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Oregon Department of Aviation

Kenji Sugahara, Director; Tony Beach, State Airports Manager;

Alex Thomas, Planning & Project Manager; Brandon Pike, Aviation Planner

Gentlemen:

I am writing to provide comments regarding your most recent presentation to the Planning Advisory Committee for the Aurora State Airport Master Plan, which was presented to the PAC during the online meeting on July 30, 2024.

As a part of the July 30th presentation, ODAV's consultant Century West Engineering (CWE) explained that, after extensive analysis and consultation with ODAV and the FAA, CWE has determined that the Aurora State Airport currently does not meet applicable FAA design guidelines for a variety of reasons, including unacceptable items in the Runway Object Free Area (Hubbard Highway, Keil Road, ASOS equipment, wind cone), unacceptable items in the Runway Safety Area (south-end drain field, open drainage ditches), unacceptable direct runway access from aprons/hangars, and a runway length that is approximately 500' too short to meet the RDC C-II requirements.

Next, CWE explained that they had developed three "Refined Preliminary Alternatives" (identified as Alternatives 1A, 1B, and 2), each of which presents a potential way that ODAV could conceivably bring the airport into compliance with FAA requirements. Notably, all three of those Refined Preliminary Alternatives include lengthening the runway by 497' to the north (bringing the runway length to 5500'), which apparently could be accomplished on existing ODAV property, with no taking of any private property required at all. I want to point out that, even though this one airport improvement (i.e., a 500' runway extension) would not on its own resolve all of the airport's current deficiencies, nevertheless it would unquestionably make the airport significantly safer for all airport users, and I believe it would be a giant step toward meeting the FAA requirements applicable to this type of airport. Other minor changes to the airport could be made that would address many of the other deficiencies (e.g., moving the windsock and ASOS equipment, replacing open drainage ditches with covered drainpipes, etc.), without requiring significant land acquisitions or negative impacts on properties adjacent to the airport which are now privately owned.

However, as CWE explained during the July 30th presentation, in order to meet all of the FAA's guidelines, either the Hubbard Highway would need to be moved to the west, requiring acquisition and clearing of 39 to 43 acres of private commercial and residential property that is west of the current Hubbard Highway (as detailed in Refined Alternatives 1A and 1B), or the runway would need to be moved to the east, requiring acquisition and clearing of 37 acres of private property that is east of ODAV's current property line and is now in active aeronautical use (as detailed in Refined Alternative 2).

This work by CWE has produced some useful information, and it has been a necessary and helpful part of the Master Plan process – identifying the airport's current deficiencies and exploring the potential implications of various possible ways that the deficiencies, theoretically, could be fixed. Unfortunately, but most importantly, what I believe this work has revealed is that none of the Refined Preliminary Alternatives is even remotely realistic. In fact, I highly doubt that there is anybody at ODAV or CWE who believes that

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any of the recently-presented Refined Alternatives will actually be implemented at any time during the Master Plan planning period. All of the presented alternatives are, in my opinion, obvious non-starters, as each of them would require a massive expenditures of public funds, at a level that is extraordinarily unlikely ever to be made available; and regardless which of the alternatives were to be pursued it would be nearly impossible to adequately justify the impacts on adjacent property owners.

While I would very much like to see the Aurora State Airport improved so that it would meet all FAA design guidelines, it is my opinion that this goal realistically cannot (and therefore will not) be achieved within the coming decades. Therefore, it would be very useful for ODAV to direct its consultants to begin exploring ideas for airport improvements that realistically could be accomplished within the Master Plan planning period.

To that end, what I would like to see is CWE developing and presenting to the public some alternatives for projects that would lead to substantial measurable progress in eliminating current non-standard conditions at the airport and that would move the airport meaningfully towards meeting RDC C-II requirements, while also acknowledging that, as a practical matter, it is extremely unlikely that the airport will ever be able to achieve 100% full compliance with FAA design guidelines.

I suggest that ODAV consider what I will call Realistic Alternative No. 3: Leave the runway right where it is now, but extend it 500' to the north. This could be done with or without various other minor changes on the airfield (such as moving the windsock and ASOS equipment and covering drainage ditches) and leaving the Hubbard Highway unchanged (noting that this would still leave the Hubbard Highway within the ROFA, which is undesirable, but perhaps cannot be helped within the foreseeable future). While not perfect, this alternative would make the airport much better for airport users, while minimizing impacts to off-airport lands. Btw, a vehicle service road could be added as well, but that road certainly does not need to be placed right along the taxiway.

I suggest you also consider Realistic Alternative No. 4, which would be the same as No. 3, except that it would also move the Hubbard Highway to the west as far as possible while still keeping it within the existing ODOT right-of-way. Of course, this variation would require cooperation/consent from ODOT, but it would avoid the need for acquisition of a large number of private properties. While this approach may not fully resolve the issue of vehicles traversing through the ROFA, it may enable cost-effective mitigation of that problem. To my knowledge, there is no law of nature, or anything in the Oregon Revised Statutes, or any FAA or ODAV rule, that requires that a highway be centered within a public right-away.

Of course there are many other possible variations on this theme. My main point is that the time has come for ODAV to turn its attention to thinking about and exploring feasible alternatives that actually could be accomplished at the Aurora State Airport. If ODAV and CWE are unwilling to explore such alternatives (i.e., projects that would be less-than-perfect but feasible within the near term), then please explain to the PAC why that is.

Thank you for considering this input.

Sincerely,



George Van Hoomissen