

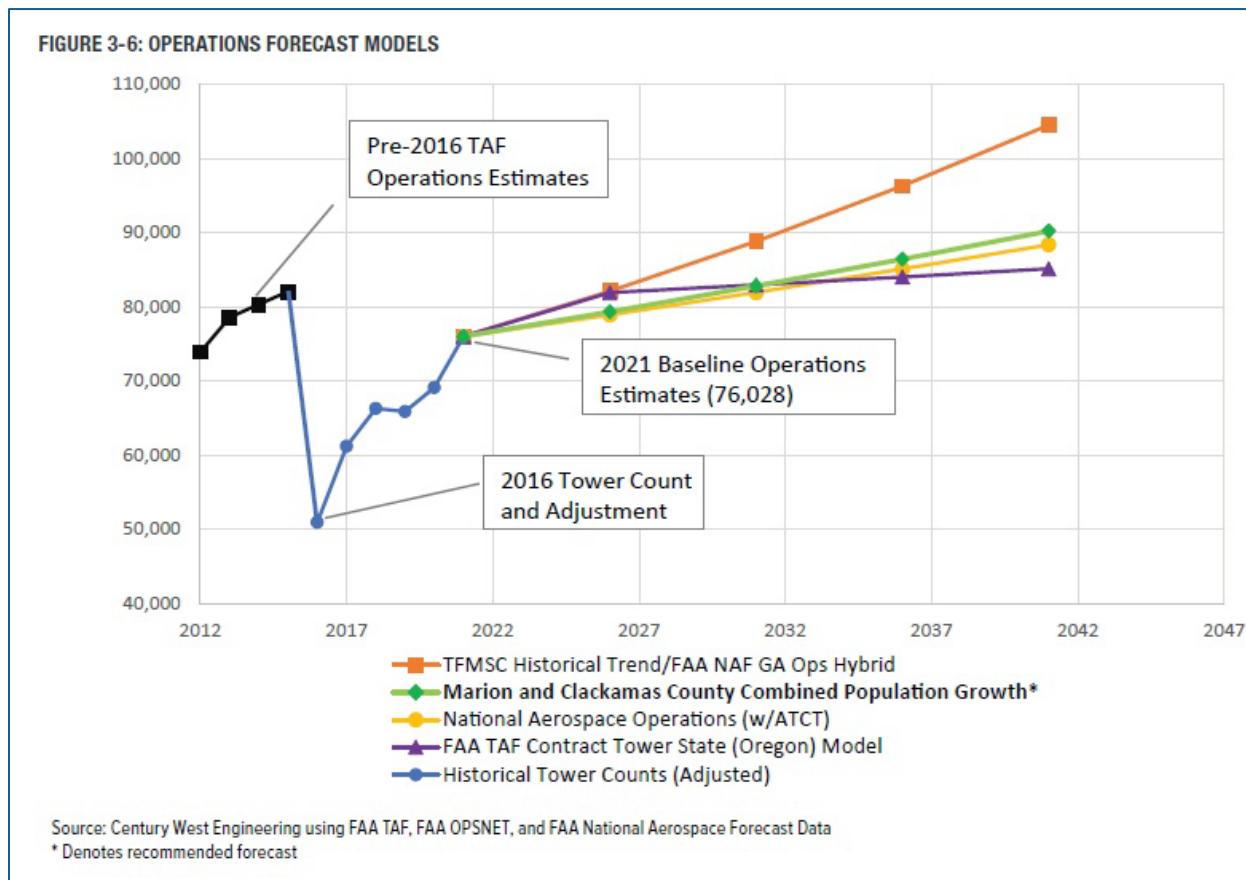
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| Public Comment Topic | Aurora Airport Master Plan |
| Public Comment | <p>You'll know from the State Airport Manager's report at your last Board meeting that work continues on the Draft Aurora Airport Master Plan with the intent to bring it before you for approval and adoption this year. Given the comments of land use non-compatibility from the impacted two counties and two cities, that presumably is where most of the work is taking place.</p> <p>My comments to you are not about land use, but rather Total Operations, one of the three factors used to justify airport expansion and runway extension. We're now in 2026 and have three years of FAA data on ACTUAL operations to compare with FORECASTED operations.</p> <p>Chair Stephens will know that as the PAC process was delayed for more than two years, many of us pointed out that settling on actual data from 2016 thru 2021 was inadequate as actual total operations numbers for 2022, and then 2023, and then 2024, and now 2025 became available.</p> <p>Extrapolating the forecast Total Operations for those years result in 77,046 for 2022 contrasted with actual of 64,651; 77,298 for 2023 contrasted with actual of 63,015; 77,550 for 2024 contrasted with actual of 66,242; and 77,802 for 2025 contrasted with actual of 61,646.</p> <p>Put another way, that is a shortfall against forecast of 16.1% for 2022, 18.5% for 2023, 14.6% for 2024 and 20.8% for 2025. ODAV and their consultant claimed incorporating subsequent years would corrupt their data set, but the actual numbers now evidence a willful blindness to the reality on the ground in order to achieve a pre-determined outcome of expansion.</p> |
| Please attach public comment and any supporting materials here: | https://www.formstack.com/admin/download/file/19124679539 |
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AURORA AIRPORT TOTAL OPERATIONS AND FORECASTS

RETROSPECTIVE ASSESSMENT

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.

Notwithstanding a great deal of criticism from Process 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 76,028 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. The 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

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. Coincidentally, data from the successive years shows a continual downward trend in Total Operations, not the increased forecast.

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 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 Adj | 77,802 |

What becomes 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.

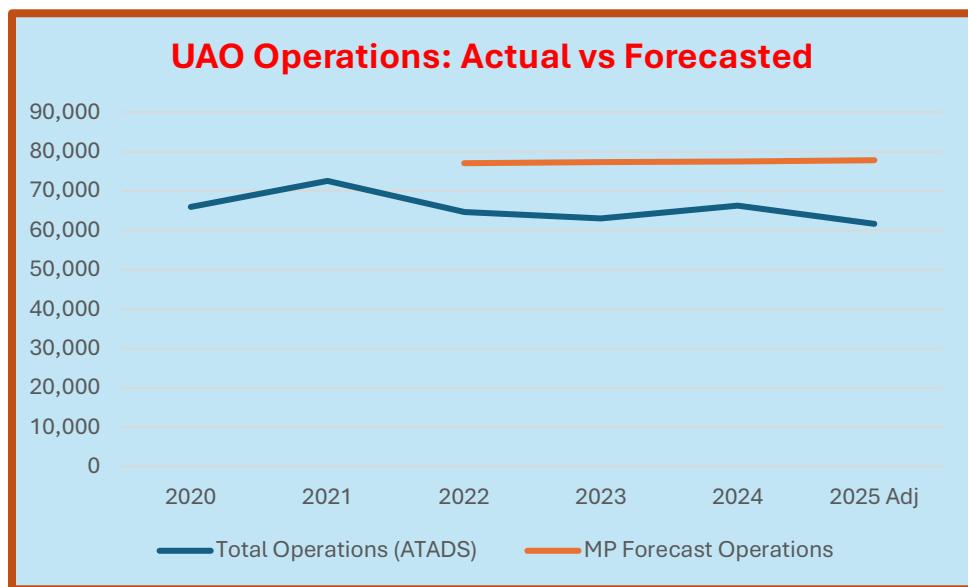
When we look at the actual Total Operations from ATADS, though, what we see actually occurred is far short of what was forecast:

ATADS airport 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 Adj | 61,646 |

[Note: Aug & Sep 2026 operations were dramatically reduced by runway closure for repaving. In order to provide objectivity, Aug & Sep 2024 Operations numbers were substituted.]

Now when we compare the forecasted Total Operations for those years with the actual Total Operations, we see:



In other words, what actually occurred in terms of Total Operations was a dramatic shortfall compared to forecast. This is important, because one of the justifications of expansion of an airport is based on forecast increases in Total Operations, as well as Based Aircraft.

The graph above is for six years using an X Axis scale of 0 to 90,000. When the scale is adjusted so that the year-on-year Total Operations numbers are presented with a scale of 56,000 to 74,000, what is even more apparent than the shortfall to forecast is the overall year-on-year decrease in operations:



What is very apparent is a one-year post-pandemic increase from 2020 to 2021, and then an on-going year-on-year decrease that continues to the present.

When the actual operations data for the years 2022 through 2025 is assessed in terms of shortfall to forecast, it is equally striking:

| Forecast | Actual | % of Goal | Shortfall |
|----------|--------|-----------|-----------|
| 77,046 | 64,651 | 83.9% | 16.1% |
| 77,298 | 63,015 | 81.5% | 18.5% |
| 77,550 | 66,242 | 85.4% | 14.6% |
| 77,802 | 61,646 | 79.2% | 20.8% |

ODAV and its consultant refused 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. A retrospective assessment, though, clearly shows that Total Operations at Aurora State Airport are already failing to achieve forecasted levels and do not justify airport expansion.