

March 12, 2024

**To: Oregon Department of Aviation; Kenji Sugahara, Director**

**Re Comments on FAA Forecast Approval letter and Chapter 3 Airport Activities Forecast**

The FAA “Aurora (UAO) Aviation Activity Forecast Approval letter of November 15, 023 (Corrected January 23, 2024) approves the aviation forecasts from the current Aurora Airport Master Plan process for airport planning purposes. These forecasts are detailed in the table “Airport Planning and TAF Forecast Comparison” derived from data in Chapter 3 (Aviation Activity Forecasts) of the master plan.

The Forecast approval letter goes on to state:

*Our approval is based on the following:*

- *The forecast is supported by reasonable planning assumptions and current data*
- *The forecast appears to be developed using acceptable forecasting methodologies*
- *The difference between the FAA Terminal Area Forecast (TAF) and the Airport’s forecast for total operations is within the 10 percent and 15 percent allowance for the 5 and 10 year planning horizons.*

### **Master Plan Aviation Activity Forecasts – Chapter 3**

The Forecasts chapter lists four Operations Forecast Models that were agreed on with the FAA for consideration in in developing the aviation forecasts for UAO. They are:

- Hybrid TFMSC Itinerant/FAA National Aerospace Forecast GA Local Operations Model
- Marion and Clackamas County Combined Population Growth Model
- National Aerospace Forecast Operations (Airports with ATCT)
- Federal Contract Tower TAF State (Oregon) Model

On page 3-26 the section “Recommended Aircraft Operations Forecasts Summary” states:

***The Marion and Clackamas County Combined Population Growth Model is the recommended aircraft operations forecast for the 2021-2041 Aurora State Master Plan. In lieu of representative operational data specific to the Airport, population growth forecasts developed for the two counties most contributing to the Airport service area were selected to indicate future operational activity. The model assumes that operations will track with the local population as it reflects the number of people likely to use airport services. This model reflects***

*the best data available considering the limitations of the available ATCT traffic counts. The model projects an average annual growth rate of 0.9% over the planning period.*

No substantive justification is provided or data presented to make the case that The Marion and Clackamas County Combined Population Growth Model is more accurate and superior to the Federal Contract Tower TAF State (Oregon) Model beyond the assertion: “The model assumes that operations will track with local population, as it reflects the number of people likely to use airport services. This model reflects the best data available considering the limitations of the available ATCT traffic counts.”

### **Validity of data**

As stated, The Marion and Clackamas County Combined Population Growth Model projects a 0.9% average growth rate of the planning period of 20 years (from 2020 to 2040), and also states that “The model combines the Portland State University (PSU) Population Research Center (PRC) population forecasts for Marion and Clackamas Counties over the planning period.” However, no references or supporting data from the PSU Population Research Center are presented, and the 0.9% AAGR number does not hold up to scrutiny.

Oregon’s population has been in flux for the past four or five years, with some years showing population decline. PSU data for the period April 1, 2020 to July 1, 2022 (attached) show the following percent change in AAGR:

Clackamas County	0.9%
Marion County	0.3%

For the year 2023, they show the following change in AAGR:

Clackamas County	0.59%
Marion County	0.29%

The PSU forecast data by County (PSU-PRC Regional Meeting; Preliminary Population Projections), show population forecast for each Oregon county. The forecasts for Clackamas and Marion County do not show the 0.9% AAGR stated in the Aviation Activity Forecasts chapter of the master plan. Specifically, for the planning period they show the following (attached):

Clackamas County	0.72%
Marion County	0.46%

Furthermore, no empirical evidence is presented that there is ANY relationship or correlation between general population growth and increased operations at this airport or any other airport. This conclusion that general population growth corresponds to airport operations appears to be a long stretch to justify a higher forecast without any supporting documentation.

The Marion and Clackamas County Combined Population Growth Model, which was selected without justification or supporting data, does not result in an AAGR of 0.9% as alleged, but rather is actually 0.59%.

### **Forecast Model Selection**

The Marion and Clackamas County Combined Population Growth Model was selected without supporting data or justification, and the Federal Contract Tower TAF State (Oregon) Model dismissed with a statement about “*the limitations of the available ATCT traffic counts.*”

Figure 3-6: Operations Forecast Models illustrates what is now common knowledge: there are 7 years of FAA operations data for UAO (FAA’s ATADs data) which covers all operations during tower operation (daylight hours). The master plan process has an adjustment factor for non-tower operational hours. The point is that given the wildly overstated and erroneous that ALL previous operations forecasts have been there is 7 years of validated objective data. However, the forecast model that used this data was not selected.

That model, the Federal Contract Tower TAF State (Oregon) Model, is described in Chapter 3 as follows:

*This model applies the Oregon Federal Contract Tower TAF forecast annual growth rates for aircraft classifications to Aurora State Airport’s baseline operations counts (using the same classifications) over the 20-year period. The model assumes that operations at the Airport will be consistent with FAA’s Terminal Area Forecast (TAF) for Oregon airports with contract air traffic control towers. This model provides a more focused regional assessment within the TAF, compared to the TAF national model for contract tower airports, as these airport are the most operationally similar to Aurora State Airport in the state. The model is non-linear and year-over-year growth rates vary. The model assumes that the Airport’s operations will mirror state trends. The model results in an average annual growth rate of 0.6%.*

*This model provides a projection of future changes in the Airport’s annual aircraft operations that is consistent with the trends defined by FAA for similar Oregon airports with contract air traffic control towers. Similar to the contract tower model used for based aircraft forecasting, this projection does not establish an historical statistical relationship between the Airport and the larger data set, although it does provide a reasonable projection for long term planning. The underlying assumption is that future activity within a group of similar Oregon contract towered airports will be similar, and that on the whole, this activity will be consistent with the FAA’s broad expectations defined in its TAF.*

Of note, Federal Contract Tower TAF State (Oregon) Model, results in an AAGR of 0.6%.

The Marion and Clackamas County Combined Population Growth Model which was selected without justification or supporting data results in an AAGR of 0.9%.

It is no coincidence that a model resulting in a higher growth rate was selected.

The question that has to be answered, however, is what process and methodology was used by ODAV and its consultant along with the FAA to eliminate the Federal Contract Tower TAF State (Oregon) Model which is based on objective historical data at UAO and similar airports, and rather select The Marion and Clackamas County Combined Population Growth Model which not only resulted in a higher forecast rate, but is based on questionable population growth projections and a fundamentally flawed assumption that "that total airport operations will track with the combined population of Marion and Clackamas Counties."

Sincerely

A handwritten signature in blue ink that reads "Benjamin D. Williams". The signature is written in a cursive style and is positioned above a light blue rectangular stamp.

Ben Williams, President