management presence. ODAV should have a manager at the airport seven days per week, roughly sunrise to sunset.⁷ Not just to maintain and monitor airport, and to diplomatically field noise complaints, but also to do on-airport research. Simply listening to tower frequency can produce a definitive log of activity; callsigns provide a base for validating (and supplementing) lists of ‘based aircraft’. And, let’s be clear: it is highly probable there are many tenants, through the fence, who are NOT documented with ODAV. This is a serious problem that undermines revenues and denies effective airport management. Resolving this problem requires a focused and thoughtful effort by ODAV, an on-airport presence.

This Master Plan document is intended to be an objective and thorough assessment of Aurora Airport, to inform and empower those citizens who take the time to read it. But, this Master Plan document can also be a ‘nudge’ to get ODAV, FAA, and others to advocate for better airport management. What we write about may precipitate positive changes; what we fail to write about tends to persist without needed changes.

Again, please add this letter to the public record. Thank you. *Jeff Lewis*

6 Informed and discerning readers would accurately assume Aurora is likely the largest revenue source for all state airports, and may also be the largest cost burden. Quantifying these amounts, and the relative sizing of Aurora, is helpful.

7 Given the number of based aircraft and the complexity of the ‘through-the-fence’ boundaries, airport management should be on-site 90+ hours per week. That said, if ODAV is too cheap or indifferent to make this happen, at a minimum management should be on-site for all weekends, and full-days on at least one or two weekdays, year-round.

Aurora State Airport Master Plans: Timeline 1976-2022

Year (APMP)	Current Year total ops	Forecast year(s) total ops	Current based acft	Forecast based acft	Notes	source (pg):
1976	est.90K	112K (1980)	est.127	154 (1980)		p29 of 63p PDF
1977		140K (1985)		184 (1985)		ALP at p37 of 63p PDF
1978		209K (1995)		248 (1995)	RSA: 300'-width	
1979					midfield parcel purchased (22-acres)	
1980						
1981						
1982						
1983						
1984						
1985						
1986					midfield parcel purchased (10-acres)	
1987						
1988	est.63K	82K (1992)	est.254	275 (1992)		ch.5 p13 APMP
1989		100K (1997)		310 (1997)		ALP at p3 of ch.3
1990		140K (2007)		360 (2007)	RSA: 200'-width existing, aims to upgrade to 250'-width; critical aircraft is medium twin-prop, aims to upgrade to medium bizjet.	
1991					Runway lengthened from 4,100ft to 5,000ft	
1992						
1993						
1994						
1995						
1996						
1997						
1998					Columbia Aviation Country Club – formerly at PDX, forced to move; new clubhouse opens 5/31/98, on land bought from Bennett's.	
1999						
2000	est.88K	92K (2002)	est.259	272 (2002)		(p57 of 118p APMP PDF)
2001		98K (2007)		288 (2007)		(Grants: see aiR-Airports at 20180331)
2002		103K (2012)		304 (2012)		best ALP copy is color, at p41 of 57p OregonSolutions.org report.
2003					RWY/TWY separation is still 200', except wider (300') at south 1,000ft; north 4,000ft still needs to be rebuilt with wider 300' spacing.	
2004		108K (2017)		318 (2017)	AIP Grants data shows ~\$5.5M AIP between 2007 and 2015, related to TWY relocation.	
2005	est.84K					Quadrex C/B Analysis (2007)
2006					Quadrex 'Cost/Benefit Analysis' to justify FAA funding of a new control tower.	
2007			est.421			Quadrex C/B Analysis (2007)
2008					RSA: 150'-width existing, to remain the same; critical aircraft is B-II small bizjet, remains the same. ROFA: 500'-width.	
2009						ALP at '20090116..', 'as-built' vers.; document plotted 1/16/09, printed 10/28/09
2010	est.100K	107K (2015)	est.432	462 (2015)		PAC#2, 20100930 (meeting presentation, p27 of 29p)
2011		115K (2020)		494 (2020)	3/31/11: Consultant WHPacific & ODAV present 'Preferred Alternative', with no runway extension.	
2012		131K (2030)		566 (2030)		ALP 'preferred alternative, vers. 3/29/11' at '20110329..'
2013						ALP by WHPacific, dated 1/3/2013; at p46 of 57p OregonSolutions.org report.
2014					RSA: 500'-width existing, to remain the same; critical aircraft is B-II small bizjet, remains the same.	
2015					ROFA: 800'-width	
2016	48K	← the only REAL ops data (tower).				
2017	58K					
2018	63K		est.349			based aircraft, at p16 of 56p Constrained Ops study
2019	63K				Critical aircraft increased to C-II bizjet.	
2020	66K					
2021	73K					
2022	64K	85K (2026)	est.281	300 (2026)		p. 3-19 of draft ch.3, 2022 APMP
		95K (2031)		317 (2031)		
		107K (2036)		333 (2036)		
		120K (2041)		350 (2041)		

Acronyms-1: ALP (Airport Layout Plan); APMP (Airport Master Plan); ROFA (Runway Obstruction-Free Area);

Acronyms-2: RSA (Runway Safety Area); RWY (Runway); TWY (Taxiway).

Based Aircraft: ODAV owns very little of the land for the larger 'airport'. Most aircraft are based on private lands with 'through-the-fence' airport access. ODAV is unable to effectively manage this airport, and based aircraft figures are estimates.

Data Sources: from various APMP's and other documents. Actual Operations data from tower starting in late 2015.