

FORMAL PUBLIC COMMENT: OREGON STATE AVIATION BOARD MEETING

TO: Chair Cathryn Stephens and Members of the Oregon State Aviation Board

DATE: December 4, 2025

RE: Formal Comment and Request for Investigation regarding Aviation Review Committee (ARC) Chair Shelley Humble

Dear Chair Stephens and Members of the Board:

This letter serves as formal public comment regarding a critical failure of ethical governance within the Aviation Review Committee (ARC).

It has come to the attention of the public that Ms. Shelley Humble, the current Chair of the ARC, has presided over the review, ranking, and recommendation of state grant funds for the Creswell Airport (Hobby Field) while maintaining an undisclosed "actual conflict of interest" as defined by ORS 244.020(1) or a "potential conflict of interest" as defined by (ORS) § 244.040(1).

Despite explicit guidance provided to ARC members and the statutory requirements of Oregon Government Ethics Law, Ms. Humble failed to publicly announce this conflict or recuse herself from the deliberation of grants that provide a direct, disproportionate, and private pecuniary benefit to her husband's business, Viper Aviation.

1. The Undisclosed Actual Conflict of Interest

Ms. Humble serves in the dual capacity of Creswell Airport Manager (the applicant) and ARC Chair (the reviewer). While this dual role is problematic, the statutory violation arises from her family's private financial interest:

- **The Relative:** Ms. Humble's husband is the owner and operator of **Viper Aviation**.
- **The Business:** Viper Aviation is the **sole** non-niche, privately owned aircraft maintenance facility located at Creswell Airport.
- **The Benefit:** Grant-funded projects such as "Taxiway Rehabilitations," "Hangar Development," and "Security Improvements" provide a unique and material financial benefit to the only business on the field that relies on bringing client aircraft into its facility for repair. This benefit is not shared "to the same degree" by other tenants, such as flight schools, rendering the "class exception" defense invalid under ORS 244.020(13)(b).

Evidence from Creswell's Own Applications:

The link between these grants and the financial health of Viper Aviation is not theoretical; it is explicitly stated in the grant applications Ms. Humble submitted and subsequently reviewed. In

the 2024 COAR grant application for security improvements, the justification relies heavily on the financial benefit to on-field businesses:

"This project increases the safety and security on the airport which effectively promotes confidence in the airport from the businesses and aircraft owners on the field."

Furthermore, Ms. Humble explicitly argued in the application that these improvements were a marketing tool to attract more aircraft owners to the field:

"Further, increased security at the airport will increase the marketability of the airport to users who may, as a result of the increased safety and security provided by the secure entrance gates, be more inclined to hangar their aircraft at 77S."

This admission is critical. By using state funds to "increase the marketability" of the airport to aircraft owners, Ms. Humble is directly using public resources to expand the potential customer base for her husband's maintenance business. More aircraft hangared at Creswell means more inspections, repairs, and maintenance work for Viper Aviation.

The application further underscores the significance of Viper Aviation as a primary beneficiary and supporter of this state funding, explicitly noting:

"Airport Security Improvements has [support from] City Council, Airport Commission, current airport businesses and airport users. **Please see the attached letters of support from Viper Aviation and About Time Aviation**"

By soliciting and attaching a letter of support from her husband's business to justify a grant application and then presiding over the committee that reviews that application, Ms. Humble has created a documented feedback loop of private gain that violates the "class exception" defense. The benefit is not general; it is specific to the "businesses... on the field" that she explicitly cites to secure the funding.

2. Disproportionate Funding Success and Disadvantage to Stakeholders

A review of the *COAR 2024-25 Applications ARC Recommendation to the Board* reveals a stark and disturbing disparity in the distribution of state funds, directly disadvantaging other aviation stakeholders in Oregon.

During the January 2025 review cycle presided over by Ms. Humble:

- **Creswell Airport** was predominantly successful, having **four separate grant applications** recommended for funding (one Priority 1 and three Priority 2 projects).
- The total recommended funding for Creswell Airport alone amounted to **\$286,200.00**.

- In stark contrast, numerous other airports across the state received recommendations for only single projects.

The COAR grant program has a finite budget. By capturing a disproportionate share of the available funding for the airport she manages—and by extension, the infrastructure that supports her husband's business—Ms. Humble’s participation has created an uneven playing field. Other Oregon airports and stakeholders are materially disadvantaged when the Chair of the review committee steers a high volume of grants to her own facility, effectively reducing the pool of resources available for other critical state aviation needs.

3. The Statutory Mandate of the ARC The Oregon legislature expressly assigned the ARC a specific role in aviation funding and demands fairness in funding by ensuring the composition of the ARC is diverse – members are “from each of the area commissions on transportation chartered by the Oregon Transportation Commission.” ORS 319.023(3)(a), (3)(c). The legislature expressly requires the diverse ARC it created to review and make grant funding recommendations to OAB and OAB is required to pay attention to those recommendations. This is particularly relevant as the OAB considers proposed amendments to OAR 738-124.

4. A Knowing and Willful Violation (Repeat Offense)

This does not appear to be an inadvertent oversight. Ms. Humble is fully aware of this specific conflict. In **April 2025**, Ms. Humble signed a **Stipulated Final Order with the Oregon Government Ethics Commission (Case No. 24-318EDP)**. In that order, she admitted to facts acknowledging that her husband’s ownership of Viper Aviation created a conflict of interest she failed to properly disclose as Airport Manager.

Despite receiving a "letter of education" from the Commission regarding this exact business relationship just months ago, Ms. Humble proceeded to chair the ARC meeting on **January 22, 2025**, where she participated in the recommendation of nearly \$300,000 in grants for Creswell Airport without adhering to the mandatory "announce and refrain" procedures required by ORS 244.120(2). The instructions given to the ARC members explicitly address these concerns.

5. Upcoming Board Action: Approval of 2026 ARC Members

It is our understanding that the State Aviation Board Work Session Agenda for **December 4, 2025**, includes action items related to **COAR Cycle 10** and the **approval of 2026 ARC Members**.

Given the documented history of ethical violations, the recent Stipulated Final Order (Case No. 24-318EDP), and the active allegations regarding her conduct during the 2025 cycle, **Ms. Shelley Humble should not be considered for a position on the 2026 Aviation Review Committee**. Re-appointing an official who has demonstrated a pattern of using their public office to steer financial benefits to their family's private business would be a dereliction of the Board’s duty to ensure the integrity of the grant review process.

6. Request to Suspend Consideration of Creswell Airport Applications

The integrity of the COAR grant selection process is paramount. Ms. Humble’s position as ARC Chair provided her with unique, non-public insight into the scoring criteria, the competitive landscape, and the specific deliberations of the committee—advantages not available to other applicants. Consequently, the applications submitted by Ms. Humble on behalf of Creswell Airport are tainted by this insider knowledge and the undisclosed conflicts of interest described above.

To prevent the finalization of potentially invalid awards, we request that the Board immediately suspend all consideration and final approval of grant applications submitted by Ms. Humble for Creswell Airport (specifically COAR-2025-77S-00037, -00051, -00042, and -00047). These applications should be held in abeyance until the Oregon Government Ethics Commission has completed its investigation and issued a determination regarding these serious allegations. Proceeding with these awards now would ratify a flawed process and expose the Board to significant legal and reputational risk.

7. Suspension of Creswell Applications for COAR Cycle 10 (2025-2026)

Regarding the **COAR Cycle 10** agenda item, we specifically request that the Board **suspend all grant applications submitted by the City of Creswell for the 2026 funding cycle.**

These applications (and the two 2026 applications for “North End T Hangar Design and Construct - IJJA Match” and “EOC Recovery Equipment”) were prepared and submitted during Ms. Humble’s tenure as both Airport Manager and ARC Chair—a period now marked by documented ethical violations and an active request for investigation. To allow these new applications to proceed through the ARC review process while the applicant (Ms. Humble) potentially remains on the committee or influences its proceedings would be improper. To ensure fairness to all other applicants, Creswell’s Cycle 10 applications must be pulled from consideration until Ms. Humble’s ethical standing is resolved and proper firewalls against conflicts of interest are verified by the OGEC.

8. Formal Request for Action The integrity of the COAR grant process relies on the impartial review of applications. That integrity has been compromised. Therefore, we respectfully request the Oregon State Aviation Board take the following immediate actions:

1. **Deny Re-appointment:** Explicitly exclude Shelley Humble from the roster of approved 2026 ARC members during the December 4, 2025 meeting.
2. **Suspend Cycle 10 Applications:** Suspend all applications from Creswell Airport for the 2026 COAR Cycle 10 pending the resolution of ethical complaints.
3. **Suspend Current Awards:** Hold all current (2025) COAR grant recommendations for Creswell Airport in abeyance pending the results of the OGEC investigation and a forensic review of the scoring process.

4. **Request for OGEC Determination:** Immediately submit a request to the Oregon Government Ethics Commission (OGEC) for an investigation and determination regarding Ms. Humble's failure to disclose her actual conflict of interest.
5. **Appointment of Independent Auditors:** Appoint an independent body to conduct a forensic review of all COAR grant funds awarded to Creswell Airport during Ms. Humble's tenure on the ARC.
6. **Immediate Recusal:** Direct Ms. Humble to immediately recuse herself from all future ARC activities pending the outcome of the OGEC investigation.

The public trust in the Oregon Department of Aviation's grant distribution process requires transparency and strict adherence to the law. We urge you to act swiftly to address these serious violations.

Sincerely,

Bjorn Dahlen

Oregon Aviation News and for Aviation Stakeholders in Oregon

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