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Public Comment Topic	UAO Master Plan
Public Comment	Please see the attached.
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November 3, 2026

Kenji Sugahara, Director
Members of the Oregon State Aviation Board
Oregon Department of Aviation
3040 25th Street SE
Salem, Oregon 97302

Subject: Southend Corporate Airpark Condo Association Comments on the Draft Final Aurora State Airport Master Plan and Airport Layout Plan

Dear Director Sugahara and Members of the Board:

The Southend Corporate Airpark Condo Association (SECAP) expresses its sincere appreciation to the Oregon Department of Aviation (ODAV) and the planning team for the extensive public involvement process conducted throughout the development of the Aurora State Airport (KUAO) Airport Master Plan. SECAP shares the Department's commitment to advancing aviation safety, operational efficiency, and long-term facility resilience. As the association representing roughly 410,000 square feet of hangar space within the South Through-the-Fence (TTF) Area—housing a major share of the airport's turbine fleet—we respectfully submit these comments to offer constructive, evidence-based refinements to the Draft Master Plan prior to its adoption.

We fully endorse the Master Plan's central safety objectives, including the FAA-justified 497-foot northern extension of Runway 17/35. To ensure that the final plan achieves these critical objectives while maintaining the operational viability of Aurora's aviation infrastructure, we request that the Board incorporate the following three refinements into the final Master Plan and Airport Layout Plan (ALP):

1. Deactivate Taxiway A4 in Lieu of Installing Taxiway Islands and Green-Painted Areas

The Draft Master Plan identifies non-standard direct apron-to-runway access at Taxiway A4 and proposes installing extensive parallel taxiway islands and painted green surfaces along the east side of Taxiway Alpha to channelize aircraft movements. While we strongly support mitigating the FAA-designated hotspot at Taxiway A4, introducing multiple channelized islands across the active apron creates unnecessary pilot confusion, constricts critical maneuvering space, and introduces artificial chokepoints between hangars and the movement area.

Under Statewide Planning Goal 2 (OAR 660-015-0000(2)) and Goal 12 (OAR 660-015-0000(12)), transportation planning must evaluate reasonable alternatives and adopt

solutions that provide safe operations while minimizing adverse operational and economic impacts. Rather than constructing or painting restrictive islands along Taxiway Alpha, ODAV should adopt the simpler, highly effective alternative of permanently deactivating connector Taxiway A4. Deactivating A4 completely eliminates direct runway access and resolves the hotspot without disrupting apron flow, impeding aircraft towing, or compromising the safe ground handling of corporate aircraft entering and exiting our facilities.

2. Pursue an FAA Modification of Standards (MOS) for the East-Side ROFA to Avert Unnecessary Apron Acquisition

The Preferred Alternative proposes the acquisition of an approximately 35-foot-wide longitudinal strip of privately operated apron immediately east of Taxiway Alpha to achieve geometric clearance for the Runway Object Free Area (ROFA). Hangars are fully functioning aviation facilities only when accompanied by adequate adjoining ramp space for aircraft staging, engine start, towing, turning, and safe clearance from adjacent parked and taxiing aircraft. The Master Plan provides no hangar-by-hangar swept-path analysis or operational demonstration showing that existing hangars can remain functional if this apron space is removed.

Under existing property lines, the east side of the airfield already achieves approximately 93% of the standard 400-foot ROFA half-width, and the parallel taxiway system fully satisfies all applicable Taxiway Object Free Area (TOFA) criteria. Imposing a standard designed for commercial airliners like the Boeing 737 on an airfield whose justified design aircraft is a mid-size business jet (AAC/ADG C-II) places an unwarranted operational burden on existing businesses and emergency providers.

Federal regulations and FAA guidance explicitly authorize site-specific relief for this condition. Appendix A of FAA Order 5300.1G and 14 CFR § 152.11(b) classify the ROFA as a standard eligible for regional FAA MOS approval. Furthermore, FAA AC 150/5300-13B, Section 3.12.1(4)(a), expressly permits taxiing and holding aircraft within the ROFA. In accordance with Statewide Planning Goal 2, ODAV should formally evaluate and submit an MOS application for the east-side ROFA—or explore an avigation safety easement preserving operational access—as a practical alternative to land acquisition. This approach preserves essential working apron capacity, aligns with ODAV’s own 2012 FAA-approved ALP (which successfully utilized the MOS framework for the ROFA), and fully satisfies FAA safety objectives.

3. Remove the Speculative "Aeronautical Reserve" Designation and Reaffirm Support for Private TTF Investment

The Draft Master Plan designates approximately 152 acres of developed private aeronautical land as an "aeronautical reserve" for potential future State acquisition. Although the text notes that this designation does not represent an immediate commitment to acquire, labeling nearly the entire privately developed east side of KUAO

for public purchase introduces substantial uncertainty for property owners, tenants, and lenders.

Private investment is the foundational cornerstone of KUAO's success: 231 of the airport's 281 based aircraft (82%) and 33 of its 36 based jets reside on private through-the-fence parcels. Moreover, the Oregon Legislature enacted ORS 836.642 specifically directing ODAV to establish a through-the-fence pilot program at Aurora State Airport to foster public-private partnerships, create family-wage jobs, and expand the local tax base. Designating these productive private facilities for public acquisition conflicts with this statutory mandate and contradicts Marion County's acknowledged planning framework. On July 29, 2026, the Land Use Board of Appeals affirmed Marion County's comprehensive plan amendment expanding the KUAO boundary to incorporate adjacent private aeronautical property (Schaefer v. Marion County, LUBA Nos. 2025-085/086/087 and 2026-001/002).

We respectfully ask ODAV to remove the "aeronautical reserve" label over developed private TTF properties on the ALP and replace it with language that affirmatively recognizes these lands as suitable for airport-related development under private ownership, consistent with ORS 836.642 and Marion County's adopted comprehensive plan.

SECAP remains highly optimistic about the future of Aurora State Airport. By deactivating Taxiway A4 to resolve runway direct access, pursuing an MOS to protect critical east-side ramp capacity, and aligning the plan with Oregon's statutory policy supporting private through-the-fence investment, ODAV can adopt an Airport Master Plan that is legally sound, economically vibrant, and fully supported by its airport community.

We appreciate your consideration of these comments and welcome the opportunity to meet with ODAV staff and the Board to collaborate on these positive revisions prior to final plan adoption.

Respectfully submitted,



Lukas Nickerson
Board Chair
Southend Corporate Airpark Condo Association