From:	Oregon Aviation News
To:	Oregon Department of Aviation; SUGAHARA Kenji; THOMAS Alex R
Subject:	Formal Public Comment — Aurora State Airport Master Plan — Request for Inclusion in December 3 Adoption Record
Date:	Thursday, October 29, 2026 7:02:09 PM
Attachments:	Article_Aurora Master Plan Oct 29 2026.pdf

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Director Sugahara and State Aviation Board Members,

Oregon Aviation News respectfully submits the following published investigation for consideration in connection with the proposed adoption of the Aurora State Airport Master Plan and accompanying State Agency Coordination Findings.

Aurora Airport's Nearly $1 Million Master Plan Contains Documented Errors. Where Is the Final Engineering Review?

https://oregonaviationnews.com/news/aurora-state-airport-master-plan-documented-errors-october-2026

The investigation identifies documented discrepancies in the March and May 2025 Airport Layout Plans, including incorrect survey-datum designations and a federal grant number assigned to another airport.

It also raises questions concerning the availability of completed engineering review documentation, the precise Airport Layout Plan conditionally approved by the FAA on April 6, 2026, and the state's evaluation of objections submitted by affected local governments.

We request that ODAV:

1. Include this correspondence and the referenced investigation in the official public-comment and adoption record.

2. Make the investigation available to State Aviation Board members before their December 3 deliberations.

3. Identify the final corrected ALP drawings, completed review documentation, and disposition of the documented discrepancies.

4. Address the unresolved technical and coordination questions in the record supporting the proposed adoption.

Oregon Aviation News previously provided ODAV and Century West Engineering opportunities to comment on these findings. No substantive response was received by the October 29 pre publication deadline.

Our reporting distinguishes documented errors from questions requiring additional records and does not presume that the identified discrepancies establish invalid FAA approval or improper

use of federal funds.

Please confirm receipt of this formal public comment and its inclusion in the December 3 adoption record.

Thank you.

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AIRPORTS

Aurora Airport’s Nearly $1 Million Master Plan Contains Documented Errors. Where Is the Final Engineering Review?

Incorrect survey-datum labels, another airport's federal grant number, and publicly available review forms that do not document completed verification raise questions as Oregon prepares to adopt a long-range plan for Aurora State Airport.

October 29, 2026 By Oregon Aviation News Staff

AURORA, Ore. — Oregon's proposed master plan for Aurora State Airport is approaching a consequential decision by the State Aviation Board. The planning study, which the master plan identifies as a $994,764 federally funded project, is intended to guide airport development over the coming decades.

But an Oregon Aviation News examination of the airport's published engineering documents identified errors that remained in successive versions of the Airport Layout Plan (ALP), along with questions about the technical-review record supporting the plan.

One drawing misidentifies both horizontal and vertical survey datums. Another carries a federal grant number assigned to an airport in Washington. The publicly available ALP and airport-property review checklists do not document completed reviewer verification.

The FAA conditionally approved an updated ALP on April 6, 2026. However, the publicly posted approval correspondence does not include the signed drawing set referenced in that letter, leaving unanswered whether the documented errors were corrected before approval.

These findings do not establish that the airport was improperly surveyed, that federal funds were misused, or that the FAA authorized unsafe construction.

They raise a narrower, verifiable question: **What corrections were made, who verified them, and where is the final documentation supporting the plan now being considered for adoption?**

Incorrect survey-datum designations survived a drawing revision

Sheet 2 of Century West Engineering's March 2025 Airport Layout Plan identifies the airport's horizontal datum as "NAVD83" and its vertical datum as "NAD88."

Neither designation is correct.

The standard horizontal reference is NAD83, the North American Datum of 1983. The vertical reference is NAVD88, the North American Vertical Datum of 1988.

This was not confined to an earlier preliminary drawing.

Oregon Aviation News examined the May 2025, 17-sheet ALP incorporated into the draft-final master-plan compilation subsequently released for public review.

On Sheet 2 of that revised set, appearing at PDF page 173 of the 196-page master-plan document, the same incorrect "NAVD83" and "NAD88" labels remain.

The errors therefore persisted into a later dated version of the engineering drawings.

The distinction between a mislabeled datum and an incorrect underlying survey is important. A drafting mistake does not establish that runway coordinates, elevations or engineering calculations were computed using the wrong reference system.

But when survey-reference information is published incorrectly in successive drawing sets, a completed quality-control review should establish which reference systems were actually used, when the error was corrected and which final drawings were accepted.

Another airport’s federal grant number appears in both versions

A separate document-control error appears on Sheet 3 of the March 2025 ALP.

The federal-funding disclaimer identifies Airport Improvement Program project **3-53-0011-007-2022**.

FAA grant records assign that number to a $300,000 airport master-plan award for Cashmere-Dryden Airport in Washington, issued to Chelan County.

Aurora's planning grant, by contrast, is identified in the FAA's April 6, 2026 correspondence as **3-41-0004-022-2021**.

The incorrect Cashmere-Dryden identifier also appears on Sheet 3 of the May 2025 Aurora ALP, reproduced at PDF page 174 of the draft-final master-plan compilation.

The May 2025 Airport Data Sheet additionally retains an unfilled federal project-number placeholder in a separate disclaimer.

There is another connection: Century West identifies a completed 2024 Airport Layout Plan report for Cashmere-Dryden among its aviation planning projects.

That does not prove how the Washington grant identifier entered Aurora's drawings. It does make the cross-project error particularly relevant to the consultant's document-control procedures.

There is no evidence in the reviewed records that Aurora's federal funds were directed to the wrong airport.

The question is why an identifier belonging to another airport remained in multiple dated versions of Aurora's publicly funded planning documents, and whether the discrepancy was detected and corrected during subsequent review.

Published review forms do not establish who verified the drawings

The FAA maintains standard review procedures for Airport Layout Plans and airport-property inventories.

Those procedures use detailed checklists to identify submission requirements and document review.

ODAV's publicly posted Aurora materials include an ALP Review Checklist and an Exhibit A airport-property review checklist.

However, the publicly available copies do not show completed review responses, named reviewer signoffs or final FAA verification information.

That is an important distinction.

An uncompleted checklist made available to the public does not prove that the consultant failed to perform quality control or that the FAA never reviewed the submission.

Completed records may exist separately in the consultant's, airport sponsor's or FAA's project files.

But the publicly supplied documents do not demonstrate who verified the final drawings or how specific technical discrepancies were resolved.

The project's original scope of work makes this issue more concrete.

Task 9 anticipates submission of a signed ALP review checklist and written confirmation from FAA review personnel that comments were addressed before final signature.

Those are identifiable project deliverables.

Their production, together with the controlling drawing set and revision history, would provide a basis for determining whether the review process identified and resolved the documented errors.

Runway dimensions and airport property records warrant reconciliation

The published master plan also contains differences in its descriptions of existing airport conditions.

On ALP Sheet 2, the existing runway object-free-area width is listed as approximately 688 feet.

The master-plan narrative, in Table 4-1, reports an existing width of 685 feet.

Both are compared with an applicable 800-foot design standard.

This is not a case of the consultant overlooking the runway's nonstandard conditions.

Century West explicitly identifies runway object-free-area deficiencies associated with nearby roads, equipment and other constraints. Its proposed improvements include

measures intended to address those conditions.

The difference between the reported dimensions may reflect surveying conventions, measurement locations, rounding or revisions. The controlling measurements are not established by the public documents reviewed.

Another passage, on page 4-20 of the master-plan narrative, appears to use the abbreviation OFA while discussing the obstacle-free zone, or OFZ.

Because those terms describe different protected areas, precision matters. The surrounding discussion suggests a terminology error, rather than evidence that Century West failed to recognize existing object-free-area deficiencies.

A related discrepancy appears in the existing runway length. The March ALP review material references 5,004 feet, while the March and May ALP drawings identify 5,003 feet.

A one-foot difference is not inherently a safety concern, but the final documents should consistently identify the accepted dimensions.

The airport-property material presents another issue.

Sheet 12 of the March 2025 ALP identifies approximately **8.86 acres** with the designation "MISSING OWNERSHIP INFORMATION."

That printed entry does not establish defective title or an improper property acquisition. It does warrant clarification through the completed airport-property inventory, associated title information and any later corrections.

For a planning document intended to support future land acquisition, grant eligibility and airport development, an accurate property inventory is particularly relevant.

FAA conditional approval does not identify which drawing corrections were made

On April 6, 2026, the FAA issued correspondence conditionally approving an updated Aurora Airport Layout Plan.

The letter states that a signed copy of the ALP was enclosed.

The publicly posted two-page version does not include that drawing enclosure, and the FAA signature block visible on the posted letter is uncompleted.

Those observations do not establish that the FAA's approval was invalid or that an executed version does not exist.

They do establish a public-documentation gap.

Without the dated, signed ALP and its revision history, Oregon Aviation News cannot determine whether the errors present in the March and May 2025 drawings persisted into the version conditionally approved by the FAA.

The FAA's letter also limits the significance of conditional approval.

It does not authorize construction, provide environmental approval or commit federal funding to individual projects.

The proposed improvements include an approximately 497-foot northern runway extension, producing a proposed 5,500-foot runway, along with roadway realignments, property acquisition and other airport development.

Those projects remain subject to applicable subsequent reviews and approvals.

The FAA also identifies a need for further coordination concerning a proposed northern holding bay because of direct-access concerns.

The missing public documentation is therefore more than a question about a signature.

It concerns which engineering drawings were reviewed, what comments were resolved, which conditions remain and what decisions are reserved for future FAA

consideration.

ODAV emphasizes four years of public involvement

ODAV has described the master-planning process as an extensive effort involving airport users, surrounding communities and affected governments.

In an October 20, 2026 news release, the department reported 14 public meetings, 467 responses to an initial community survey, 75 responses to an alternatives feedback form, and more than 300 indexed comment and correspondence entries.

Those numbers represent documented participation and responses rather than necessarily distinct individual participants.

ODAV says public input influenced the preferred alternative, including removal of a proposed parallel taxilane and a vehicle service road that would have required additional property acquisition or affected existing hangars.

The agency has emphasized the need to balance airport development, safety, operational requirements and community concerns.

Those efforts deserve recognition. A planning process spanning several years can reasonably produce changes to proposed infrastructure as alternatives are evaluated.

But public participation and engineering verification serve different purposes.

A substantial participation record does not establish that the published survey references are correct, that document-control errors were resolved or that the version ultimately presented for adoption corresponds to the drawings reviewed by the FAA.

The elimination or modification of proposed infrastructure also raises questions about how associated operational and safety functions were reevaluated.

The airport has documented concerns involving vehicle and pedestrian deviations, while the master plan identifies constrained taxiway and taxilane areas.

Removing a proposed road or taxilane may be an appropriate response to cost, property and environmental considerations.

The relevant engineering question is what alternatives were evaluated to address any safety or circulation functions associated with the removed facilities.

That analysis should be available to decision-makers before adoption.

The state’s coordination findings contain a substantive dispute

A separate issue concerns ODAV's proposed State Agency Coordination Findings.

Under Oregon's airport-planning framework, the department must coordinate with affected local governments and evaluate applicable statewide planning goals and acknowledged comprehensive plans.

The draft findings, on page 23, state that none of the four responding jurisdictions identified a relevant statewide-goal or comprehensive-plan conflict affecting its jurisdiction.

Yet the City of Aurora's October 6, 2025 written response expressly states that the proposed master plan is incompatible with the city's acknowledged comprehensive plan.

Aurora raises concerns involving airport expansion onto exclusive-farm-use land, annexation, urban services and the relationship between proposed airport development and its local land-use policies.

ODAV acknowledges those objections elsewhere in the same document and explains why it disputes their jurisdictional significance.

The department emphasizes that the airport lies outside Aurora's municipal boundaries and distinguishes proposed airport development from changes directly affecting the city's existing planning jurisdiction.

That explanation deserves fair consideration.

A public agency may evaluate and reject a local government's asserted conflict if the applicable law and record support that determination.

But acknowledging and rejecting an identified objection is different from suggesting no such objection was raised.

Marion County's position adds another important distinction.

In its September 2025 response, county planning officials indicated they could not determine compatibility from the draft information supplied and identified the need for subsequent county review and findings.

ODAV's coordination narrative describes further discussions and distinguishes preliminary master-plan adoption from future land-use applications.

This does not establish that required coordination was omitted. It does leave a question about which compatibility issues are being resolved through the present adoption decision and which will remain for later county proceedings.

Wilsonville also raised concerns about airport noise, water quality, farmland, transportation access, employment lands and emergency response.

ODAV concluded that those comments did not establish a direct conflict of the kind relevant to its proposed findings.

Those competing positions are significant to the public record. They should be described accurately rather than reduced to an assertion that affected governments raised no relevant issues.

The draft findings contain additional editorial errors.

Among them are references to OAR Chapter 138 where Chapter 738 is intended, inconsistent citations to the applicable coordination rule, and language about minimizing "compatibility" where the cited airport-planning rule addresses minimizing incompatibility.

Such mistakes do not automatically invalidate the legal analysis.

But precise regulatory references and accurate descriptions of the positions taken by affected jurisdictions are fundamental expectations for official findings intended to support a public decision.

ODAV and Century West were offered an opportunity to respond

Oregon Aviation News contacted Century West Engineering on October 16, 2026, requesting technical explanations for the identified discrepancies.

On October 23, OAN provided updated investigative material to Century West management and submitted further specific questions concerning drawing corrections, quality-control procedures, the FAA review and the controlling ALP revision.

That same day, OAN separately requested comment from ODAV Director Kenji Sugahara and agency representative Alex Thomas.

The department was asked to explain its oversight of the consultant's work, identify completed review documentation, and address questions concerning the proposed State Agency Coordination Findings.

Both organizations were provided a response deadline of **5 p.m. Pacific on October 29, 2026**, and invited to identify material factual inaccuracies or supporting records requiring further examination.

Neither provided a substantive response to the Aurora-specific prepublication questions by that deadline.

Oregon Aviation News has considered ODAV's previously published statements regarding the planning process and its proposed findings.

The publication remains open to factual corrections, supporting documentation and substantive responses from both organizations.

The question before the State Aviation Board

The State Aviation Board is scheduled to consider the Aurora Airport Master Plan on December 3, 2026.

ODAV has established November 3 as the deadline for formal written public comments.

The approaching decision presents an opportunity to clarify several identifiable matters without assuming the outcome of any technical or legal review.

The public record should establish:

- Which dated and signed ALP drawing set received the FAA's conditional approval on April 6, 2026.
- Whether the incorrect datum designations, federal grant identifier and other documentary discrepancies were corrected.
- Where the completed ALP and Exhibit A review records, quality-control documentation and FAA comment-resolution correspondence can be examined.
- Which existing airport design deficiencies, obstructions and property-inventory issues remain outstanding.
- How the state evaluated the comprehensive-plan objections and procedural reservations raised by affected jurisdictions.

- Which proposed improvements remain subject to future engineering, environmental, land-use and funding approvals.

These are questions about documentation, technical accuracy and governmental accountability, not allegations that every identified drafting error necessarily affected the underlying engineering.

A complete review should allow the public to follow the sequence from an identified discrepancy to its correction, the responsible technical verification and the applicable sponsor or FAA determination.

At nearly $1 million in public planning expenditures, the expectation is not that every draft document will be free of mistakes.

It is that the final work product can be demonstrated to be accurate, that its review history is traceable, and that its unresolved technical and planning questions are presented candidly to the decision-makers being asked to adopt it.

At Aurora, that documentation—not merely assurances about the length or extent of the planning process—is what remains to be established in the publicly available record.

Primary source documents

1. **ODAV — Aurora State Airport Master Plan:** Official project page, planning documents and adoption process
2. **Century West Engineering — March 2025 ALP:** 16-sheet Airport Layout Plan, particularly Sheets 2, 3 and 12.
3. **Century West Engineering — May 2025 Draft Final Master Plan:** Available through ODAV's project page. May 2025 ALP Sheet 2 appears at combined PDF page 173; Sheet 3 at page 174.
4. **FAA ALP Review Checklist:** ODAV project document, Appendix A, SOP 2.00.

5. **FAA Exhibit A Review Checklist:** ODAV project document, Appendix B, SOP 3.00.
6. **FAA — April 6, 2026 ALP Conditional Approval:** Two-page letter posted on ODAV's project page.
7. **FAA — FY2022 AIP Grants Awarded:** Federal grant records, identifying Cashmere-Dryden project 3-53-0011-007-2022.
8. **ODAV — State Agency Coordination Findings, Final Draft 1.2:** Project documents, especially pages 4, 21 and 23–26.
9. **City of Aurora — October 6, 2025 response:** Included in ODAV's jurisdictional coordination records.
10. **Marion County — September 19, 2025 response:** Included in ODAV's coordination materials.
11. **City of Wilsonville — October 13, 2025 response:** Included in ODAV's coordination materials.
12. **ODAV — October 20, 2026 news release:** *Aurora State Airport Master Plan Reflects Years of Community Engagement.*
13. **Oregon Administrative Rules:** OAR 738-130-0055 and OAR 660-013-0040.
14. **Oregon Aviation News correspondence:** Technical questions to Century West dated October 16 and 23, 2026, and prepublication request to ODAV dated October 23, 2026.

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