

February 25, 2025

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3040 25th St SE
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Re – AAIA Comments to Airport Layout Plan (Aurora State Airport Master Plan)

Dear Mr. Thomas,

Please include in the record.

This letter is submitted on behalf of the Aurora Airport Improvement Association (AAIA). AAIA continues to have significant concern about the Aurora State Airport Master Plan.

The proposed master plan neglects airport safety because it continues to plan to punt the runway extension that has been needed for more than 15 years. The safety value of a runway extension to **6000'** has long been the primary focus of this airport's future. Through this most recent Master Planning process, however, it seems ODAV completely lost sight of this top priority. The priority of safety.

The focus of the airport's future has never been the introduction of scheduled airline service or a massive expansion outside the rough footprint of the State-owned land and through the fence properties. Claims otherwise are "boogie-men" meant to distract the process and stir opposition to a runway extension. Aurora State Airport will never be an FAR Part 139 airport.

This current draft Airport Layout Plan and the process that brought us all to this point are clear evidence of ODAV's effort to avoid ever extending the runway to 5500', let alone to the beneficially safe length of 6000'. This proposed plan ignores safety and places any extension far in the future, behind and at the mercy of other projects that due to exorbitant funding requirements, will never happen. This is being done by ODAV claiming those projects are required to be done in the name of safety. This is a false analysis.

The runway extension should happen early in the planning schedule. The FAA allows for this as freely admitted by FAA Planner, Tim House, during a PAC meeting. When questioned, he explained that the sponsor must only show in the plan **progress toward compliance** before the runway can

be extended. This is different from ODAV's claim of perfect design guidance compliance before the runway can be extended.

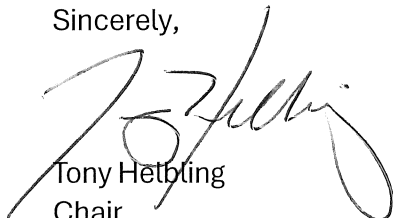
ODAV needs to state in the Master Plan that it intends for the Airport Boundary to be adjusted to take in of the property long identified in all master plans as suitable for airport related use that runs to Airport Road NE in the ALP. Although the FAA does not require specific designation, the State of Oregon land use system, as called out by the courts, does recognize the boundary as important. ODAV is a state agency and as called out in Oregon Revised Statute 836.642, the agency should recognize the importance of the airport, as a whole, whether privately or publicly owned.

ODAV needs to fight for the airport by applying for variances or MoS for ROFA – it is possible as per precedent set in Key West, Florida and Rutland, Vermont. It is clear the FAA can consider pre-existing conditions, as called out in FAA guidance, as reasoning for allowances to be made.

As previously requested, AAIA asks again that ODAV involve Through the Fence (TTF) parties as collaborative partners in the airport Master Plan process moving forward. This request applies across all state airports. The AAIA highlights the following reasons for their involvement:

- **Direct Impact and Proximity:** Through the Fence parties are located within the confines of the airport property, meaning they are directly affected by any developments or changes proposed in the Master Plan. As such, their interests and operations are more closely impacted than those of any other participants in the planning process.
- **Private Investments Based on ORS 836-642:** Through the Fence parties have made private investments based on the efficacy and stipulations of Oregon Revised Statute 836-642. These investments contribute to the airport's development and its operational success.
- **Source of Airport Improvement Needs:** The investments made by TTF parties contribute directly to the need for airport improvements. These improvements, in turn, are necessary for ensuring safety, efficiency, and respectful business operations, which must be coordinated with the surrounding communities.

Sincerely,



Tony Hetbling
Chair
AAIA