

# Mayors of the Aurora State Airport Area Communities

**Aurora**



**Wilsonville**

Mayor Brian Asher

Mayor Shawn O'Neil

June 2, 2025

*Sent via email to:*

The Honorable Tina Kotek, Governor, State of Oregon

*Governor.Kotek@oregon.gov*

The Honorable Ron Wyden, U.S. Senator

*Breanna\_Irish@wyden.senate.gov*

The Honorable Jeff Merkley, U.S. Senator

*Sara\_Schmitt@merkley.senate.gov*

Honorable Andrea Salinas, U.S. Representative

*Erin.Chen@mail.house.gov*

## **RE: Intervention Requested to Address Issues of Significant Public Concern with Federal Aviation Administration (FAA) and Oregon Department of Aviation (ODAV) Aurora State Airport (KUAO) 2021-2025 Master Planning Process**

Dear Governor Kotek, Senator Wyden, Senator Merkley and Congresswoman Salinas:

We write to you as the elected leaders of the communities—the Cities of Aurora and Wilsonville—located in closest proximity to the Aurora State Airport (KUAO) to express our profound disappointment at the Federal Aviation Administration (FAA) and Oregon Department of Aviation (ODAV) handling of the long, drawn-out 2021-2025 Aurora State Airport Master Planning process.

**ODAV and the FAA are now proposing a \$185 million boondoggle to greatly expand the Aurora State Airport with more larger jets and a longer runway despite substantial public-safety concerns over the Airport's operations in a highly constrained site.** Our communities bear the brunt of impacts of the airport's operations, and yet the federal and state aviation departments are discounting our concerns with plans to expand the airport despite numerous public-safety and other substantial problems that have been identified but not addressed in the pending Master Plan.

**We request your immediate intervention to correct a series of failures with the master plan process and to provide a path forward that utilizes actual airport data, provides for a regional approach to airport planning and respects local community concerns regarding aircraft noise and low-altitude overflights.**

In particular, we respectfully ask for:

- **Governor Kotek to instruct the ODAV State Aviation Board to Not adopt the new Aurora State Airport Master Plan** and instead to request a re-do of the Plan without a predetermined outcome favoring expansion that conforms with actual data, the reality on the ground of the Airport's highly constrained site, the role of other airports in the region and local community aspirations.

- **Senators Wyden and Merkley and Congresswoman Salinas to intercede with the FAA to Not approve the new Aurora State Airport Airport Layout Plan (ALP) submitted by ODAV and to return the unapproved ALP to ODAV for action first by the State Aviation Board.**

Furthermore, we request our federal representatives to lobby the FAA to not force ODAV to accept a larger class of aircraft known as C-II and D-II at the Aurora State Airport, and instead to request the FAA to withdraw the finding that B II airfield design is not appropriate.

The Cities of Aurora and Wilsonville, along with other Planning Advisory Committee (PAC) members to the Aurora State Airport Master Planning process such as 1000 Friends of Oregon and Friends of French Prairie, seek to raise significant issues of public concern, yet there has not been a single public hearing before either the FAA or ODAV. This federally funded Aurora State Airport Master Plan demonstrates the federal and state aviation departments apparent bias and inability at providing fair public processes that meet Oregon's standards for meaningful public engagement.

**One of the most important aspects that the FAA has highlighted at the Aurora State Airport is the Airport's current unsafe operation that threatens public safety.** So many modifications of public-safety standards have occurred over the years that the FAA now demands improvement to these public-safety concerns by moving a state highway and greatly enlarging the Airport. The FAA has in effect threatened ODAV that failure to expand the Aurora State Airport will result in the Airport being placed in a "maintenance mode" and withdrawal of federal aviation funds. And ODAV allows larger, heavier aircraft to use the Airport than the Airport's rating that further increases public-safety risks, and results in damage to the runway. Thus, in a sense, ODAV's actions in allowing larger aircraft to use the Aurora State Airport has forced the agency into a position that it must accept Airport expansion in order to keep receiving federal airport improvement funds — many members of the community speculate that this was ODAV's intention all along in allowing more larger, over-sized aircraft to use the Airport.

Airport expansionists have demonstrated that they are very concerned about FAA's finding of a lack of ODAV compliance with important public-safety standards and demand for correction of key safety features without further "modifications of standards" (MOS). A proposed Oregon Senate Resolution praising the Aurora State Airport's importance was introduced in the current 2025 state legislative session for the primary purpose of seeking FAA deferral of not issuing MOS for public safety standards at the Airport, and was deemed important enough that those giving oral testimony before the Rules Committee sought to equate federal modifications of standards with local conditional use permits in an attempt to lessen the fact that in this

case the desired MOS's result in a relaxing of airfield design standards and a loosening of safety standards. In other words, Airport expansion interests seek new modifications of standards that have the effect of decreasing public safety.

**We are concerned that ODAV is again making similar mistakes as it did with the prior controversial 2011/2012 Aurora State Airport Master Plan process that both the Oregon Supreme Court and the Oregon Court of Appeals found in 2021 violated Oregon land-use and public-process laws.** The Court of Appeals found that the Aviation Board failed to approve and adopt the "2012 Master Plan" in 2011—notwithstanding that it was submitted to the FAA, which then approved the accompanying Airport Layout Plan that was then signed by both FAA and ODAV. The 2012 Master Plan was not approved and adopted at the time, OAB only attempting to do so eight years after the fact in 2019. We have found so far that the State Aviation Board is unable to demonstrate decisive leadership that provides confidence to local-government officials that federal and state planning processes are conducted in a legal and ethical manner above reproach, which at this time appears questionable.

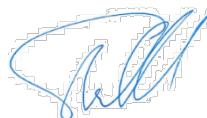
On the following pages is a summary of core problems with the increasing contentious 2021-2025 Aurora State Airport Master Plan process — substantial problems that most parties in the master plan process oppose. In all of our years of government service, we have never seen federal and state agencies act with such disregard to the concerns of local communities, and appropriate and fair public process. We request your intervention now to provide for an unbiased process that produces trust-worthy results for a viable Aurora State Airport Master Plan. We believe that if ODAV were to comply with—rather than seek to evade—the letter and spirit of Oregon's land-use and public-process laws, judicial intervention to set a course correction would not be a necessary remedy that must be pursued by local governments and concerned citizens.

Again, we appreciate your time and consideration of these important issues, and we look forward to your timely response. Thank you.

Sincerely,



Brian Asher, Mayor  
City of Aurora  
[mayor@ci.aurora.or.us](mailto:mayor@ci.aurora.or.us)



Shawn O'Neil, Mayor  
City of Wilsonville  
[mayor@ci.wilsonville.or.us](mailto:mayor@ci.wilsonville.or.us)

cc: Office of Governor Tina Kotek  
Senate President Rob Wagner  
Senator Courtney Neron Misslin (SD 13)  
Clackamas County Board of County Commissioners  
Marion County Board of County Commissioners  
William Garrison, FAA NW Mountain Region

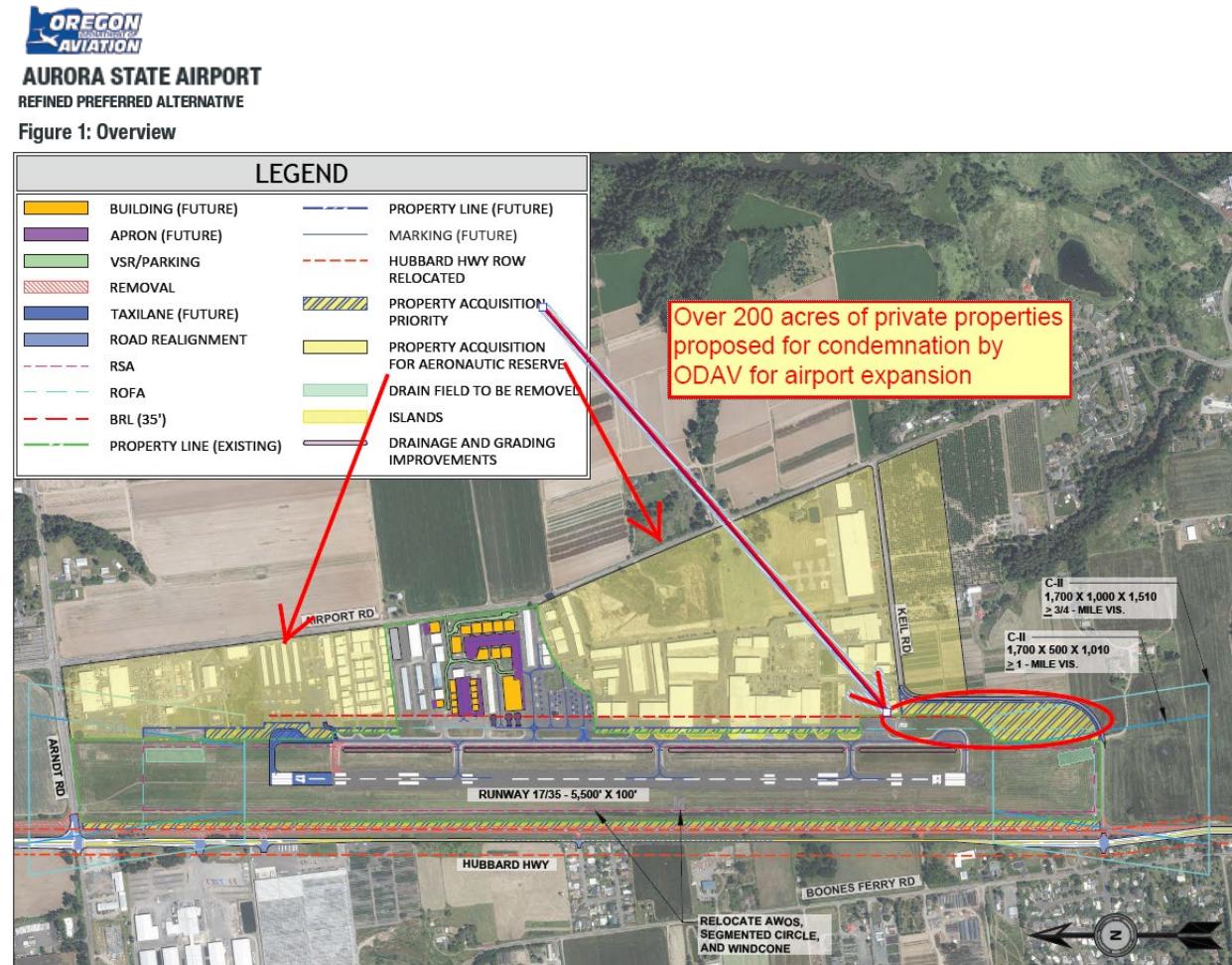
State Aviation Board  
House Speaker Julie Fahey  
Metro Council President Lynn Peterson  
Metro Councilor Garrett Rosenthal  
Gordon Howard, DLCD Regional Rep  
Warren Ferrell, Seattle Airports Dist Office

**Following is a summary of core problems with the increasing controversial 2021-2025 Aurora State Airport Master Plan process:**

- **Proposed Expansion of Aurora State Airport by the new Master Plan proposes to condemn over 210 acres of private property, including:**
  - 148 acres of private airport businesses' property zoned "Public Use";
  - 62 acres zoned Exclusive Farm Use (EFU), composed of 16 acres at the former church camp, 31 acres of prime farmland south of Keil Road, and 15 acres west of State Highway 551 proposed for relocation by the Master Plan.

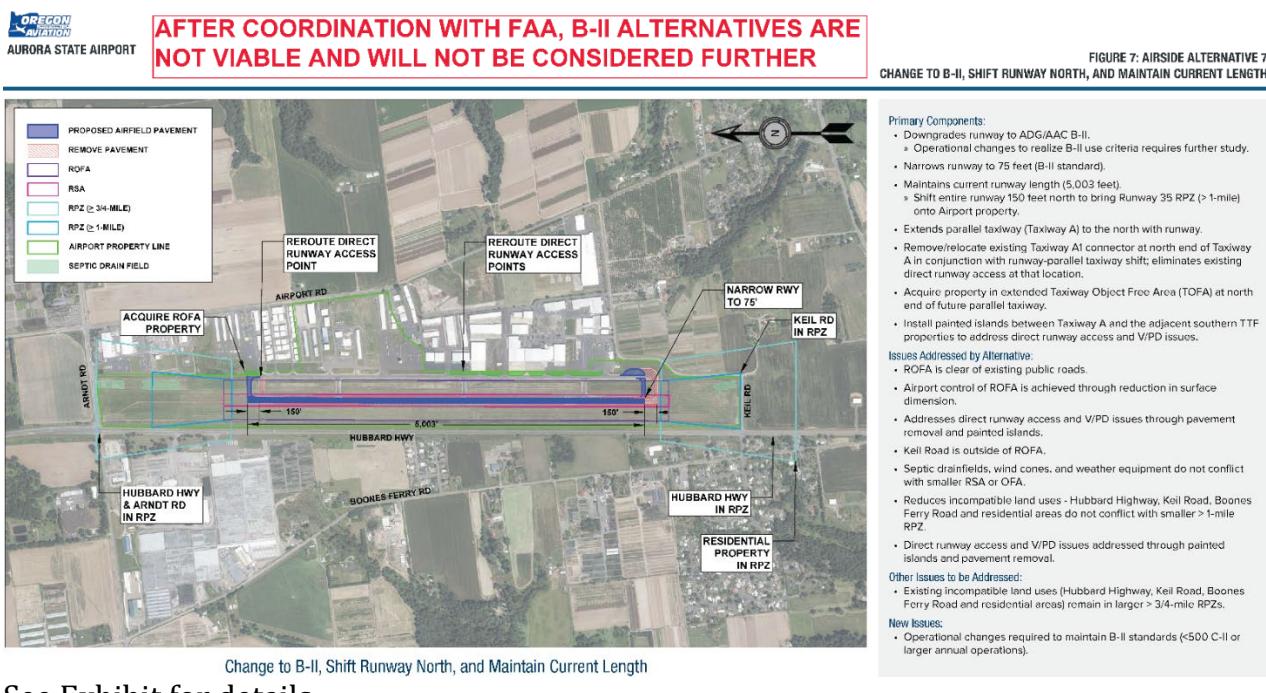
As described by PAC member Tony Helbling of Wilson Construction, ODAV's publicly stated position to acquire private business properties at the Airport creates "pre-condemnation blight" by reducing the real-estate value of these properties.

Additionally, the proposed property acquisition by ODAV to be funded by FAA Airport Improvement funds includes prime EFU farmland, dozens of low-income residents' housing and local, long-term agricultural-based businesses along Highway 551, which ODAV proposed to relocate 80 feet to the west of current location.



- Only Airport-Expansion Alternatives Are to Be Considered; No Alternatives Maintain Airport's Current Footprint:** Of seven (7) original Alternatives in the draft Master Plan, three (3) that would keep the Airport operational for the vast majority of 88% of all current airport users have been arbitrarily eliminated by the FAA. Only four (4) Alternatives remain that all propose to expand the airport onto prime farmland, add a 500-foot runway extension and spend millions of taxpayer dollars to move State Highway 551 to accommodate only 7% of large, oversized aircraft.

The FAA, however, has told the public that a “No Action” Alternative is *Not allowable* and *only Airport expansion* can occur since the Aurora State Airport is already violating too many air-safety requirements, which seems to indicate that other steps should be taken to increase public safety.



See Exhibit for details.

- Bogus Operations Forecast Numbers Used to Justify Airport Expansion:** The FAA and ODAV are ignoring nine (9) years' worth of actual Airport control tower flight operations data to project future Airport growth. Rather than use actual Airport operations data or the standard “FAA Oregon Federal Contract Tower Terminal Area Forecast (TAF) Model,” the draft Master Plan uses inflated population growth projections of Clackamas and Marion Counties to determine future Airport growth. ODAV’s FAA-approved dubious methodology inexplicably equates population growth with increasing operations at the Airport — a false correlation between general population growth of counties and Airport without passenger air service. Furthermore, ODAV Airport Operations Forecast is 50% greater than the

standard FAA Oregon Federal Contract Tower Terminal Area Forecast (TAF) Model forecast.

- Actual Data Is Contrary to Decisions Favoring Airport Expansion:** FAA and ODAV are disregarding actual airport operations data that shows a decrease over time in larger, heavier C-I and C-II aircraft, and that smaller, lighter B-II and smaller aircraft are the vast majority of Airport users. The current FAA-approved Airport Layout Plan shows the Aurora State Airport to be an airport with an Airport Reference Code (ARC) of C-II. This increase in ARC occurred as a result of the so-called “2012 Master Plan,” and prior to that the airport was rated as B-II. Approximately 88% of all aircraft using the airport are smaller B-II aircraft, while about 7% of aircraft are larger C-I and larger aircraft. It makes no sense to expand the airport for larger aircraft when those aircraft operations are decreasing.

TABLE 3-7: AURORA STATE AIRPORT INSTRUMENT FLIGHT OPERATIONS

AAC/ADG	TFMSC IFR Operations by AAC/ADG - Calendar Year Data										Average Annual Operations
	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	
A-I	2,372	2,638	2,414	2,482	2,750	2,750	3,428	2,458	2,162	2,330	2,578
A-II	410	494	1,108	1,554	1,814	1,966	1,844	1,158	930	1,398	1,268
A-III	14	6	2	4	4	10	6	2	0	4	5
A-IV	0	0	0	0	0	0	0	0	0	0	0
B-I	1,498	1,368	1,422	1,194	1,198	1,126	1,134	1,190	1,024	1,154	1,231
B-II	2,222	2,232	2,214	2,620	3,270	3,110	3,152	3,798	3,448	4,182	3,025
B-III	0	0	0	2	0	2	4	8	2	0	2
B-IV	0	0	0	0	0	0	0	0	0	0	0
C-I	360	374	514	440	340	306	274	286	170	274	334
C-II	348	378	294	208	316	370	358	226	242	264	300
C-III	18	10	4	8	0	14	50	54	10	0	17
C-IV	0	0	0	0	0	0	0	0	0	0	0
C-V	0	0	0	0	0	0	0	0	0	0	0
D-I	2	8	16	0	4	6	8	4	0	12	6
D-II	4	0	4	0	2	6	2	8	26	84	14
D-III	6	10	4	2	6	8	4	0	4	6	5
D-IV	0	0	0	0	0	0	0	0	0	0	0
D-V	0	0	0	0	0	0	0	0	0	0	0
Unknown	446	390	380	388	504	376	366	472	442	572	434
<b>Total</b>	<b>7,700</b>	<b>7,908</b>	<b>8,376</b>	<b>8,902</b>	<b>10,208</b>	<b>10,050</b>	<b>10,630</b>	<b>9,664</b>	<b>8,460</b>	<b>10,280</b>	<b>9,218</b>
Operations by AAC C and D Aircraft	738	780	836	658	668	710	696	578	452	640	676
Operations by ADG II and Larger	3,022	3,130	3,630	4,398	5,412	5,486	5,420	5,254	4,662	5,938	4,635

Source: FAA TFMSC Report - 4/14/2022 (Aurora State Airport)

Table 3-7 from the new Aurora State Airport Master Plan compares 2021 Operations data with the 10-year Average Annual Operations data and reveals the following:

- At no time did C-II aircraft ever meet the 500 operations FAA threshold for designating an airport's ARC

- The most active class of aircraft accounting for largest share of operations at 33% are **B-II aircraft**, which totaled 2,066 operations in 2021, *45% over the 10-year average*.
- The second most active group, **C-I aircraft**, totaled 252 ops in 2021, *23% below the 10-year average*.
- The third most active group, **C-II aircraft**, totaled 218 ops in 2021, *52% below the 10-year average*.

To make matters worse, ODAV has submitted to the FAA for approval an Airport Layout Plan (ALP) that states that ODAV seeks to re-classify the Aurora State Airport as CII/DII, although during the master plan process the concept of increasing aircraft size to DII was never presented nor discussed. Thus, ODAV has again demonstrated deceit in how the agency approaches the master-planning process in relation to the conclusion of the Aurora State Airport Master Plan.

- **ODAV Seeks a Money Grab with Airport Expansion for Bigger Aircraft that Burn More Fuel:** The main revenue source for Oregon Department of Aviation is a tax on aviation fuel, with Aurora State Airport generating a significant cash flow for the agency. ODAV also generates revenue from aircraft hangar leases at the Airport. Expansion of the Aurora State Airport to accommodate more large, heavy aircraft can dramatically increase aviation fuel sales and hangar rentals that provide more funds for ODAV, despite negative impacts to residents, farmers, environment and climate-change goals. In essence, the Aurora State Airport competes with other regional airports as a relatively cheap gas station and parking lot for aircraft and no additional landing fees.
- **FAA and ODAV Do Not Consider Negative Impacts to Other Regional Airports of Aurora State Airport Expansion:** The FAA and ODAV disregard that other regional airports—including Hillsboro, PDX, Salem, McMinnville, Troutdale and Eugene—with over 5,000-foot runways are all underutilized and would welcome additional based aircraft and operations. Each of these airports has less total average daily operations in 2023, ranging from -22% to -64%, than 10 years prior in peak-year of 2013.

How does the Aurora State Airport fit in with other airports in the area? Does it make sense to spend millions on expanding Aurora, when so many other airports are operating far below past levels? The Master Plan makes no attempt to conduct an analysis, which the land use laws require prior to expansion onto agricultural land outside an urban growth boundary. In the interest of safety, should we keep

larger private jets with heavy fuel loads at the safest possible airport, PDX, where highest level fire services are provided 24/7 on-airport?

The table of data below illustrates the across-the-board decline in aircraft operations at regional airports in northwest Oregon.

Airport	Direction & Distance from KUAO	Runway dimensions (largest)	Weight Capacity (single gear)	Fire & Rescue	TAF data avg daily <u>Total Ops</u> (peak year)	ATADS data			
						2019: avg daily <u>Total Ops</u>	2023: avg daily <u>Total Ops</u>	% local Ops	2023 vs peak year
Aurora (KUAO)	--	5,003ft x 100ft	30,000 lbs	no ARFF Index	286 (2013)	172	173	46%	-40%
Portland International (KPDX)	22nm NNE	11,000ft x 200ft	200,000 lbs	ARFF Index E	898 (1997)	653	521	1%	-42%
Hillsboro (KHIO)	19nm NW	6,600ft x 150ft	50,000 lbs	no ARFF Index	714 (2008)	422	503	64%	-30%
Salem (KSLE)	23nm SW	5,811ft x 150ft	105,000 lbs	ARFF Index B	272 (2007)	108	121	41%	-56%
McMinnville (KMMV)	16nm W	5,420ft x 100ft	40,000 lbs	no ARFF Index	213 (2007)	no ATC, no count	no ATC, no count	??	
Troutdale (KTID)	24nm NE	5,399ft x 150ft	19,000 lbs	no ARFF Index	367 (2018)	267	287	72%	-22%
Eugene (KEUG)	70nm SSW	8,009ft x 150ft	120,000 lbs	ARFF Index C	443 (1991)	172	159	32%	-64%

ARFF: Aircraft Rescue & Fire Fighting Index ranges from 'A' to 'E'; PDX has the highest ARFF Index, to handle accidents for the largest aircraft. ATADS & TAF are two FAA databases; ATADS provides precise operational counts for each of 500+ U.S. airports with ATC (air traffic control tower); TAF is Terminal Area Forecast and provides past annual operations totals and future projected ops levels for each of nearly 4,000 U.S. airports. Weight Bearing Capacity is an important metric, to define which aircraft can safely and sustainably use a runway. When an airport authority allows uses by larger and overweight aircraft, the runway surface is rapidly degraded, which reduces safety.

Rather than working with the FAA create a rational coordinated airport operations program in the Portland metro/Willamette Valley region, ODAV's actions to expand the Aurora State Airport at the current projected cost of \$185 million is severely detrimental to these other airports' operations. For example the Port of Portland is seeking \$150+ million to strengthen the PDX runway to be seismically resilient; whereas Oregon Department of Geology and Mineral Industries geologic hazard maps illustrate that the Aurora State Airport runway will be broken apart into pieces when the projected 9.0 Cascadia Subduction Earthquake hits.

- Aurora State Airport Master Plan Effort is Tainted by Poor Quality, Four-Year-Long Public-Engagement Process:** The Aurora State Airport Master Plan process has been riddled with unnecessary requirements and lack of communications that hamper public engagement. While commencing the Aurora State Airport master plan process in 2021, one-year-plus delays by FAA and ODAV are now resulting in a tentative completion date of the master plan in 2025. A four-year process for a small airport's master plan is by definition a long, drawn-out process that frustrates meaningful opportunity for public engagement.

ODAV initially required advance public registration to attend public meetings of the PAC and key information about the process has not been communicated timely to

the PAC. If members of the public had not registered in advance to attend a PAC meeting, they were unable to attend at all.

Other than a meeting agenda, ODAV never sent any information to the PAC members prior to PAC meetings. Thus, PAC members went in “blind” each time to a PAC meeting and had no idea of the specific issues or topics to be discussed. Even at the last PAC meeting in February 2025, the Director of ODAV expressed surprise that the proposed ALP had not been sent to PAC members in advance of the meeting; thus PAC members were unable to intelligently review and discuss the ALP as presented.

An FAA/ODAV-hosted Open House on the four (4) remaining Airport-expansion alternatives in June 2024 was barely promoted by the agencies, with no announcements being published in local media or other forms of substantial public notification being used. Since the City of Wilsonville could not allow such a travesty of public input by conducted, the City actively notified local-area constituents. *And to make matters worse, the agencies ran out of public comment forms less than half-way through the three-hour open-house event attended by hundreds of concerned citizens whose comments were unable to be collected or addressed.*

- **Master Plan Totally Ignores Important Issues and Key State Laws:** None of the four (4) remaining Aurora State Airport expansion alternatives in the draft Master Plan address substantively any land-use, surface transportation, pollution and other issues of concern to area constituents or that are required by Oregon law:

A. **No study of surface-transportation impacts on poor quality roads in the Airport area vicinity** that are narrow, unimproved rural county roads with no shoulders or sidewalks and deep ditches. No study of Airport expansion on increased traffic has been conducted and no improvements to roads servicing the Airport are proposed by the Master Plan. While proposing airport expansion, the Master Plan ignores that people need to drive to the airport on hazardous roads and are unable to take a bus, walk or bike to the Airport.

Related to the lack of study of Airport expansion impacts to local roads, ODAV failed to conduct Oregon’s mandatory Climate Friendly Equitable Communities (CFEC) analysis on the proposed relocation of State Highway 551 and enlarged intersection with Boones Ferry Road. The \$185 million proposed Airport expansion seeks to condemn private-property for State highway roadway relocation/expansion over one mile long and displace lower-income neighborhoods and rural agricultural businesses.

B. **Negative impacts to the farming-based agricultural economy** due to proposed airport expansion onto prime EFU farmlands of French Prairie and

resulting speculative real-estate deals that drive up the cost of farmland near the airport are not addressed. Already local farmers complain about land-speculation of developers buying cheap farmland to 'flip' to an urban airport use.

- C. No mitigation methods for low-flying overflights and loud aircraft noise** that negatively impact area real-estate values and residents' quality-of-life are presented in the Master Plan. Already the cities of Aurora and Wilsonville field increasing numbers of complaints from constituents regarding loud and low-flying aircraft that do not follow ODAV-designated flight paths. Aurora and Wilsonville-area residents resent that neither ODAV nor the FAA have taken seriously an increasing number of noise and public-safety complaints.
- D. Failure to conduct review of a lack of infrastructure at the Aurora State Airport, including no study of safe domestic water, sewage/wastewater treatment, stormwater treatment, and the lack of fire-fighting equipment on site.** Currently, ODAV plans to call PDX and request a foam fire-fighting truck be sent when a aircraft crash happens at the Aurora State Airport. When that special fire-fighting truck arrives an hour later at the Aurora State Airport, it will be too late to be of any use.
- E. Lack of study of known pollution** sources from fuel, sewage, contaminated stormwater and US EPA-listed PFAS forever chemicals generated by Airport users. The master plan completely disregards any study of negative impacts from stormwater pollution to salmon-bearing streams with headwaters adjacent to the Airport. The Aurora State Airport is listed on the EPA and Oregon DEQ lists of sites contaminated by FAS forever chemicals generated by Airport users.
- F. Absence of any review of impacts from increasing climate change greenhouse gas (GHG) emissions at the Airport.** The Master Plan proposes a substantial increase in large jets using the Airport . Money-making ODAV fuel sales at Aurora State Airport are disregarded by the Master Plan, as are the state mandates of Oregon's Climate Action Plan that call for reduction in carbon emissions.
- G. Master Plan Disregards Seismic Earthquake hazard** documented by the Oregon Department of Geology and Mineral Industries (DOGAMI) data showing that the Aurora State Airport is located in an area subject to major potential damage in a projected 9.0 Cascadia Subduction Zone Earthquake. Airport area soils are prone to shaking and liquefaction during major earthquake, resulting in runway broken-apart into many sections and unserviceable for a long period of time. Only helicopters, which don't need a runway, will be able to operate at the Aurora State Airport for months or years after the Big One hits.

**H. State land-use Goals 3, 11, and 14 to not conduct urban-level activities on rural farmlands** is also flouted by ODAV, which seeks to expand the airport without municipal governance or public sewage or water service and other urban-development requirements. Rather, ODAV unfairly subsidizes airport businesses that do not pay typical charges that businesses in other cities pay for roads, sidewalks and other public utilities.

**I. Adverse effects to residents' quality of life and homeowner real-estate values** are not accounted for in the master plan. Already residents of Aurora/Wilsonville area complain about low-flying and loud aircraft that likely increases with expanded airport for larger, heavier aircraft.

**A primary concern pertains to the extremely lopsided membership composition of the Planning Advisory Committee (PAC).** The Department of Aviation stacked the Planning Advisory Committee with self-dealing financial interests at the Airport that benefit from taxpayer-funded Airport operations and capital improvements. A review of the PAC membership demonstrates that well over half of the PAC membership is comprised of entities with direct pecuniary interest in furthering airport expansion at taxpayer expense.

Additionally, the same pro-airport expansion entities are represented multiple times on the PAC. Two associations placed on the PAC are composed of a majority of Airport financial interests, including Aurora Airport Improvement Association and Positive Aurora Airport Management association.

By all appearances, the process and committee composition has the appearance of a “tick the box” exercise in public involvement. This led us to conclude that the outcome is predetermined and that the inevitable result will lead to airport expansion regardless of the impacts on safety, the environment and surrounding infrastructure — and surprise, surprise (*not!*), the Master Plan proposes a massive expansion of the Airport.

**Another key problem is that ODAV omitted three key state agencies as PAC members: Department of Agriculture (ODA), Department of Environmental Quality (DEQ) and Department of Transportation (ODOT).**

- The Aurora State Airport is located in the heart of the Oregon’s best “foundation farmland” of French Prairie, which hosts some of Oregon’s foremost traded-sector ag producers, nurseries and food processors. Real-estate speculation and uncontrolled urban-level development—as are occurring at the Aurora State Airport area—are harmful to this prime ag-sector economic cluster. By excluding the Department of Agriculture from the public process, the Department of Aviation continues a trend of excluding parties that may provide valuable information or may question the Aviation agency’s objectives.

- We read in the media that the US Environmental Protection Agency (EPA) indicates that 750 Oregon sites could expose residents to 'forever chemicals' of per- and poly-fluorinated substances or PFAS, where growing evidence points to their adverse health effects, including some cancers. In Oregon, the state Department of Environmental Quality (DEQ) is testing locations including the Aurora State Airport for known or suspected PFAS use. Again, the Department of Aviation's exclusion of DEQ demonstrates an on-going pattern of discriminatory conduct.
- ODAV has now proposed a \$185 Million expansion of the Aurora State Airport that includes moving over a one-mile-long segment of State Highway 551 (Wilsonville-Hubbard Cut-off) and condemning extensive amount of private-property for Airport expansion use. ODAV, however, has had minimal communications with ODOT, an agency having severe budget problems, regarding the proposed relocation of State Highway 551.

We understand that the Governor's Office Executive Order 20-04 on Climate Action "Directing State Agencies to Take Actions to Reduce and Regulate Greenhouse Gas Emissions" (GHG) directs DEQ to develop strategies that "Cap and Reduce Greenhouse Gas Emissions." We are concerned that representatives of the Governor's Office appointed to the State Aviation Board and Department of Aviation staff simultaneously are advocating for major expansion of the Aurora State Airport that results in substantial increases in aviation-gas fossil-fuel consumption and GHG emissions, contrary to the Executive Order on Climate Action.

One of the major reasons stated by aviation interests for Aurora State Airport runway extension is to increase the sale of aviation fuel so that a larger class of aircraft may takeoff from the airport with full tanks of gas. We note that the tax on aviation fuel is the primary source of operational revenue for the Department of Aviation. Thus, the Department of Aviation has a direct pecuniary interest in advocating for increased aviation-gas fuel sales that would accompany expansion of the Aurora State Airport, seemingly in direct conflict with the Governor's Executive Order on Climate Action.

Additionally, DEQ data appears to indicate that the NMPDES (National Pollution Discharge Elimination System) permit for the Department of Aviation's Aurora State Airport discharge into Mill Creek-Pudding River watershed expired June 30, 2017. We understand that area residents have expressed concerns for surface-water, ground-water and well-water quality due to prospective airport run-off pollutants, unregulated septic systems and potential ground water pollution. Cumulatively, these all appear to be good reasons from the Department of Aviation's perspective to exclude DEQ from Airport planning efforts.

**The Department of Aviation's tightly controlled master planning process fails to meet the test for meaningful public engagement.** The Zoom meeting format used by the Department of Aviation does not list or show all participants in the meeting and provide clear labeling of names and affiliations. It is unclear to the public who is attending the meetings and who or what entity that participants represent. At the November 16, 2021, PAC meeting, it was difficult to ascertain from many of the name labels who was attending in what role. Names and affiliations of all PAC members and staff/consultants should be clearly evident.

Additionally, some PAC members were allowed to have two representatives participate in the meeting, while some PAC members were ignored and not allowed to participate in the meeting. These elements indicate a failure of meaningful public process.

The facilitators for the PAC meeting often used a series of unscientific "polls" to gauge participants' thoughts or perspectives; however, it was unclear who was participating — was it PAC members, Aviation staff and consultants, and/or the public? Moreover, the facilitators interpreted the results of the poll that may or may not be an accurate reflection of the participants involved.

The Department of Aviation states that "As the airport sponsor, ODA staff will be the final decision-making authority. They will decide what is included in the Master Plan." Setting aside the fact that this pronouncement at the start of a "public involvement" process sends a message that is contrary to Oregon's Statewide Planning Goal Number 1, we believe this is false information; only the appointed body (*i.e.*, the Oregon Aviation Board) can legally approve a master plan. The failure of the Oregon State Aviation Board to adopt the 2011 or 2012 Aurora State Airport Master Plan was a centerpiece for the Oregon Supreme Court's affirmation of the Court of Appeal's decision against the Department of Aviation for failure to comply with Oregon law.

During the November 16, 2021, PAC meeting, aviation consultants indicated that they would consider nearby external "outside the fence" proposed urban-level developments in the Airport master-planning process — implying that such proposed developments would favor Airport expansion. However, the consultants gave no indication of reviewing such information in light of Oregon's EFU land-use laws, nor the potential reality of such proposed developments ever actually occurring. Additionally, consultants gave no indication of considering the "negative" aspects of proposed developments outside the Airport, such as increased surface-transportation impacts/traffic congestion and potential mitigation, increased land-speculation harming the ag industry, and increased pollution and environmental impacts.

**The Department of Aviation has allowed and promoted the dissemination of false information about the seismic resilience of the Aurora State Airport.** At the October 6, 2021, Oregon Aviation Board planning session and at the November 16,

2021, PAC meeting, misinformation about the seismic conditions of the Aurora State Airport area was provided without rebuttal. At the October meeting, the Aviation Board had considerable discussion on resilience, and the importance of selling the resilience concept to the public and government officials as a component of building support for state and federal funds for the Aurora State Airport expansion. Aviation Board Chair Meeker indicated a desire to improve “lines of communication” between the Governor’s Office and airport businesses to promote resilience.

Contrary to statements that depict the Aurora State Airport as a crucial facility for the projected 9.0 Cascadia Subduction Zone Earthquake, the Aurora State Airport is listed at the lowest-level of Tier 3 airports in the Oregon Resilience Plan. The Tier designations “indicate the priorities for making future investments.” In other words, the Department of Aviation is effectively targeting one of the lowest priority airports to prepare for recovery in the Oregon Resilience Plan for potentially one the largest airport capital improvement projects ever planned by the state.

With respect to the airport’s ability to withstand a Cascadia Subduction Zone Earthquake, reports by the Oregon Department of Geology and Mineral Industries (DOGAMI) show that the Aurora State Airport is located in an area subject to major potential damage in a projected 9.0 Cascadia Subduction Zone Earthquake. The “Mid/Southern Willamette Valley Geologic Hazards, Earthquake and Landslide Hazard Maps, and Future Earthquake Damage Estimates,” DOGAMI publication IMS-24, shows that the Aurora State Airport specifically is located in an area:

- Rated High for Ground Shake Amplification
- Rated High for Amplification Susceptibility
- Rated Moderate to High for Liquefaction Susceptibility

The same deep, fine soils that make the French Prairie area such exemplary foundation farmland also mean these soils are subject to amplification and liquefaction. As a result of such an earthquake, the airport runway would likely be unserviceable for a long period of time (6-12 months) post-earthquake. Rather than allow aircraft to take off or land due to an inoperable runway, the most likely role of the Aurora State Airport will be to accommodate vertical take-off and landing of heavy-lift helicopters with locally-based Columbia Helicopters and Helicopter Transport Services, neither of which require a runway extension to operate.