

PIKE Brandon

From: Hughes, Jennifer <jenniferh@clackamas.us>
Sent: Tuesday, October 14, 2025 3:51 PM
To: PIKE Brandon
Cc: BEACH Anthony; THOMAS Alex R; Hart, Nick
Subject: FW: Request to Review Aurora State Airport Draft Final AMP

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Good afternoon,

Thank you for the opportunity to comment on the draft Aurora State Airport master plan and for taking time to meet with my colleague, Nick Hart, about some of the details of the plan.

You requested that we review the following information from the draft plan to determine whether this portion of the plan is compatible with our acknowledged comprehensive plan and whether our plan contains any specific or general requirements that may apply.

- *The proposed plan includes extending the public airspace to the north as a result of the proposed runway extension—and, as a result, shifting the runway protection zone (RPZ) to the north (see Chapter 6 – Airport Layout Plan). Pursuant to OAR 660-013-0040, a local government shall adopt comprehensive plan and land use regulation requirements for each state or local aviation facility subject to the requirements of ORS 836.610(1). Because the proposed master plan would require you to update your airport overlay zone in the future to match the proposed boundary of the airspace and relocated RPZ, ODAV wants to ensure your organization is aware of the applicable state statutes and the impact of the proposed plan.*
- The County has a public use airport overlay zone that applies to various defined airport imaginary surfaces associated with the Aurora State Airport. Staff understands that there may be a need to revise the airport overlay zone boundaries for the Aurora Airport if the runway is someday extended as proposed by the master plan. However, staff cannot predetermine the outcome of a future application to do so. Changing the airport overlay zone boundaries will require a full analysis of the Comprehensive Plan through a future land use application review process. With a cursory review, staff notes that the following Plan policy may be implicated by a proposed expansion:

Require that new airports, airport expansions, or expansions of airport boundaries, except those limited to use by ultra-lights and helicopters, have a runway at least 1,800 feet long and control at least enough property at the end of each runway through ownership, aviation easement, or long-term lease to protect their approach surfaces until the approach surfaces are 50 feet above the terrain. Require the runway to be located so as to achieve at least a 20-foot clearance of the approach surface over a county, city or public road.

I understand that the runway length substantially exceeds 1,800 feet, both now and with the future extension. However, I do not know whether it complies with the remaining elements of this policy.

It may also be the case that this policy is not applicable because the boundaries that would be expanded are the imaginary surfaces and not the airport boundary itself.

- *The proposal includes potential future property acquisition for road realignment and other improvements (see Chapter 5 – Alternatives Analysis). ODAV wants to ensure your organization is aware of the potential implications from the planned property acquisition.*

Staff in our land use and transportation programs reviewed this element and note the following:

- It is difficult to determine from the drawings if the proposed realignment of Hubbard Road is within the existing right-of-way or if you expect to purchase new right-of-way. The map labels the red dashed line “Hubbard Hwy ROW Relocated.” It appears to be a significant realignment, and the drawing does not show how/where it tapers back into the original alignment as it moves northward. It is difficult to make out the specific recommended changes to the cross section of the road, and the plan does not appear to include the full scope of the improvements that will be needed to Hubbard Road as it travels north through Clackamas County.
- Arndt Road (west of Airport Road) and the portion of Hubbard Road to the north through Clackamas County is considered a “Local Access Road” and is maintained by Marion County through an intergovernmental agreement. Therefore, future improvements to that road should also be coordinated with Marion County.
- The area in Clackamas County is zoned Exclusive Farm Use, and there are state land use rules that apply to road improvements. Depending upon the specific improvements that are someday proposed, approval of a land use application may be required. The outcome of such an application cannot be predetermined.

Jennifer Hughes, Planning Director

Planning and Zoning

Clackamas County Department of Transportation and Development

150 Beavercreek Road, Oregon City, OR 97045

503-742-4518

Work Hours: Mon-Fri, 8 a.m. – 5 p.m.

www.clackamas.us

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where new or contrary information becomes available, or in response to changes to state law or administrative rule, future legislative amendments of the Zoning and Development Ordinance, decisions of courts or administrative tribunals, or quasi-judicial land use decisions.

This is not a land use decision as defined by Oregon Revised Statutes 197.015(10).

From: PIKE Brandon <Brandon.PIKE@odav.oregon.gov>

Sent: Friday, August 29, 2025 3:59 PM

To: ZoningInfo <ZoningInfo@clackamas.us>

Cc: BEACH Anthony <Anthony.BEACH@odav.oregon.gov>; THOMAS Alex R <Alex.R.THOMAS@odav.oregon.gov>

Subject: Request to Review Aurora State Airport Draft Final AMP

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Good afternoon,

As you may know, ODAV is working its way through the master planning process for the Aurora State Airport and has developed a draft master plan for submission to the Oregon Aviation Board. As part of ODAV's planning process, we request that you review the following information from the draft plan to determine whether this portion of the plan is compatible with your acknowledged comprehensive plan and whether your plan contains any specific or general requirements that may apply, which we ask that you identify.

Please review the following from the draft plan:

- The proposed plan includes extending the public airspace to the north as a result of the proposed runway extension—and, as a result, shifting the runway protection zone (RPZ) to the north (see *Chapter 6 – Airport Layout Plan*). Pursuant to OAR 660-013-0040, a local government shall adopt comprehensive plan and land use regulation requirements for each state or local aviation facility subject to the requirements of ORS 836.610(1). Because the proposed master plan would require you to update your airport overlay zone in the future to match the proposed boundary of the airspace and relocated RPZ, ODAV wants to ensure your organization is aware of the applicable state statutes and the impact of the proposed plan.
- The proposal includes potential future property acquisition for road realignment and other improvements (see *Chapter 5 – Alternatives Analysis*). ODAV wants to ensure your organization is aware of the potential implications from the planned property acquisition.

A copy of the final draft of the plan and appendices can be found here:

- Draft Final AMP: https://centurywest.com/wp-content/uploads/2025/08/UAO_Draft-Final-AMP_8.27.25.pdf
- Appendix 1-10: publicproject.net/files/UAOAMP/250703-uao-appendix1-10.pdf
- Appendix 11: https://centurywest.com/wp-content/uploads/2025/08/UAO-Appendix-11-Public-Record_a_r1.pdf

Please provide us with a reply within 45 days from the date of this correspondence. Thank you in advance, and please let us know if you have any questions or concerns.

Regards,

BRANDON PIKE

OREGON DEPARTMENT OF AVIATION (ODAV)
AVIATION PLANNER



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