

Oregon Department of Aviation
ATTN: Brandon Pike
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City of Aurora, OR
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October 6, 2025

Thank you for inviting comments from the City of Aurora on the draft Aurora State Airport Master Plan. The City has reviewed Chapter 6 and other elements of the draft plan, and unfortunately concludes that the draft plan is not compatible with the City's acknowledged comprehensive plan.

The city's acknowledged comprehensive plan has several provisions regarding the airport.

"The City will work closely with Marion County, the Oregon Department of Aviation, and the Oregon Department of Land Conservation and Development to evaluate and balance the net value (cost/benefit) of the industrial and commercial potential of the Aurora Airport and surrounding lands. The City will strive to minimize potential land use conflicts within the mutual planning area in an effort to maximize the livability of the community, including evaluation of a potential urban growth boundary (UGB) expansion to incorporate the Aurora Airport."

The City has begun the preliminary steps of a UGB expansion to incorporate the Aurora State Airport into the City consistent with this policy. The airport expansion shown on the airport layout plan is not compatible with this policy, because expansion onto agricultural land zoned EFU creates land use conflicts between the urban airport and adjacent rural uses, including conflicts resulting from what Marion County described as "deficiencies in rural services." The correct method of resolving these conflicts is for the urban uses to be annexed into the City, so that urban public services and governance can be provided.

"The City's policy is that any airport expansion beyond the 1994 boundary established by ORS 836.605(2) should be preceded by annexation and connection to city water and sewer services."

This policy is consistent with LUBA's conclusion that the airport is an urban public facility. *Murray v. Marion County*, 23 Or LUBA 268, 283 (1992). Consistent with Goals 11, 12, and 14, such facilities should be located within urban growth boundaries. The draft airport layout plan

illustrates airport expansion onto agricultural land to the east, south and west of the existing airport, without any mention of annexation or any apparent provision of urban public services such as potable water or sanitary sewer. The City notes that existing septic drainfields are identified for relocation without identifying any replacement drainfields or connection to the City's sewer system, which demonstrates inadequate sanitary sewer service. Therefore, the draft master plan is not compatible with the City's acknowledged comprehensive plan.

This is not a new problem. The draft 2012 Aurora State Airport explained that land surrounding the airport is high-value farmland which is zoned Exclusive Farm Use.

"Airport development on EFU land is restricted, and it is difficult to rezone EFU land to other classifications, such as Public. Changing zoning would require an exception to Oregon Planning Goal 3."

And LUBA previously ruled that Goal 11 and 14 exceptions are also required. *Murray v. Marion County, supra*. These exceptions are of course comprehensive plan amendments. For the airport expansion to occur prior to annexation, the county comprehensive plan must be amended. The need for an amendment demonstrates the draft master plan is not compatible with the acknowledged county comprehensive plan.

Adoption of an airport master plan is an agency action and program which affects land use within the meaning of ORS 197.180(1). Therefore, the plan must be in compliance with the statewide planning goals, and the OAR 660 rules implementing the goals and rules implementing ORS chapter 197.180. The plan must also be compatible with the acknowledged comprehensive plans and land use regulations of Aurora and Marion County. Again, the need for goal exceptions and a plan amendment proves that the draft plan fails to satisfy these requirements.

Thank you for your consideration of these comments, and we look forward to coordinating with you to resolve these compatibility issues.

Sincerely,

David James Robinson

David Robinson
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