

## Comments for Aurora Airport PAC Meeting 8 Roundtable discussion on Preferred Alternative

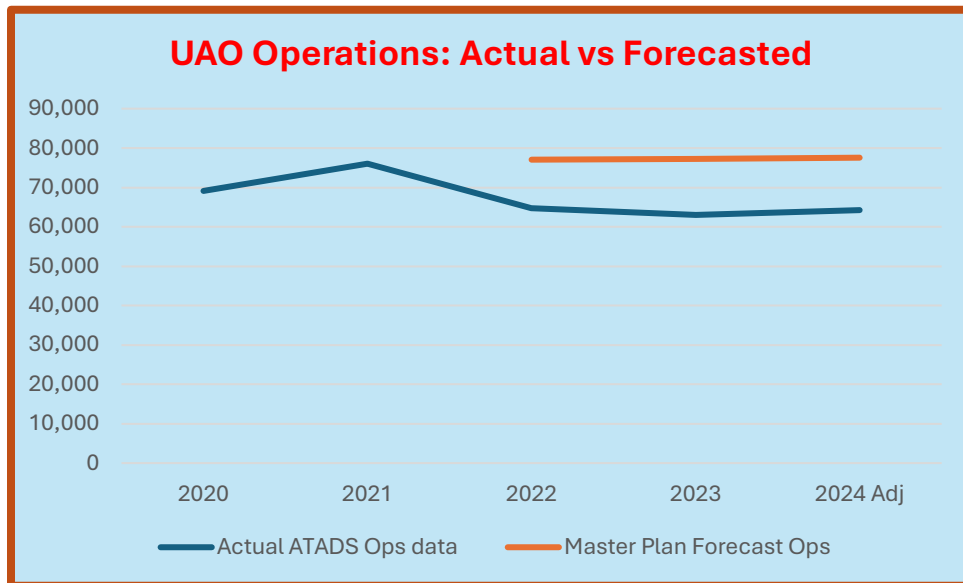
Friends of French Prairie has previously (March 12, 2024 letter) commented on the forecast approval by the FAA and specifically the selection of the Marion and Clackamas County Population Growth Model rather than the Federal Contract Tower TAF State (Oregon) Model.

Additionally, in Response 7 to Comments made at 11-15-24 PAC meeting, Century West and ODAV respond: *FAA has stated that alternatives that artificially downgrade to AAC/ADG BII do not reflect the current or forecasted operational environment at the Airport and they are not viable options.*

Compounding the problem of the forecast model chosen is a much more fundamental problem which is now visible due to the delay in the Aurora Airport Master Plan process which was originally expected to deliver a Final Report in March of 2023. The data set being used is 2016 through 2021, and we are now at the end of 2024.

Specifically, the forecast model selected is not only the one most favorable that results in the highest growth forecast, but it is built off the 2021 operations data. When compared to the subsequent years, 2021 can now be seen as a one-year fluke with increased operations followed by three years of reduced operations.

When total operations of 76,028 in 2021 are compared using the FAA's own ATADS data, 2022 dropped to 64,651, followed by a further drop in 2023 to 63,015, and a slight increase in 2024 to 64,259 (adjusting 2024 YTD data for twelve months). See attached ATADS data. All three of these subsequent years are lower than both 2021 and 2020, and look like this:



Note: 2024 Adjustment begins with Jan-Sep data and adds 16.5% (same % for period as 2023)

We are now in the forecasted period and are already falling far short of the forecasted operations.

The present has caught up with the future, and it is incumbent upon the FAA, Century West and ODAV to acknowledge this reality and correspondingly get real about the future of Aurora State Airport and give up on the outlandish and expensive C-II based Preferred Alternative, and seriously assess reverting to B-II status.

Ben Williams

Friends of French Prairie

**ANALYSIS: KUAO Monthly ATADS data, 2015 thru SEP 2024 (pg.1 of 2)**

month	FAA's ATADS data									12-Month Running Sum						
	Itinerant ops					Local ops				TOTAL	Ave. ops/day			12mo RS: yr2yr chg		
	AC	AT	GA-I	MI-I	ITIN	GA-L	MI-L	LCL	TOTAL	TOTAL	AC+AT	LCL	%LCL	LCL	ITIN	AC+AT
11/2015	14	129	2,156	17	2,316	1,296	32	1,328	3,644							
12/2015	1	106	979	3	1,089	466	6	472	1,561							
01/2016	0	143	1,853	13	2,009	1,018	0	1,018	3,027							
02/2016	0	106	2,429	13	2,548	1,202	0	1,202	3,750							
03/2016	0	142	2,382	29	2,553	1,012	74	1,086	3,639							
04/2016	0	190	2,895	18	3,103	1,242	6	1,248	4,351							
05/2016	0	213	3,142	14	3,369	1,484	14	1,498	4,867							
06/2016	0	183	3,183	32	3,398	1,140	10	1,150	4,548							
07/2016	0	220	3,229	28	3,477	1,303	6	1,309	4,786							
08/2016	0	180	3,589	44	3,813	1,477	2	1,479	5,292							
09/2016	0	205	3,027	19	3,251	1,576	0	1,576	4,827							
10/2016	0	160	2,015	12	2,187	1,106	4	1,110	3,297	47,589	5	40	30%			
11/2016	0	153	2,156	15	2,324	1,586	0	1,586	3,910	47,855	5	40	31%			
12/2016	0	145	1,009	9	1,163	907	13	920	2,083	48,377	6	42	31%			
01/2017	0	157	1,691	4	1,852	954	10	964	2,816	48,166	6	41	31%			
02/2017	0	121	1,301	4	1,426	668	0	668	2,094	46,510	6	40	31%			
03/2017	1	130	1,856	10	1,997	1,090	0	1,090	3,087	45,958	6	40	32%			
04/2017	0	198	2,340	9	2,547	1,325	0	1,325	3,872	45,479	6	40	32%			
05/2017	0	186	3,482	40	3,708	2,593	28	2,621	6,329	46,941	6	43	34%			
06/2017	0	198	3,396	15	3,609	2,700	0	2,700	6,309	48,702	6	48	36%			
07/2017	0	212	4,057	24	4,293	3,500	22	3,522	7,815	51,731	6	54	38%			
08/2017	0	239	3,928	8	4,175	2,962	8	2,970	7,145	53,584	6	58	39%			
09/2017	0	188	3,317	35	3,540	2,674	28	2,702	6,242	54,999	6	61	40%			
10/2017	0	158	2,865	11	3,034	2,014	6	2,020	5,054	56,756	6	63	41%	59%	19%	5%
11/2017	0	210	1,844	7	2,061	1,245	18	1,263	3,324	56,170	6	62	41%	55%	17%	7%
12/2017	0	166	2,214	19	2,399	1,666	0	1,666	4,065	58,152	6	64	40%	55%	20%	6%
01/2018	0	150	2,138	12	2,300	1,552	32	1,584	3,884	59,220	6	66	41%	60%	23%	5%
02/2018	0	161	2,098	2	2,261	1,618	8	1,626	3,887	61,013	6	69	41%	72%	31%	6%
03/2018	0	216	2,750	13	2,979	1,892	142	2,034	5,013	62,939	6	71	41%	78%	37%	11%
04/2018	0	137	2,742	9	2,888	1,973	2	1,975	4,863	63,930	6	73	42%	82%	41%	8%
05/2018	0	171	3,537	20	3,728	2,484	10	2,494	6,222	63,823	6	73	42%	68%	36%	8%
06/2018	0	179	3,731	9	3,919	2,644	0	2,644	6,563	64,077	6	73	41%	53%	32%	6%
07/2018	0	165	3,660	131	3,956	2,860	5	2,865	6,821	63,083	6	71	41%	32%	22%	5%
08/2018	0	220	3,558	11	3,789	3,004	12	3,016	6,805	62,743	6	71	41%	23%	17%	1%
09/2018	0	179	3,437	26	3,642	3,154	6	3,160	6,802	63,303	6	72	42%	19%	15%	1%
10/2018	0	144	2,801	11	2,956	2,308	2	2,310	5,266	63,515	6	73	42%	15%	12%	1%
11/2018	0	144	2,311	9	2,464	1,640	4	1,644	4,108	64,299	6	74	42%	19%	14%	-5%
12/2018	0	123	1,752	6	1,881	1,072	6	1,078	2,959	63,193	5	72	42%	12%	9%	-8%
01/2019	0	139	2,190	5	2,334	1,699	4	1,703	4,037	63,346	5	73	42%	10%	7%	-8%
02/2019	1	96	1,229	7	1,333	1,040	0	1,040	2,373	61,832	5	71	42%	3%	1%	-13%
03/2019	1	125	2,695	2	2,823	1,911	2	1,913	4,736	61,555	5	71	42%	-1%	-2%	-20%
04/2019	0	117	2,388	3	2,508	1,904	0	1,904	4,412	61,104	5	71	42%	-3%	-4%	-19%
05/2019	0	133	3,118	25	3,276	3,031	4	3,035	6,311	61,193	5	72	43%	-1%	-4%	-20%
06/2019	0	176	3,337	4	3,517	2,854	0	2,854	6,371	61,001	5	73	43%	0%	-5%	-19%
07/2019	0	196	3,386	2	3,584	3,597	0	3,597	7,181	61,361	5	75	44%	5%	-3%	-16%
08/2019	0	188	3,803	21	4,012	3,683	5	3,688	7,700	62,256	5	77	45%	8%	-1%	-17%
09/2019	0	127	2,878	14	3,019	2,653	1	2,654	5,673	61,127	5	75	45%	4%	-3%	-19%
10/2019	0	138	3,276	8	3,422	2,752	8	2,760	6,182	62,043	5	76	45%	5%	-2%	-19%
11/2019	0	70	2,619	4	2,693	1,915	8	1,923	4,616	62,551	4	77	45%	4%	-3%	-20%
12/2019	0	62	1,664	5	1,731	1,527	0	1,527	3,258	62,850	4	78	46%	8%	-1%	-21%
01/2020	0	50	1,653	3	1,706	1,648	0	1,648	3,354	62,167	4	78	46%	8%	-2%	-25%
02/2020	0	53	2,548	4	2,605	2,479	4	2,483	5,088	64,882	4	82	46%	15%	5%	-25%
03/2020	0	125	2,028	2	2,155	2,268	0	2,268	4,423	64,569	4	83	47%	17%	5%	-21%
04/2020	0	46	2,052	1	2,099	2,073	0	2,073	4,172	64,329	4	84	47%	18%	5%	-24%

...ATC tower opens, including daily ops counts (earlier counts are NOT reliable)

2016

2017

...initial large growth in local ops as area pilots learn to trust ATC at new control tower

2018

...air charter decline begins ~16-months ahead of COVID

2019

...LCL ops flatten out briefly, indicating transition to and acceptance of local tower is complete

2020

...accelerated growth in LCL ops prior to and during COVID

...begin widespread air travel collapse due to COVID...

**ANALYSIS: KUAO Monthly ATADS data, 2015 thru SEP 2024 (pg.2 of 2)**

month	FAA's ATADS data									12-Month Running Sum									
	Itinerant ops					Local ops				TOTAL	Ave. ops/day			12mo RS: yr2yr chg					
	AC	AT	GA-I	MI-I	ITIN	GA-L	MI-L	LCL	TOTAL		AC+AT	LCL	%LCL	LCL	ITIN		AC+AT		
05/2020	0	77	2,713	1	2,791	3,332	1	3,333	6,124	64,142	4	84	48%	17%	5%	-26%	..during the pandemic, ops by GA pilots (mostly personal and recreational hobby flying) saw substantial growth, while commercial flying was all but frozen for more than a year		
06/2020	0	86	2,730	2	2,818	3,398	1	3,399	6,217	63,988	3	86	49%	18%	5%	-31%			
07/2020	0	155	3,837	8	4,000	3,855	10	3,865	7,865	64,672	3	87	49%	16%	5%	-34%			
08/2020	0	133	3,721	1	3,855	3,642	0	3,642	7,497	64,469	3	87	49%	13%	4%	-36%			
09/2020	0	67	2,377	9	2,453	2,501	0	2,501	4,954	63,750	3	86	49%	15%	4%	-38%			
10/2020	0	86	3,328	1	3,415	4,154	0	4,154	7,569	65,137	3	90	50%	18%	5%	-41%			
11/2020	0	122	1,665	2	1,789	2,166	2	2,168	3,957	64,478	3	91	51%	17%	3%	-35%			
12/2020	0	61	2,028	2	2,091	2,638	0	2,638	4,729	65,949	3	94	52%	19%	5%	-32%			
01/2021	0	96	2,107	4	2,207	2,651	4	2,655	4,862	67,457	3	96	52%	23%	9%	-25%		2021	
02/2021	0	59	1,758	3	1,820	1,882	4	1,886	3,706	66,075	3.0	95	52%	15%	2%	-22%			
03/2021	0	134	3,142	12	3,288	3,419	0	3,419	6,707	68,359	3.1	98	52%	18%	6%	-22%			
04/2021	0	128	3,379	2	3,509	3,095	26	3,121	6,630	70,817	3.3	101	52%	21%	10%	-12%			..begin post-COVID resumption of air travel; result was slightly more than 2-years of sating pent-up elite travel demand
05/2021	0	177	3,364	1	3,542	4,301	0	4,301	7,843	72,536	3.6	103	52%	23%	13%	0%			
06/2021	0	248	3,621	19	3,888	3,756	8	3,764	7,652	73,971	4.0	104	52%	22%	16%	20%			
07/2021	0	189	4,102	4	4,295	4,033	0	4,033	8,328	74,434	4.1	105	51%	21%	15%	27%			
08/2021	0	220	4,016	4	4,240	3,762	0	3,762	8,002	74,939	4.3	105	51%	22%	16%	41%			
09/2021	0	207	3,393	8	3,608	3,198	3	3,201	6,809	76,794	4.7	107	51%	24%	20%	63%	..peak in LCL ops per day		
10/2021	0	148	2,781	9	2,938	2,272	8	2,280	5,218	74,443	4.9	102	50%	13%	14%	77%			
11/2021	0	132	2,093	6	2,231	1,754	0	1,754	3,985	74,471	4.9	101	49%	11%	15%	69%			
12/2021	0	147	1,552	2	1,701	1,098	8	1,106	2,807	72,549	5.2	97	49%	3%	10%	78%			
01/2022	0	150	2,315	2	2,467	1,460	10	1,470	3,937	71,624	5.3	93	48%	-3%	6%	75%	2022		
02/2022	0	122	2,307	13	2,442	1,428	12	1,440	3,882	71,800	5.5	92	47%	-3%	9%	80%			
03/2022	4	229	2,766	5	3,004	2,289	6	2,295	5,299	70,392	5.8	89	46%	-9%	3%	87%			
04/2022	0	161	2,295	14	2,470	1,884	4	1,888	4,358	68,120	5.8	86	46%	-15%	-4%	77%			
05/2022	0	202	3,045	7	3,254	2,616	4	2,620	5,874	66,151	5.9	81	45%	-22%	-9%	66%			
06/2022	0	178	3,633	4	3,815	2,948	0	2,948	6,763	65,262	5.7	79	44%	-24%	-12%	42%			
07/2022	0	241	3,717	38	3,996	2,900	2	2,902	6,898	63,832	5.9	76	43%	-28%	-14%	43%			
08/2022	0	361	4,204	10	4,575	3,968	0	3,968	8,543	64,373	6.3	76	43%	-27%	-14%	44%			
09/2022	0	200	3,573	9	3,782	2,800	0	2,800	6,582	64,146	6.2	75	43%	-30%	-16%	32%			
10/2022	0	181	2,873	4	3,058	2,178	6	2,184	5,242	64,170	6.3	75	43%	-26%	-14%	29%			
11/2022	0	171	2,290	5	2,466	1,798	4	1,802	4,268	64,453	6.4	75	43%	-26%	-13%	30%			
12/2022	0	154	1,661	0	1,815	1,190	0	1,190	3,005	64,651	6.4	75	43%	-22%	-11%	25%			
01/2023	0	180	1,911	3	2,094	1,574	0	1,574	3,668	64,382	6.5	76	43%	-19%	-10%	23%	2023		
02/2023	0	159	1,854	4	2,017	1,276	0	1,276	3,293	63,793	6.6	75	43%	-18%	-11%	21%			
03/2023	0	175	2,212	7	2,394	1,698	4	1,702	4,096	62,590	6.5	74	43%	-17%	-11%	12%			
04/2023	0	177	2,509	29	2,715	1,714	4	1,718	4,433	62,665	6.5	73	43%	-15%	-8%	11%		..LCL ops per day bottomed out at 2018 base level, and ~80%+ over 2016 rates	
05/2023	0	261	3,500	55	3,816	2,757	10	2,767	6,583	63,374	6.7	74	42%	-9%	-4%	13%			
06/2023	0	239	3,253	7	3,499	2,752	0	2,752	6,251	62,862	6.8	73	42%	-8%	-4%	20%			
07/2023	0	277	3,556	22	3,855	3,704	0	3,704	7,559	63,523	6.9	75	43%	-1%	0%	18%			
08/2023	0	262	3,447	12	3,721	3,734	0	3,734	7,455	62,435	6.7	75	44%	-2%	-3%	7%			..air charter COVID-recovery ends; begin period of flat or declining commercial ops
09/2023	0	209	3,053	4	3,266	3,524	0	3,524	6,790	62,643	6.7	77	45%	2%	-2%	7%			
10/2023	0	226	2,739	9	2,974	2,564	16	2,580	5,554	62,955	6.8	78	45%	3%	-2%	8%			
11/2023	0	162	2,133	5	2,300	2,248	0	2,248	4,548	63,235	6.8	79	45%	5%	-2%	6%			
12/2023	0	120	1,412	5	1,537	1,242	6	1,248	2,785	63,015	6.7	79	46%	5%	-3%	4%			
01/2024	0	135	1,213	13	1,361	1,210	4	1,214	2,575	61,922	6.6	78	46%	3%	-4%	1%	2024		
02/2024	0	154	2,093	0	2,247	2,072	0	2,072	4,319	62,948	6.6	80	46%	7%	-1%	-1%			
03/2024	0	174	2,644	6	2,824	2,112	6	2,118	4,942	63,794	6.6	81	47%	11%	2%	1%			
04/2024	0	178	2,877	23	3,078	2,526	18	2,544	5,622	64,983	6.6	84	47%	14%	4%	1%			
05/2024	0	174	3,516	6	3,696	3,938	12	3,950	7,646	66,046	6.3	87	48%	18%	4%	-5%		..the trend in 2024: air charter (large planes) is declining, while personal flying and flight training (small planes) are increasing	
06/2024	0	196	3,355	13	3,564	3,636	18	3,654	7,218	67,013	6.2	89	49%	22%	7%	-9%			
07/2024	0	192	2,910	9	3,111	3,874	2	3,876	6,987	66,441	6	90	49%	19%	5%	-14%			
08/2024	0	185	3,508	18	3,711	4,808	0	4,808	8,519	67,505	6	93	50%	24%	8%	-14%			
09/2024	0	192	3,177	23	3,392	3,936	2	3,938	7,330	68,045	6	94	50%	23%	9%	-15%			