



August 4, 2020

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RE: Comments on Draft Environmental for Aurora State Airport Obstruction Removal and North Run-up Apron Improvement

Friends of French Prairie has been actively involved in the Aurora State Airport master planning process since 2009, and the related matter of expanding the Aurora Airport. This Master Plan process has been characterized by Oregon Dept. of Aviation not following its own rules and regulations for finalizing, approving and adopting the Master Plan for the Aurora State Airport.

Among other things, airport master plans are supposed to present current data for Based Aircraft and Total Operations, and then forecast changes in those numbers across future years to justify improvements and potential expansion. Multiple master plans for the Aurora State Airport (1976, update in 1988, 2000 and 2012) have been shown to have inflated forecasts of both based aircraft and total operations.

We herein comment on the Draft EA for “Obstruction removal and North Run-up Apron Improvement.”

While we acknowledge that the principal purposes and justification for this EA work is safety (hazard reduction related to asphalt surfaces) and efficiency (creation of a dedicated north run-up area), the underlying justification for the improvement work is increase in usage at Aurora Airport. To that end both Based Aircraft and Total Operations data are cited in the EA:

1.2 Background

The airport is located on approximately 144 acres of land in the heart of the Willamette Valley in Marion County. The majority of the County is rural and has abundant agricultural lands, making it the largest producer of agricultural products in the state of Oregon. The

Airport has an elevation of 199.8 feet above mean sea level (MSL). Aurora State Airport has 327 based aircraft and has an estimated 94,935 total annual operations, as reported on the FAA 5010-1, Airport Master Record (effective 3/01/2018 with operations for 12 months ending 09/29/2015).

The question must be asked, given that this is August of 2020, why the data provided in the Draft EA is effective March 2018, using twelve-month data from 2015.

Based Aircraft

As seen in the attached white paper published in September of 2019, as of 2015 (per the 2012 Master Plan) ODA's consultant forecast 279 based aircraft for 2015, growing to 405 by 2020.

In the Draft EA, based aircraft are presented as 327. This is striking not only because it is a number that does not match the current (though disputed) Aurora Airport Master Plan, but because Century West, the consultant for the Draft EA also conducted a Constrained Operations Study for ODA in 2018, wherein they reported that Validated Based Aircraft as of March 28, 2018 was 349.

Not only is the number of based aircraft at 327 at odds with the most recent numbers for this airport, why is the same consultant not using the most recent collected data (that they themselves collected) in this draft EA?

Of note, the 2012 Aurora Airport Master Plan forecast 379 Based Aircraft in 2015, meaning that the Draft EA number of 327 is almost 14% short of forecast.

Total Operations

Correspondingly, the Draft EA uses the number of 94,935 total annual operations "as reported on the FAA 5010-1 Airport Master Record." Of note, the 2012 Aurora Airport Master Plan forecast 98,321 Total Operations for 2015 illustrating again that actual performance fell short of forecast. It is noteworthy that no explanation is provided as to how the data for the Airport Master Record was collected given that there was no tower at Aurora. Were runway counters used? For what period? How was the data extrapolated for the entire year? Did pilots self-report? If so, how was that data validated?

However, the most striking discrepancy about the Total Operations number presented in the Draft EA is that late 2015 is when the Air Traffic Control tower became operational at Aurora Airport. That means that beginning with 2016 **Actual** data became available in the FAA's ATADS database.

As shown in the attached white paper, based on actual ATADS data from that database, Actual Total Operations in 2016 were only 48,377, meaning that Aurora Airport suffered a 49% reduction in Total Operations from 2015 to 2016.

Total Operations increased in 2017 and 2018 (compared to 2016), but continued to fall short of forecast by 42.7% and 18.3% respectively, and shortfalls compared to the number presented in the Draft EA are 49%, 39% and 33% for 2016, 2017 and 2018 respectively.

Since the attached white paper was prepared, ATADS data for the entire year of 2019 is available:

| Date | Itinerant | | | | | Local | | | Total Operations |
|---------------|-------------|--------------|------------------|------------|---------------|---------------|-----------|---------------|------------------|
| | Air Carrier | Air Taxi | General Aviation | Military | Total | Civil | Military | Total | |
| 01/2019 | 0 | 139 | 2,190 | 5 | 2,334 | 1,699 | 4 | 1,703 | 4,037 |
| 02/2019 | 1 | 96 | 1,229 | 7 | 1,333 | 1,040 | 0 | 1,040 | 2,373 |
| 03/2019 | 1 | 125 | 2,695 | 2 | 2,823 | 1,911 | 2 | 1,913 | 4,736 |
| 04/2019 | 0 | 117 | 2,388 | 3 | 2,508 | 1,904 | 0 | 1,904 | 4,412 |
| 05/2019 | 0 | 133 | 3,118 | 25 | 3,276 | 3,031 | 4 | 3,035 | 6,311 |
| 06/2019 | 0 | 176 | 3,337 | 4 | 3,517 | 2,854 | 0 | 2,854 | 6,371 |
| 07/2019 | 0 | 196 | 3,386 | 2 | 3,584 | 3,597 | 0 | 3,597 | 7,181 |
| 08/2019 | 0 | 188 | 3,803 | 21 | 4,012 | 3,683 | 5 | 3,688 | 7,700 |
| 09/2019 | 0 | 127 | 2,878 | 14 | 3,019 | 2,653 | 1 | 2,654 | 5,673 |
| 10/2019 | 0 | 138 | 3,276 | 8 | 3,422 | 2,752 | 8 | 2,760 | 6,182 |
| 11/2019 | 0 | 70 | 2,619 | 4 | 2,693 | 1,915 | 8 | 1,923 | 4,616 |
| 12/2019 | 0 | 62 | 1,664 | 5 | 1,731 | 1,527 | 0 | 1,527 | 3,258 |
| Total: | 2 | 1,567 | 32,583 | 100 | 34,252 | 28,566 | 32 | 28,598 | 62,850 |

Total Operations for 2019 was 62,850, dramatically short of forecast, and equally dramatically lower than the 2015 number cited in the Draft EA! Even adjusting the Total Operations number upwards by 5% or 10% to capture operations outside of ATC hours of operation, the shortfall is still dramatic.

As stated previously, Oregon Dept. of Aviation has a multi-decade history of dramatically over-forecasting Based Aircraft and Total Operations for Aurora State Airport and never adjusting for the shortfall. Failing to use the most current and demonstrably accurate numbers for Based Aircraft and Total Operations calls into question both methodology and validity of the entire Draft EA, given that the proposed work is supposed to be necessary not just to support current operations, but to accommodate future growth.

FAA acceptance of a document laden with questionable data could lead to concerns about agency credibility and exposure to legal action akin to the current LUBA (Oregon Land Use Board of Appeals) Appeal that the Oregon Dept. of Aviation is having to defend.

This Draft EA should not be accepted at face value, and in fact makes the case for an Environmental Impact Statement that would require a much deeper assessment of the underlying data and assumptions for the proposed work.

Sincerely

Benjamin D Williams

Friends of French Prairie