



Pacific Skies Aviation LLC

December 23, 2024

Alex Thomas

Planning and Programs Manager

Oregon Department of Aviation

3040 25th Ste SE

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Re: Aurora State Airport Master Plan Proposed Preferred Alternative

Mr. Thomas,

Please enter this letter into the record for the Oregon Department of Aviation's (ODAV) proposed "Preferred Alternative" for the Aurora State Airport Master Plan. We support Director Sugahara's statement that ODAV is willing to modify its Preferred Alternative for the Aurora Airport Master Plan. We believe that it is important that ODAV do so, to enable the airport to continue to deliver significant tax benefits, family wage jobs, emergency resiliency and aeronautical innovation to the region and state. The current version of ODAV's proposed Preferred Alternative is inconsistent with these objectives.

ODAV is bound by ORS 836.640-642 which was developed by Business Oregon. That statute strongly encourages private investment at the Aurora Airport and commands ODAV to carry out that objective. Contrary to that statute, ODAV's proposed alternative contemplates ODAV taking by eminent domain the Aurora Airport front line aircraft hangars for which the owners have invested more than \$200 million, created millions in tax revenue, more than a 1000 good jobs and millions in directly and indirectly related tourist revenue for surrounding communities, with ORS 836.640-642 as the catalyst.

Against this backdrop, the "Preferred Alternative" anomalously designates areas that have been set aside in airport master plans for airport related development since 1976, as areas for ODAV acquisition instead of bringing them into the airport boundary established by ORS 836.640-642 for development for airport related uses and wipes out the front line hangars.

Both elements of the preferred alternative are misguided. Among other objectives for the Aurora Airport, ORS 836.642 requires ODAV to "Preserve investments [at the Aurora Airport] and the level of service provided by [the Aurora Airport]" and to "promote economic development" at Aurora "by creating family wage jobs, increasing local tax bases" through support of private aviation-related uses so that they may "develop and thrive." The preferred alternative is contrary to ORS 836.640-642 and expressly seeks to trade the private investment that the statute seeks to encourage and grow, for government condemnation and ownership.

Concerningly, ODAV's preferred alternative significantly gambles with the significant economic benefits that private investment at the airport has delivered, risking their continuation. The threat of ODAV condemnation, not to mention ODAV actually engaging in such litigation against those owners, presents an unacceptable risk of driving away not only those aircraft hangar owners, but also their businesses, jobs and related tax and tourist revenue. Once they are gone, the stigma of such ODAV action could make the airport and indeed any airport that ODAV manages, a private investment pariah for decades. Such a risk should not be taken where, as here, a state statute commands ODAV otherwise and there are alternatives.

It is respectfully submitted that the justification for the "preferred alternative" simply does not justify its deleterious effects. ODAV is on record stating that these harmful consequences only flow from ODAV's



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desire for a “vehicle service road” (VSR) and a new aircraft taxiway. But neither necessitates the preferred alternative.

Regarding the VSR, the 2012 master plan approved a VSR that has none of the Preferred Alternative’s deleterious effects and does not carry a \$200 million condemnation price tag. At worst, the 2012 VSR costs the state some pavement. Moreover, we are advised that the private aeronautical stakeholder owners have offered ODAV the land needed for the 2012 MP VSR free of charge. We are unaware of any reason for ODAV to not pursue that 2012 MP VSR and we can only see good reasons to do so.

We are further advised that there are alternatives for a new taxiway that ODAV has not explored. We understand that ODAV has not explored any such alternatives because it does not own the land needed for a taxiway to be located elsewhere. However, so far as we know this has never been an impediment previously to the development of the Aurora Airport and should not be an impediment now. Many features of the proposed alternative are now contemplated on land that ODAV does not own – including the taking of the frontline hangars. Even if ODAV had to acquire some private land for a new taxiway, ODAV should explore such alternatives having the least adverse impact on the continuation and growth of private aeronautical investment at the airport, not to mention a price tag well south of the \$200 million under the Preferred Alternative. Finally, we are advised that ODAV simply does not “want” to extend the airport boundary to include the land that is now and has long been foreseen for airport-related development in the airport boundary. Such a justification if true, would obviously be contrary to ODAV’s mission and responsibility to enable the Aurora Airport to grow with aviation-related uses.

We are frankly perplexed by these problems given the success of the airport and the commands of ORS 836.640-642. ODAV should be eager to develop a master plan that ensures the Aurora Airport’s continued growth and success over the master plan’s 20-year horizon. If these problems that risk sending the airport backwards by decades arise from a lack of meaningful airport stakeholder engagement in the development of the preferred alternative, then ODAV should meaningfully engage. But whatever the reason, we strongly encourage ODAV to dismiss the Preferred Alternative and to meet with the airport stakeholders and to explore a more normative and economically reasonable preferred alternative that is consistent with ORS 836.640-642.

Thank you for your consideration.

Sincerely,

Lukas Nickerson
Chief Operating Officer
Pacific Skies Aviation LLC