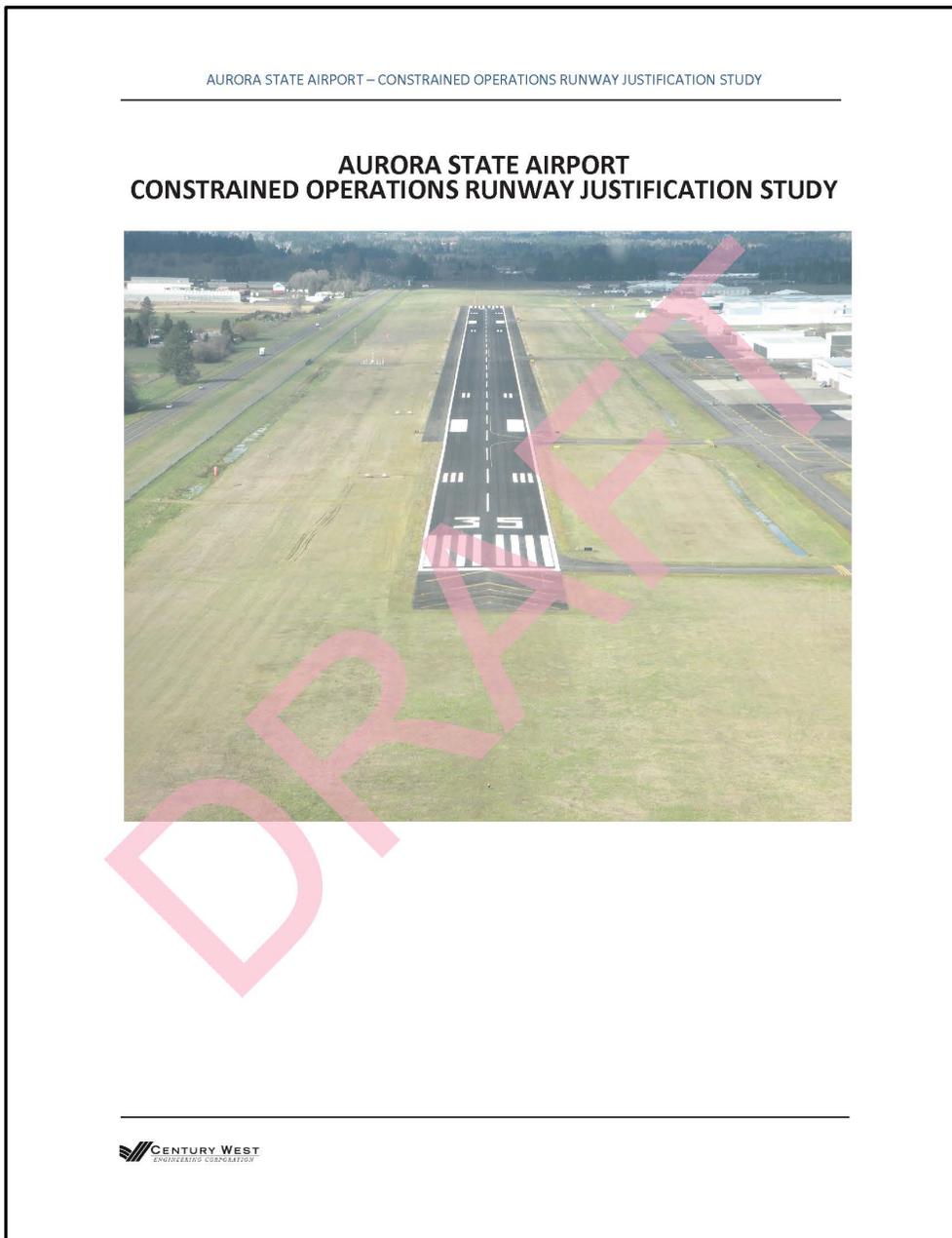


# DATA SHORTCOMINGS AND MISREPRESENTATIONS IN THE AURORA AIRPORT MASTER PLAN



Prepared by Friends of French Prairie  
Version 1.0, September 2019

## **DATA SHORTCOMINGS AND MISREPRESENTATIONS IN THE AURORA AIRPORT MASTER PLAN**

*Although the Oregon Department of Aviation based its recommendation to expand the Aurora Airport on estimates of traffic in the 2012 Master Plan, actual data available since 2015 is far lower and does not support expansion.*

In both theory and in practice, an airport master plan is a guidance document for the operation and development of an airport. It must take into account the current facts and the likely future scenarios in outlining what will probably occur and describe necessary developments, if required, over a ten or twenty-year time frame.

The most recent Aurora State Airport Master Plan process, which ran from late 2009 to the end of 2012, was problematic enough that nearly seven years later there is still significant debate about how the process was conducted, the degree to which the process and the plan itself complied with Oregon land use law, and about the very data that were used to justify future alterations and expansion.

All too often a master plan is merely used to justify a desired expansion of an airport. Most commonly it is a document created by a small cadre of aviation engineers whose principal source of income is the aviation system, and who thus tailor their work to the desired ends of that system. In too many cases this results in the creation of a document that forecasts growth in a manner consistent with wished-for goals, resulting in proposed airport expansion to be paid for principally with FAA (that is to say, taxpayer) funds, instead of a document that makes recommendations based on hard data with no obvious agenda.

The 2012 Aurora Airport Master Plan was an update to a series of previous master plans (1976, 1988, 2000). However, since the opening of the Air Traffic Control (ATC) tower in October 2015, there is now, for the first time, factual data against which master plan forecasts can be compared and assess if the need for expansion actually exists.

### **FAA Guidance on Airport Master Plans**

It is worthwhile then, to consider what the FAA has to say about Airport Planning and Airport Master Plans

#### ***500 - Airport Planning***

##### *General*

*Airport planning is a systematic process used to establish guidelines for the efficient development of airports that is consistent with local, state and national goals. A key objective of airport planning is to assure the effective use of airport resources in order to satisfy aviation demand in a financially feasible manner. Airport planning may be as*

*broad based as the national system plan or more centrally focused as an airport master plan for a specific airport. The primary types of airport planning may basically be classified as follows:*

- *National System Planning (NPIAS)*
- *State Airport System Planning (SASP)*
- *Metropolitan Airport System Planning*
- *Airport Master Planning*

### *Master Plan*

*For an individual airport, owners more closely identify with the airport master plan for their airport. An airport master plan represents the airport's blueprint for long-term development. A few of the goals of a master plan are:*

- *To provide a graphic representation of existing airport features, future airport development and anticipated land use.*
- *To establish a realistic schedule for implementation of the proposed development*
- *To identify a realistic financial plan to support the development*
- *To validate the plan technically and procedurally through investigation of concepts and alternatives on technical, economic and environmental grounds.*
- *To prepare and present a plan to the public that adequately addresses all relevant issues and satisfies local, state and federal regulations.*
- *To establish a framework for a continuous planning process.*

### *Limitations of FAA Actions*

*Sponsors must not construe the acceptance of an airport master plan by the FAA as an approval of the entire master plan document. The FAA only approves components of a master plan, not the entire document. The key elements that the FAA reviews and formally approves are:*

- *Forecasts*
- *Selection of critical aircraft*
- *Airport layout plan (ALP)*

*It is from these elements that the FAA makes a determination regarding eligibility of AIP funding for proposed development. It is critical that airport owners and their consultant coordinate early and often with the appropriate FAA planner to identify significant planning issues and to determine the type and magnitude of effort required to address such issues.*

Source: [https://www.faa.gov/airports/central/aip/sponsor\\_guide/media/0500.pdf](https://www.faa.gov/airports/central/aip/sponsor_guide/media/0500.pdf)

## **Aurora Airport Master Plan Data Failures**

***With FAA guidance and context, this paper aims to show that the Operations, Based Aircraft and Constrained Operations data used in the 2012 Aurora Airport Master Plan is inaccurate, and that the validity and the value of the forecasts are seriously flawed.***

In late 2015 an Air Traffic Control Tower (ATC) went live at Aurora State Airport, meaning that not only were flights controlled during the daylight hours of operations, but flights were recorded. Now there is access to that flight data in the form of the FAA's Air Traffic Activity Data System (ATADS) database, which documents all flights handled by the ATC and allows assessment of Total Operations at the airport (excluding flights that occur when the ATC is not staffed).

As stated above in the FAA guidance document for airport master plans, forecasts (total operations) and critical aircraft (based and typical aircraft) must be taken into account along with the ALP. Additionally, in order to qualify for FAA funding for lengthening of a runway and/or expansion of an airport, the airport must be able to demonstrate in excess of 500 constrained operations per year. A constrained operation is generally a take off that requires a lighter load (in fuel, freight or passengers) due to weather and/or runway length), and can include inability to land in bad weather due to a slick runway, etc.

In the process of seeking FAA approval for expansion of the Aurora Airport, the Dept. of Aviation commissioned a "Constrained Operations Study" to be conducted by the Century West engineering firm, and it included a "Validated Based Aircraft" count as of March 2018.

Both of these data sets are the first new and objective sets of data to appear since the end of the 2012 master plan process and they allow a realistic assessment of the forecast data in the 2012 Aurora Airport Master Plan.

### **Total Operations**

***In the absence of an air traffic control tower that documents operations, all operations numbers are estimates, and all forecasts are projections based on estimates.***

Total Operations are all take offs and landings from an airport (including Instrument and Visual Flight Rules operations) but exclude overflights (no landing or take off). Total Operations are made up of two types, Local Operations (operations within the traffic pattern airspace—i.e. take off and land at the same airport) and Itinerant Operations (those arriving from another airport or departing the traffic pattern airspace to another airport).

Almost nothing was said in previous master plans to make clear that described "operations" were estimates, and readers were allowed to assume that the data was objective. Actual objective data become available when the ATC tower opened in October of 2015. Once Total

Operations data for the full year of 2016 was in hand, it was inexcusable for ODA to continue to use estimates in the published Aurora Airport Master Plan posted on the ODA website.

In the case of Aurora, the Dept. of Aviation has stated that in the past it intermittently used an acoustical counting device of some sort to collect data. However, operations numbers in the Aurora Airport master plans are estimates derived from a mix of pilot surveys and calculations using formulas that apply the average number of flights at similar airports to the number of based aircraft. Like all estimates they are subject to significant error, especially when one of the factors (based aircraft) is also a variable in the calculation.

Of note, then, is that ALL Annual Operations or Total Operations numbers that appear in ALL of the Aurora Airport master plans prior to 2016 are estimates.

Estimated Operations	Actual Operations	Forecast Operations
<i>1976 to Nov. 2016</i>	<i>Nov. 2016 to present</i>	<i>Present forward</i>

With that understanding in mind, consider the “Aircraft Operations Forecast table from the “Aurora Airport Master Plan Update Final Report” of December, 2012

Year	Itinerant Air Taxi	Itinerant GA	Itinerant Military	Total Itinerant	Local GA	Total Operations
2009 Historical	9,788	42,592	250	52,630	36,865	89,495
2010 Estimated	10,000	48,395	250	58,645	32,264	90,909
2015	10,815	52,354	250	63,419	34,902	98,321
2020	11,697	56,635	250	68,582	37,756	106,338
2030	13,682	66,272	250	80,205	44,181	124,386

*Source: WHPacific, Inc., except Terminal Area Forecast for 2009.*

According to these flawed estimates, Total Operations are forecasted to grow from 98,321 in 2015 to 106,338 by 2020, a growth of 8,017 annual operations or 8.2%. A year-by-year distribution of that growth rate over the five-year period translates to a growth of 1,603 operations per year, and looks like this:

	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
<b>Forecast Ops*</b>	<b>98,321</b>	<b>99,924</b>	<b>101,528</b>	<b>103,131</b>

As stated previously, ACTUAL operations data (excluding night flights, which are estimated to add no more than 3-5% additional operations) now exist via the FAA ATADS database for 2016, 2017 and 2018. As demonstrated by the following table, forecast estimates used by ODA (103,131) when compared to actual numbers counted by the ATC (63,603) shows an inflated forecast with an error rate of 38% to 51%.

	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
<b>Forecast Ops*</b>	<b>98,321</b>	<b>99,924</b>	<b>101,528</b>	<b>103,131</b>
<b>Actual ATADS Ops</b>		<b>48,377</b>	<b>58,152</b>	<b>63,603</b>
<b>Forecast Error</b>		<b>51.6%</b>	<b>42.7%</b>	<b>38.3%</b>

More importantly, in spite of the fact that the ACTUAL Total Operations data have been available for over three years, ODA has made NO adjustment has been made to the Operations Forecast in the Aurora Airport Master Plan in the face of these substantial discrepancies.

Even though Actual Operations show increases from 2016 through 2018, this appears to be due to increases in local operations vs. itinerant operations, potentially masking the decrease in itinerant operations as the operations decreased. The year-to-year comparison for the first seven months indicates that 2019 will have lower Actual Operations than 2018. 2019 will likely end with Total Operations of about 60,000—far lower than all previous forecasts.

	<b>Jan-Jul 2016</b>	<b>Jan-Jul 2017</b>	<b>Jan-Jul 2018</b>	<b>Jan-Jul 2019</b>
<b>Actual ATADS Ops</b>	<b>26,968</b>	<b>32,322</b>	<b>37,063</b>	<b>35,421</b>
<b>Change</b>		<b>19.9%</b>	<b>14.7%</b>	<b>-4.4%</b>

### Based Aircraft

*ODA's forecast for the number of Based aircraft numbers at Aurora Airport in the 2012 Master Plan is over 16% higher than that shown in the new 2018 "validated" data.*

Determining the number of based aircraft at an airport is important in terms of the number of aircraft (which can factor into calculating total operation estimates) as well as the types of aircraft that define airport needs. Airports with significant numbers of mid-sized or large corporate jets have very different needs than those that only have small single engine or mid-sized turboprop aircraft. These are heavier aircraft requiring longer and stronger runways, that carry much larger amounts of fuel in order to fly much longer distances. For instance, the

Bombardier Global Express weighs 50,300 pounds empty and has a Maximum Take Off Weight of 92,500 pounds, and can carry up to 39,250 pounds (5,884 Gal) of jet fuel plus passengers and freight, and has a manufacturer stated range of 6,170 nautical miles.

The following table from “Aurora Airport Master Plan Update Final Report” of December, 2012, shows Based Aircraft and Fleet Mix Forecast

**Table 3J. Based Aircraft and Fleet Mix Forecast**

Year	Jet	Turboprop (Multi-engine)	Multi-engine Piston	Single Engine	Helicopter	Other	Total
2010	23	16	24	261	25	5	354
2015	27	19	24	276	28	5	379
2020	33	20	25	288	34	5	405
2030	47	26	27	316	43	5	464

ODA’s consultant forecasted the number of based aircraft to grow from 379 in 2015 to 405 in 2020, a growth of 26 aircraft (5.2 per year), or 6.8%. A year-by-year distribution of that forecasted growth over a five year period looks like this:

	2015	2016	2017	2018	2,019	2020
<b>Forecast Based Aircraft</b>	<b>379</b>	<b>384</b>	<b>389</b>	<b>396</b>	<b>401</b>	<b>405</b>

The previously referenced “Constrained Operations Study” commissioned by the Dept. of Aviation and conducted by Century West Engineering, and obtained from the department by

*Based Aircraft*

Based Aircraft data was recently updated in March 2018 and identified 349 validated aircraft that are based at the Airport. 10.8% of the aircraft based at the Airport are jet aircraft.

Validated Based Aircraft - 3-28-2018	
Single Engine Piston	238
Multi Engine Piston	27
Jet	38
Helicopter	46
<b>Total</b>	<b>349</b>

Source: [www.basedaircraft.com](http://www.basedaircraft.com)

Friends of French Prairie only after filing a Public Records Request and paying “costs” of \$500, includes this table titled “Validated Based Aircraft as of March 28, 2018

When the actual based aircraft from the Constrained Operations Study is compared to forecast for that year, we see:

		<b>2018</b>
<b>Forecast Based Aircraft*</b>		<b>396</b>
<b>Actual Based Air</b>		<b>349</b>
<b>Forecast Error</b>		<b>11.9%</b>

Thus, in spite of the fact that the ACTUAL Based Aircraft data have been available for a year and a half, ODA has made NO adjustment has been made to the Based Aircraft Forecast in the published 2012 Aurora Airport Master Plan in the face of these flawed figures.

### Constrained Operations

*A major point of contention in the 2012 Master Plan was the estimate of constrained operations, which was arrived at by a survey(s) of pilots and was highly criticized at the time. In 2018 ODA commissioned a new Constrained Operations Study and again the number of constrained operations was arrived at by a survey, with no effort to validate the numbers.*

As stated above, the FAA has a threshold requirement of at least 500 demonstrated Constrained Operations at an airport in order to receive approval for runway lengthening/airport expansion and to receive FAA funding. Constrained Operations numbers can be obtained by pilot surveys, or by review of flight plans and flight logs, or a mix of the two.

During the 2012 Master Plan Update process one of the points of contention was the survey to assess constrained operations. Many observers of the process complained about a biased and manipulated survey process, but the result still fell short of the required 500:

<b>Constrained Operations - 2012 Master Plan Survey</b>	
<b>Surveyed</b>	<b>473</b>
<b>Anonymous</b>	<b>12</b>
<b>Total</b>	<b>485</b>

The Constrained Operations Study commissioned by the Dept. of Aviation in February 2018 stated the following in the Scope of Work document:

**PROJECT INTENT**

*The Oregon Department of Aviation (ODA) has selected Century West Engineering (Consultant) to complete a focused planning effort to provide FAA requested justification for a constrained operations study to determine if a runway extension at the Aurora State Airport (UAO) that is currently identified on the ALP is justified. This Constrained Operations Runway Justification Study scope identifies the planning efforts and supporting justification for the planned runway extension and appurtenant facilities. The study will utilize the current 2012 Airport Master Plan (AMP) and updated Airport Layout Plan revised July 25, 2016 as the foundation documents upon which additional justification and modifications (as needed) are required to satisfy the FAA for funding eligibility and confirm project configuration, work elements, and agency approval requirements. The study will be self-funded by ODA, but will be coordinated with the FAA Seattle Airports District Office (ADO) to obtain concurrence on the scope, forecast approval, funding justification for relevant projects, and approval of the updated Airport Layout Plan, if required.*

The methodology chosen to determine the number of constrained operations was pilot interviews and a survey, and the following result:

<b>Constrained Operations - 2018 ODA Constrained Operations Study</b>		
<b>Cited Jets with Constrained Operations</b>		
	<b>Total</b>	<b>645</b>

The new ODA surveys show a 33% increase in Constrained Operations since 2012, a result that is seriously at odds with the fact that actual Total Operations are running an average of 44% below forecast, and based aircraft are down by 8.2%.

The Constrained Operations Study does not have any data indicating that the Constrained Operations claimed by pilots **were validated** with actual flight data. This is something that ODA should certainly do when these two elements are considered:

1. 7 of the 16 corporate jets reporting constrained operations reported a specific “typical stage length” on their survey, and that Stage Length is less than half of the Manufacturer Stated Maximum Range for the aircraft. For example:

	Reported CO's	Typical Stage Length Reported (nm)	Manufacturer Stated Range (nm)
Falcon 50	160	1,000-1,5000	3,200

2. 50 percent of the jets reporting Constrained Operations gave identical Reported Reasons for the experienced Constrained Operations, for example:

Reported reason for experienced Constrained Operations
Unable to depart with enough fuel to accomplish mission due to inadequate runway length

If Dept. of Aviation and its consultant Century West, to say nothing of the FAA, are entitled to rely on the numbers of constrained operations being claimed by pilots, at the very least the questionable survey results need to be validated against filed flight plans and flight logs, not just accepted at face value.

For example, on listed aircraft, the Bombardier Global Express has a Minimum Take Off Distance of 6,179 feet and an empty weight of 50,300 pounds. Aurora Airport has a 5,004 foot runway with a strength rating of 45,000 pounds and aspirations of 6,000 feet and 60,000 pounds. Therefore ODA needs to come clean not only on why they granted a permanent waiver to this non-qualifying aircraft, but also why it counts ANY of that aircraft's operations as constrained, given that this aircraft is oversize for the airport and alone accounts for 6.2% of all constrained operations claimed in the study.

### Conclusion about the new Constrained Operations Study

***Although ODA's new study finds that Constrained Operations have increased while Total Operations and Based Aircraft have decreased over the same period, it fails to offer any explanation for why it still considers the data it employed to be "reasonable!"***

As stated above, based on surveys about constrained operations the Constrained Operations Study shows a 33% increase in Constrained Operations since 2012, in spite of the fact that actual Total Operations are running an average of 44% below forecast, and based aircraft are down by 8.2%.

In the Aviation Activity Forecasts section of the Constrained Operations Study, the following is stated:

## **AVIATION ACTIVITY FORECASTS**

*The primary purpose of the forecast update associated with the Aurora State Airport Constrained Operations Runway Justification Study is to evaluate the forecasts of aviation activity (2010-2030) contained in the 2012 Aurora State Airport Master Plan (AMP), which supported the planned runway extension depicted on the 2012 Airport Layout Plan (ALP). This forecast update focuses on the activity generated by the critical aircraft, or group of aircraft, required to support the runway length justification study, but also updates other elements of the 2012 AMP forecast, per FAA requirements for aviation activity forecast approval. This interim forecast update will rely on existing master plan data where appropriate, and supplement with more recent data, where available.*

*The primary tasks supporting the runway justification study include verifying current year activity (2018 based aircraft and aircraft operations, including critical aircraft) and updating key forecasts for the next twenty years (2018-2038). Events occurring at UAO since the AMP was completed in 2012 will be reviewed to evaluate the accuracy of AMP forecasts and to support the updated forecast.*

*The updated forecasts will support the runway length justification study by identifying the current and future levels of critical aircraft operations. The critical aircraft operations are used to establish the corresponding Airport Reference Code (ARC) and Runway Design Code (RDC) designations for Runway 17/35 that define the applicable FAA design standards and length requirements.*

***Note that the language has changed from being engaged “to determine if a runway extension at the Aurora State Airport (UAO) that is currently identified on the ALP is justified,” to “The updated forecasts will support the runway length justification study by identifying the current and future levels of critical aircraft operations.”***

This is significant in that it reinforces the assertion that the consultant has shaped the data to deliver to the Dept. of Aviation the desired outcome prerequisite to the FAA approving runway lengthening and providing funding, rather than providing unbiased information on which a legitimate decision can be made.

### **How can such an assertion be made?**

The study says this about current Total Operations data from the ATC:

*The 2012 AMP forecasts provided reasonable growth assumptions for both based aircraft and annual aircraft operations that reflected both broad regional economic conditions and airport-specific factors. An updated discussion of the underlying economic conditions and airport events is provided in the existing conditions section of this memo (see 2012 AMP for additional information).<sup>1</sup> The evaluation of critical aircraft activity contained in this forecast update confirms that the current and future C-II ARC and RDC defined for Runway 17/35 in the 2012 AMP remain valid.*

However, it then goes on to pass over the very fact that Total Operations forecasts in the 2012 Master Plan were dramatically overstated and the forecast error was very large, by pivoting to make the case that it doesn't matter because the MIX of aircraft has changed, and now the major aircraft at Aurora Airport are corporate jets:

*However, the availability of new data sources, particularly air traffic control tower (ATCT) operations counts (adjusted to include aircraft activity when the tower is closed) indicates that recent UAO activity is currently about 25 percent below previously forecast levels. The ability to rely on actual traffic counts improves the accuracy of the overall forecasts, although it appears that the original long term growth rate assumptions were reasonable.*

*Although the recalibration (lowering) of overall air traffic volumes at UAO is significant, data confirms that this adjustment does not affect critical aircraft (business jet) determination at UAO. Table 9, provided later in this chapter, illustrates that the volume of high performance business jet activity at UAO increased by 40 percent between 2012 and 2018.<sup>2</sup> This most recent five-year period of business jet activity represents an average annual growth rate of 7 percent, which is slightly lower than the 9.7 percent annual growth experienced at UAO between 2009 and 2018. This trend provides a strong indication of future growth potential at UAO.*

On the face of it, how can it be asserted in the same paragraph that forecast levels were off by 25% (how was that number arrived at?) and then also state that "it appears that the original long-term growth rate assumptions were reasonable?"

The tacit admission is that the major mission of Aurora State Airport has changed from that of a General Aviation Airport serving the general flying public, to an emphasis on mid-size and large corporate jets, and the vision of turning Aurora into Oregon's largest and premier corporate jet airport. That is to say, turning it into an airport which benefits the One Tenth of One Percent of ultra-wealthy individuals and corporations who chose to provide luxury perks to their execs.

### ***What can now be said about the 2015 Aurora Airport Master Plan in light of this new and objective data?***

When we compare all of this to the expectations of the FAA guidance document for airport master plans, we can readily see the following failures on the part of ODA:

- Failure to comply with FAA-required local and state land use requirements (chronicled in a separate protest letter from Friends of French Prairie sent to Dept of Aviation on Sept. 6, 2019, documenting the ongoing steps to avoid land use law compliance and to exclude affected municipalities).
- Failure to update forecasts with current (actual) data for total operations and based aircraft.
- Failure to validate constrained operations numbers based on highly questionable results from the pilot surveys utilized.

***We thus conclude that the Dept. of Aviation is (1) complicit with developers and national aviation companies in transforming Aurora Airport into a high-end corporate jet airport, regardless of state land use laws, and against the wishes and best interests of the majority of citizens living around the Aurora Airport (2) willing to avoid or suppress inconvenient facts, and (3) willing to engage in disingenuous studies by consultants hired to deliver the desired outcomes.***

In addition to the data and arguments presented thus far, we have on record the minutes of the July 19, 2018 Oregon Aviation Board meeting wherein Senator Betsy Johnson illustrates the sought after goal and how to achieve it. After referring to the current operators at Aurora as “the family,” she excoriates personnel from the Dept. of Aviation about their methodology and lack of aggressiveness in getting the requisite data to assure a result in excess of 500 constrained operations:

**Airports & Operations Division Update [Agenda item on the July 19, 2018 Oregon Aviation Board meeting]**

- Aurora State Airport Discussion – Maas (Matthew Maas, State Airports Manager), Meeker (Martha Meeker, Chair of Aviation Board, Heather Peck, Projects & Planning Manager).

**Start 2:04:25**

*Chair Martha Meeker* So, that’s Pacific City; also, another busy airport that we have is Aurora. So, the latest on Aurora; we haven’t heard about it for a while.

*Matt Maas* Just, real quick, because I know we’re running way behind schedule, our Constrained Operations Study is moving forward. We met with a lot of concerned parties with this, as far as getting the number of constrained operations when meeting in Aurora, I believe it was about three weeks ago, and so the process of collecting data is still moving forward. I believe I saw an email that came across that I think they are getting close to the end of that data collection and then we’ll have a look at, you know, some initial reports/chapters of the study for review. I would expect that to probably be here in the next—

*Heather Peck* —by the next Board meeting, you will have a draft of some of the preliminaries of the work that’s been done. Is that what you’re—?

*Sen. Betsy Johnson* By what process is the data being collected for constrained operations? Who’s responsible for doing it, and what’s the process?

*Matt Maas* This is the contract that is with Century West Engineering, and so, they have the engineering contract for Aurora State Airport. **There was a work order contract that was put together that was vetted through the FAA,**

and the FAA signed off on the process for collecting the constrained operations and so, we did not want to start this process unless it was something the FAA was going to accept and approve. Because, ultimately, they're going to be the ones that are going to be footing the bill for any runway extensions, so, this work order contract—scope of work—has been vetted through the FAA, and they've signed off on it. And so, now we're just going through the process and reaching out to the operators at Aurora State Airport to verify the equipment that is used in the airport on a regular basis.

Sen. Betsy Johnson Follow up, Madam Chair? I heard you say that it was approved by the FAA; that was fine. I heard you say reaching out, and I don't know what that means, and if you are reaching out to the current operators; finding out what their operations are, are you reaching out to potential operators who are not using Aurora because of limitations. I mean, if you're just talking to "the family," you may ignore the fact that the XYZ financial institution wants to fly in because they're doing business in Wilsonville, but their corporate documents say they have to have—I'm making this up, obviously—7,000 feet. So, if you're calling Ted and saying, "How often are you flying?" I think you're missing data.

Heather Peck But, we're not. We're actually—from the businesses that are out there, they are also providing—they're supposed to be providing that data where ever they can. Ted's [Millar's] group is providing the data that is being left out; what he needs to—you were supposed to be working with the consultant to provide that. That's the last—the last group meeting we had was with all of the businesses that were participating in the current operations that were out there, and what their restrictions are and if they had upcoming needs. That's what's supposed to be getting to the consultant.

Sen. Betsy Johnson I'm sorry to beat this to death, but you still haven't answered my question. You're talking to "the family".....

Heather Peck Right.

Sen. Betsy Johnson What I'm trying to figure out is when you go to Ted Millar, who knows more about that airport than anybody else around I would submit, and you say to him, "Has the XYZ bank called you and said, 'with another 1,000 feet, we'd be in and out of there every other day.'" I don't know how you're getting that which is unknown to you now. Are you calling flight departments? Has somebody reached out to Nike and said, "Given the congestion at Hillsboro, would you go to Aurora if there was another

2,500 feet? And, again, I'm just making these numbers up, but I don't know how you are soliciting the unknown.

Heather Peck *Unfortunately, we can't solicit the unknown for this study as it's paid for and acceptable—it's not paid for—but accepted in a strict statement of work by the FAA. We are—*

Sen. Betsy Johnson *Then how do you answer the question, Heather?*

Heather Peck *You don't know what you don't know. I don't know if the consultant can actually go out there and try to find that data. They don't know what they are looking for without getting all of the information from all of the aircraft owners, operators, and sponsors, and everybody that's on that airport now.*

Sen. Betsy Johnson *May I just tell you, anecdotally, we needed to discuss constrained operations at Scappoose. I must have made a hundred phone calls to flight departments and talking to chief pilots and soliciting information about, "would you use us if..." and that's the piece that, for me, is missing. And I don't care that the FAA signed off on it; I think they've signed off on a flawed study if you don't have a mechanism to go out and try to find the unknown, which based on my experience at Scappoose, you can find if somebody sits down and makes the calls.*

Matt Maas *The other piece to that though is I know that with constrained operation, the FAA is not going to counter this constrained operation based on "if you build it, they will come", but we have aircraft that are going into Aurora and flying out of Aurora that are coming in light, taking off light, flying somewhere else, landing to continue to their destination; those are the ones that we know and that we know that we have over 500 of those operations and so, we are reaching out to that low hanging fruit. Because, if we can get that information just from the operations that are currently happening at Aurora, and we can verify that, then that is additional money that we don't have to spend calling out to the hundreds of flight departments because the numbers are already there. We're just verifying those.*

Sen Betsy Johnson *I'll buy that, but I still think it's valuable to reach out to some of the bigger flight departments, particularly with the air space constraints, and the crowding at Hillsboro,*

It should be noted that Heather Peck describes the consultant for the Constrained Operations Study doing something more than surveying pilots. The image that springs to mind when one

discusses a survey is a one-on-one meeting where the person being surveyed fills out a form or is asked questions. What Heather Peck describes is a group setting where the consultant meets with multiple pilots to discuss constrained operations. This itself could explain how fifty percent of the surveys gave identical Reported Reasons for Constrained Operations.

Additionally, Heather Peck inadvertently describes something else very troubling when she says “**Ted’s [Millar] group is providing the data that is being left out; what he needs to...**” Ted Millar is the owner of Southend Air Park, former owner of the Jet Center (now owned by Lynx FBO) and currently developing a corporate jet hangar and office complex adjoining the airport. He is the single largest developer at Aurora Airport, and a long-term proponent of expansion. **Dept. of Aviation is turning to Ted Millar to provide “the data that is being left out...”**

### ***Broken Public Process from start to finish***

It is worth noting that during the master plan process itself, which concluded in December 2012, the public process was poor enough that on Sept. 14, 2010, Clackamas County, City of Wilsonville, some neighboring communities and Friends of Marion County wrote to the Chair of the Aviation Board stating that the Planning Advisory Committee (PAC) was marginalized, the master planning process was being rushed, discussion times were severely limited, there was no discussion of study goals or vision, activity forecasts had been sent to the FAA for approval prior to PAC review, and that there had been no impact analyses of noise, pollution or traffic. A meeting with the Chair of the Aviation Board, the FAA, the Director of ODA and the consultant was requested. No response to the request was received.

On March 31, 2011, Dept. of Aviation and their consultant presented the final master plan to the Aviation Board and recommend the “No Build Alternative” (i.e. no runway extension), this recommendation never appeared in the minutes of the Aviation Board meeting. This fact and other problems about the master plan process were described in a May 2012 letter to the FAA from Charbonneau Country Club. Since that time there has been no public process, even though the master plan was changed to incorporate a 1,000 foot extension with a cost of \$7 million, and then in late 2018 the Dept. of Aviation sought Legislative approval to apply for \$37 million to expand the Aurora Airport.

***We are left with the sad state of affairs that an out of control state agency (Dept. of Aviation) receives no real oversight from the Aviation Board, is in thrall to moneyed corporate interests, and the entire State Aviation System receives no oversight or accountability from the Governor’s office. Thus Dept. of Aviation is diligently moving forward to expand a state airport at the expense of EFU ag land, having ignored input from affected municipalities opposed to the expansion, and against the wishes of the majority of local citizens, for the benefit of corporate special interests and the ultra-wealthy.***