October 25, 2026

**To: Oregon Aviation Board**

**Re: Comments in advance of the Aviation Board hearing re: Adoption of the Aurora State Airport Master Plan**

I submit these comments regarding the draft Aurora State Airport Master Plan as a life-long aviator with over 47 years of experience across international commercial operations, corporate aviation, flight instruction, and operations as a contract tactical pilot in Afghanistan. Having flown into KUAO regularly for 40 years, I offer deep operational insight into this specific airspace and infrastructure. My background in high-stakes environments gives me a definitive understanding of operational safety under high-density, low-margin airport parameters, taxiway and apron clearance constraints, and the systemic safety hazards that manifest when clear zones are structurally compressed.

Historically, KUAO has operated safely and efficiently under its intended FAA design standard as a B-II General Aviation airport. However, the current master planning process displays a systemic bias toward expansion, relying on forecasted demand metrics that appear to selectively exclude historical operations data and ignore taxiway and apron safety constraints.

As an Airline Transport Pilot, I urge the Board to postpone or deny the adoption of the current Master Plan based on the following critical deficiencies:

**1. Statistically Unsupported Aviation Demand Forecasts and ARC Design Shift**
The proposed runway extension and subsequent shift in the Airport Reference Code (ARC) to accommodate larger aircraft are operationally unjustified. The forecasted demand metrics utilized in the draft plan do not reconcile with the actual, observed traffic mix that utilizes KUAO on a regular basis. Upgrading the airport's design category based on speculative or transient operations data overstates the true operational need. I formally request that the Board withhold adoption until a comprehensive, transparent audit of the underlying design-hour fleet mix and specific tracking metrics is conducted to verify whether the baseline requirements for a design standard shift have actually been met by a true resident design fleet. Moving State Highway 551 to facilitate this expansion represents a substantial capital expenditure lacking a safety-based cost-benefit justification or clear public utility.

**2. Compromised Wingtip Clearance and Apron Maneuvering Margins**
The draft layout plan introduces acute ground safety risks by structurally reducing established aircraft apron dimensions. Specifically, the proposed alignment requires acquiring approximately 35 feet of active apron space utilized for staging emergency response and medical transit aircraft. Restricting this specialized footprint compromises mandatory FAA Object Free Area (OFA) safety margins. Forcing high-frequency, rapid-deployment airframes to navigate diminished ground

clearances increases the metric for wingtip strikes, constricts safe taxi pathways, and intensifies prop-wash/rotor-blast hazards during concurrent emergency launches.

**3. Absence of Internal Circulating Road and Surface Incident Mitigation**

As ODAV has acknowledged and presented to the Aviation Board, ODAV reported in December of 2025 that they had received a letter from the FAA in October (2025) stating that there had been an increasing trend in recent years at UAO; that V/PDs pose a "serious safety hazard;" that UAO is #1 in the region for V/PDs, and that there is need for a Corrective Action Plan to ultimately stop V/PDs. Anthony Beach went on to share that KUAO is #2 in the nation behind Chicago O'Hare Airport! Yet, during the same year the master plan saw the removal of a proposed internal circulation road, opting instead for signage and an educational program. This decision once again will increase aeronautical risks given the focus on accepting larger corporate jets and compromise safety.

**4.. Aeronautical Risks Introduced by Highway and Roadway Realignment**

The plan to realign State Highway 551 and Keil Road to facilitate a physical runway extension has been framed locally as a land-use dispute, but from an aviator's perspective, it represents an immediate airspace and approach risk. Forcing significant traffic infrastructure closer to the runway thresholds fundamentally alters the risk profile within the Runway Protection Zones (RPZs). The Board has a regulatory obligation to ensure absolute compatibility between airport development and surrounding physical corridors. The current findings fail to prove that shifting these high-density roadways will not introduce new transitional surface obstructions or interfere with future approach lighting system configurations.

To protect the operational safety, economic viability, and regulatory compliance of KUAO, I request that the State Aviation Board table the vote to adopt the Master Plan and State Agency Coordination findings until an independent, safety-first audit of the underlying traffic data and apron safety margins is conducted.

Respectfully submitted,

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Attachments: KUAO.20261002.. ATADS monthly RS Analysis 2015-AUG2026 (4p)

ODAV PowerPoint: 2025-12 Airports Presentation_307090319

# FORECAST AND ACTUAL OPERATIONS SUMMARY -_KUAO MASTER PLAN

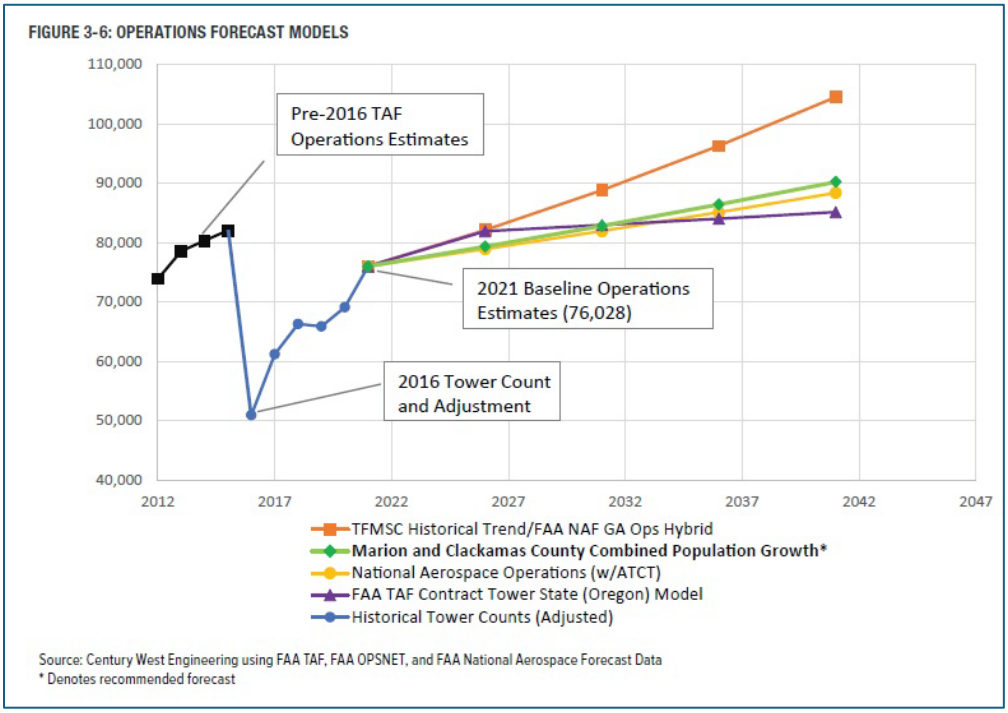
In Chapter 3 of the Draft Aurora Airport Master Plan, Total Operations are treated along with Based Aircrafts, including the presentation of historical data and then forecasted growth. Based aircraft are forecasted to continue year-on-year growth over the entire planning period from 281 to 350.

TABLE 3-14: FORECAST BASED AIRCRAFT FLEET MIX

| | CAGR | 2021 | 2026 | 2031 | 2036 | 2041 |
|---|---|---|---|---|---|---|
| Single Engine* | 0.9% | 216 | 229 | 240 | 250 | 259 |
| Multi Engine Piston | 0.0% | 6 | 6 | 6 | 6 | 6 |
| Turbo Prop | 1.1% | 13 | 14 | 15 | 15 | 16 |
| Jet | 2.3% | 36 | 40 | 45 | 50 | 56 |
| Helicopter | 1.4% | 10 | 11 | 11 | 12 | 13 |
| **Total Based Aircraft** | 1.1% | 281 | 300 | 317 | 333 | 350 |

Source: Century West Engineering
*Includes Experimental/LSA

A year-on-year increase in based aircraft would logically correlate with year-on-year increases in Total Operations. Notwithstanding a great deal of criticism from Planning Advisory Committee (PAC) members about the model selected, the Draft Aurora Airport Master Plan contains this graph illustrating forecast growth in Total Operations.




The selected model was the Marion and Clackamas County Combined Population Growth, showing a steady annual increase in Total Operations from 76,02 in 2021 to 90,000 in 2040. Many members of the PAC argued that the chosen model should have been FAA TAF Contract Tower

State (Oregon) Model, one that used actual FAA data adjusted for Oregon instead of population growth. The FAA TAF Oregon model projected a rise to about 82,000 Operations and then rather modest increases to about 84,000 Total Operations by 2040.

The Aurora Airport Master Plan process was delayed long enough that rather than concluding in 2023, it did not conclude until the end of 2025 and the final Draft Aurora Airport Master Plan released by ODAV and Century West in February of 2026. **The historical Total Operations data that was used in the master plan spanned 2016 to 2021.**

TABLE 2-9: ANNUAL OPERATIONS FLEET MIX (HISTORICAL)

| | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 |
|---|---|---|---|---|---|---|
| Itinerant | | | | | | |
| Air Taxi | 2,194 | 2,319 | 2,121 | 1,670 | 1,129 | 2,006 |
| General Aviation | 32,174 | 33,502 | 35,665 | 33,638 | 31,621 | 36,390 |
| Military | 265 | 199 | 277 | 107 | 38 | 79 |
| **Subtotal** | **34,633** | **36,020** | **38,063** | **35,415** | **32,788** | **38,475** |
| Local | | | | | | |
| General Aviation | 16,191 | 25,075 | 28,011 | 30,453 | 36,333 | 37,488 |
| Military | 139 | 129 | 245 | 34 | 19 | 65 |
| **Subtotal** | **16,330** | **25,204** | **28,256** | **30,487** | **36,352** | **37,553** |
| **Total** | **50,963** | **61,223** | **66,320** | **65,902** | **69,140** | **76,028** |

Source: Century West Engineering developed using FAA TFMSC Data

**Refusal to use more current Operations Data**

Despite concerns raised by the PAC as the master plan process was delayed about not using actual operations from current years (2022, then 2023, then 2024, etc.) ODAV and their consultant refused, claiming changing the data after the fact would corrupt the underlying data model.

Of note, there is another FAA database of Operations, called ATADS (Air Traffic Activity Data System) that is publicly available. We have been downloading the ATADS data to track actual operations at Aurora, as laid out in the attached ***KUAO ATADS Analysis with 12-month Running Sums*** document.

As of the scheduled date for the Oregon Aviation Board to approve the master plan on December 3, 2026 there are now four full years (2021 thru 2024) and year to date 2026 **actual operations data available**. Given the scope of the expansion contemplated in the master plan, the $184 million projected cost, and the small numbers of aircraft owners and operators who will benefit, this data must be considered.

The forecast horizon in the master plan was twenty years out to 2040, so reducing the forecast window down to five years helps put the data in perspective. To do so the forecast growth of operations for the period can be averaged and distributed over those years, as follows:

| Source | Year | Forecast |
|---|---|---|
| Master Plan | 2020 | 65,949 |
| Master Plan | 2021 | 72,549 |
| ATADS | 2022 | 77,046 |
| ATADS | 2023 | 77,298 |
| ATADS | 2024 | 77,550 |
| ATADS | 2025 | 77,802 |

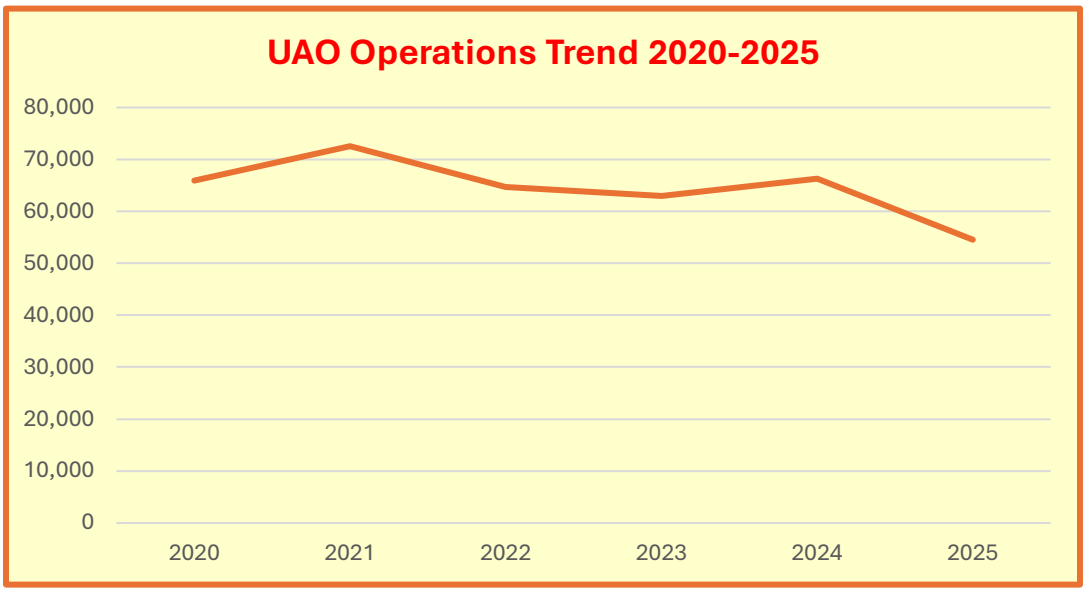
What become visible then is about a 7% forecasted increase in Total Operations for 2022 over 2021, and then relative flattening going forward across 2023, 2024 and 2025.

When actual Total Operations from ATADS database (attached), is considered, what we see actually occurred across the years 2022 through 2025 is far short of what was forecast:

| KUAO Ops Data | | |
|---|---|---|
| Master Plan | 2020 | 65,949 |
| Master Plan | 2021 | 72,549 |
| ATADS | 2022 | 64,651 |
| ATADS | 2023 | 63,015 |
| ATADS | 2024 | 66,242 |
| ATADS | 2025 | 54,543 |
| ATADS | 2026 YTD | 55,590 |

*[Note: Aug & Sep 2025 operations were dramatically reduced by runway closure for repaving. ATADS actual for 2025 = 50,806. To adjust for the runway closure in Aug & Sept of 2025, Aug & Sept Operations from 2024 were used for 2025.]*

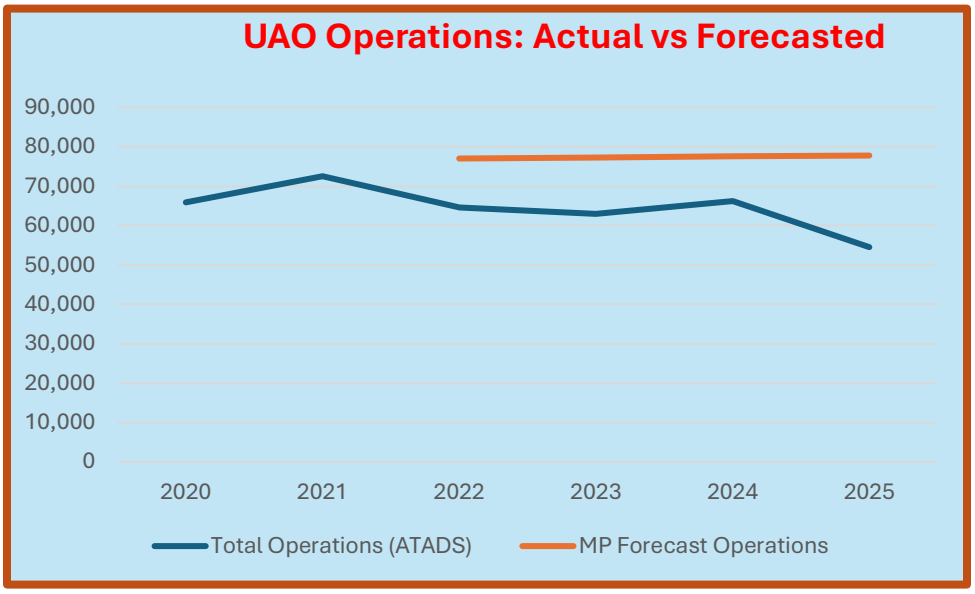
**This is a dramatic shortfall in Total Operations for an airport making the case in its master plan for expansion**. Graphically, the shortfall looks like this:




The shortfall in year-on-year Total Operations is compounded by how that shortfall compares to what was forecast in the master plan:

| KUAO Ops Data | | | Forecast | Shortfall |
|---|---|---|---|---|
| Master Plan | 2020 | 65,949 | | |
| Master Plan | 2021 | 72,549 | | |
| ATADS | 2022 | 64,651 | 77,046 | 16.1% |
| ATADS | 2023 | 63,015 | 77,298 | 18.5% |
| ATADS | 2024 | 66,242 | 77,550 | 14.6% |
| ATADS | 2025 | 54,543 | 77,802 | 20.8% |
| ATADS | 2026 YTD | 55,590 | | |

The data range selected at the outset of the master plan process happened to reflect a post-COVID bounce back, and enabled a forecast of continued growth. ODAV and its consultant refused to consider or use more current years of actual Total Operations data as the master plan process was delayed, claiming that it would corrupt the data range. Doing so meant that **future forecasts were based on incorrect historical data, and the failure to use more current annual operations data as the master planning process continued enabled false forecasts with continued year-on-year growth that has proven wrong, with dramatic forecast shortfalls!**




The reality is that forecast growth in based aircraft should correlate with increased operations. It does not. Not only have Total Operations shown a year-on-year decline for 2022 through 2025, the annual Total Operations are woefully short of what was forecast, and that forecast in growth of based aircraft and operations over the master plan's planning period is the basis for most of the airport expansion.

**We can now see that the decision by ODAV and its consultant to refuse to consider or use more current years of Total Operations data as the master plan process was delayed, claiming that it would corrupt the data range, is a fatal flaw in the master plan.**

**A retrospective assessment clearly shows that Total Operations at Aurora State Airport are already failing to achieve forecasted levels and do not justify airport expansion.**