OREGON
Department of Aviation

AURORA STATE AIRPORT

AIRPORT MASTER PLAN

APPENDIX 12



CENTURY WEST ENGINEERING

Appendix 12

Land Use Coordination

Draft Appendix 12
Land Use Coordination

This appendix addresses land use requirements for the new elements proposed in the AMP and is intended to complement Chapter 2, Existing Conditions. The new elements are described in Chapter 5, figure 5-1: Preferred Alternative and generally summarized as follows:

- Improvements to the Runway Safety Area (RSA) to mitigate the drainage ditch along Taxiway A, and the septic drainfield located near the south end of the runway
- Extend Runway 17-35, RSA, ROFA, and Taxiway A 497 feet to the north
- Relocate the ASOS, segmented circle, and the wind cone outside of the ROFA and RSA
- New and improved facilities in the ODAV-owned landside areas to include the main apron area, existing and future hangar areas, apron tiedowns and future helicopter parking positions, vehicle parking and access roads, airport fencing and gates.
- Realign Highway 551 (Hubbard Highway) approximately 80 feet west to clear the existing Runway Object Free Area (ROFA)
- Realign Keil Road east, outside of the ROFA
- Potential property acquisition within the ROFA and Taxiway Object Free Areas (TOFA) (25 acres) if the property becomes available for sale

The existing Airport and the proposed elements are located entirely within Marion County. Except for the realignment of Highway 551 and Keil Road, all of the planned elements are within the P (Public) zone. The realignment of the roads and any development that may occur as the result of a voluntary sale at a later time will affect area zoned for Exclusive Farm Use, industrial and acreage residential, as shown on Chapter 6, sheets 11 and 12.

The Marion County Comprehensive Plan policies and goals, zoning and implementing ordinances that may be impacted by the ALP are as follows:

- Airport Overlay Zones: MCC Chapters 16.21 (Urban Zoning – Airport Overlay Zone) and 17.177 (Rural Zoning – Airport Overlay Zone)
- Base Zoning (as discussed above): MCC 17.171.030 establishes airport and airport-related commercial and industrial uses are allowed as conditional uses in the P (Public) zone
- Noise Impact Areas:
  - » MCC 17.110.392 establishes noise impact areas within Ldn 65 contour lines based on the projected use at the end of the airport master planning period around public airports.
  - » MCC 17.110.834 provides that a proposed residence or place of public assembly in a noise impact area shall be referred to DEQ to comment on the impact and how the proposal may be modified to maintain acceptable noise levels, and that adequate mitigation of noise impacts will be required in those cases.
  - » MCC II. Goals and Policies, pg. 58: The County will discourage noise-sensitive uses from locating in close proximity to public airports.
  - » MCC II. Goals and Policies, pg. 103: “The Airport Overlay zone further limits development in the airport area and provides a good base from which to implement setbacks and buffering. The Aurora Airport Master Plan, previously reviewed by DEQ, defines a 1995 NEF 20 contour line that will be used by the County to define the noise impact area around the airport” (pg. 103).

- Chapter 10 of the 2005 Rural Transportation System Plan (RTSP) identifies policies to continue and/or implement in the future. Policies related to airport master planning include:
  - » Policy 1: Airports and airstrips shall be located in areas that are safe for air operations and should be compatible with surrounding uses.
  - » Policy 2: The County should review and take appropriate actions to adopt State master plans for public airports in Marion County.
  - » Policy 3: The County will adopt appropriate provisions (including plans, ordinances, and inter-governmental agreements) to protect the public airports from incompatible structures and uses. These provisions will be consistent with Federal Aviation Administration guidelines.
  - » Policy 4: The County will discourage noise sensitive uses from locating in close proximity to public airports.
- The 1976 Aurora State Airport Master Plan is an adopted component of the county's comprehensive plan and established the initial Aurora Airport Boundary ("Boundary") and long-range development framework for the Aurora Airport for the period of 1976 to 1995. The Boundary was recently amended by Marion County to include additional private property adjacent to the Airport under Marion County Ordinance No. 1487.

All proposed uses of the AMP that fall within the Boundary are uses and activities that are authorized under the relevant portions of the Marion County Comprehensive Plan. Pursuant to MCC 17.171.030, airport and airport-related commercial and industrial uses are allowed as conditional uses in the P (Public) zone. ODAV will pursue the appropriate land use approvals necessary when implementing the plan on a project-by-project basis.

For the surrounding lands, MCC Chapter 17.177 establishes standards and regulations of Marion County's Airport Overlay Zone, which exists "to minimize potential dangers from, and conflicts with, the use of aircraft at public airports based on the adopted master plans for each airport. It is to be used in conjunction with the underlying zone", which, in this case, is EFU for most of the land adjacent to the airport boundary and in the surrounding area. EFU-zoned lands are subject to the restrictions set forth in ORS 215, OAR Chapter 660 Division 033, and MCC Chapter 17.136 which already prohibit the types of uses that conflict with the use of aircraft at airports. MCC 17.177.010 continues: "If any conflict in regulation or procedure occurs with the underlying zoning districts, the more restrictive provisions shall govern. This section is intended to comply with FAA Regulation FAR-77 and all other applicable federal and state laws regulating hazards to air navigation." *Id.*

The realignment of Hubbard Highway and Keil Road as currently proposed is outside of the P zone, extending into property zoned EFU and AR. The single purpose for the proposed realignment is to meet FAA safety standards which necessitate the realignment of these roadways to an area outside the runway object free area (ROFA) to protect the safety of the airport and other users. Accordingly, the realignment furthers the stated goals in MCC Chapter 17.177. In addition, this is a use is allowable under Marion County's codes as MCC 17.136.050(J) specifically permits the proposed realignment with approval of a conditional use permit. And, MCC 17.126.010 permits outright the proposed realignment within the AR zone.

The RTSP 2005 Rural Transportation System Plan (RTSP) is Marion County's long-range plan for its transportation system, as required under the Transportation Planning Rule.[1] Table 5-18 identifies public and private airports and heliports in the county, including the Airport. The RTSP commits to promoting air travel within the county (chapter 2, pg. 3), and states an intention to adopt the AMP upon being reviewed by County staff for compatibility with land use and zoning requirements (chapter 2, pg. 7).

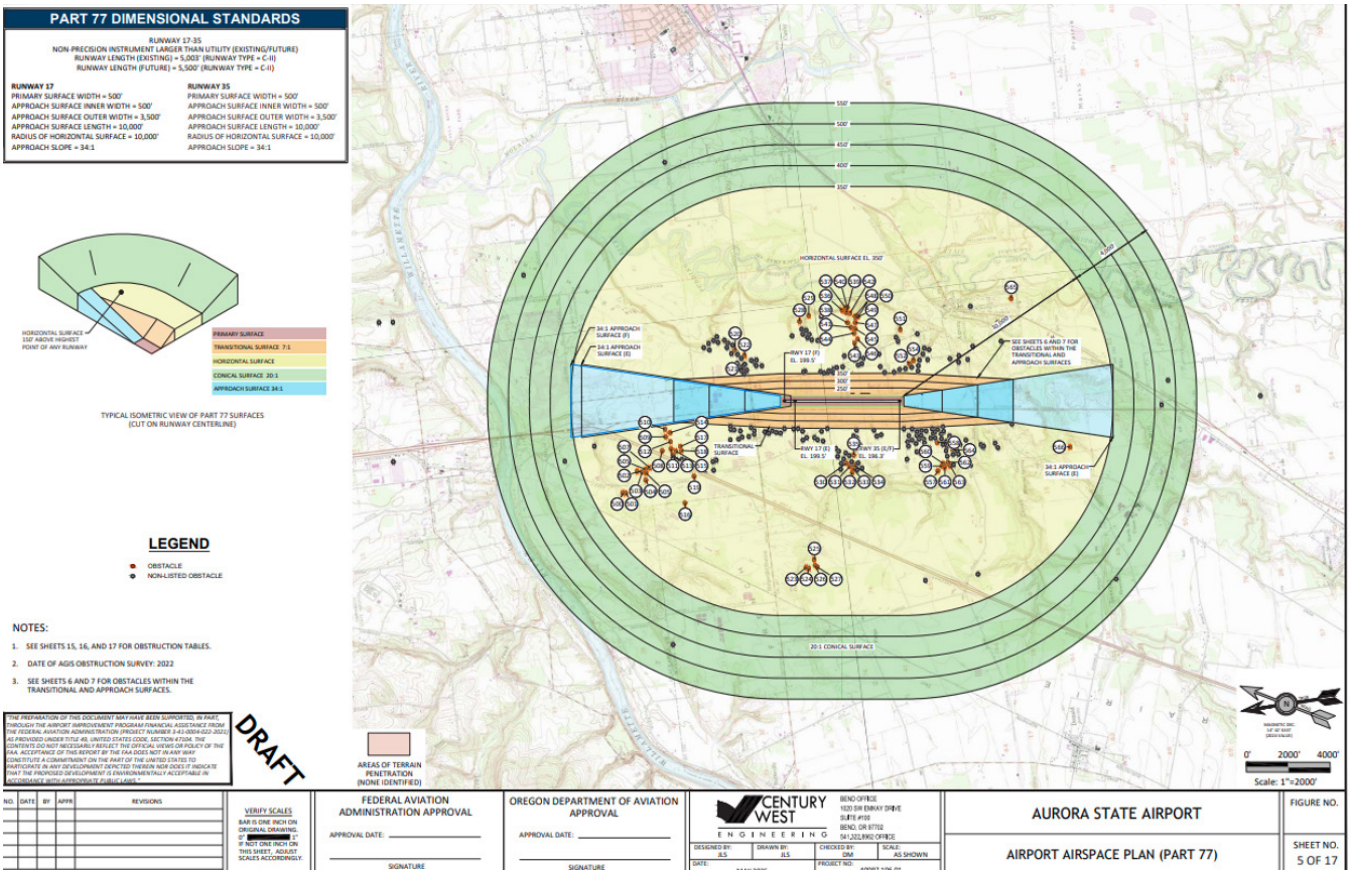
For a discussion regarding noise and MCC requirements, see Appendix 10.

Per Marion County processes, once a new master plan is adopted by the Board, ODAV will apply to Marion County for a post acknowledgment plan amendment to adopt the Master Plan, replacing the 1976 Aurora State Airport Master Plan.

1 Marion County Comprehensive Plan, Goals and Policies, Transportation Element, provides as follows: "For rural areas outside urban growth boundaries, the Marion County Rural Transportation System Plan (RTSP) serves as the framework for transportation planning. The RTSP is the County's 20-year plan to provide mobility, address safety needs, accommodate planned growth, facilitate economic development, and maintain a high standard of livability for County residents. The findings, recommendations and policies contained in this Transportation Element come directly from the RTSP. While every effort has been made to ensure this element matches the RTSP, in the event of any differences, the RTSP would govern."

All of the proposed future physical improvements in the AMP will occur within the Marion County planning jurisdiction. However, as a result of a proposed project to modify the runway, there will also be a change to the current airport imaginary surfaces as shown in the image below. As established in 14 CFR 77.19, the civil airport imaginary surfaces ("Part 77 surfaces" or "imaginary surfaces") are a Federal Aviation Administration ("FAA") safety requirement to ensure that the airspace is free of obstructions so that aircraft may take off and land safely.

As seen in the figure below, the Part 77 surfaces extend in a conical shape from the runway into the airspace over the cities of Aurora, Barlow and Wilsonville, and Clackamas County and Marion County. The surfaces include: primary surface, transitional surface, horizontal surface, conical surface, and approach surface, established in accordance with 14 CFR 77.19 and OAR 738-070-0120.



There are a total of six jurisdictions or MPOs, including Marion County, with comprehensive planning authority over areas underneath the airspace that may be impacted under the draft UAO Master Plan: Aurora, Barlow, Clackamas County, Wilsonville, and Metro. Marion County is discussed above, the remaining jurisdictions are addressed as follows:

a. Clackamas County

As a result of the proposed runway extension, the relocated RPZ will extend partially into Clackamas County. This area contains portions of two tax lots (31W35 01890 and 31W35 02102), along with public rights-of-way. Both tax lots are zoned EFU (Exclusive Farm Use) and are not inside any city's urban growth boundary. ZDO Section 401 identifies the zoning standards of the EFU zone. The current use of both tax lots is farm use. As shown in Table 3-4 of the *Airport Land Use Compatibility Guidebook*, farm or agricultural uses (except livestock) are classified as compatible uses inside the RPZ.

Under the *Airport Policies (5.X)* of the Clackamas County TSP, the County commits to coordinating with Marion County, the City of Wilsonville, ODAV, and other affected agencies to develop and implement the AMP. Policy 5.X.4 commits to cooperation with the Oregon Department of Environmental Quality, ODAV and FAA to minimize

conflicts between airports and uses of surrounding lands. Finally, the TSP commits to applying a Public-Use Airport and Safety overlay zoning district to public-use airports within the County, consistent with ORS 836.600 through 836.630.

Clackamas County ZDO Section 713 establishes the public use airport and safety overlay zone. Section 713.02 states,

> "The boundaries of this special use district are coterminous with airport boundaries as described in Oregon Administrative Rules (OAR) 660-013-0040. The boundaries of safety overlay zones radiate from points at the ends of the airport's primary surface as described in OAR 660-013-0070(1)(a) and Exhibits 1 and 4 that accompany that rule."[2]

As part of the coordination efforts by ODAV with the County, they affirmed that its zoning maps will need to be updated to reflect the adjusted RPZ at such time that the runway is extended.[3] ODAV and the County may also amend the ZDO to add specific restrictions on livestock in ZDO Section 713 as applied to the RPZ, to adhere to the guidelines of Table 3-4 of the *Airport Land Use Compatibility Guidebook*.

Clackamas County staff also noted that, per Policy 5.X.5, new airports, airport expansions, or expansions of airport boundaries, except those limited to use by ultra-lights and helicopters, are required to 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. The policy also requires 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. The proposed runway configuration calls for a length of 5,500 feet, with Department-owned land approximately 1,480 feet beyond the north end of the runway, and 1,000 feet beyond the south end of the runway, with public roads located beyond both ends. The On Airport Land Use Plan (Chapter 6, sheet 11) identifies existing and future avigation easements which extend over lands within the runway protection zones. Coupled with the existing airport land under the Department's ownership, the AMP meets or exceeds the clearance minimums of Policy 5.X.5.

Clackamas County ZDO 713.03(E) establishes airport noise impact boundaries for areas located within 1,500 feet of an airport runway or within established noise contour boundaries exceeding 55 Ldn. As noted above, Clackamas County recognizes the need to update their noise impact boundaries as a result of the runway extension proposed in the UAO Master Plan. Once that is complete, any project completed pursuant to the UAO Master Plan will be compatible with the Clackamas County Comprehensive plan. ODAV will coordinate with Clackamas County to update their plan prior to the construction of a project pursuant to the Master Plan.

b. City of Aurora

As identified within the City's Zoning Designations map, Chapter 6, sheet 5 and 12 of 17) and Figure 2-9 of the proposed master plan, and Aurora Municipal Code section 16.24.010, the entirety of the city falls underneath the horizontal surface of the Airport.

The City of Aurora has adopted in its plan and land use regulations an airport overlay zone prohibiting the construction or growth of obstacles within the horizontal surface (150 feet above the established airport elevation) in its Zoning Ordinances (Aurora Municipal Code 16.24.010), consistent with its aviation planning requirements in OAR 660-013-0070. The overlay zone identifies uses which are deemed incompatible with the requirements of 14 CFR Part 77 (Aurora Municipal Code 16.24.070). The code is proactive, in that it contains language related to the approach surface, in the event that future annexation brings city limits underneath the approach surface.

2 A copy of the exhibits referenced in Clackamas County's airport overlay zone and within the Airport Planning Rule is available here: https://www.oregon.gov/aviation/Aurora-Master-Plan/Documents/Aurora%20Master%20Plan%20JLA%20Documents/Draft%20Findings%20Sources/OAR%20660%20Division%2013%20Exhibits.pdf

3 See Oct. 19, 2025, email from Jennifer Hughes, Clackamas County Planning Director Re: Request to Review Aurora State Airport Draft Final AMP, available at the Department's Website at https://www.oregon.gov/aviation/Aurora-Master-Plan/Documents/Aurora%20Master%20Plan%20JLA%20Documents/Draft%20Findings%20Sources/Jurisdictions_responses/Clackamas%20County%20Response.pdf. This email is incorporated into these findings by reference.

While noting that no airports exist within the study area, the City of Aurora's 2009 TSP contains airport-related considerations. Goal 7 of the TSP states: *Improve coordination among the City of Aurora, Marion County, the Aurora State Airport, and ODOT*. Under the Air, Rail, Water, and Pipeline Element, section, the City commits to continue working with the Aurora State Airport and ODAV "to help maintain and improve roadway access to and from the airport" (chapter 3, pg. 20).

The proposed airport imaginary surfaces in the AMP are entirely within the existing Aurora airport overlay zone, therefore, this component is compatible with Aurora's acknowledged comprehensive plan and land use regulations.

With respect to noise impacts, the City of Aurora Comprehensive Plan is not at issue as the city falls outside the noise contours established with the proposed airport master plan (see AMP chapter 6, sheet 12 of 17: Off Airport Land Use Plan with 2041 Noise Contours).

c. City of Wilsonville

As depicted in Chapter 6, sheet 12, the City of Wilsonville is also impacted to the extent the invisible airspace extends over a portion of the City zoned PDC (Planned Development Commercial) and PF (Public Facility). The City of Wilsonville's code of ordinances does not contain an airport overlay zone, though the TSP contains a brief section on airport-related considerations. Specifically, it states that the City does not have jurisdictional control nor responsibility for managing the Aurora State Airport, and notes the potentially conflicting interests of impacts from the airport (including noise) and reliance of local economic interests on the airport (Wilsonville Transportation System Plan 2013, chapter 4, pg. 16). Policy 21 of the plan (chapter 2, pg. 7) is to: "Recognize the Aurora State Airport as a component of the state's transportation system and an economic asset to Wilsonville, while advocating that any expansion of the airport consider potential impacts (e.g., noise, pollution, and safety) to Wilsonville neighborhoods, area roadways, I-5 interchanges, agricultural operations, and the environment."

To help facilitate compatibility between the airport and the City of Wilsonville, and as addressed within the airspace protection findings herein, ODAV staff notes that an airport overlay zone (or equivalent) should be incorporated into the City's zoning code, per the requirements of OAR 660-013-0070 (Local Government Safety Zones for Imaginary Surfaces).

As part of the implementation of this master plan, ODAV will assist local jurisdictions, including Wilsonville, to update their zoning ordinances in accordance with the requirements of OAR 660-013-0070 (Local Government Safety Zones for Imaginary Surfaces). This would entail adopting ordinances to ensure new or altered tall structures, such as communication towers or trees, do not penetrate airport imaginary surfaces. ODAV's Model Public Use Airport Safety and Compatibility Overlay Zone for Public Use Airports with Instrument Approaches[4] provides a framework for jurisdictions to enshrine airspace protections in their code which meets the requirements of the Airport Planning Rule. This coordination will promote enhanced compatibility between UAO and the City of Wilsonville.

d. City of Barlow and Metro

As depicted in Chapter 6, sheet 12, the City of Barlow and Metro are within the invisible airspace. Metro does not have a comprehensive plan and neither Metro nor Barlow have adopted airport overlay zones. The Barlow Comprehensive Plan calls for assistance and encouragement on a case-by-case basis of aviation services in areas suitable for airport development, including efforts by the Department.[5] No other airport-related provisions are included in Barlow's Comprehensive plan. Similarly, Metro's 2023 Regional Transportation Plan (RTP) contains no considerations or standards which would apply to the Airport. ODAV endeavors to work alongside our partners at these organizations to bring their code into compliance with state rules requiring airport safety zones within a local government's zoning code (per OAR 660-013-0070).

4 ODAV's Model Public Use Airport Safety and Compatibility Overlay Zone for Public Use Airports with Instrument Approaches is available in Appendix D of the Airport Land Use Compatibility Guidebook, available here: https://www.oregon.gov/aviation/airports/planning-and-programs/Documents/Land%20Use%20Compatibility%20Guidebook/Full_Version_ODA_Airport_Land_Use_Compatibility_Guidebook.pdf

5 See, Barlow Comprehensive Plan, p. 38.