From: Pacific Aviation
To: Oregon Department of Aviation
Subject: Individual Public Comment – November 5, 2026 – ARC Membership and COAR Grant Oversight
Date: Sunday, November 1, 2026 1:23:53 PM

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Dear Chair Stephens and Members of the Oregon State Aviation Board:

I submit these comments regarding the proposed approval of the 2027 Aviation Review Committee (ARC) membership and continuing concerns about the integrity, consistency, and oversight of the COAR grant review process.

1. Historical Conflict-of-Interest Disclosures

Following concerns raised regarding ARC Chair Shelley Humble's participation in recommendations involving Creswell Airport, multiple ARC members disclosed financial, professional, or other relationships involving applicant airports during the January 15, 2026 ARC meeting.

These disclosures raise questions about whether comparable relationships existed during previous grant cycles and, if so, whether they were properly disclosed, documented, and addressed.

The apparent absence of corresponding conflict-of-interest disclosures in earlier ARC meeting records warrants examination.

ORS 244.120 establishes disclosure and participation requirements for public officials with actual or potential conflicts, while ORS 244.130 requires disclosures to be recorded in the public body's official records.

I request that the Board examine previous ARC review cycles, including 2024 and 2025, to determine:

- Whether members made required disclosures and whether those disclosures were recorded.
- Whether relationships disclosed in January 2026 existed during previous grant cycles.
- Whether members participated in deliberations, rankings, or recommendations involving applications in which they had actual or potential conflicts.
- What procedures ODAV employed before January 2026 to identify and address conflicts of interest.

If prior disclosures were made, I request identification of the corresponding official records.

2. ARC Internal Policy Versus Oregon Government Ethics Law

The ARC's internal review procedures expressly permit members who abstain from voting on individual applications to participate in voting on the overall slate of recommended projects.

However, an internal committee policy cannot override Oregon Government Ethics Law.

The January 13, 2025 correspondence from the Oregon Government Ethics Commission concerning Shelley Humble addressed potential conflicts involving Creswell applications. It has not been shown to expressly authorize participation in an overall-slate vote containing those same applications.

I request that the Board establish whether ARC members who recused themselves from individual applications subsequently participated in overall-slate recommendations containing those applications.

I further request written OGEC guidance addressing whether such participation is consistent with ORS 244.120, particularly where an actual financial conflict exists.

The Board should not assume that compliance with an internally adopted ARC procedure necessarily establishes compliance with Oregon law.

3. Inconsistent Priority 2 Grant Classifications

I remain concerned about apparent inconsistencies in the classification and ranking of COAR Priority 2 applications.

Creswell Airport's Runway 34 obstruction-removal proposal was classified Priority 3 during the 2024 grant cycle, while a substantially similar proposal was classified Priority 2 and ranked first statewide in 2025.

During that same cycle, Creswell received the top three Priority 2 rankings, including applications involving airport emergency operations equipment, communications systems, security gates, and a drone.

Some proposed equipment was described as supporting broader municipal emergency-management functions.

I recognize the important role airports play in emergency preparedness and disaster recovery. However, a project's general emergency-management value does not, by itself, establish that it qualifies for Priority 2 aviation funding.

I request a written explanation of the identified classification discrepancies, including the criteria used to determine eligibility and priority.

4. Continued Use of Resilience Criteria in the 2027 COAR Grant Cycle

The current COAR Cycle 11 (2026–2027) continues to recognize emergency preparedness and infrastructure projects consistent with the Oregon Resilience Plan or Oregon Aviation Plan as Priority 2 projects.

Because this classification places qualifying projects ahead of Priority 3 applications, it is important that eligibility be established through objective, documented criteria.

A general assertion that equipment may be useful during an emergency should not be sufficient to establish Priority 2 eligibility.

For Cycle 11, I request that the Board clarify:

1. Whether applicants claiming Priority 2 eligibility must identify the specific provisions of the Oregon Resilience Plan or Oregon Aviation Plan supporting each project.

2. Whether ODAV independently verifies those claims before applications are forwarded to the ARC.

3. Whether applicants must demonstrate that the project's primary purpose and anticipated use are consistent with an identifiable aviation preparedness or airport infrastructure need.

4. How ODAV evaluates projects that serve both airport operations and broader municipal emergency-management functions.

5. Whether components that do not independently qualify for Priority 2 funding can be bundled with qualifying infrastructure to obtain a higher priority.

6. What written findings support the ARC's classification and recommendation of such projects.

These questions are particularly relevant because the 2027 application cycle has already closed and the ARC will be reviewing the submitted applications.

I request that the Board ensure appropriate eligibility safeguards are in place before Cycle 11 applications are evaluated and recommended for funding.

5. Safeguards Against Misclassification and Improper Use of Aviation Grant Funds

I am concerned about the potential for applicants to characterize projects primarily serving general municipal purposes as airport-resilience projects in order to obtain more favorable funding priority.

Emergency operations centers, communications equipment, drones, vehicles, and recovery equipment may serve legitimate aviation purposes. However, some such projects may also support municipal police, fire, emergency management, or other non-aviation functions.

The existence of an airport-related purpose does not necessarily establish that the entire project expenditure is properly chargeable to aviation funds.

This raises additional concerns at federally obligated airports, where airport sponsors must comply with applicable FAA grant assurances and restrictions concerning airport land use, facilities, and revenue.

Although these federal obligations do not automatically determine eligibility for every state-funded project, they are relevant to evaluating proposed uses and ensuring that state grants do not facilitate activities inconsistent with an airport sponsor's federal obligations.

I request that ODAV establish and document the following safeguards:

Independent eligibility review: Require ODAV staff to evaluate each project's actual purpose and proposed use before submission to the ARC, rather than relying primarily on the applicant's requested classification.

FAA compliance verification: Require applicants operating federally obligated airports to demonstrate that proposed expenditures and operational arrangements are compatible with applicable FAA grant assurances, airport land-use restrictions, and approved Airport Layout Plans. Where material uncertainty exists, obtain written FAA clarification.

Documented aviation-specific benefits: Require applicants to identify the actual airport operations, infrastructure, or aviation emergency-response functions supported by each project, including the applicable provisions of the Oregon Resilience Plan or Oregon Aviation Plan.

Dual-purpose equipment review: Require applicants to identify equipment or facilities intended for both aviation and municipal purposes, explain anticipated uses, and document appropriate funding allocations where necessary.

Restrictions on project bundling: Establish procedures to prevent otherwise ineligible or lower-priority expenditures from receiving Priority 2 treatment merely because they are included within a broader airport emergency-preparedness application.

Post-award accountability: Establish enforceable conditions concerning equipment ownership, location, permitted uses, recordkeeping, and changes in use. Require appropriate monitoring and provide for corrective action or recovery of funds where material grant conditions are violated.

Transparent eligibility determinations: Require written findings explaining the statutory, regulatory, and planning basis for approving mixed-purpose projects and assigning their funding priority.

The Creswell emergency operations equipment applications illustrate why these safeguards are important.

Equipment proposed for an airport emergency operations center may be appropriate when used for aviation recovery, airport communications, or restoration of airport operations. However, the same equipment could also be used primarily for broader municipal emergency response unrelated to airport functions.

In such circumstances, the Board should require documentation establishing the qualifying aviation purpose, appropriate allocation of public funding, applicable federal compliance, and enforceable conditions governing equipment use.

The objective is not to discourage legitimate airport resilience projects. It is to ensure that aviation funds support the aviation purposes for which they are appropriated and that applicants compete under consistent standards.

6. Requested Board Action Before Approval of 2027 ARC Membership

Before approving the proposed 2027 ARC membership, I respectfully request that the Board:

1. Verify the qualifications and appointment procedures of all proposed ARC members.

2. Examine historical conflict-of-interest disclosures, recusals, and voting practices for the 2024 through 2026 grant-review cycles.

3. Determine whether ODAV has consistently complied with the disclosure and recordkeeping requirements of ORS Chapter 244.

4. Obtain written OGEC guidance concerning participation in overall-slate votes involving applications from which members have recused themselves.

5. Review the identified Priority 2 classification discrepancies and provide written explanations.

6. Establish documented Cycle 11 eligibility criteria requiring a demonstrated connection to the Oregon Resilience Plan or Oregon Aviation Plan.

7. Implement independent review and FAA compliance safeguards for mixed-purpose aviation and municipal projects.

8. Examine previously approved mixed-purpose grants to determine whether their classification, authorized uses, and funding arrangements complied with applicable requirements.

9. Consider deferring approval of the proposed 2027 ARC membership until the relevant governance and oversight concerns have been adequately addressed.

The ARC is entrusted with recommending the distribution of limited public aviation funds. That responsibility requires more than procedural compliance during committee meetings. It requires a review process capable of identifying conflicts, verifying project eligibility, preventing improper classification, and ensuring that public aviation resources are administered consistently and lawfully.

These concerns extend beyond any individual ARC member or applicant airport. They concern the integrity of the statewide grant-review process and the Board's responsibility to ensure that appropriate safeguards are in place.

I respectfully request that these comments be included in the official record of the November 5, 2026 State Aviation Board meeting and that the Board provide a written response addressing the questions raised.

Sincerely,

Bjorn Dahlen