



9. COMPLIANCE REPORT

9.1 Introduction

The Oregon Aviation Plan v6.0 considered Oregon and federal compliance regulations within three areas: Municipal and County Land Use and Zoning, FAA airport design standards, and Oregon Transportation Plan guidance.

9.2 Land Use Compatibility

Regulating the development patterns surrounding airports is critical to preventing incompatible land uses, which are of concern to both airport operations and to the health, safety, and welfare of nearby communities. Oregon state law currently requires that airports be considered in locally-adopted comprehensive plans and be protected from incompatible uses through adopted zoning and land use development codes and ordinances. However, not all jurisdictions with land use authority over public use airports in the Oregon Department of Aviation (ODA) system sufficiently protect airport operations through their adopted ordinances.

The 2007 Oregon Aviation Plan (OAP) Update verified the status of airport-related land use planning and local regulations for each jurisdiction (both city and county) with land use authority over an ODA system airport. The ODA updated the Oregon Aviation Plan to review and analyze local jurisdiction compliance with state regulations regarding land uses surrounding airports and make recommendations on how to better implement those regulations. This Land Use Compatibility Compliance Report details the steps taken to collect and analyze land use compatibility information for public use airports, explains how this data was analyzed, and identifies the extent to which jurisdictions comply with state laws. The last section of this report provides guidance on prioritizing assistance for jurisdictions whose policies and land use regulations put airports and adjacent communities at risk.

9.3 Airport Protection Methods

The primary methods through which Oregon's statewide regulations are intended to protect incompatible land uses surrounding airports are summarized below:

- **Transportation Planning Rule (TPR).** Oregon's TPR implements Statewide Planning Goal 12 (Transportation) and requires local jurisdictions to adopt regulations that protect public-use airports by controlling land uses within noise corridors and imaginary surfaces and limit physical hazards to air navigation. The TPR also requires jurisdictions to develop a process for coordinated review of future land use decisions affecting transportation corridors or facilities (including public use airports).
- **Airport Planning Rule (APR).** The APR, embodied in Oregon Administrative Rules (OAR) Chapter 660, Division 13, was adopted to aid the TPR with the implementation of Statewide Planning Goal 12, and establishes requirements for local jurisdictions related to airport planning in order to limit incompatible uses. Under the APR, local jurisdictions with land use authority over a public use airport are required to comply with the following measures:
 - Adopt comprehensive plan and land use regulations for airports and update local plans and land use regulations to conform to the APR during Periodic Review.
 - Map and document airport boundaries, existing and future facilities, airport safety and compatibility zones and imaginary surfaces, and noise impact boundaries.

- Adopt an Airport Safety Overlay Zone that includes height restrictions, as well as exceptions to height limitations and a means of approving variances when supported by the ODA and the Federal Aviation Administration (FAA).
- Develop compatibility standards that prohibit residential and public assembly uses within Runway Protection Zones (RPZs).
- Limit certain uses within noise impact boundaries.
- Limit outdoor lighting for new and expanded industrial, commercial, or recreational uses.
- Prohibit new and expanded industrial uses that cause emissions that would obscure visibility within airport approach corridors.
- Coordinate the review of all radio, telephone, and television towers and electrical lines with ODA.
- Regulate water impoundments and prohibit new landfills in proximity to an airport.
- Adopt land use regulations for non-towered airports authorizing various aviation and airport-related uses and activities.
- Allow certain industrial, manufacturing, and other uses within airport boundaries if they would result in no significant hazard or limitation on approved airport uses, and are consistent with local comprehensive plans, statewide planning goals, and other OARs.
- **Comprehensive Planning and Periodic Review.** Oregon Statewide Planning Goal 2 and its implementing statutes and regulations require each city and county to develop and adopt a comprehensive plan, as well as the zoning and development ordinances needed to implement the plan. Cities and counties are also required to examine and, as necessary, update their comprehensive plans and implementing codes through the process of Periodic Review in order to respond to changing conditions and bring their plans and codes into compliance with updated state regulations. However, pursuant to ORS 197.629, Periodic Review is only required for cities with a population of over 10,000 or for cities that are located within the boundaries of a Metropolitan Planning Organization (MPO), leaving many smaller rural cities exempt from the requirement. Counties are exempt from state Periodic Review requirements altogether.

9.4 Data Collection

Angelo Planning Group (APG) used SurveyMonkey software to create a survey to gather local comprehensive plan and land use regulation information for each jurisdiction (city and county) with land use authority over a public use airport. In some cases, an airport's boundary or imaginary surfaces can impact more than one municipal boundary. In these cases, information was gathered from each affected jurisdiction. The objective of the survey was to ascertain the status of airport-related land use planning and local regulations within currently adopted plans and identify which jurisdictions are not in compliance with state laws (OAR 660-013 – Airport Planning Rule, OAR 738-070 – Physical Hazards to Air Navigation, and ORS 836 – Airports and Landing Fields). The survey requested that local staff assess their jurisdictions' current compliance with state laws through questions about airport-related policies, guiding documents, and regulatory requirements. The survey also asked for links or citations for applicable local policy and regulatory documents and maps.

ODA sent a hyperlink to the SurveyMonkey questionnaire via email to city and county planning directors for all jurisdictions with land use authority over a public use airport on May 17, 2017. The survey was originally intended to close on June 2; however, the deadline was extended to June 30 due to the low number of complete responses received by the original closing date. A follow-up email was sent to staff for each non-responsive jurisdiction on June 19 notifying them of the extension. For those jurisdictions that provided incomplete responses, APG followed up with the respective jurisdictions' planning director individually. A total of forty-two (42) complete responses were received by the June 30 deadline.

Given the number of jurisdictions that did not respond to the survey, ODA's focus turned to obtaining information for the 97 airports that make up ODA's public use airport system. In the fall of 2017, surveys for non-responsive jurisdictions were manually inputted by the project consultant team. Research included reviewing local comprehensive plan policies; researching local airport overlays and zoning; auditing local land use requirements; and, in some cases, verifying information with local staff.

9.5 Data Analysis

The data gathered during the survey phase of the project was compiled into a searchable database (Existing and Future Airport Operations and Land Uses Survey Database, attached as an appendix to this report). The database is comprised of the answers to questions posed in the 2017 survey for each jurisdiction with land use authority over one or more of the 97 public use airports in the ODA system. The database includes references and links to applicable local goals, policies, maps, and code/ordinance sections. In addition to the information gathered through the survey, the database also identifies each airport's associated city, the jurisdiction in which the airport is located, the airport's category, National Plan of Integrated Airport Systems (NPIAS) listings, whether the airport falls within its associated city's municipal boundary, the estimated horizontal surface that falls outside the municipal boundary, the airport's sponsor, and the jurisdictions' prioritization score (discussed further in this report under Compliance Results).

The project team used this database to review the survey data for consistency, completeness, and accuracy. Where information from the original survey was lacking or absent, the consultant team focused their efforts on filling in information for counties and municipalities with land use regulation over and/or in close proximity to an ODA system airport. For airports with 100% of the horizontal surface located outside of nearby municipal boundaries, the consultant team only filled in information relating to county land use regulations. As part of the analysis, the consultant team referred to results documented in the 2007 OAP (Table 1.1 - Application of the Airport Planning Rule) to support filling in missing database information for jurisdictions whose locally adopted regulations have not been updated since 2007. A summary of jurisdictions' compliance with state airport protection requirements is provided in **Table 9-1**.



This page is intentionally blank.

TABLE 9-1: COMPLIANCE WITH STATE LAND USE REGULATIONS FOR PUBLIC USE AIRPORTS

Airport	Jurisdiction	FAA Notification Required	ODA Notification Required	Height Restrictions	Means to Approve Variance to Height Restrictions if Supported by FAA/ODA	RPZ Protection	Limit Uses Within Noise Impact Boundary	Industrial Uses that Obstruct Visibility	Limit Outdoor Lighting	Coordinate Transmission Facilities and Electrical Transmission Lines with ODA	Regulate Water Impoundments	Prohibit New Landfills	Airport Safety Overlay Zone	Airport Zone	Customary & Usual Aviation-Related Activities	Emergency Medical Flight Services	Law Enforcement & Firefighting Activities	Flight Instruction	Aircraft Service, Maintenance, and Training	Aircraft Rental	Sale of Aircraft & Aeronautic Equipment and Supplies	Aeronautic Recreational & Sporting Activities	Crop Dusting Activities	Agricultural & Forestry Activities	Air Passenger & Freight Services and Facilities
		Required Eligible Uses																							
Albany Municipal Airport	Albany			X									X	X											
	Millersburg			X				X	X	X															
	Linn County												X	X											
Alkali Lake State Airport	Lakeview a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Lake County			X		X		X	X			X	X	X	X									X	
Arlington Municipal Airport	Arlington			X	X	X	X	X	X		X		X	X	X	X	X	X	X	X	X	X	X		X
	Gilliam County	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Ashland Municipal Airport - Sumner Parker Field	Ashland			X									X												
	Jackson County	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Port of Astoria Regional Airport	Astoria	X	X	X	X																				
	Warrenton	X		X		X	X		X				X												
	Clatsop County		X	X		X	X	X	X				X										X	X	
Aurora State Airport	Aurora c			X	X	X		X	X				X		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Marion County	X	X	X		X			X			X	X	X											
Baker City Municipal Airport	Baker City a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Baker County		X	X		X		X			X	X	X	X	X				X		X			X	
Bandon State Airport	Bandon			X	X	X		X	X	X			X												
	Coos County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X
Beaver Marsh Airport	Beaver Marsh a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Klamath County			X									X												
Bend Municipal Airport	Bend a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Deschutes County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Boardman Airport	Boardman a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Morrow County		X	X	X	X		X	X				X	X	X		X	X	X		X			X	
Brookings Airport	Brookings	X	X			X	X	X	X	X	X	X	X	X											X
	Curry County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X			X			
Burns Municipal Airport	Burns a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Harney County	X		X				X	X	X	X		X	X	X	X			X	X	X			X	X
Cape Blanco State Airport	Sixes a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Curry County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X					X			
Cascade Locks State Airport	Cascade Locks			X		X			X				X	X											
	Hood River County	X	X		X	X	X	X	X	X	X	X													
Chehalem Airpark	Newberg a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Airport	Jurisdiction	FAA Notification Required	ODA Notification Required	Height Restrictions	Means to Approve Variance to Height Restrictions if Supported by FAA/ODA	RPZ Protection	Limit Uses Within Noise Impact Boundary	Industrial Uses that Obstruct Visibility	Limit Outdoor Lighting	Coordinate Transmission Facilities and Electrical Transmission Lines with ODA	Regulate Water Impoundments	Prohibit New Landfills	Airport Safety Overlay Zone	Airport Zone	Customary & Usual Aviation-Related Activities	Emergency Medical Flight Services	Law Enforcement & Firefighting Activities	Flight Instruction	Aircraft Service, Maintenance, and Training	Aircraft Rental	Sale of Aircraft & Aeronautic Equipment and Supplies	Aeronautic Recreational & Sporting Activities	Crop Dusting Activities	Agricultural & Forestry Activities	Air Passenger & Freight Services and Facilities	
		Required Eligible Uses																								
	Yamhill County			X	X	X		X	X			X	X	X	X										X	
Chiloquin State Airport	Chiloquin																									
	Klamath County			X				X	X				X	X												
Christmas Valley Airport	Christmas Valley a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Lake County			X		X		X	X			X	X	X	X										X	
Columbia Gorge Regional / The Dalles Municipal Airport	The Dalles	X	X	X	X			X	X		X	X	X													
	Wasco County			X		X			X				X	X											X	
Condon State Airport - Pauling Field	Condon			X	X	X	X	X	X				X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Gilliam County	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Corvallis Municipal Airport	Corvallis												X													
	Benton County		X	X		X		X	X				X													
Cottage Grove State Airport - Jim Wright Field	Cottage Grove	X	X		X			X		X	X	X														
	Lane County			X				X	X				X	X	X			X	X						X	X
Country Squire Airpark	Sandy a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Clackamas County						X				X		X	X	X	X	X	X	X	X	X	X	X	X	X	X
Crescent Lake State Airport	Crescent Lake Junction a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Klamath County			X									X													
Creswell Hobby Field Airport	Creswell	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X							X
	Lane County			X				X	X				X	X	X			X	X						X	X
Davis Field Airport	Gates																									
	Marion County	X	X	X		X			X			X	X	X												
Eastern Oregon Regional Airport at Pendleton	Pendleton c			X	X								X	X	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Umatilla County			X				X	X				X	X												
Enterprise Municipal Airport	Enterprise		X	X	X	X		X	X				X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Wallowa County		X	X	X	X	X	X	X	X	X		X	X												
Eugene - Mahlon Sweet Field Airport	Eugene c			X	X	X		X	X				X	X	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Veneta c														N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	Lane County			X				X	X				X	X	X			X	X					X	X	
Florence Municipal Airport	Florence	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Lane County			X				X	X				X	X	X			X	X					X	X	
George Felt Airport	Roseburg			X	X	X		X	X	X			X	X	X			X	X	X	X				X	X
	Douglas County			X		X	X	X	X				X													
Gold Beach Municipal Airport	Gold Beach												X	X	X	X	X	X	X	X	X	X	X	X	X	
	Curry County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Airport	Jurisdiction	FAA Notification Required	ODA Notification Required	Height Restrictions	Means to Approve Variance to Height Restrictions if Supported by FAA/ODA	RPZ Protection	Limit Uses Within Noise Impact Boundary	Industrial Uses that Obstruct Visibility	Limit Outdoor Lighting	Coordinate Transmission Facilities and Electrical Transmission Lines with ODA	Regulate Water Impoundments	Prohibit New Landfills	Airport Safety Overlay Zone	Airport Zone	Customary & Usual Aviation-Related Activities	Emergency Medical Flight Services	Law Enforcement & Firefighting Activities	Flight Instruction	Aircraft Service, Maintenance, and Training	Aircraft Rental	Sale of Aircraft & Aeronautic Equipment and Supplies	Aeronautic Recreational & Sporting Activities	Crop Dusting Activities	Agricultural & Forestry Activities	Air Passenger & Freight Services and Facilities
		Required Eligible Uses																							
Grant County Regional / Ogilvie Field Airport	John Day		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Grant County		X	X	X	X	X	X	X	X	X	X	X	X										X	
Grants Pass Airport	Grants Pass a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Josephine County			X	X				X				X	X	X									X	
Hermiston Municipal Airport	Hermiston			X	X	X		X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X
	Umatilla County			X				X	X				X	X											
Hillsboro Airport	Hillsboro c			X	X										N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Washington County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Illinois Valley Airport	Cave Junction a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Josephine County			X	X								X	X	X									X	
Independence State Airport	Independence			X	X	X		X	X	X			X	X	X	X	X	X	X	X	X	X	X	X	X
	Polk County		X	X	X			X	X				X	X	X				X		X				
Joseph State Airport	Joseph																								
	Wallowa County		X	X	X	X	X	X	X	X	X		X	X											
Ken Jernstedt Airfield	Hood River a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Hood River County	X	X	X	X	X	X		X	X			X	X	X	X	X	X	X	X	X	X	X	X	X
Crater Lake-Klamath Regional Airport	Klamath Falls c												X	X	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Klamath County			X		X	X		X				X												
La Grande / Union County Airport	La Grande a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Union County			X		X		X	X		X	X	X	X											
Lake Billy Chinook Airport	Culver a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Jefferson County	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Lake County Airport	Lakeview																								
	Lake County			X		X		X	X			X	X	X	X									X	
Lake Woahink Seaplane Base	Florence a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Lane County			X				X	X				X	X	X			X	X					X	X
Lakeside Municipal Airport	Lakeside		X	X		X	X		X				X	X											
	Coos County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Lebanon State Airport	Lebanon	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Linn County												X	X											
Lenhardt Airpark	Hubbard a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Marion County	X	X	X		X			X			X	X	X											
Lexington Airport	Lexington																								
	Morrow County		X	X	X	X		X	X				X	X	X		X	X	X		X			X	

Airport	Jurisdiction	FAA Notification Required	ODA Notification Required	Height Restrictions	Means to Approve Variance to Height Restrictions if Supported by FAA/ODA	RPZ Protection	Limit Uses Within Noise Impact Boundary	Industrial Uses that Obstruct Visibility	Limit Outdoor Lighting	Coordinate Transmission Facilities and Electrical Transmission Lines with ODA	Regulate Water Impoundments	Prohibit New Landfills	Airport Safety Overlay Zone	Airport Zone	Customary & Usual Aviation-Related Activities	Emergency Medical Flight Services	Law Enforcement & Firefighting Activities	Flight Instruction	Aircraft Service, Maintenance, and Training	Aircraft Rental	Sale of Aircraft & Aeronautic Equipment and Supplies	Aeronautic Recreational & Sporting Activities	Crop Dusting Activities	Agricultural & Forestry Activities	Air Passenger & Freight Services and Facilities
		Required Eligible Uses																							
Madras Municipal Airport	Madras	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Jefferson County	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Malin Airport	Malin	X																							
	Klamath County			X									X												
McDermitt State Airport	McDermitt a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Malheur County													X											
McKenzie Bridge State Airport	McKenzie Bridge a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Malheur County													X											
McMinnville Municipal Airport	McMinnville	X	X	X	X	X	X						X												
	Yamhill County			X	X	X		X	X			X	X	X	X										X
Memaloose USFS Airport	Imnaha a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Union County			X		X		X	X		X	X	X	X											
Miller Memorial Airpark	Vale			X	X		X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Malheur County													X											
Monument Municipal Airport	Monument																								
	Grant County		X	X	X	X	X	X	X	X	X	X	X	X											X
Mulino State Airport	Mulino a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Clackamas County						X				X		X	X	X	X	X	X	X	X	X	X	X	X	X
Myrtle Creek Municipal Airport	Myrtle Creek																								
	Douglas County												X												
Nehalem Bay State Airport	Manzanita			X		X		X	X				X												
	Tillamook County		X	X	X			X	X				X	X											
Newport Municipal Airport	Newport			X	X	X	X	X	X				X	X											
	Lincoln County			X	X	X	X		X			X	X												
Oakridge State Airport	Oakridge			X	X	X	X	X		X			X												
	Lane County			X				X	X				X	X	X			X	X					X	X
Ontario Municipal Airport	Ontario	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Malheur County													X											
Owyhee Reservoir State Airport	Owyhee a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Malheur County													X											
Pacific City State Airport	Pacific City a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Tillamook County		X	X	X			X	X				X	X											
Paisley Airport	Paisley a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Lake County			X		X		X	X			X	X	X	X										X

Airport	Jurisdiction	FAA Notification Required	ODA Notification Required	Height Restrictions	Means to Approve Variance to Height Restrictions if Supported by FAA/ODA	RPZ Protection	Limit Uses Within Noise Impact Boundary	Industrial Uses that Obstruct Visibility	Limit Outdoor Lighting	Coordinate Transmission Facilities and Electrical Transmission Lines with ODA	Regulate Water Impoundments	Prohibit New Landfills	Airport Safety Overlay Zone	Airport Zone	Customary & Usual Aviation-Related Activities	Emergency Medical Flight Services	Law Enforcement & Firefighting Activities	Flight Instruction	Aircraft Service, Maintenance, and Training	Aircraft Rental	Sale of Aircraft & Aeronautic Equipment and Supplies	Aeronautic Recreational & Sporting Activities	Crop Dusting Activities	Agricultural & Forestry Activities	Air Passenger & Freight Services and Facilities
		Required Eligible Uses																							
Pinehurst State Airport	Pinehurst a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Jackson County	X	X	X		X	X	X	X	X	X	X	X	X									X	X	
Portland Downtown Heliport	Portland	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Portland International Airport	Portland c	X		X	X	X	X	X	X	X	X	X	X	X	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Multnomah County	X		X		X			X				X												
Powers Hayes Field Airport	Powers																								
	Coos County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Prineville Airport	Prineville	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Crook County			X	X			X	X				X												
Prospect State Airport	Prospect a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Jackson County	X	X	X		X	X	X	X	X	X	X	X	X									X	X	
Redmond Municipal Airport (Roberts Field)	Redmond c	X	X	X								X	X	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Deschutes County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rogue Valley International Airport - Medford	Medford c	X	X	X	X	X	X	X		X			X	X	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Jackson County	X	X	X		X	X	X	X	X	X	X	X	X									X	X	
Rome State Airport	Rome a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Malheur County													X											
Roseburg Regional Airport	Roseburg			X	X	X		X	X	X			X	X	X			X	X	X	X			X	X
	Douglas County			X		X	X	X	X				X	X										X	
Salem McNary Field Airport	Salem c			X	X				X				X	X	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Marion County	X	X	X		X			X			X	X												
Sandy River Airport	Sandy																								
	Clackamas County						X				X		X	X	X	X	X	X	X	X	X	X	X	X	X
Santiam Junction State Airport	Santiam Junction a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Linn County												X	X											
Scappoose Industrial Airpark	Scappoose	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	X
	Columbia County			X	X		X	X	X				X	X	X		X		X	X	X	X	X	X	X
Seaside Municipal Airport	Seaside			X	X								X	X		X	X	X	X	X	X				
	Gearhart			X	X	X			X				X	X											
	Clatsop County		X	X		X	X	X	X				X	X									X	X	
Siletz Bay State Airport	Gleneden Beach a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Lincoln County			X	X	X	X		X			X	X												
Silver Lake USFS Airport	Silver Lake a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Lake County			X		X		X	X			X	X	X	X									X	

Airport	Jurisdiction	FAA Notification Required	ODA Notification Required	Height Restrictions	Means to Approve Variance to Height Restrictions if Supported by FAA/ODA	RPZ Protection	Limit Uses Within Noise Impact Boundary	Industrial Uses that Obstruct Visibility	Limit Outdoor Lighting	Coordinate Transmission Facilities and Electrical Transmission Lines with ODA	Regulate Water Impoundments	Prohibit New Landfills	Airport Safety Overlay Zone	Airport Zone	Customary & Usual Aviation-Related Activities	Emergency Medical Flight Services	Law Enforcement & Firefighting Activities	Flight Instruction	Aircraft Service, Maintenance, and Training	Aircraft Rental	Sale of Aircraft & Aeronautic Equipment and Supplies	Aeronautic Recreational & Sporting Activities	Crop Dusting Activities	Agricultural & Forestry Activities	Air Passenger & Freight Services and Facilities
		Required Eligible Uses																							
Sisters Eagle Air Airport	Sisters	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Deschutes County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Skyport Airport	Cornelius a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	Washington County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Southwest Oregon Regional Airport	North Bend c			X	X	X	X	X	X	X	X	X	X	X	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	Coos County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Sportsman Airpark	Newberg	X	X	X	X					X			X	X	X	X	X	X	X	X	X	X		X	
	Yamhill County			X	X	X		X	X			X	X	X	X									X	
Stark's Twin Oaks Airport	Hillsboro a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	Washington County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Sunriver Airport	Sunriver a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	Deschutes County	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
Tillamook Airport	Tillamook a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	Tillamook County		X	X	X			X	X				X	X											
Toketee State Airport	Toketee Falls a b	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	Douglas County			X		X	X	X	X				X												
Toledo State Airport	Toledo a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	Lincoln County			X	X	X	X		X			X	X												
Troutdale Airport	Troutdale c	X		X									X		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
	Multnomah County	X		X		X			X				X												
Valley View Airport	Estacada				X																				
	Clackamas County						X				X		X	X	X	X	X	X	X	X	X	X	X	X	
Vernonia Airfield	Vernonia a	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	Columbia County			X	X		X	X	X				X	X	X		X		X	X	X	X	X	X	
Wakonda Beach State Airport	Waldport																								
	Lincoln County			X	X	X	X		X			X	X												
Wasco State Airport	Wasco																								
	Sherman County	X	X	X	X	X	X	X	X	X			X	X	X	X	X						X		

^a Information was not gathered for cities where 100% of the airport's horizontal surface is located outside the municipal boundary

^b Information not applicable to unincorporated communities; land use authority lies with the associated county

^c Towered airports are exempt from municipally-regulated required eligible uses

9.5.1 Compliance Results

Oregon’s public use airports are a vital component of the state’s transportation system, critical to the provision of emergency services and fundamental to maintaining the economic vitality of both state and local economies. The encroachment of development and incompatible uses on areas surrounding airports is a major concern both to the operational efficiency of an airport and to the safety of nearby communities. To protect airports from incompatible land uses, Oregon’s TPR and APR contain strong language requiring jurisdictions in proximity to a public use airport to regulate development and land uses.

As summarized in **Table 9-1**, compliance was assessed for jurisdictions with land use authority pertaining to airports in the ODA public use airport system, which is made up of 97 airports. A summary of ownership for public use airports is provided in **Table 9-2**.

TABLE 9-2: AIRPORT OWNERSHIP

Airport Owner Type	Number of Airports
City/County	40
State	28
Port	10
Private	15
Other ^a	4
Total:	97

^a This category includes the U.S. Forest Service, Wallowa Whitman National Forest, a county airport district, and a local park and recreation district.

There are 93 individual jurisdictions regulating land uses for these airports. This number excludes municipalities for which 100% of the airport’s horizontal surface lies outside of the municipal boundary. It also excludes unincorporated communities, since counties have land use authority over these areas.

The results of the most recent survey update information from Table 1.1 of the 2007 OAP **Table 9-1** of this report reflects an assessment of applicable local policy and regulatory compliance with both TPR and APR requirements; Table 1.1 of the 2007 OAP solely addressed requirements found in the APR. Based on criteria that can be compared between the 2007 and 2017 data, some slight improvements have been made related to compliance. For example, in the 2007 OAP only 68% of jurisdictions had height restrictions for areas surrounding airports. According to the most recent data, that number has grown to 78%.

Despite some gains, implementation of the requirements in the APR has clearly not been uniformly achieved throughout Oregon. Of the jurisdictions assessed in 2017, 29% do not have any policies related to airport planning in their adopted comprehensive plans, 23% do not have an airport safety overlay zone in their development codes, and 28% do not have adopted height restrictions for areas surrounding airports. Reasons for continued deficiencies may include a lack of funding, motivation, or pressing need at the local level to bring comprehensive plans and development codes into compliance with provisions in the APR.



Periodic Review is a state program that could potentially provide the motivation and state assistance for plan and code updates.¹ In 1997 the Oregon Legislature passed ORS 836.600-836.630 (Local Government Airport Regulations), which states:

“(2)(a) Local governments shall amend their comprehensive plan and land use regulations as required under subsection (1) of this section not later than the first periodic review, as described in ORS 197.628 to 197.651, conducted after the date of the adoption of a list of airports by the Oregon Department of Aviation under subsection (3) of this section.”

The ODA created complementary rules in OAR 660-013 (Airport Planning):

“Local government plans and land use regulations shall be updated to conform to this division at periodic review...”

Since 1997, however, many jurisdictions have been exempted from Periodic Review, thus removing the requirement for jurisdictions to adopt provisions in the APR. Jurisdictions may still choose to voluntarily adopt airport planning requirements; however, many jurisdictions—particularly smaller, rural jurisdictions—lack the funding and staff capacity to undertake such a comprehensive planning exercise. A 2016 League of Oregon Cities survey found that the process requires a significant amount of time, staffing, and funding to complete.²

9.5.2 Prioritization of Non-Compliant Airports

The persistence and scope of non-compliance with state laws suggests a need to develop a prioritization system that identifies jurisdictions with the highest urgency for updating their land use regulations. The proposed prioritization system provided in this report scores each city and county individually based on four factors that relate to the airport within its regulatory jurisdiction. The factors that impact a jurisdiction’s prioritization score are: the airport’s OAP V6.0 category; whether the airport is located within a municipal boundary; the estimated percentage of the airport’s horizontal surface that falls outside of the municipal boundary; and whether the jurisdiction has in place an airport safety overlay zone consistent with state rules.

The prioritization system presented in this analysis allots points for each of the four factors, with a maximum of 30 points available. Jurisdictions with the lowest number of points are the highest priority for reviewing and updating land use regulations. Due to regulatory and boundary differences, cities and counties are scored differently for two of the categories: whether the airport is located within the municipal boundary and the estimated horizontal surface located over the municipality. Below is an overview of and rationale for the prioritization system for both cities and counties.

City Prioritization

- **OAP V6.0 Category.** Cities receive one point for Commercial Service Airports (Category I), two points for Urban General Aviation Airports (Category II), three points for Regional General Aviation Airports (Category III), four points for Local General Aviation Airports (Category IV), and five points for Remote

¹ Periodic Review is a process whereby jurisdictions examine and, as needed, update their comprehensive land use plans and implementing codes based on an evaluation and work program developed with the assistance of DLCD. As explained in *The Complete Planner’s Guide to Periodic Review*, the process of completing a task on the work program “varies based on the needs and practices of the affected jurisdiction and the nature of the task. Generally speaking, the local process is essentially the same as it would be for a plan amendment outside periodic review.”

² https://www.orcities.org/Portals/17/Library/Periodic%20Review%20Survey%20Report_FINAL%202016.pdf As stated in the report, when asked about challenges during the Periodic Review process, responses could be categorized within the following themes: Length of the process; Lack of necessary funding; Lack of necessary staff; Failure of the process to address a city’s unique situation; and Process rules changed during the process of periodic review.

Access/Emergency Service Airports (Category V). The rationale for this scoring is related to airport function, design, and services provided, as described in the 2007 OAP.³

- **Airport Within Municipal Boundary.** A city receives zero points if the airport's runway is located partially or completely within a municipality's boundary. If the airport is located entirely outside the municipal boundary it gets five points. This reflects the assumption that an airport that is located partially or completely within a municipal boundary is more likely to be susceptible to incompatible land uses associated with urban growth and development. Municipal jurisdictions are responsible for regulating the land uses that occur within their boundaries.
- **Estimated Horizontal Surface Outside of Municipal Boundary.** The municipality is assigned from one to five points based on the percentage of each airport's horizontal surface that is located over a municipal boundary. For example, if 100% of the airport's horizontal surface is located outside a municipal boundary it receives five points. If 0% of the horizontal surface is located outside a municipal boundary (meaning the horizontal surfaces falls entirely over the municipality) it receives zero points.⁴ An airport can be located entirely outside of a municipality, but still have a portion of its horizontal surface located over a municipality, putting that community and the airport itself at risk for impacts such as noise, obstructions to visibility, and the penetration of horizontal surfaces by tall structures. The more of the horizontal surface that is located over the municipality, the more important it is for that municipality to regulate their land uses accordingly.
- **Airport Safety Overlay Zone.** A jurisdiction with an adopted Airport Safety Overlay Zone receives 15 points; if it does not have a Safety Overlay Zone it receives zero points. Having an Airport Safety Overlay Zone (or a similar regulatory protection) that complies with State laws for protecting communities from safety and noise-related impacts is considered the most important criteria for preventing incompatible land uses in areas surrounding airports.

County Prioritization

- **OAP V6.0 Category.** As with the prioritization system developed for cities, counties receive one point for Commercial Service Airports (Category I), two points for Urban General Aviation Airports (Category II), three points for Regional General Aviation Airports (Category III), four points for Local General Aviation Airports (Category IV), and five points for Remote Access/Emergency Service Airports (Category V).
- **Airport Within Municipal Boundary.** If the airport's runway is located outside of the county's jurisdictional boundary the county receives zero points, and if it is located partially or completely within a municipality's boundary, the county receives five points. The point system here reflects that counties are responsible for regulating land uses for rural areas and those areas located outside of municipal boundaries.
- **Estimated Horizontal Surface Outside of Municipal Boundary.** If 100% of the horizontal surface falls outside a municipal boundary the county receives zero points. If 0% of the horizontal surface falls outside a municipal boundary the county receives five points.⁵ The scoring for this category is the inverse of the points allotted to cities for each airport. The more of the horizontal surface that falls outside city limits and over the county-regulated rural areas, the more important it is for counties to have adopted land use regulations to protect airports and adjacent communities. As with the system developed for cities, points range from zero to five and are scored to the nearest tenth of a point.

³ The 2007 update of the OAP revised the airport classification system established in the 2000 OAP to account not only for airport function and design, but also to integrate the types of facilities and services that should be provided at each airport category. For more information about functional airport roles, please see Chapter 4 of the 2007 Oregon Aviation Plan: http://www.oregon.gov/aviation/docs/system_plan/chapter_4_-_airport_functional_roles.pdf

⁴ Points for this category range from zero to five and are estimated to the nearest tenth of a point.

⁵ Points for this category range from zero to five and are estimated to the nearest tenth of a point.

- **Airport Safety Overlay Zone.** Similar to the prioritization system for cities, if a county has an adopted Airport Safety Overlay Zone it receives 15 points; if it does not it receives zero points.

There are 35 cities and two counties that received scores of under 15 points and, therefore, are considered the highest priority for updating land use policies and regulations. Based on the prioritization system, the two jurisdictions in the greatest need of code updates are the City of Astoria for the Port of Astoria Regional Airport and the City of Hillsboro for the Hillsboro Airport. A complete list of jurisdictions and their corresponding prioritization scores are provided in **Table 9-3** and **Table 9-4**, as well as in the Existing and Future Airport Operations and Land Uses Survey Database.

TABLE 9-3: PRIORITIZATION OF CITIES

Airport	Jurisdiction	OAP Category	Airport Within Municipal Boundary	Estimated Horizontal Surface Outside Municipal Boundary	Airport Safety Overlay Zone	Total Score
Albany Municipal Airport	Albany	4	0	2.5	15	21.5
Albany Municipal Airport	Millersburg	4	0	2.5	0	6.5
Alkali Lake State Airport	Lakeview	5	5	5	0	15
Arlington Municipal Airport	Arlington	5	0	2.5	15	22.5
Ashland Municipal Airport - Sumner Parker Field	Ashland	3	0	1.25	15	19.25
Port of Astoria Regional Airport	Astoria	2	0	3	0	5
Port of Astoria Regional Airport	Warrenton	2	0	3	15	20
Aurora State Airport	Aurora	2	5	4.5	15	26.5
Baker City Municipal Airport	Baker City	3	5	5	0	13
Bandon State Airport	Bandon	3	5	3.5	15	26.5
Bend Municipal Airport	Bend	2	5	5	0	12
Boardman Airport	Boardman	4	5	5	0	14
Brookings Airport	Brookings	4	5	2.5	15	26.5
Burns Municipal Airport	Burns	3	5	5	0	13
Cascade Locks State Airport	Cascade Locks	5	0	0.5	15	20.5
Chehalem Airpark	Newberg	4	5	5	15	29
Chiloquin State Airport	Chiloquin	5	0	2.5	0	7.5
Columbia Gorge Regional / The Dalles Municipal Airport	The Dalles	3	5	4.5	15	27.5
Condon State Airport - Pauling Field	Condon	4	5	4	15	28
Corvallis Municipal Airport	Corvallis	2	5	4.5	15	26.5
Cottage Grove State Airport - Jim Wright Field	Cottage Grove	4	5	2.5	0	11.5

Airport	Jurisdiction	OAP Category	Airport Within Municipal Boundary	Estimated Horizontal Surface Outside Municipal Boundary	Airport Safety Overlay Zone	Total Score
Country Squire Airpark	Sandy	5	5	5	0	15
Creswell Hobby Field Airport	Creswell	4	5	2.5	15	26.5
Davis Field Airport	Gates	5	5	1	0	11
Eastern Oregon Regional Airport at Pendleton	Pendleton	1	0	3.75	15	19.75
Enterprise Municipal Airport	Enterprise	5	0	2.5	15	22.5
Eugene - Mahlon Sweet Field Airport	Eugene	1	5	0.5	15	21.5
Eugene - Mahlon Sweet Field Airport	Veneta	1	5	0.05	0	6.05
Florence Municipal Airport	Florence	4	0	0	15	19
George Felt Airport	Roseburg	5	5	4.5	15	29.5
Gold Beach Municipal Airport	Gold Beach	4	0	4	15	23
Grant County Regional / Ogilvie Field Airport	John Day	3	5	1.5	15	24.5
Grants Pass Airport	Grants Pass	3	5	5	0	13
Hermiston Municipal Airport	Hermiston	3	0	2.5	15	20.5
Hillsboro Airport	Hillsboro	2	0	3	0	5
Illinois Valley Airport	Cave Junction	4	5	5	0	14
Independence State Airport	Independence	4	0	3	15	22
Joseph State Airport	Joseph	4	5	1	0	10
Ken Jernstedt Airfield	Hood River	4	5	5	0	14
Crater Lake-Klamath Regional Airport	Klamath Falls	1	0	2	15	18
La Grande / Union County Airport	La Grande	3	5	5	0	13
Lake Billy Chinook Airport	Culver	5	5	5	0	15
Lake County Airport	Lakeview	3	5	4.75	0	12.75
Lake Woahink Seaplane Base	Florence	5	0	5	15	25
Lakeside Municipal Airport	Lakeside	5	0	0.5	15	20.5
Lebanon State Airport	Lebanon	4	0	2.5	15	21.5
Lenhardt Airpark	Hubbard	4	5	5	0	14
Lexington Airport	Lexington	4	5	2.5	0	11.5
Madras Municipal Airport	Madras	4	0	2.5	15	21.5
Malin Airport	Malin	5	5	1.25	0	11.25

Airport	Jurisdiction	OAP Category	Airport Within Municipal Boundary	Estimated Horizontal Surface Outside Municipal Boundary	Airport Safety Overlay Zone	Total Score
McMinnville Municipal Airport	McMinnville	2	0	2.5	15	19.5
Miller Memorial Airpark	Vale	5	5	4.5	15	29.5
Monument Municipal Airport	Monument	5	5	3.75	0	13.75
Myrtle Creek Municipal Airport	Myrtle Creek	4	0	2.5	0	6.5
Nehalem Bay State Airport	Manzanita	5	5	2.5	15	27.5
Newport Municipal Airport	Newport	2	0	2.5	15	19.5
Oakridge State Airport	Oakridge	5	5	2	15	27
Ontario Municipal Airport	Ontario	3	0	2.5	15	20.5
Paisley Airport	Paisley	5	5	5	0	15
Portland Downtown Heliport	Portland	2	0	0	15	17
Portland International Airport	Portland	1	0	3.5	15	19.5
Powers Hayes Field Airport	Powers	5	5	3.75	0	13.75
Prineville Airport	Prineville	4	0	2.5	15	21.5
Redmond Municipal Airport (Roberts Field)	Redmond	1	0	2.5	15	18.5
Rogue Valley International Airport - Medford	Medford	1	0	2.5	15	18.5
Roseburg Regional Airport	Roseburg	3	0	2	15	20
Salem McNary Field Airport	Salem	2	0	2	15	19
Sandy River Airport	Sandy	5	5	3.5	0	13.5
Scappoose Industrial Airpark	Scappoose	2	0	2.5	15	19.5
Seaside Municipal Airport	Seaside	4	0	3	15	22
Seaside Municipal Airport	Gearhart	4	0	3	15	22
Sisters Eagle Air Airport	Sisters	4	5	2.5	15	26.5
Skyport Airport	Cornelius	5	5	5	0	15
Southwest Oregon Regional Airport	North Bend	1	0	2.5	15	18.5
Sportsman Airpark	Newberg	4	5	0.5	15	24.5
Stark's Twin Oaks Airport	Hillsboro	5	5	5	0	15
Tillamook Airport	Tillamook	3	5	5	0	13
Toledo State Airport	Toledo	5	5	5	0	15
Troutdale Airport	Troutdale	2	0	1.5	15	18.5

Airport	Jurisdiction	OAP Category	Airport Within Municipal Boundary	Estimated Horizontal Surface Outside Municipal Boundary	Airport Safety Overlay Zone	Total Score
Valley View Airport	Estacada	5	5	4.5	0	14.5
Vernonia Airfield	Vernonia	5	5	5	0	15
Wakonda Beach State Airport	Waldport	5	5	4.95	0	14.95
Wasco State Airport	Wasco	4	0	2.5	0	6.5

TABLE 9-4: PRIORITIZATION OF COUNTIES

Airport	Jurisdiction	OAP Category	Airport Within Municipal Boundary	Estimated Horizontal Surface Outside Municipal Boundary	Airport Safety Overlay Zone	Total Score
Albany Municipal Airport	Linn County	4	5	2.5	15	26.5
Alkali Lake State Airport	Lake County	5	0	0	15	20
Arlington Municipal Airport	Gilliam County	5	5	2.5	15	27.5
Ashland Municipal Airport - Sumner Parker Field	Jackson County	3	5	3.75	15	26.75
Port of Astoria Regional Airport	Clatsop County	2	5	2	0	9
Aurora State Airport	Marion County	2	0	0.5	15	17.5
Baker City Municipal Airport	Baker County	3	0	0	15	18
Bandon State Airport	Coos County	3	0	1.5	15	19.5
Beaver Marsh Airport	Klamath County a	5	0	0	15	20
Bend Municipal Airport	Deschutes County	2	0	0	15	17
Boardman Airport	Morrow County	4	0	0	15	19
Brookings Airport	Curry County	4	0	2.5	15	21.5
Burns Municipal Airport	Harney County	3	0	0	15	18
Cape Blanco State Airport	Curry County a	5	0	0	15	20
Cascade Locks State Airport	Hood River County	5	5	4.5	0	14.5
Chehalem Airpark	Yamhill County	4	0	0	15	19

Airport	Jurisdiction	OAP Category	Airport Within Municipal Boundary	Estimated Horizontal Surface Outside Municipal Boundary	Airport Safety Overlay Zone	Total Score
Chiloquin State Airport	Klamath County	5	5	2.5	15	27.5
Christmas Valley Airport	Lake County ^a	4	0	0	15	19
Columbia Gorge Regional / The Dalles Municipal Airport	Wasco County	3	0	0.5	15	18.5
Condon State Airport - Pauling Field	Gilliam County	4	0	1	15	20
Corvallis Municipal Airport	Benton County	2	0	0.5	15	17.5
Cottage Grove State Airport - Jim Wright Field	Lane County	4	0	2.5	15	21.5
Country Squire Airpark	Clackamas County	5	0	0	15	20
Crescent Lake State Airport	Klamath County ^a	5	0	0	15	20
Creswell Hobby Field Airport	Lane County	4	0	2.5	15	21.5
Davis Field Airport	Marion County	5	0	4	15	24
Eastern Oregon Regional Airport at Pendleton	Umatilla County	1	5	1.25	15	22.25
Enterprise Municipal Airport	Wallowa County	5	5	2.5	15	27.5
Eugene - Mahlon Sweet Field Airport	Lane County	1	0	4.5	15	20.5
Florence Municipal Airport	Lane County	4	5	0	15	24
George Felt Airport	Douglas County	5	5	0.5	15	25.5
Gold Beach Municipal Airport	Curry County	4	5	1	15	25
Grant County Regional / Ogilvie Field Airport	Grant County	3	0	3.5	15	21.5
Grants Pass Airport	Josephine County	3	0	5	15	23
Hermiston Municipal Airport	Umatilla County	3	5	2.5	15	25.5
Hillsboro Airport	Washington County	2	5	2	15	24
Illinois Valley Airport	Josephine County	4	0	0	15	19
Independence State Airport	Polk County	4	5	2	15	26
Joseph State Airport	Wallowa County	4	0	4	15	23
Ken Jernstedt Airfield	Hood River County	4	0	0	15	19
Crater Lake-Klamath Regional Airport	Klamath County	1	5	3	15	24
La Grande / Union County Airport	Union County	3	0	0	15	18
Lake Billy Chinook Airport	Jefferson County	5	0	0	15	20
Lake County Airport	Lake County	3	0	0.25	15	18.25
Lake Woahink Seaplane Base	Lane County	5	5	4.75	15	29.75

Airport	Jurisdiction	OAP Category	Airport Within Municipal Boundary	Estimated Horizontal Surface Outside Municipal Boundary	Airport Safety Overlay Zone	Total Score
Lakeside Municipal Airport	Coos County	5	5	4.5	15	29.5
Lebanon State Airport	Linn County	4	5	2.5	15	26.5
Lenhardt Airpark	Marion County	4	0	0	15	19
Lexington Airport	Morrow County	4	0	2.5	15	21.5
Madras Municipal Airport	Jefferson County	4	5	2.5	15	26.5
Malin Airport	Klamath County	5	0	3.75	15	23.75
McDermitt State Airport	Malheur County ^a	5	0	0	0	5
McKenzie Bridge State Airport	Malheur County ^a	5	0	0	0	5
McMinnville Municipal Airport	Yamhill County	2	5	2.5	15	24.5
Memaloose USFS Airport	Union County ^a	5	0	0	15	20
Miller Memorial Airpark	Malheur County	5	0	0.5	0	5.5
Monument Municipal Airport	Grant County	5	0	1.25	15	21.25
Mulino State Airport	Clackamas County ^a	4	0	0	15	19
Myrtle Creek Municipal Airport	Douglas County	4	5	2.5	15	26.5
Nehalem Bay State Airport	Tillamook County	5	0	2.5	15	22.5
Newport Municipal Airport	Lincoln County	2	5	2.5	15	24.5
Oakridge State Airport	Lane County	5	0	3	15	23
Ontario Municipal Airport	Malheur County	3	5	2.5	0	10.5
Owyhee Reservoir State Airport	Malheur County ^a	5	0	0	0	5
Pacific City State Airport	Tillamook County ^a	5	5	3	15	28
Paisley Airport	Lake County	5	0	0	15	20
Pinehurst State Airport	Jackson County ^a	5	0	0	15	20
Portland International Airport	Multnomah County	1	5	1.5	15	22.5
Powers Hayes Field Airport	Coos County	5	0	1.25	15	21.25
Prineville Airport	Crook County	4	5	2.5	15	26.5
Prospect State Airport	Jackson County ^a	5	0	0	15	20
Redmond Municipal Airport (Roberts Field)	Deschutes County	1	5	2.5	15	23.5
Rogue Valley International Airport - Medford	Jackson County	1	5	2.5	15	23.5
Rome State Airport	Malheur County ^a	5	0	0	0	5
Roseburg Regional Airport	Douglas County	3	5	3	15	26

Airport	Jurisdiction	OAP Category	Airport Within Municipal Boundary	Estimated Horizontal Surface Outside Municipal Boundary	Airport Safety Overlay Zone	Total Score
Salem McNary Field Airport	Marion County	2	5	3	15	25
Sandy River Airport	Clackamas County	5	0	1.5	15	21.5
Santiam Junction State Airport	Linn County ^a	5	0	0	15	20
Scappoose Industrial Airpark	Columbia County	2	5	2.5	15	24.5
Seaside Municipal Airport	Clatsop County	4	5	2	15	26
Siletz Bay State Airport	Lincoln County ^a	4	5	2.5	15	26.5
Silver Lake USFS Airport	Lake County ^a	5	0	0	15	20
Sisters Eagle Air Airport	Deschutes County	4	0	2.5	15	21.5
Skyport Airport	Washington County	5	0	0	15	20
Southwest Oregon Regional Airport	Coos County	1	5	2.5	15	23.5
Sportsman Airpark	Yamhill County	4	0	0	15	19
Stark's Twin Oaks Airport	Washington County	5	0	0	15	20
Sunriver Airport	Deschutes County ^a	4	0	0	15	19
Tillamook Airport	Tillamook County	3	0	0	15	18
Toketee State Airport	Douglas County ^a	5	0	0	15	20
Toledo State Airport	Lincoln County	5	0	0	15	20
Troutdale Airport	Multnomah County	2	5	3.5	15	25.5
Valley View Airport	Clackamas County	5	0	0.5	15	20.5
Vernonia Airfield	Columbia County	5	0	0	15	20
Wakonda Beach State Airport	Lincoln County	5	0	0.05	15	20.05
Wasco State Airport	Sherman County	4	5	2.5	15	26.5

^a Airport is associated with an unincorporated community

Counties regulate land uses for airports that are not located within—and have no horizontal surface radius over—the municipal boundaries of a city. In many cases these airports are in rural areas and are less likely to encounter development that is incompatible with airport operations. There are, however, unincorporated communities⁶ within counties that have urban uses and densities.

Despite being located outside city limits, airports in unincorporated communities are more likely to include incompatible land uses due to the fact that new and expanded urban uses may be permitted by counties in such areas. There are 18 airports associated with unincorporated communities in the ODA public use airport system, as denoted in **Table 9-4**.

Additional factors that could be considered when determining which jurisdictions to assist with bringing their policies and regulations into compliance include:

- Areas experiencing rapid population growth and urbanization, which include cities such as Sandy, Molalla, Hillsboro, The Dalles, Bend, and Redmond
- Airports with current or planned expansion projects

Port of Astoria Regional Airport is located within the City of Warrenton near Highway 101. It is one of the most accessible general aviation airports in the northern Oregon coast region and is home to the Columbia River sector of the United States Coast Guard. The airport is adjacent to the 45-acre Port of Astoria Regional Airport Industrial Park, which, according to the Port of Astoria, is “available for industrial development or logistics warehouse capacity.”⁷

The City of Warrenton currently has some land use regulations in place in the Warrenton Municipal Code to protect airport operations. These regulations include requiring FAA notification for the development of tall structures, height restrictions, limiting uses within a noise impact boundary, limiting outdoor lighting, and establishment of an Airport Hazard Overlay District⁸. The City of Astoria also has a portion of the airport’s horizontal surface over its city limits, and although it does have some height restrictions located in Article 15 (Wireless Communication Service Facilities) of the City of Astoria Development Code, they do not have an Airport Overlay Zone or any other airport-related regulations.

Land uses surrounding the Hillsboro Airport are also of particular concern. In 2016, it experienced 190,069 flights—roughly 20,000 fewer than the Portland International Airport. This is a 4.8% growth in flights from 2015, indicating increasing airport activity. The airport is located in and serves the “Silicon Forest.” It is located only a few miles from Intel’s Ronler Acres campus, which recently completed a major five-year-long expansion and was the largest capital project in Oregon’s history at the time. Intel relies heavily on the Hillsboro airport for business flights, as does Nike’s nearby World Headquarters.

⁶ Unincorporated communities are areas with existing development that are located outside urban growth boundaries (UGBs) and are not governed by a local municipal body. When Oregon’s Statewide Planning Program was put into effect 1973, counties were required to inventory farm and forest lands and zone them accordingly. For areas that were located outside UGBs but that were already physically developed to the point where farm or forest use was impracticable, counties were able to include them in their comprehensive plans as “exception areas,” which would later be termed unincorporated communities. In 1994 the Land Conservation and Development Commission (LCD) adopted the Unincorporated Communities Rule (OAR 660, Division 22) and recognized these “exception areas” as established development centers that were never incorporated but nevertheless shared many qualities with small cities. Under state law, counties are responsible for regulating land uses and development in unincorporated communities, and for ensuring that any new or expanded uses do not adversely affect farm or forest operations or interfere with the function of UGBs.

⁷ http://www.portofastoria.com/Airport_Information.aspx

⁸ In October 2018, the City of Warrenton revised the Airport Hazard Overlay District and renamed it the Airport Operations Overlay District. The RPZ was addressed.

9.5.3 Recommendations

Based on the number of jurisdictions with land use authority over an ODA system airport that are not currently in compliance with State regulations, there is a significant amount of work needed to achieve statewide compliance. Recommendations for land use zoning related to airport planning is presented in the Recommendations Chapter of this report.

9.6 FAA Airport Design Standards Review

The Federal Aviation Administration (FAA) has standards and recommendations for the geometric layout and engineering design of runways, taxiways, aprons, and other facilities at civil airports. As part of the Oregon Aviation Plan, each airport in the system was reviewed for non-standard design and construction related to airport Object Free Areas (OFA), Runway Safety Areas (RSA), and Runway Protection Zones (RPZ).

9.7 OFA, RSA, and RPZ Analysis

The consultant began the aerial portion of the analysis of statewide airport system deficiencies by developing KMZ files for each airport depicting each Runway OFA, RSA, and RPZ. Aerial images overlain with these KMZ files were analyzed individually by the consultant for deficiencies, which generally includes vehicle/aircraft parking, trees, brush, man-made obstructions, roads, buildings, structures, pedestrian trails, and potential RSA grading issues. In some instances, consultant knowledge of a specific issue, known obstacle, or deficiency not recognizable in the aerial images were able to be identified. Additionally, the runway/taxiway separation for each primary runway with a full or partial parallel taxiway was analyzed for compliance with FAA standards and any non-standard separation issues identified.

Table 9-5 sums the number of the deficiencies for the OFA, RSA, RPZ and parallel taxiway separation found for each airport. **Appendix F** provides aerial images of each airport and color codes deficiencies by three types. Green symbols indicate nonstandard issues in the OFA, Red symbols indicate nonstandard land use issues in the RPZ and Blue indicate nonstandard issues found in the RSA. In September 2012, the FAA issued interim policy guidance¹ on Land Uses within RPZs; to address what constitutes a compatible land use and how to evaluate proposed land uses contained within an RPZ. The FAA is now requesting Airports analyze RPZ land use conditions if a land use change is being proposed as a result of:

- An airfield project (e.g. runway extension, runway shift)
- A change in the critical aircraft that increases the RPZ dimensions
- A new or revised instrument approach procedure that increases the RPZ dimensions
- A local development proposal in the RPZ (either new or reconfigured)

An Alternatives Analysis of existing and proposed incompatible land use conditions within an RPZ provides information to the FAA to allow them to determine whether the future actions of a proposed plan (e.g. Master Plan/ALP) are sufficient to meet the FAA RPZ land use compatibility guidance. The objective of an RPZ Alternatives Analysis is to identify preferred plans to improve compliance with FAA Airport Design Standards for Runway Protection Zones (RPZ) at the end of each runway.

TABLE 9-5: NUMBER OF DEFICIENCIES FOR THE OFA, RSA, RPZ, AND PARALLEL TAXIWAY SEPARATION

FAA ID	Airport	Number of Non-Standard Deficiencies			
		RSA	OFA	RPZ	RWY/TWY Separation
S12	Albany Municipal			19	
R03	Alkali Lake State	1	2	2	
1S8	Arlington Municipal	1	2	3	
S03	Ashland Municipal Airport - Sumner Parker Field		6	7	
AST	Port of Astoria Regional			4	
UAO	Aurora State		9	23	
BKE	Baker City Municipal			17	
S05	Bandon State				Non-Standard
2S2	Beaver Marsh State		4	9	
BDN	Bend Municipal			3	
M50	Boardman			3	
BOK	Brookings		1	6	
BNO	Burns Municipal			2	
5S6	Cape Blanco State Airport				
CZK	Cascade Locks State	1	8	17	
17S	Chehalem Airpark		16	11	
2S7	Chiloquin State			8	
62S	Christmas Valley			7	
DLS	Columbia Gorge Regional-The Dalles			10	
3S9	Condon State Airport - Pauling Field			3	
CVO	Corvallis Municipal			6	
61S	Cottage Grove State Airport - Jim Wright Field				
S48	Country Squire Airpark		7	7	Non-Standard
LMT	Crater Lake-Klamath Regional		2	9	
5S2	Crescent Lake State	1	5	14	
77S	Creswell Hobby Field Airport			5	
6S4	Davis		2	7	
PDT	Eastern Oregon Regional Airport at Pendleton				
8S4	Enterprise Municipal	3	6	6	Non-Standard
EUG	Eugene Airport-Mahlon Sweet Field			2	
6S2	Florence Municipal			4	
5S1	George Felt	2	8		
4S1	Gold Beach Municipal			8	



FAA ID	Airport	Number of Non-Standard Deficiencies			
		RSA	OFA	RPZ	RWY/TWY Separation
GCD	Grant County Regional			8	
3S8	Grants Pass			1	
HRI	Hermiston Municipal			6	
3S4	Illinois Valley		2	13	
7S5	Independence State			3	
JSY	Joseph State			9	
4S2	Ken Jernstedt Airfield		11	6	
LGD	La Grande-Union County		1	5	
5S5	Lake Billy Chinook			3	
LKV	Lake County			3	
9S3	Lakeside Municipal			41	
S30	Lebanon State			9	
7S9	Lenhardt Airpark	6	3	7	
9S9	Lexington		1	5	
S33	Madras Municipal				
4S7	Malin	2	1	7	
26U	McDermitt State				
00S	Mckenzie Bridge State	1	9		
MMV	McMinnville Municipal	1	1	4	
25U	Memaloose	4	9	4	
S49	Miller Memorial Airpark			4	
12S	Monument Municipal	2	5	7	
4S9	Mulino State		1	3	
16S	Myrtel Creek Municipal				
3S7	Nehalem Bay State	3	16	7	
ONP	Newport Municipal				Non-Standard
5S0	Oakridge State	1	7	5	
ONO	Ontario Municipal			20	
28U	Owyhee reservoir State				
PFC	Pacific City State	3	23	29	
22S	Paisely		14	3	
24S	Pinehurst State		20	3	
HIO	Portland-Hillsboro Airport		2	7	
PDX	Portland International Airport				

FAA ID	Airport	Number of Non-Standard Deficiencies			
		RSA	OFA	RPZ	RWY/TWY Separation
TTD	Portland-Troutdale Airport			4	
6S6	Powers Hayes Field		2	6	
S39	Prineville-Crook County			4	
64S	Prospect State	3	18	4	
RDM	Redmond Municipal Airport-Roberts Field			3	
MFR	Rogue Valley International - Medford			11	
REO	Rome State	2		2	
RBG	Roseburg Regional			11	
SLE	Salem McNary Field		1	22	
03S	Sandy River	5	11	15	
8S3	Santiam Junction State	1	4	4	
SPB	Scappoose Industrial Airpark			5	
56S	Seaside Municipal		5	8	
S45	Siletz Bay State		4	7	
45S	Silver Lake USFS			2	
6K5	Sisters Eagle Air		31	19	Non-Standard
4S4	Skyport	2	2	3	
OTH	Southwest Oregon Regional	1			
2S6	Sportsman Airpark	2	1	23	Non-Standard
7S3	Starks Twin Oaks	2	1	4	Non-Standard
S21	Sunriver		16	5	Non-Standard
TMK	Tillamook			6	
3S6	Toketee State		15	3	
5S4	Toledo State		8	6	
5S9	Valley View	6	12	8	Non-Standard
05S	Vernonia Municipal	3	5	1	
R33	Wakonda Beach State	3	20	17	
35S	Wasco State				
	Total	60	336	551	9

Source: Century West, Jviation



9.8 Compliance with Oregon Transportation Plan Goals

The OAP v6.0 has addressed each of the Transportation Plan (OTP) goals, where applicable, to meet the intent of the OTP. Continual assessment of the goals and the OAP v6.0 is recommended to provide a fresh evaluation of the ever-changing needs and demands placed on the system by the various aviation users. The foundation provided in the OAP v6.0 is used to assess all state, regional, and local aviation facilities and services and creates a strategy that will guide transportation improvement decisions over the next 20 years.

OTP Goal 1 – Mobility and Accessibility

To enhance Oregon’s quality of life and economic vitality by providing a balanced, efficient, cost-effective and integrated multimodal transportation system that ensures appropriate access to all areas of the state, the nation and the world, with connectivity among modes and places.

An effort was made to address mobility and accessibility to the aviation system in several ways. First, it was noted that it was important to have aviation opportunities throughout the state, therefore it is necessary to maintain the existing infrastructure as is it exists today. To increase the accessibility for aircraft passengers and cargo, additional precision approaches with vertical guidance were noted as being recommended at select airports. Additionally, ground transportation was noted as being available at airports serving larger population areas. Ground transportation included taxi service, rental car, courtesy transportation, or Uber/Lyft service.

OTP Goal 2 – Management of the System

To improve the efficiency of the transportation system by optimizing the existing transportation infrastructure capacity with improved operations and management.

The OAP v6.0 provides guidance on developing and preserving a system of airports ranging in size from large commercial service airports to small rural airstrips providing access to all Oregonians. Research using GIS identified that nearly 90 percent of all Oregonians reside within 30 minutes’ drive of an airport.

OTP Goal 3 – Economic Vitality

To promote the expansion and diversification of Oregon’s economy through the efficient and effective movement of people, goods, services and information in a safe, energy-efficient and environmentally sound manner.

Economic Vitality identifies that a reliable public transportation system supports the livability and economic vitality of Oregon communities, including airports. The OAP v6.0 promotes and supports the use of airports for tourism, business, and recreation purposes. Additionally, each airport was evaluated for its economic impact to its local community as well as the state. Creating this baseline impact of the aviation system was an initial step addressing this goal. Additionally, the performance criteria, as outlined in Chapter 4 of this document, provided a set of evaluation criteria that are facilities or services which increase the potential economic vitality for an airport. These services include providing such options as fuel service, aircraft maintenance, pilot lounge areas, aircraft storage areas, etc. Addressing these issues was noted as an important element for most of the airport categories.

OTP Goal 4 - Sustainability

To provide a transportation system that meets present needs without compromising the ability of future generations to meet their needs from the joint perspective of environmental, economic and community objectives. This system is consistent with, yet recognizes differences in, local and regional land use and economic development plans. It is efficient and offers choices among transportation modes. It distributes

benefits and burdens fairly and is operated, maintained and improved to be sensitive to both the natural and built environment.

The OAP focuses on the safety of its users while maintaining a sustainable future – socially sustainable, providing for the aviation needs of the residents of the state; economically sustainable, providing economic development opportunities and financing the aviation system; and, environmentally sustainable, incorporating stewardship of natural resources.

The ODA updated the OAP v6.0 to review and analyze local jurisdiction compliance with state regulations regarding land uses surrounding airports and make recommendations on how to better implement those regulations. This Land Use Compatibility Compliance Report details the steps taken to collect and analyze land use compatibility information for public use airports, explains how this data was analyzed, and identifies the extent to which jurisdictions comply with state laws. The last section of this report provides guidance on prioritizing assistance for jurisdictions whose policies and land use regulations put airports and adjacent communities at risk. Land use compliance is presented in Chapter 9 of the report.

Goal 5: Safety and Security

To plan, build, operate and maintain the transportation system so that it is safe and secure.

The extensive aviation system in Oregon is a crucial asset to the state during times of emergency. Airports enable emergency rescue crews to quickly access remote or hard-hit areas, and supply resources to and evacuate areas that may otherwise be unreachable via roadway, boat, and rail. As such, this study included an inventory of airports that support emergency services. Further, this study inventoried airports located within the Cascadia subduction zone (CSZ) that may be impacted or destroyed during a zone event. This study did not include an in-depth resiliency analysis but rather a high-level overview of airports that currently provide emergency services and those that may likely be unable to provide such service following a Cascadia subduction zone event.

Goal 6: Funding and Strategic Investment

To create a transportation funding structure that will support a viable transportation system to achieve state and local goals today and in the future.

Based on the analysis of the recommended airport system’s performance, the OAP v6.0 identifies specific projects for airports in the Oregon system. These are presented in Chapter 8. These projects improve the airport system’s performance, especially as it relates to facility and service objectives identified as part of this study.

Estimated costs for each airport project were developed using broad assumptions appropriate for system level planning. Circumstances at individual airports vary considerably, often requiring additional expenditures not covered by these broad assumptions. With that in mind, these cost estimates are best viewed as a starting point for understanding overall project costs.

OTP Goal 7 - Coordination, Communication, and Cooperation

To pursue coordination, communication and cooperation among transportation users, providers and those most affected by transportation activities to align interests, remove barriers and bring innovative solutions so that transportation system functions as one system.



State Aviation Board Coordination

As the appointed body that governs actions related to the aviation system of Oregon, coordination with the State Aviation Board was vital in the development of the OAP v6.0. The extensive knowledge each of these Board members provided related to individual airports, state issues, FAA policies and procedures, and their commitment to serving the people of Oregon was invaluable to the process. ODA Board Members meet bimonthly and ODA staff, or the consultant, updated them on a regular basis. Project documents and reports were made available to the Board three weeks prior to ODA Board Meetings.

Public Involvement

The involvement of the public in the development of the OAP v6.0 was encouraged throughout the development of the document via the project website, conferences and ODA Board meetings. ODA staff and the project consultant updated key stakeholders and airport managers on the studies at several Oregon Airport Managers Association meetings and conferences. The public attending ODA Board bi-monthly meetings were apprised of the study process and results. Public comments and questions related to the study were addressed during these meetings. In addition, a 35-day public-comment period was provided for interested persons and agencies to review the entire OAP v6.0 Technical Report which was posted to the Project Web Page. This period was from December 3, 2018 to January 8, 2019.

Project Web Page

A project web page was established to allow the public to learn about the project through postings as the project progressed. Meeting handouts and copies of draft report chapters and documents as well as presentations were posted on the web page for public review. The final draft document was posted on the web page in December 2018 to allow for general public and agency review. Additionally, a project email address was also provided on the project web page which allowed persons to communicate with the Project Team via an online form.