Outlook

RE: Comments on Findings of Compatibility and Aurora Airport Master Plan

From MORRIS Alexis <Alexis.MORRIS@odav.oregon.gov>
Date Mon 10/26/2026 4:49 PM
To Ben Williams <fofp99@gmail.com>

Hello Ben,

Thank you for submitting public comment to the State Aviation Board. I am confirming that we have received your email with 3 documents.

Your comments will be forwarded to the board for their review, and I will add them to our website under the December 3rd board meeting after the public comment period deadline.

Thank you,
Alexis Morris
Communications & Administrative Specialist
State Aviation Board Administrator
Alexis.morris@odav.oregon.gov

From: Ben Williams <fofp99@gmail.com>
Sent: Monday, October 26, 2026 2:06 PM
To: Oregon Department of Aviation <mail.aviation@ODAV.oregon.gov>
Subject: Comments on Findings of Compatibility and Aurora Airport Master Plan

You don't often get email from fofp99@gmail.com. Learn why this is important

This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Greetings;

Friends of French Prairie submits the attached comments:

Friends of French Prairie had a representative on the Planning Advisory Committee (PAC) and attended every PAC meeting.

Our comments are supported by two attachments. The first is the Joint Mayor's Letter of December 31, 2021 submitted by the Mayors of Aurora and Wilsonville.

Additionally, Friends of French Prairie engaged a civil engineering firm (Windsor Engineers) and commissioned them to conduct an assessment of the Draft Aurora State Airport Master Plan and write an Engineering Review.

The Windsor Engineers Engineering Review (dated May 4, 2026) is the basis for many of the written comments made in the following Findings document in red font.

The Engineering Review (hereinafter WEER) is submitted as the second attachment to these comments.

OF NOTE: WE ARE SUBMITTING COMMENTS VIA EMAIL BECAUSE THE WEB LINK FOR SUBMITTING COMMENTS IN THE AGENCY PRESS RELEASE WILL ONLY ACCEPT ONE UPLOADED DOCUMENT!

PLEASE CONFIRM RECEIPT OF THIS EMAIL WITH BOTH ATTACHMENTS (TOTAL THREE DOCUMENTS) AND THAT THEY HAVE BEEN PLACED IN THE RECORD.

Sincerely

--
Ben Williams
Friends of French Prairie
fofp99@gmail.com

Friends of
French Prairie

Friends of French Prairie
is an Oregon non-profit corporation

PO Box 403 | Donald, Oregon 97020 | www.friendsoffrenchprairie.org

October 25, 2026

To: Oregon Aviation Board

Re: Comments on State Agency Coordination Findings for the Adoption of the Aurora State Airport Master Plan

Friends of French Prairie had a representative on the Planning Advisory Committee (PAC) and attended every PAC meeting.

Our comments are supported by two attachments. The first is the Joint Mayor's Letter of December 31, 2021 submitted by the Mayors of Aurora and Wilsonville.

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Sincerely

Benjamin D Williams

Ben Williams, President

Attachments: First Joint Mayors Letter_12-13-21

2026-05-04_Windsor Engineers_Aurora Airport Master Plan Eng. Review_FINAL

State Agency Coordination
Findings for the Adoption of the
Aurora State Airport Master Plan
(ORS 197.180 and OAR 738-130-0055)

Pursuant to Oregon Revised Statute ("ORS") 197.180 and Oregon Administrative Rules "OAR"), chapter 738, division 130, the Oregon Aviation Board ("Board") and the Department of Aviation ("Department) are required to carry out their respective planning duties, powers and responsibilities with respect to a program affecting land use in a manner that complies with the statewide land use planning goals and that is compatible with the acknowledged comprehensive plans and land use regulations of local agencies affected by the land use program. These findings are intended to demonstrate that the Department and the Board have satisfied these requirements as part of the Board's adoption of the Aurora State Airport Master Plan ("UAO Master Plan").

BACKGROUND

A. Description of the UAO Master Plan

The UAO Master Plan was the result of a four-year-long master planning process to address the Aurora State Airport's ("UAO") safety and operational needs for the next 20 years. The UAO Master Plan provides specific guidance to maintain a safe and efficient airport that is economically, environmentally, and socially sustainable.[1] Chapter 1 of the UAO Master Plan sets out a summary of the extensive public process that was followed for the development of the plan. This included a Planning Advisory Committee (PAC), surveys and public comments, and 14 public meetings.

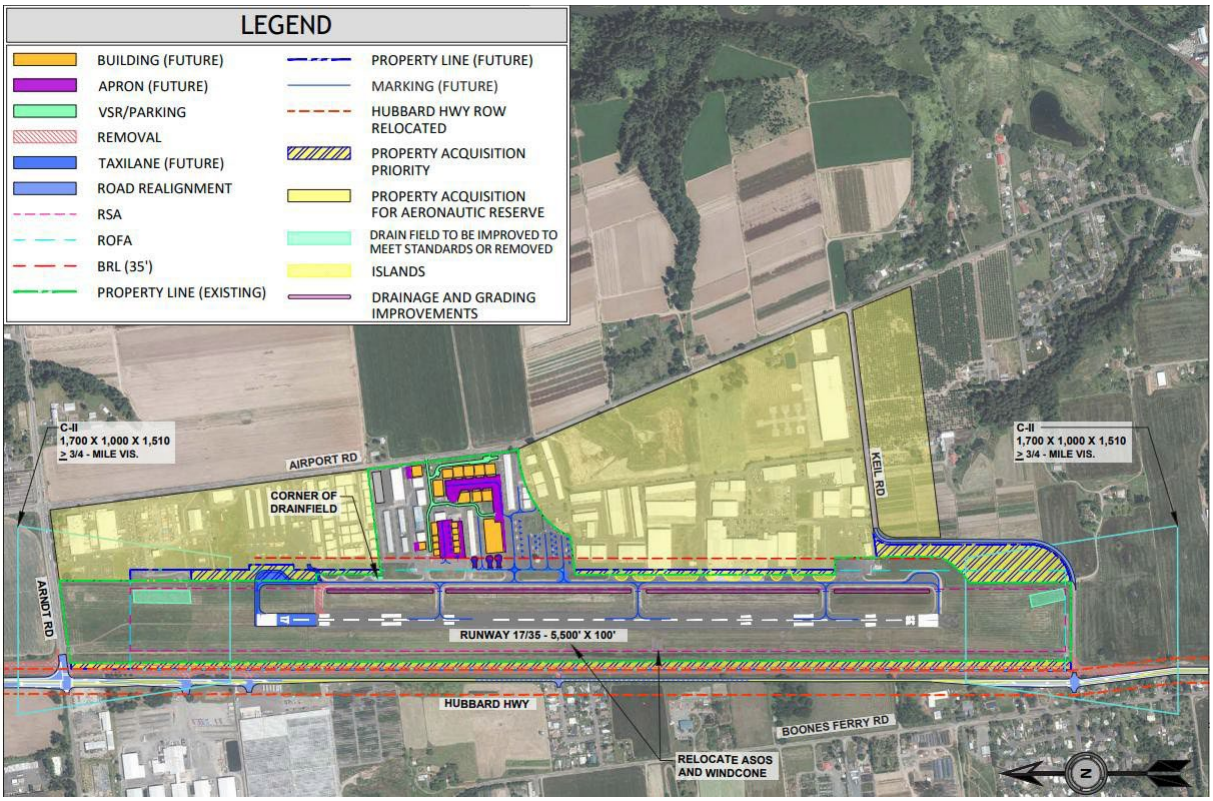
Following this process, the Department selected a preferred alternative, which is described in detail in Chapter 5 of the UAO Master Plan. The Airport Layout Plan that forms the basis of the preferred alternative is illustrated in Chapter 6. Chapters 5 and 6 together set out the Department's preferred plan for future public improvement projects for the UAO property and adjacent areas.

As shown in Chapter 5, figure 5-1: Preferred Alternative, the UAO Master Plan proposes a variety of on-the-ground improvements, generally summarized as follows:

- Realign Highway 551 (Hubbard Highway) approximately 80 feet west to clear the existing Runway Object Free Area (ROFA)
- 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
-

[1] The UAO Master Plan is incorporated into these findings by reference and available at the Department's website at: https://www.oregon.gov/aviation/Aurora-Master-Plan/Pages/default.aspx

- Realign Keil Road east, outside of the ROFA



- 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
- Potential property acquisition within the ROFA and Taxiway Object Free Areas (TOFA) (25 acres) if the property becomes available for sale
- 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.

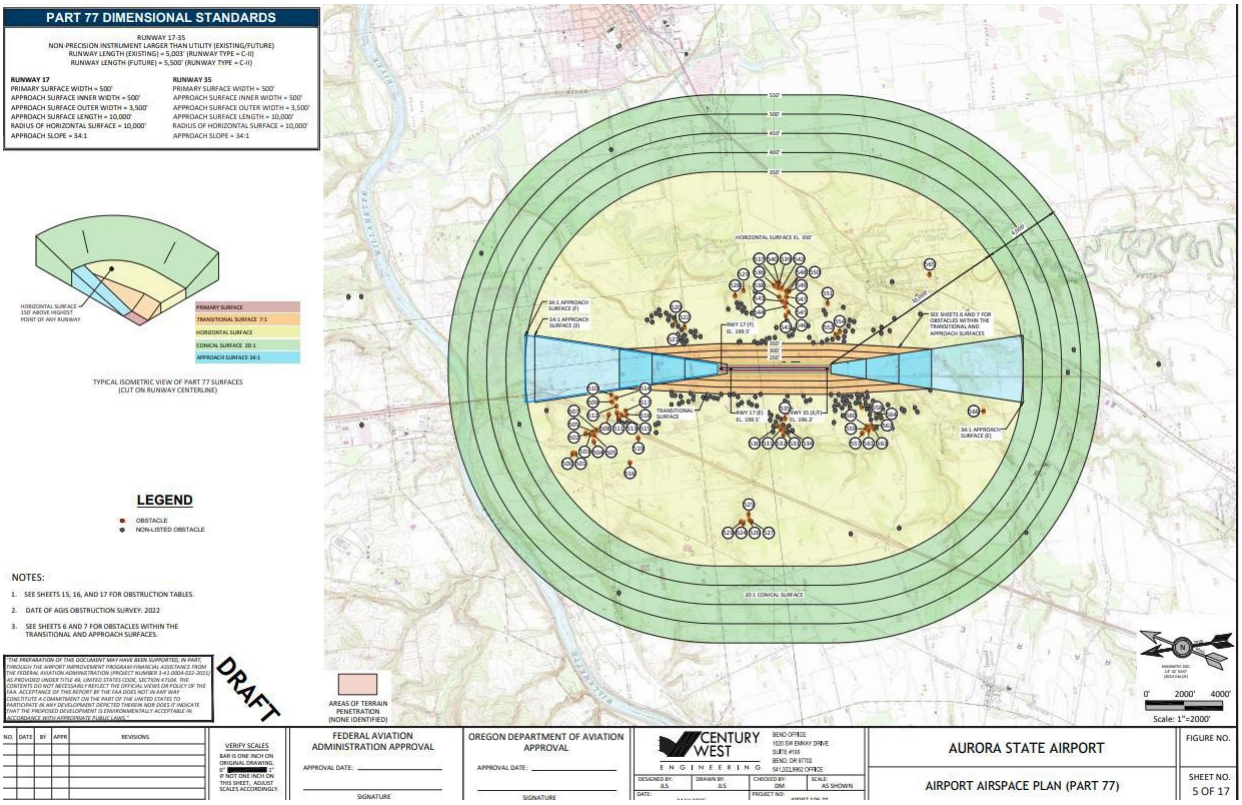
All of the future physical improvements will occur within the Marion County planning jurisdiction. However, as a result of a proposed project to modify the runway, there will also be a change to the current airport imaginary surfaces as shown in the image below. As established in 14 CFR 77.19, the civil 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.[2] The surfaces include: primary surface,

[2] A map of Part 77 surfaces set forth in the UAO Master Plan, Chapter 6, sheet 5.

transitional surface, horizontal surface, conical surface, and approach surface, established in accordance with 14 CFR 77.19 and OAR 738-070-0120.

COMMENT: The defined Part 77 surfaces extending over the cities of Aurora, Barlow and Wilsonville, and Clackamas and Marion Counties confirm that these jurisdiction are affected local jurisdictions per Goal 2



B. Laws and Rules Relevant to These Findings

Pursuant to ORS 197.180, the Board adopted a state agency coordination ("SAC") program, OAR, chapter 738, division 130, setting out the process for complying with state law and ensuring that the Department in its land use planning activities coordinates with an affected local jurisdiction. OAR 738-130-0055 specifically addresses the coordination requirements that apply to the Board's adoption of a master plan. As these rules have not been certified by the Land Conservation and Development Commission ("LCDC"), ORS 197.180(10) requires the Board make findings when adopting a new plan as to compliance with the statewide land use goals and compatibility with the acknowledged comprehensive plans of the local governments. These findings are intended to address the Board's planning duties under ORS

197.180(10) and OAR 738-130-0055.

Whether or not an aviation facility master plan is compatible with a local jurisdiction's acknowledged comprehensive plan and land use regulations, includes a consideration of whether the local government has satisfied its aviation planning requirements under ORS 836.610 and OAR chapter 660, division 013 ("Aviation Planning Rule"). Under these laws, a local government is required to adopt comprehensive plan and land use regulation requirements that promote "a convenient system of airports in the state for land use planning to reduce risks of aircraft operations and nearby land uses" (OAR 660-013-0010). The Aviation Planning Rule mandates a local jurisdiction to adopt plan language and land use regulations that establish an airport boundary and current and future aviation related uses within that boundary (OAR 660-013-0040, OAR 660-013-0100).

Local jurisdictions are further required to adopt an Airport Safety Overlay Zone prohibiting structures, trees and other vegetation from penetrating airport imaginary surfaces pursuant to OAR 660-013-0070. The local jurisdiction must also limit conflicting uses surrounding the airport, including residential development and other uses relating to noise, visibility, outdoor lighting, signal transmissions, water impoundment and landfill uses under OAR 660-013-0080. And, local governments are required to update their plans and rules at periodic review under OAR 660-013-0160. Significantly, if there are issues of compatibility, the "decision maker" is required to take reasonable steps to eliminate or minimize the compatibility through location, design or conditions under OAR 660-013-0040(6).

Pursuant to these rules, the Department has developed the Airport Land Use Compatibility Guidebook ("Guidebook").[3] The Guidebook provides a comprehensive guide for local jurisdictions in their adoption of comprehensive plans and land use regulations, including sample local codes, ordinances, and plan language. The Guidebook serves to assist in efforts to implement State land use laws relating to aviation and required federal laws regarding the safety and operation of aircraft in the airspace. A local jurisdiction which adopts the provided language is deemed by the Department to comply with its planning requirements for public airports under OAR chapter 660, division 013. Accordingly, whether or not a master plan, including the UAO Master Plan, is compatible with a local jurisdiction's comprehensive plan depends on whether the local jurisdiction has adopted a comprehensive plan and land use regulations that comply with OAR chapter 660, division 013.

FINDINGS

A. ORS 197.180

1. *ORS 197.180(1): Except as provided in ORS 197.277 or subsection (2) of this section or unless expressly exempted by another statute from any of the requirements*[3] The Airport Land Use Compatibility Guidebook is available at: https://www.oregon.gov/aviation/airports/planning-and-programs/Documents/Land%20Use%20Compatibility%20Guidebook/Full_Version_ODA_Airport_Land_Use_Compatibility_Guidebook.pdf

of this section, state agencies shall carry out their planning duties, powers and responsibilities and take actions that are authorized by law with respect to programs affecting land use: (a) In compliance with the goals, rules implementing the goals and rules implementing this section; and (b) In a manner compatible with acknowledged comprehensive plans and land use regulations.

Finding: The Board and the Department are required to exercise their planning duties, powers and responsibilities with respect to the adoption of the UAO Master Plan because the adoption and implementation of a master land use plan is a program affecting land use.

Comment: The overall finding [of the Windsor Engineers assessment] is that the Aurora Airport Draft Master Plan (2025) does not meet the criteria for Oregon's Land Use Planning documents. It neglects to adequately identify, evaluate or improve on:

- Overall planning requirements
- Water use and needs
- Wastewater (septic) use and needs
- Transportation – outside the fence – upgrades and impacts
- Stormwater and drainage impacts
- Community safety impacts

The Master Plan is required by ORS 197.180(1) to meet the same requirements as any developer or development would. (WEER, Page 4)

The Aurora AMP states (in the **Introduction**, Goals 4 and 5) that the Plan will evaluate facilities and conformance with applicable local, state, and FAA standards and identify *facility improvements*. This identification is minimal, and the evaluation is missing, and upgrades are not included within the document. (WEER, Page 5)

2. *ORS 197.180(1)(a) the UAO Master Plan shall be adopted in compliance with the statewide land use planning goals, rules implementing the goals and rules implementing ORS 197.180.*

Finding: The Board and the Department make the following findings regarding compliance with the goals:

Goal 1: Citizen Involvement – *To develop a citizen involvement program that ensures the opportunity for citizens to be involved in all phases of the planning process*.

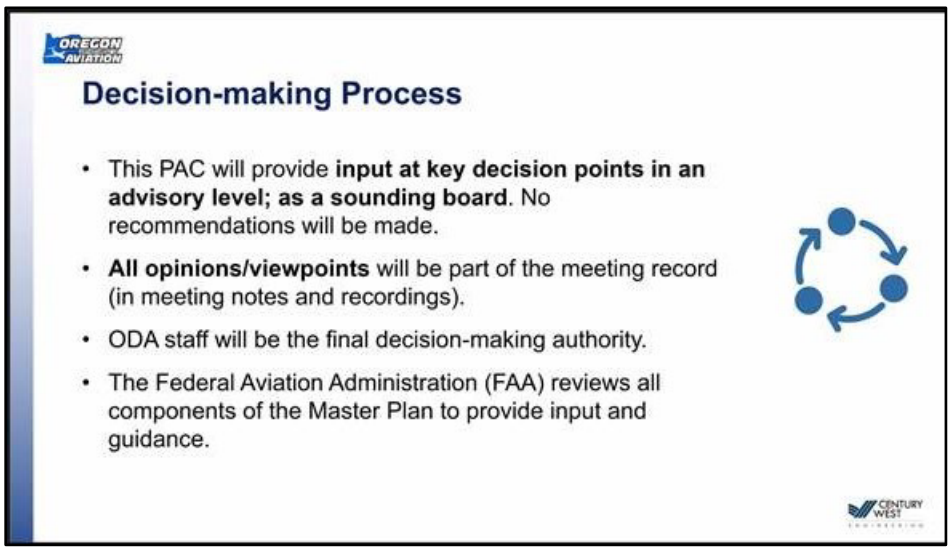
Finding: As discussed above, throughout the airport master planning process, the Department has made citizen involvement a major priority. Between November 2021 and February 2025, ODAV conducted 14 public meetings to address the components of the master plan and discuss concerns and solutions brought up by Planning Advisory Committee (PAC) members and members of the public. This included nine PAC meetings, three PAC work sessions, and two open houses, where ODAV staff and consultants discussed the plan in greater detail with members of the public and PAC members. Most of these meetings were held virtually, beginning during the COVID-19 pandemic when virtual meetings were the only viable option for public meetings. To guide the master planning process, ODAV also conducted a survey with airport users

and stakeholders.

PAC members, government partners, and other interested parties were encouraged to provide testimony both during public meetings and at various points throughout the planning efforts by providing written comments. Appendix 11 of the UAO Master Plan includes a record of the public involvement summary, PAC meeting materials, and public comments.

The Board finds the UAO Master Plan satisfies the requirements of Goal 1.

Comment: The Planning Advisory Committee role was presented at its first meeting on November 16, 2021 as:



Creating an "advisory committee" that is told they will not be providing recommendations (i.e. not giving advice), but only be a "sounding board," is contrary to the Goal 1 intent of citizen involvement to "be involved in the planning process" and relegated non-aviation members of the PAC to observers with no input.

PAC membership was lop-sided toward Aurora Airport and aviation interests, PAC meetings were held via Zoom and initially access was so restrictive that non-PAC members could not join the calls to listen or comment. Oral and written comments were documented but not public or opposition comments were given meaningful consideration by ODAV or its consultant, Century West. No public meetings were held locally, or in Salem. The situation was so bad that it prompted the first of three Joint Mayor's Letters from the respective mayors of Wilsonville and Aurora to the Governor's office protesting methodology and requesting intervention and corrective action. (Letter attached). The letter's central complaint was:

> *The Department of Aviation's tightly controlled master planning process fails to meet the test for meaningful public engagement. The Zoom meeting format used by the Department of Aviation does not list or show all participants in the meeting and provide clear labeling of names and*

affiliations. It is unclear to the public who is attending the meetings and who or what entity that participants represent. At the November 16, 2021, PAC meeting, it was difficult to ascertain from many of the name labels who was attending in what role. Names and affiliations of all PAC members and staff/consultants should be clearly evident.

Additionally, some PAC members were allowed to have two representatives participate in the meeting, while some PAC members were ignored and not allowed to participate in the meeting. These elements indicate a failure of meaningful public process.

Goal 2: Land Use Planning – *To establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions*.

Finding: Goal 2 requires coordination with affected governments and agencies, evaluation of alternatives, and an adequate factual base. In developing the plan and selecting the preferred alternative, the Department engaged in significant coordination efforts over multiple years with officials from nearby cities and counties, representatives from other State agencies—including the Department of Transportation (ODOT) and Department of Land Conservation and Development (DLCD)—and other local leaders and business owners. Chapter 5 of the master plan covers the alternatives which were considered. Using input from the FAA, the public, and local officials and stakeholders, the Department selected a preferred alternative which would best serve the airport, its users, and the surrounding community.

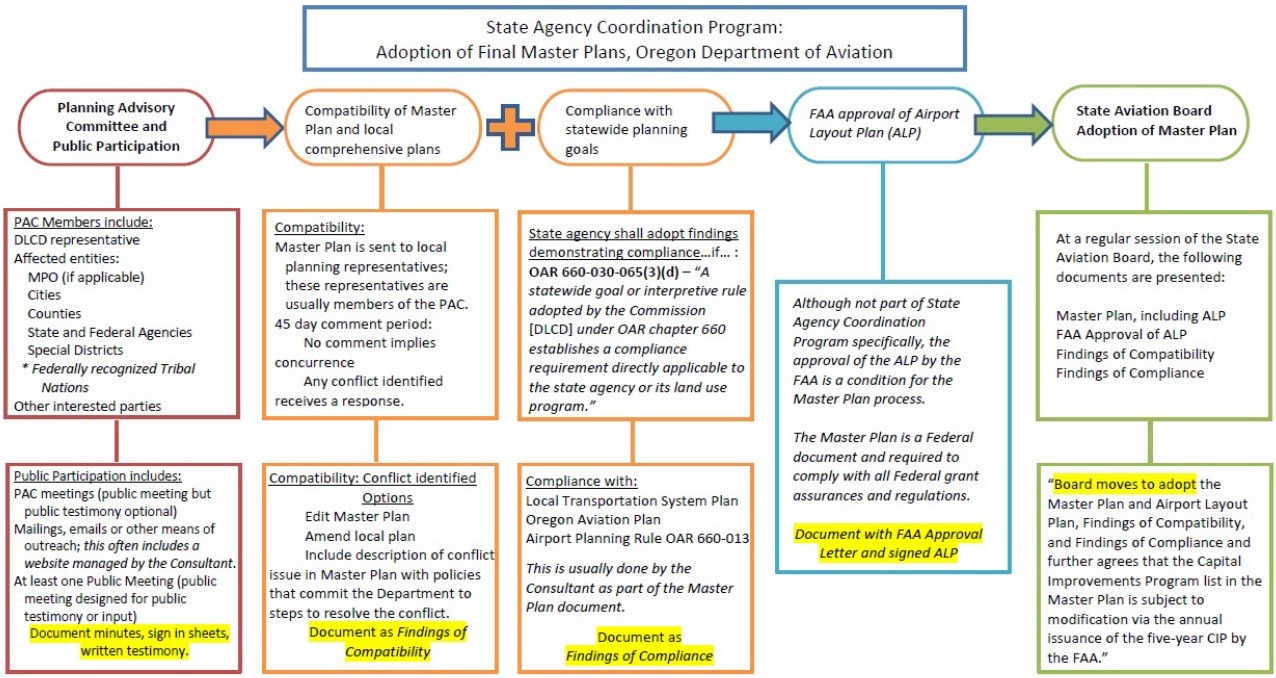
In addition, the Department has adopted its state agency coordination rules to ensure that the Department's planning actions comply with statewide planning goals and are compatible with acknowledged comprehensive plans. The Department has followed the coordination process established in these state agency coordination requirements, which requires the Department to coordinate with affected jurisdictions in its adoption of the master plan. The Department presented these findings to demonstrate that Goal 2 coordination obligations have been satisfied in the adoption of the UAO Master Plan. To ensure the continued opportunity for public participation, affected persons and interested parties, including affected jurisdictions, were given an opportunity to provide testimony and evidence when the UAO Master Plan was presented to the Board for adoption in an open public meeting. At such time, the Board further consider the testimony and evidence provided, along with the draft findings of compatibility and compliance, in accordance with OAR 738-130-0055(6).

The Board finds the UAO Master Plan satisfies the requirements of Goal 2.

Comment: Goal 2 - There is no discussion or evidence within the Aurora AMP that any review or compliance with local government plans has occurred. As part of the Class B

airport permit process (OAR 660-031-0010), assurances of compliance with Statewide Planning Goals and compatibility are required; again, there is no discussion of compliance.(Page 6)

Contrary to the Findings stated above, ODAV did not coordinate with affected jurisdictions (Marion and Clackamas counties, cities of Aurora and Wilsonville) during the master planning process, as required and illustrated in its own guidance document:



https://www.oregon.gov/aviation/AVB/Documents/2019/08_01/RA/1.%20Flowchart_Coordination%20Procedures%20for%20Adopting%20Final%20Master%20Plans.pdf

Of note: having PAC members from the affected cities and counties on the PAC is not the same as identifying and resolving land use compatibility conflicts as the master plan process proceeded.

Further compounding ODAV's methodology, following the formal delivery of the Draft Master Plan to the affected jurisdictions and requesting comments in September of 2025, all four jurisdictions responded in greater or lesser detail about land use compatibility conflicts. No formal correspondence or meetings to address and resolve those identified conflicts took place during the intervening year before ODAV announced its scheduled Findings of Compatibility Hearing for December 3, 2026. In other words, ODAV failed to complete coordination required by OAR 738-130-0055(3), because it did not respond to comments of incompatibility provided by Marion and Clackamas counties and the Cities of Aurora and Wilsonville.

Goal 3: Agricultural Lands – *To preserve and maintain agricultural lands.*

Finding: Goal 3 requires counties to preserve and maintain agricultural lands for farm uses. Counties must inventory agricultural lands and protect them by adopting exclusive farm use (EFU) zones consistent with ORS 215.203.

The UAO property is located within Marion County, on lands zoned P (Public). Most of the surrounding land are rural lands, zoned EFU except for small portions zoned Acreage Residential (AR). As shown on the preferred design for the ALP, the only on-the-ground improvements envisioned for Marion County EFU and AR land are a proposed realignment of Keil Road and Wilsonville-Hubbard Highway (Oregon Route 551). The realignment on EFU property is deemed consistent with Goal 3, 4, 11 and 14 pursuant to OAR 660-012-0065(3)(b) and (n). All other proposed capital projects in the UAO Master Plan, including the construction of the proposed runway extension, will be constructed within the existing airport boundary on land zoned public, where such uses are allowed.

COMMENT: Because, as the Court of Appeals ruled [*Schaefer v. Oregon Aviation Board, 312 Or App 316 (2021)]*, the 2012 Master Plan was never approved and adopted by the OAB, the Aurora State Airport (in terms of Oregon law) is still a B-II airport. Therefore OAR 660-012-0065(3)(n) does not apply because the Draft Master Plan permits service to a larger class of aircraft.

The ALP also includes "reserved lands" that may be suitable for future airport development on EFU lands east of the current airport boundary if and when they can be acquired.[4] The sole reason for identifying this property for future airport development is to allow ODAV to pursue FAA funding if and when these properties ever become available. There are no specific plans for any improvement, and any future improvement may be limited to uses permitted within the EFU zone. For any airport-related development that may be needed in the future and that is not permitted within the EFU zone, ODAV has the option to either initiate a process to expand the airport boundary pursuant to OAR chapter 660, division 013 and/or pursue any required land use approvals, including any exceptions, if necessary, if and when these properties become available.

The third element of the plan that will extend into lands zoned EFU is the runway protection zone (RPZ) for Runway 17, which is within the Part 77 surfaces and safety areas. The RPZ is not a land use zone, but, instead, an area identified by the FAA and the State of Oregon with the function of enhancing the protection of people and property on the ground. This may be achieved through airport sponsor control over RPZs, as well as coordination with land use authorities. Such control includes keeping the RPZ clear of incompatible objects and activities. The dimensions of the RPZ are determined by the runway category and approach type, and extend outward from the runway, regardless of ownership of the underlying land. The RPZ does not include proposed uses that conflict with EFU zoned property. The Board finds the proposed location of the RPZ to be compatible with the existing and allowed land uses.

The Board concludes the UAO Master Plan preserves and maintains agricultural land and complies with Goal 3.

COMMENT: Goal 3 of the Oregon Statewide Planning Goals requires the counties to 'preserve and maintain' farmlands; there is no discussion related to any effort to address this, except to have zoning changed.

According to Chapter 5 (of the AMP), the south Runway Extension Option has been eliminated; however, the Master Plan still shows expansion onto EFU land for expansion of the Runway Safety Area. The Master Plan also shows expansion onto EFU land east and south of the existing airport for landside activities, described as Aviation Reserve. Any area of the RPZ which is purchased by ODAV and/or developed with security fencing converts the land to the urban airport use. The EFU zone does not allow a public use airport as a permitted or conditional use,
The Master Plan also shows the Hwy 551 right-of-way moving west onto EFU land. All of these "improvements" result in "damages" to the local prime farmland. This impact should be coordinated with the appropriate public agencies for the change of use. (WEER, page 8)

AMP shows expansion onto approximately 62 acres of EFU land, not in conformance with Goal 3. The 2012 Master Plan stated that such expansion onto EFU land may not be feasible and would require a Goal 3 exception. This AMP should address that topic. (WEER, page 9)

Goal 4: Forest Lands – *To conserve forest lands by maintaining the forest land base and to protect the state's forest economy by making possible economically efficient forest practices that assure the continuous growing and harvesting of forest tree species as the leading use on forest land consistent with sound management of soil, air, water, and fish and wildlife resources and to provide for recreational opportunities and agriculture.*

Finding: Goal 4 protects working forest land around the state, preserving it for commercial forestry while recognizing its value for fish and wildlife habitat, recreation, and protection of air and water quality. The UAO is located in the northern portion of the Willamette Valley, south of the Portland Metro area. The airport and its immediate environs do not include forest lands, as defined by Goal 4.

The Board finds the UAO Master Plan does not impact state forest lands and therefore complies with Goal 4.

Goal 5: Natural Resources, Scenic and Historic Areas, and Open Spaces – *To protect natural resources and conserve scenic and historic areas and open spaces.*

[4] See UAO Master Plan, Chapter 6 (Airport Layout Plan), Sheet 3, Notes 2 and 5.

Finding: Goal 5 identifies 12 resources to be inventoried within a community: riparian corridors, wetlands, wildlife habitat, federal Wild and Scenic Rivers, Oregon Scenic Waterways, groundwater resources, approved Oregon recreation trails; natural areas, wilderness areas, mineral and aggregate resources, energy sources, and cultural areas. These include six resource categories which rely on state or federal inventories: wild and scenic rivers, state scenic waterways, groundwater resources, Oregon recreation trails, Sage Grouse habitat, and wilderness areas. Additionally, there are three relevant categories that require local inventories: historic resources, open space, and scenic views and sites.

The UAO does not include any known protected areas or resources identified in Goal 5. The UAO property contains several human-made drainage swales with non-hydric soil wetlands. According to Oregon Department of State Lands Rule 141-085-0515 (Removal-Fill Jurisdiction by Type of Water), these swales with wetland hydrology, vegetation, and soils are not considered waters of the state because they are artificially created for the purposes of stormwater detention and/or treatment.

As is appropriate within the context of developing an airport project pursuant to a master plan, the Department will complete the necessary environmental reviews, such as an Environmental Impact Statement (EIS), as part of the design and construction of the capital projects identified within the master plan. This will ensure any protected areas or resources within the boundaries of the master plan are adequately identified and taken into consideration before development, allowing for coordination with the appropriate federal, state, or local bodies, including the State Historic Preservation Office (SHPO).

The Board finds the UAO Master Plan complies with Goal 5.

COMMENT: The Aurora State Airport is defined as an urban airport and is clearly an urban-density land use, as evidenced by approximately 1 million square feet of hangar space and the nature of the aircraft that use it. Rather than being treated as a subject in the master plan, stormwater and surface water and accompanying water quality and wastewater needs are relegated to the appendices rather than included within the document. (WEER, page 10). The master plan does not clearly address potential onsite sources of hazardous or deleterious materials and the fact that there is no runoff detention system. The current site is largely flat. It is located adjacent to runoff tributary areas, primarily the Pudding River to the east. Current conditions are the use of “roadway” ditches to send runoff to area culverts. The overall area is bounded by the Pudding River (~0.85 miles east), the Molalla River (~3 miles northeast), and Mill Creek (~0.75 miles southeast). All of these watercourses are downstream of the airport's stormwater discharge and are classified as sensitive habitat for salmonids. (WEER, page 18)

FAA AC 150/5070-6B (Airport Master Plans) indicates the master plan should include utilities in the inventory and planning effort, including: A utilities inventory that includes the “major elements” serving airport demand for water (and sanitary sewer) and also includes stormwater drainage. (WEER, page 11)

The AMP describes the area waterways as contaminated (AMP Chapter 2) but provides no discussion for airport responsibility or efforts for onsite treatment or control. The airport is

immediately adjacent to the Pudding River tributary area – basin (AMP Figure 2-8) and a 303(d) listed sub-watershed. It would be negligent for development in this area not to address the downstream impacts. (WEER, page 21)

Goal 6: Air, Water and Land Resources Quality – *To maintain and improve the quality of the air, water and land resources of the state.*

Finding: Any improvements made under the proposed master plan will be expected to satisfy applicable state and federal environmental laws and standards. These include Oregon Department of Environmental Quality (DEQ) rules governing air, water, and noise quality (OAR 340), the Oregon Wetland Removal/Fill Act (ORS 196), along with federal standards, such as NEPA and the Clean Air and Clean Water acts.

Additional adherence with Goal 6 will be ensured at the stage of construction of capital facility projects. ODAV will continue to work closely with its agency partners, including DEQ and the U.S. Army Corps of Engineers, to identify any necessary permits or approvals prior to construction.

Additionally, adherence with this goal will be ensured during the normal course of airport operations. Aircraft operating within UAO airspace are subject to air quality standards such as 40 CFR Part 87 (Control of Air Pollution from Aircraft and Aircraft Engines), 40 CFR Part 1030 (Control of Greenhouse Gas Emissions from Engines Installed on Airplanes), and 40 CFR Part 1031 (Control of Air Pollution from Aircraft Engines). Solid waste and sewage generated by the facility will continue to be managed in accordance with the provisions of Marion County's health and safety ordinance (Marion County Code (MCC), Title 8).

The Board finds the UAO Master Plan complies with Goal 6.

COMMENT: Goal 6 - This goal requires local comprehensive plans and the implementation of measures to be consistent with state and federal regulations on matters such as groundwater pollution. This should be discussed within the septic (sewer) and stormwater sections; there is no discussion of potential pollution or steps to protect the area. (WEER, page 7), and there is no identification or discussion of Goal 6 in the master plan! The master plan also makes no mention of lead pollution from aviation gas, nor sulfur pollution from jet fuel.
The AMP includes an Environmental Overview performed by ESA in 2021 (Appendix 3). The document states that: "*The purpose of this Environmental Overview is to describe the environmental conditions of the Airport and identify any known or potential environmental conditions or issues that could be affected by proposed development at the Airport."* It further states that a desktop analysis was performed of the following: Air Quality; Biological Resources; Department of Transportation Act, Section 4(f); Hazardous Materials, Solid Waste, and Pollution Prevention; Natural Resources and Energy Supply; Visual Effects; Water Resources. The review only addresses 'inside the fence' issues and does not address any of the larger environmental issues or impacts of the area. *From the Airport property, overflow culverts direct stormwater to unnamed tributaries to Deer Creek. From Deer Creek, stormwater runoff flows to*

Senecal Creek, to Mill Creek, to the Pudding River, the Molalla River, and the Willamette River, where critical habitat is designated." (WEER, page 18)

Goal 7: Areas Subject to Natural Hazards – *To protect people and property from natural hazards*.

Finding: Goal 7 specifies floods (coastal and riverine), landslides, earthquakes and related hazards, tsunamis, coastal erosion, and wildfires as hazards for local governments to consider when developing comprehensive plans. Local governments may identify and plan for other natural hazards, as well.

UAO property lies inside a FEMA Zone X, which is considered an area of minimal flood risk. UAO falls outside the 500-year floodplain, while the closest 100-year floodplain is located approximately 0.55 miles east of the Airport, along Mill Creek and the Pudding River. Marion County Code Chapter ("MCC") 17.178 establishes the County's Floodplain Overlay Zone; UAO does not fall with the floodplain overlay zone.

According to the Statewide Landslide Information Database for Oregon (SLIDO), UAO property (including existing inventory and lands proposed for acquisition) does not include areas of known landslides. The 2013 *Oregon Resilience Plan* identifies UAO as a Tier 3 airport, meaning it would provide economic and commercial restoration after a Cascadia seismic event, as opposed to Tier 1 or 2 airports, which are anticipated to accommodate initial access, response, and recovery efforts for the state. The same plan notes that, in a scenario involving a magnitude 9.0 earthquake in the region, liquefaction of the soil would likely occur in a moderate to high manner on UAO property, leading to potential ground failure. According to MCC Chapter 17.182, current and proposed airport property do not fall within the Geologically Hazardous Areas Overlay Zone of Marion County.

As identified within the *Existing Conditions* chapter of the Draft UAO Master Plan (chapter 2, pg. 23), a Water Control District has been formed at UAO to provide water for fire protection for properties at UAO. Two wells are located on UAO property, in addition to a pumphouse and underground water storage tanks that provide water to fire hydrants across the UAO property.

No other hazards in the vicinity of UAO are identified within Marion County's Code. The Board finds the proposed master plan adequately takes natural hazards into consideration, addressing both the requirements of Goal 7 and the natural hazard planning undertaken at the local level. Accordingly, the UAO Master Plan complies with Goal 7.

COMMENT: Stormwater management at the Aurora Airport is minimally discussed and realistically not included in the AMP. The current site is largely flat. It is located adjacent to runoff tributary areas, primarily the Pudding River to the east. Current conditions are the use of "roadway" ditches to send runoff to area culverts. The overall area is bounded by the Pudding River (~0.85 miles east), the Molalla River (~3 miles

northeast), and Mill Creek (~0.75 miles southeast). All of these watercourses are downstream of the airport's stormwater discharge and are classified as sensitive habitat for salmonids.(WEER, page 18)
Specific to the *Existing Conditions* chapter of the master plan: “Overall, while the AMP acknowledges the existence of the water/fire protection system and identifies arsenic exceedance with a general mitigation concept, the AMP does not clearly document: (a) system condition and capacity, (b) current status and quality of existing water supply, (c) commitments and implementation steps for arsenic mitigation (or alternative supply options), or (d) fire suppression storage/flow adequacy and operating assumptions.(WEER, page 11)

Goal 8: Recreational Needs – *To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.*

Finding: Goal 8 requires local governments to plan for the recreation needs of their residents and visitors, including developed recreation facilities and destination resorts. The runway extension would allow UAO to meet FAA safety standards and improve resident and visitor access to the area via the airport, including providing additional access to nearby recreational facilities.

The Board finds the UAO Master Plan meets the requirements of Goal 8.

Goal 9: Economic Development – *To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens.*

Finding: Goal 9 states that comprehensive plans should strongly emphasize the expansion of and increased productivity from existing industries and firms as a means to strengthen local and regional economic development. As an integral piece of the regional transportation network, UAO provides myriad economic opportunities for the local community in alignment with Goal 9. The UAO Master Plan would strengthen the airport’s ability to serve the local community’s economic interests.

The Oregon Aviation Plan (OAP) version 6.0 classifies UAO as a Category II – Urban General Aviation Airport. Per the OAP, Category II airports support all general aviation aircraft and accommodate corporate aviation activity, including piston and turbine engine aircraft, business jets, helicopters, gliders, and other general aviation activity. The most demanding user requirements are business-related. With an estimated total of 2,672 direct and indirect employees supported by UAO (as of 2019), UAO is responsible for more employment than any airport in the state, excluding Portland International (PDX).

Additionally, UAO is estimated to account for over $22 million in annual sales from general aviation visitors (per Oregon Aviation Plan v6.0, Mead and Hunt, EDR Group, Jviation, IMPLAN econometric package).

OAR 660-009-0005 identifies airports as one of the locational or market factors that may affect where a particular type of industrial or other employment use will locate. Proximity to airports can also be a factor for identifying prime industrial land, under the same rule. Adopting the UAO Master Plan allows the local communities to continue to tap into the significant economic investments that have been made into the Airport and the businesses which rely on its continued operation.

Goal 9 states that *plans directed toward diversification and improvement of the economy of the planning area should consider as a major determinant, the carrying capacity of the air, land and water resources of the planning area. The land conservation and development actions provided for by such plans should not exceed the carrying capacity of such resources*. Nothing within the applicable comprehensive plans indicates the UAO Master Plan would exceed the carrying capacity of the resources of the subject area.

The Board finds the UAO Master Plan complies with the requirements of Goal 9.

Goal 10: Housing – *To provide for the housing needs of citizens of the state.*

Finding: The UAO Master Plan is a facility plan for a public-use airport, and not intended nor required to provide housing for citizens of the state. The UAO property is also not inside a UGB nor identified for future residential development by Marion County. Importantly, housing needs may not be a component of an airport master plan pursuant to state and federal guidance for airports which discourage residential development in conjunction with public-use airports (per FAA AC 150/5190-4B (Airport Land Use Compatibility Planning) and OAR 660-013-0080). Nothing in the proposed master plan conflicts with Goal 10's mandate to local governments to provide for the housing needs of their citizens through their usual methods, including buildable lands inventories, government-assisted housing, and housing ordinances which factor in inevitable fluctuations in housing stock.

The Board finds the UAO Master Plan complies with Goal 10.

Goal 11: Public Facilities and Services – *To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development*.

Finding: UAO is served by existing public facilities, with septic systems, well water and utility providers Portland General Electric (PGE) and NW Natural providing electricity and natural gas, respectively. Services which are generally only present within city limits, such as sewer and public water, are not available on UAO property. If UAO or the surrounding properties are ever brought into a UGB or city limits, connections to those services will take place at the appropriate time during the course of development, per the standards of the subject jurisdiction(s).

The Board finds the proposed master plan meets the requirements of Goal 11.

COMMENT: There is no description of Goal 11 in the master plan.
The airport is in a rural area. The Master Plan does not address the requirements of Goals 2 and 11 that public facilities and services, including potable water, firefighting water, sanitary sewer, stormwater, and surface transportation, be appropriate for rural uses only. Yet the airport is clearly an urban-density land use, as evidenced by approximately 1 million square feet of hangar space and lacks public sanitary sewer, public stormwater management and public potable water services. (WEER, page 9)
While the State identifies that the AMP is not a 'county land use plan or a transportation plan', it nevertheless is a "facility" plan subject to ORS 197.180(1) and Goal 11. The following Oregon Administrative Rules (OAR) and Oregon Revised Statutes (ORS) are requirements for planning documents, and consequently, discussion is expected to be included in this document: OAR 125-110 Land Use Coordination Rules; OAR 660-031 Land Conservation and Development-State Permit Compliance; ORS 197.180 Comprehensive Land Use Planning-State agency planning responsibilities OAR 125-110 Land Use Coordination; OAR 660-031. (WEER, page 6)
The master plan should address the Goal 11 requirements and each specific public utility and/or service required for an urban airport. (WEER, page 9).

Goal 12: Transportation – *To provide and encourage a safe, convenient and economic transportation system*.

Finding: Goal 12 requires transportation system plans to consider all modes of transportation, including air. It is implemented through the Transportation Planning Rule (TPR) (OAR chapter 660, division 12). OAR 660-012-0020(2)(e) requires that, for airports, "the planning area shall include all areas within airport imaginary surfaces and other areas covered by state or federal regulations". Goal 12 is also implemented through OAR chapter 660, division 13 (the "Airport Planning Rule"), which provides that the "policy of the State of Oregon is to encourage and support the continued operation and vitality of Oregon's airports" (OAR 660-013-0010). Division 13 is "intended to promote a convenient and economic system of airports in the state and for land use planning to reduce risks to aircraft operations and nearby land uses." *Id*.

The purpose of adopting a new master plan for UAO is to ensure that the public airport continues to provide and encourage a safe, convenient and economical means of transportation for the commercial and other private users of this airport. The elements of the UAO Master Plan and as described in the introduction to these findings are specifically intended to ensure that the UAO facilities meet safety requirements established by FAA.

Goal 12 with respect to aviation planning is also specifically addressed through local planning efforts which establish zoning for the airport and adjacent areas, intending to protect airport users and adjacent communities from conflicting uses. For example, OAR 660-012-0045(2)(c) requires a jurisdiction to implement measures to protect public use airports by controlling land uses within airport noise corridors and imaginary surfaces, and by limiting physical hazards to air navigation. OAR 660-012-0045(2)(f) requires jurisdictions to provide notice to public agencies providing transportation facilities and services, MPOs, and ODOT, including for applications within airport noise

corridors and imaginary surfaces that affect airport operations. Additionally, under the Land Use Requirements rule (OAR 660-012-0330), local governments are required to adopt land use compatibility requirements stipulated by the Airport Planning Rule. For those affected jurisdictions that do not already have these requirements in place, the Department will continue to coordinate with local jurisdictions to assist them in complying with the TPR and the Airport Planning Rule as part of any local adoption process and as part of the planning process for future projects implementing the UAO Master Plan, as described in these findings.

The Board finds the UAO Master Plan complies with Goal 12.

COMMENT: The Aurora draft AMP states, "The study will also address elements of local planning (land use, transportation, environmental, economic development, etc.)" on the first page in the Purpose and Need section. This information is minimal at best and largely missing from the AMP document, and should affect the planning, development, and operation of the Airport moving forward. While the Aurora AMP is an airport planning document rather than an engineering document, planning should be conducted for both the airport properties and the overall impact on adjacent neighbors. (WEER, page 5)
The master plan fails to address road designation, has removed an internal vehicle service road, ignores traffic impacts on Airport Road and City of Aurora, and contains no traffic mitigation components consistent with the proposed airport expansion.

Goal 13: Energy Conservation – *To conserve energy.*

Finding: Goal 13 stipulates that land and uses developed on land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles. The UAO Master Plan involves continued investment into an existing resource, maximizing energy efficiency when compared to redeveloping this use elsewhere in the state. UAO is subject to the energy standards in place at the federal level for public-use airports and aircraft, including fuel efficiency standards for certain aircraft, such as those adopted under 89 Fed. Reg. 12634 (Vol. 89, No. 33, Feb. 16, 2024).

The Board finds the proposed master plan does not conflict with Goal 13's mandate to conserve energy.

Goal 14: Urbanization – *To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.*

Finding: UAO's proximity to existing urbanized areas, including Aurora, Wilsonville, and the greater Portland metro area, provides many of the elements that Goal 14 identifies as important for orderly and efficient development patterns between urban and rural

lands. Under the *Implementation* guidelines of Goal 14, major transportation facilities (including air) and their improvements are factors to account for when considering urban expansion or restriction of development in rural areas. The Airport provides employment opportunities for the nearby urbanized areas, while maintaining a buffer of low-density and/or rural development in accordance with the land use compatibility guidance of the FAA and the State of Oregon—FAA AC 150/5190-4B (Airport Land Use Compatibility Planning) and OAR 660-013-0080, specifically.

None of the development contemplated by the UAO Master Plan will require a change to Marion County's existing plan or zoning designations. The airport's existing comprehensive plan and zoning designations (*Public and Semi-Public Facilities*, and *Public*, respectively) demonstrate compliance with Goal 14. For any airport-related development that may be needed in the future and that is not permitted within those areas identified in the UAO Master Plan for future expansion on rural lands, the Department has the option to either initiate a process to expand the airport boundary pursuant to OAR chapter 660, division 013 and/or pursue any required land use approvals, including any exceptions, if necessary, if and when these properties become available. For any elements of the plan which require zone changes or goal exceptions, for example, Staff will seek the appropriate land use approvals at that time.

The Board finds the UAO Master Plan meets the requirements of Goal 14.

COMMENT: The Aurora State Airport is designated as an urban airport, and the airport is clearly an urban-density land use, as evidenced by approximately 1 million square feet of hangar space. There is no discussion related to urban services. The airport is an urban land use that lacks the customary urban public facilities and services such as sanitary sewer, storm sewer, and potable water.
The master plan contemplates expansion onto approximately 63 acres of EFU land and three or four acres or RR land. Goal 14 does not allow the expansion of, or urban development, on rural land. Further, Goal 14 requires the accommodation of urban employment inside urban growth boundaries but the Aurora Airport is outside the UGB of the city of Aurora.

Goals 15-19: Willamette River Greenway, Estuarine Resources, Coastal Shorelands, Beaches and Dunes, and Ocean Resources.

Finding: Because the properties of the Aurora State Airport do not include lands subject to goals 15 through 19, the Board finds the proposed master plan does not conflict with these goals.

3. *ORS 197.180(1)(b): the UAO Master Plan shall be compatible with acknowledged comprehensive plans and land use regulations.*

Finding: Chapter 4 of the UAO Master Plan addresses facility goals and requirements relating to all elements of the plan, which it breaks down into regional, airside, landside and administrative requirements. As stated in the UAO Master Plan, once a master plan

is adopted, pursuant to OAR 660-013-0030(2), Marion County, Clackamas County, City of Aurora, City of Barlow and City of Wilsonville will all require comprehensive plan updates to remain compliant with state land use laws as each of these jurisdictions are located within the Part 77 airspace. ORS 836.610 requires local jurisdictions to adopt comprehensive plans and land use regulations that protect and encourage airport uses as described in the background section. A local jurisdiction must ensure that their comprehensive plan and land use regulations include the requirements set forth in the Airport Planning Rule, including OAR 660-013-0040 ("Aviation Facility Planning Requirements"), 0070 ("Local Government Safety Zones for Imaginary Surfaces"), and 0080 ("Local Government Land Use Compatibility Requirements for Public Use Airports").

With respect to the airspace, OAR 660-013-0070 requires these local governments to adopt Airport Safety Overlay Zones to promote aviation safety by prohibiting structures, trees, and other objects of natural growth from penetrating airport imaginary surfaces. While UAO is an existing airport, the proposed runway extension will result in an extension of the Part 77 airspace which, under state law, must be protected through zoning under OAR 660-013-0070. ODAV has provided through its Land Use Compatibility Guidebook a process that these jurisdictions may follow to adopt the required zoning. ODAV will provide any additional support, as needed.

For land use development, Marion County is the jurisdiction specifically responsible for development on and surrounding the Airport and has acknowledged this requirement in comprehensive plan Policy #2 of the Air, Rail, Water, Energy and Pipeline Transportation Policies. ODAV will pursue an additional zoning classification with Marion County to include an airport-specific base zone for public use airports.

The specific requirements for each of the jurisdictions that will require plan updates, following the adoption of the UAO Master Plan, is identified as a "facility requirement" in the UAO Master Plan (page 4-9) and discussed more fully below.

COMMENT: As noted above in the comments on Goal 2, neither ODAV nor its consultant followed its own guidance document during the master planning process to consult with affected jurisdictions when land use non-compatibility issues were identified with the aim or resolving the conflicts. The assertion that "Marion County, Clackamas County, City of Aurora, City of Barlow and City of Wilsonville will all require comprehensive plan updates to remain compliant with state land use laws" essentially defines the ODAV position as forcing the affected jurisdictions to change their adopted comprehensive plans to adopt the master plan, when, in fact, the master plan must comply with local government land use regulations when it is adopted. ORS 197.180(1).
ODAV does not have the authority to adopt its preferred master plan and then force local governments to change their adopted comprehensive plans and set aside their previously identified land use non-compatibility conflicts. ODAV should be required to follow its own

guidance document, and petition local government to make the desired amendments to their land use regulations. As the body authorized to approve and adopt the master plan, the Aviation Board must recognize that the approach contemplated is the exact opposite of what is intended in statute.

a. Marion County Acknowledged Comprehensive Plan

Finding: The scope of the UAO Master Plan is entirely within Marion County for on-the-ground future projects. Therefore, the uses proposed in the UAO Master Plan must be compatible with Marion County's comprehensive plan and land use regulations under ORS 197.180.

The Marion County Comprehensive Plan includes the following policies and goals, zoning and implementing ordinances relating to airport facility planning:

- Airport Overlay Zones: MCC Chapters 16.21 (Urban Zoning – Airport Overlay Zone) and 17.177 (Rural Zoning – Airport Overlay Zone)
- Base Zoning: MCC 17.171.030 establishes airport and airport-related commercial and industrial uses are allowed as conditional uses in the P (Public) zone[5]

[5] As noted previously, lands falling within the airport boundary established for UAO in the County's Comprehensive Plan through the 1976 Aurora State Airport Master Plan are zoned P.

- 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.

As discussed in these findings, all proposed uses of the UAO Master Plan that fall within the UAO Airport Boundary, as established with the adoption of the 1976 Airport Master Plan, 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 proposed realignment is compatible with Marion County’s comprehensive plan as it furthers the stated goals in MCC Chapter 17.177. 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 airport and other users. In addition, 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.

With respect to noise, per MCC 17.110.392 and MCC Goals & Policies II, the County has established noise contour lines of DNL 65 dB as noise impact areas—"based on the projected use at the end of an airport master planning period.” The UAO Master Plan establishes contour lines that the County may use to update their noise standards and policies, if applicable. The UAO Master Plan is compatible with Marion County Comprehensive Plan requirements relating to noise impact areas as the 2041 noise contours, shown on Sheet 12 of the UAO Master Plan, delineate DNL of 65 dB or above, and will allow the County to plan for future development in the airport environs while considering potential noise impacts. Further, Marion County’s Noise Policy and MCC 17.110.834 establish thresholds for how to mitigate noise impacts from the airport when siting noise-sensitive uses in the area, which may be pursued at the project phase of any airport improvements that are based on UAO Master Plan.

With respect to the 2005 Rural Transportation System Plan (RTSP), the RTSP is Marion County’s long-range plan for its transportation system, as required under the Transportation Planning Rule.[6] Table 5-18 identifies public and private airports and heliports in the county, including UAO. The RTSP commits to promoting air travel within the county (chapter 2, pg. 3), and states an intention to adopt the UAO Master Plan upon being reviewed by County staff for compatibility with land use and zoning requirements (chapter 2, pg. 7).[7]

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[6] 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.”

[7] As of September 2026, the County is in the process of updating the RTSP. The Department will continue to review the proposed updates to Marion County’s RTSP to ensure compatibility

Finally, and pursuant to OAR 660-013-0160, Marion County is required to update its comprehensive plan and land use regulations related to airport planning and periodic review. ODAV intends to apply to Marion County to adopt the UAO Master Plan and make any necessary regulatory amendments to its plan or regulations.

Based on the foregoing, the UAO Master Plan is compatible in its entirety with the Marion County acknowledged comprehensive plan and land use regulations. In the future when ODAV implements projects pursuant to this UAO Master Plan, ODAV will follow its coordination requirements under OAR 738-130-0065 or OAR 738-130-0075, and OAR 660-013-0040(6) which establishes a process for resolving any conflicts at the project implementation phase.

b. Clackamas County Acknowledged Comprehensive Plan

Finding: 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."[8]

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 UAO Master Plan. 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. ZDO Section 713, as outlined above, establishes a public use airport and safety overlay zone. The County has already recognized the need to update its zoning maps to reflect the

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with the proposed UAO Master Plan and will amend these draft findings as necessary if the RTSP is adopted prior to adoption of the UAO Master Plan.

[8] 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/Pages/default.aspx

adjusted RPZ at such time that the runway is extended.[9] One additional legislative option that ODAV and the County could explore would be 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 note 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 UAO Master Plan, as outlined within the On Airport Land Use Plan, 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 UAO Master Plan 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.

c. City of Aurora Acknowledged Comprehensive Plan

Finding: 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.

[9] 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/Pages/default.aspx

As identified within the City's Zoning Designations map, the Airport Airspace Plan (AMP chapter 6, sheet 5 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 UAO. 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.

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 UAO Master Plan 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). Accordingly, ODAV is not required to show compatibility relating to noise restrictions for locations within the City of Aurora.

d. City of Wilsonville Acknowledged Comprehensive Plan

Findings: 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[10] 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.

e. City of Barlow and Metro

The City of Barlow and Metro either do not have a comprehensive plan (in Metro's case) or have not adopted airport overlay zones (both Metro and City of Barlow). 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 (pg. 38). 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 UAO. 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).

Additionally, neither Barlow nor Metro provided a response during the 45-day comment period. Pursuant to OAR 738-130-0055(2), if no reply is received from an affected city, county or metropolitan planning organization within 45 days of the Department's request for a compatibility determination, the Department shall deem that the draft plan is compatible with that jurisdiction's acknowledged comprehensive plan.

[10] 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

The Board finds that there are no conflicts between the UAO Master Plan and the comprehensive planning of the City of Barlow and Metro.

Conclusion

The Board finds no element of the UAO Master Plan which would conflict with the existing airport overlay zones of the affected jurisdictions. Any future conflicts or changes which arise due to development or airport activity will be handled through the appropriate method, such as airspace evaluations, mitigation of hazards through marking and/or lighting, or going through the appropriate land use processes and compliance with any applicable conditions of approval to ensure airport development occurs in accordance with local code.

B. OAR Chapter 738, Division 130 State Agency Coordination Program

The following section contains findings related specifically to the State Agency Coordination Program.

1. OAR 738-130

The purpose of this division is to establish procedures to implement the Department's state aviation program to assure that the Department carries out a program that significantly affects land use, including the adoption of a transportation facility plan in compliance with statewide land use goals and in a manner compatible with acknowledged comprehensive plans

Finding: Agency must make findings under OAR Chapter 138 because the UAO Master Plan is a transportation facility plan.

2. OAR 738-130-0055

Coordination procedures for adopting final master plans.

Finding: The Board and the Department are required to follow the procedures set forth in OAR 738-0130-0055 because the UAO Master Plan is a master plan.

3. OAR 738-130-0055(1)

Except in the case of minor amendments, the Department shall involve DLCD and affected metropolitan planning organizations, cities, counties, state and federal agencies, special districts and other interested parties in the development or amendment of a facility plan. This involvement may take the form of mailings, meetings or other means that the Department

determines are appropriate for the circumstances. The Department shall hold at least one public meeting on the plan prior to adoption.

Finding: According to OAR 738-130-0015(1), affected cities and counties are those that have comprehensive planning authority over a site or area which is directly impacted by a proposed Board or Department action. OAR 738-130-0015(2) states that affected state and federal agencies are those identified in the Department's state agency coordination program. In the case of a new master plan for the UAO, this includes Metro, City of Aurora, City of Barlow, City of Wilsonville, Clackamas County, Marion County, along with DLCD.

As addressed in these findings, Section A, *Goal 1*, the Department undertook a significant effort to involve the organizations, agencies, and other interested parties in the development of the UAO Master Plan, in the form of public meetings and work sessions, mailings, surveys, and opportunities for public comment. Included within the planning advisory committee (PAC) for the UAO Master Plan were representatives from DLCD, and the affected MPO, cities, and counties. ODAV encouraged participation and solicited feedback from these organizations, as catalogued in the meeting materials.[11]

The Board finds the proposed airport master plan adheres to the adoption procedures identified within OAR 738-130-0055(1).

4. OAR 738-130-0055(2)

The Department shall provide a draft of the proposed facility plan to planning representatives of all affected cities, counties and metropolitan planning organization and shall request that they identify any specific plan requirements which apply, any general plan requirements which apply and whether the draft facility plan is compatible with the acknowledged comprehensive plan. If no reply is received from an affected city, county or metropolitan planning organization within 45 days of the Department's request for a compatibility determination, the Department shall deem that the draft plan is compatible with that jurisdiction's acknowledged comprehensive plan. The Department may extend the reply time if requested to do so by an affected city, county or metropolitan planning organization.

Finding: As stated above, there are a total of six jurisdictions or MPOs with comprehensive planning authority over areas underneath the airspace of Aurora State Airport: Aurora, Barlow, Clackamas County, Marion County, Wilsonville, and Metro. A draft of the proposed airport master plan was provided to the affected jurisdictions and organizations on Aug. 29, 2025. Within 45 days of the request, responses were received from City of Aurora, City of Wilsonville, Clackamas County, and Marion County. Their comments and the Department's responses are set out in the findings below.

No responses were received from City of Barlow or Metro. Pursuant to OAR 738-130-0055(2), the Department shall deem that the draft plan is compatible with those jurisdictions' acknowledged comprehensive plans. While Metro does not have a comprehensive plan like the other jurisdictions identified in this section, it is included in this discussion since the SAC rule identifies metropolitan planning organizations as

[11] See UAO Master Plan, Chapter 1, pg. 1-4. See also records of meetings, available on the project website: https://www.oregon.gov/aviation/Aurora-Master-Plan/Pages/default.aspx

agencies which shall be involved in efforts to adopt a final airport master plan. Because no response was received from the City of Barlow nor Metro, the Board finds the UAO Master Plan to be compatible with the comprehensive planning of those jurisdictions.

5. OAR 738-130-0055(3)

(3) If any statewide goal or comprehensive plan conflicts are identified, the Department shall meet with the local government planning representatives to discuss ways to resolve the conflicts. These may include:

(a) Changing the draft facility plan to eliminate the conflicts;

(b) Working with the local governments to amend the local comprehensive plans to eliminate the conflicts; or

(c) Identifying the conflicts in the draft facility plan and including policies that commit the Department to resolving the conflicts prior to the conclusion of the transportation planning program for the affected portions of the transportation facility.

Finding: In response to the Department's request to affected jurisdictions that they review the UAO Master Plan and identify any conflicts, the Department received comments from City of Aurora, City of Wilsonville, Clackamas County, and Marion County.[12] None of these jurisdictions identified a statewide goal or comprehensive plan conflict with the components of the UAO Master Plan that will impact their respective jurisdictions.

A summary of the comments received from affected jurisdictions and the Department's responses are as follows:

> **Marion County:** The Marion County Public Works Department provided comments in a letter dated September 19, 2025. The County explained generally that its public zone, which contains the majority of the plan elements in the UAO Master Plan allows any airport and airport related uses as conditional uses. The County also explained that within its EFU zone, a road realignment is permissible as an outright permitted use or, if structures are removed or a new parcel is created, that would also be permissible with a conditional use permit.
>
> In direct response to the Department's request that the County review the plan to assess whether it is compatible with the County's comprehensive plan, the County instead stated that it could not make this assessment without a final County Commission review as part of a formal application by the Department. The County proposed three options to the Department as pathway to a final Commission determination, including an application to the County to adopt the UAO Master Plan into the County's planning documents, or, alternatively, that the Department apply for conditional use approvals if and when those are required. If the Department chooses the latter option, the County points out this may present issues or concerns with the 1976 Aurora Airport Master Plan which is currently

[12] Responses received from affected jurisdictions can be found here: https://www.oregon.gov/aviation/Aurora-Master-Plan/Pages/default.aspx

part of the County's comprehensive planning documents. Finally, the County further responded that, notwithstanding its statement that only the Commission could determine compatibility, the County was unable to assess compatibility in any event because the UAO Master Plan as presented to them did not contain findings that it complies with local and state land use laws.

Response: The Department staff met with Marion County representatives on Oct. 14, 2025, to discuss these comments and has drafted these findings to address the County's comment that it may not make an initial determination of compatibility absent specific findings in the UAO Master Plan documents. As discussed in these findings, the UAO Master Plan is compatible with the MCC sections and Comprehensive Plan goals relating to aviation use specifically. In addition, the Department will seek the appropriate land use approvals, as identified within these findings, such as conditional use permits for realignment of rights-of-way.

For those areas identified in the UAO Master Plan for future airport expansion on lands currently zoned EFU, no specific development is contemplated. Designation of these areas is solely to reserve the right to access FAA funds in the future. Any efforts to develop those areas in the future would require an expansion of the airport boundary pursuant to OAR chapter 660, division 13, or possibly through Marion County's land use planning process to change the plan and zoning designations of those parcels, which the Department will pursue, if necessary.

Notwithstanding the Department's efforts to coordinate with Marion County, compliance with OAR 738-0130-0055(2) requires only that the Department submit its proposed master plan to the County for its review of the plan to assess whether or not it is compatible. Subsection (3) then requires the agencies to coordinate if conflicts are identified. The County in its comments confirmed that the applicable zoning allows for airport and airport related uses, even if conditionally. The County further confirmed that the realignment of the road could be allowed outright or conditionally. It did not identify any conflicts that would require additional coordination. In addition, the County's comments relating to a need for specific findings and a final decision by its Commission are appropriate to the Department's future application to the County to adopt the UAO Master Plan as part of a future TSP update or, a conditional use application if the Department chooses to take that path—which the Department may endeavor to do when a UAO Master Plan is adopted by the Board.

However, and by contrast, the Department's request of Marion County's review under its coordination requirements prior to the Board's adoption is a request for a preliminary review to assess whether the proposed plan will conflict with Marion County's comprehensive planning documents. The Department developed draft findings based on these coordination requirements to present to the Board as part of its decision to adopt the UAO Master Plan. Following adoption, the Department will present Marion County with more specific findings demonstrating why the adopted plan is compatible with Marion County's comprehensive planning documents. However, as Marion County has not identified a conflict at

this time and has confirmed that the uses proposed in the UAO Master Plan are permitted, even if conditionally, the Department has satisfied its coordination requirements under OAR 738-015-0055(2) and (3).

Clackamas County: Clackamas County Department of Transportation and Development provided general feedback regarding the UAO Master Plan. This included considerations for a County provision which requires a minimum 20-foot clearance of the approach surface over a county, city, or public road; road design considerations, responsibilities for maintenance; and State land use rules which apply to EFU-zoned land subject to road improvements.

Response: The considerations identified by the County were anticipated by the Department and will be included in the planning and implementation of the master plan. ODAV will coordinate with Clackamas County to amend the local comprehensive plan to reflect the new Part 77 boundaries resulting from the proposed runway extension.

City of Aurora: The City of Aurora stated in its comments to the Department that the draft plan is not compatible with the City's acknowledged comprehensive plan. The City stated 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. They assert that statewide planning goals 11, 12, and 14 stipulate that facilities such as UAO should be located within urban growth boundaries, and expansion of the airport onto nearby agricultural land conflicts with these goals. The City states that, for the airport expansion to occur prior to annexation, Marion County's comprehensive plan must be amended and, therefore, proves incompatibility between the proposed master plan and the County's comprehensive plan.

Response: The City of Aurora falls under the horizontal surface of UAO; while Aurora meets the definition of an *affected city* under OAR 738-130-0055, the city limits and urban growth boundary do not abut airport property. Any future jurisdiction by City of Aurora over airport property or the surrounding airport-related developments is speculative. No changes to the portion of the airspace extending over Aurora are proposed by the plan, and, thus, no direct impact to Aurora is expected. The City of Aurora did not identify any concerns directly related to existing airspace over their jurisdiction.

In response to the City of Aurora's claim that the UAO Master Plan does not comply statewide planning goals 11, 12, and 14, see findings above under discussion of compliance with ORS 197.180.

City of Wilsonville: The City of Wilsonville indicated a variety of concerns with the UAO Master Plan, including noise and air pollution, water pollution affecting drinking water, loss of high-quality farmland, negative impacts to the City's own development of industrial and employment lands, surface transportation access

and maintaining adequate levels of service, and reduced capacity for emergency response. They also state there is an absence of findings in the UAO Master Plan related to the Climate-Friendly and Equitable Communities (CFEC) program, and that the Department has not demonstrated whether the plan is a "business master plan" or a "land use master plan".

Response: The Department intends for the UAO Master Plan to be reviewed as a land use master plan.

Similar to the City of Aurora, the City of Wilsonville, while meeting the definition of an affected city, falls under the conical and approach surfaces of UAO. Other than a change to the location of these surfaces as a result of the proposed runway extension, no other direct impacts are expected. Wilsonville's comments do not identify a conflict with the airspace extension. As stated above, the Department would expect affected jurisdictions to adopt comprehensive plan and land use regulations consistent with OAR 660-013-0040, which would include codifying the new Part 77 boundaries resulting from the runway extension.

6. OAR 738-130-0055(4)

The Department shall evaluate and write draft findings of compatibility with acknowledged comprehensive plans of affected cities and counties, findings of compliance with any statewide planning goals which specifically apply as determined by OAR 660-030-0065(3)(d), and findings of compliance with all provisions of other statewide planning goals that can be clearly defined if the comprehensive plan of an affected city or county contains no conditions specifically applicable or any general provisions, purposes or objectives that would be substantially affected by the facility plan.

Response: The Board's findings above under Section A addressing compatibility and compliance requirements under ORS 197.180 are incorporated into this finding by reference. The Board further refers to and incorporates the Area Land Use/Zoning discussion within the UAO Master Plan, which identifies how land use requirements will be addressed as projects are developed and implemented. Based on these findings, the Board finds that this coordination requirement is met.

7. OAR 738-130-0055(5)

The Department shall present to the Aviation Board the draft plan, findings of compatibility with the acknowledged comprehensive plans of affecting cities and counties and findings of compliance with applicable statewide planning goals.

Finding: In accordance with OAR 738-130-0055(5), the Department presented UAO Master Plan and these findings to the Board at its regularly scheduled and duly noticed public meeting on December 3, 2026.

8. OAR 738-130-0055(6)

The Aviation Board shall adopt findings of compatibility with the acknowledged comprehensive plans of affected cities and counties and findings of compliance with applicable statewide planning goals when it adopts the final facility plan.

Finding: The Board, as part of its adoption of the UAO Master Plan, hereby adopts these findings as presented herein, determining the UAO Master Plan to be in compliance with the acknowledged comprehensive plans of affected cities and counties and with applicable statewide planning goals.

9. OAR 738-130-0055(7)

The Department shall provide copies of the adopted final facility plan and findings to DLCD, to affected metropolitan planning organizations, cities, counties, state and federal agencies, special districts and to others who request to receive a copy.

Finding: In accordance with OAR 738-130-0055(7), the Department will provide copies of the adopted plan and findings to the necessary agencies and others who request a copy.

SOURCES

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WINDSOR ENGINEERS

FRIENDS OF FRENCH PRAIRIE

Aurora Airport Master Plan Engineering Review

MAY 4, 2026



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CERTIFICATION

CERTIFICATE OF THE ENGINEER

Title: FRIENDS OF FRENCH PRAIRIE

Project: Aurora Airport Master Plan Engineering Review

This Technical Information Report (TIR) has been prepared under my supervision and meets the standard of care for similar documents. The TIR includes the review of information per the references below.

Windsor Engineers LLC



Expires 12/31/2026

Reviewed By: Travis Tormanen, PE

Developed By: Charles McDonald PE

REFERENCES

Oregon Statewide Land Use Planning Goals

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1.0 EXECUTIVE SUMMARY

The Aurora State Airport is owned and managed by the Oregon Department of Aviation (ODAV). The mission of the ODAV is to *…enable and advocate for a safe and efficient aviation system ….* The ODAV is developing a Master plan update for the airport. However, the update has focused primarily on efficiency and economic growth, with limited attention to safety and engineering improvements, which should be a focal area.

The Aurora airport has been designated (2019) as a Category II – General Aviation Airport. This airport designation applies to jet aircraft. It appears that the airport master plan focuses only on aircraft type, primarily jets rather than other components that should be in a planning document. Interestingly, other site improvements are necessary to support jet aircraft, and yet the recommended improvements are not included in the final recommendations.

The overall finding is that the Aurora Airport Draft Master Plan (2025) does not meet the criteria for Oregon's Land Use Planning documents. It neglects to adequately identify, evaluate or improve on:

- Overall planning requirements
- Water use and needs
- Wastewater (septic) use and needs
- Transportation – outside the fence – upgrades and impacts
- Stormwater and drainage impacts
- Community safety impacts

The Master Plan is required by ORS 197.180(1) to meet the same requirements as any developer or development would.

2.0 MASTER PLANNING

The U.S. Federal Aviation Administration (FAA) requires master planning documents and reviews/updates every 10-20 years. While master planning documents are voluminous, there are different document requirements for meeting specific agency requirements (e.g., land use vs. airport upgrades) than for other master planning documents. While airport master plans differ significantly from land use master plans, there are still specific components that are required by the overall approving agency (State of Oregon), that apply to this document and are a requirement for improvements.

The Airport Master Plan (AMP) document was prepared in accordance with Advisory Circular (AC) 150/5070-6B of the FAA. The FAA advisory circular provides extensive flexibility in preparation; however, "The scope of each master plan must be tailored to the individual airport under evaluation." The Aurora draft AMP states, "The study will also address elements of local planning (land use, transportation, environmental, economic development, etc.)" on the first page in the Purpose and Need section. This information is minimal at best and largely missing from the AMP document, and should affect the planning, development, and operation of the Airport moving forward. While the Aurora AMP is an airport planning document rather than an engineering document, planning should be conducted for both the airport properties and the overall impact on adjacent neighbors. In addition, as a federally funded (FAA) document, it should include compliance with planning requirements for affected local governments, including Marion and Clackamas Counties and the Cities of Aurora and Wilsonville under Grant Assurance No. 6. In review of the Aurora AMP, the majority of these requirements are not discussed, and improvements and betterments that would impact the surrounding community are left undefined and unaddressed.

Draft Master Plan Document

The Aurora AMP states (in the **Introduction**, Goals 4 and 5) that the Plan will evaluate facilities and conformance with applicable local, state, and FAA standards and identify *facility improvements*. This identification is minimal, and the evaluation is missing, and upgrades are not included within the document.

FAA Planning Requirements (AC 150/5075-6B)

The FAA AC 150/5070-6B), the planning circular for creating a Master Plan, specifically states that the Plan should include the following objectives (***Section 104 – Function***):

4) Establish a realistic schedule for the implementation of the development proposed in the plan, particularly the short-term capital improvement program.

5) Propose an achievable financial plan to support the implementation schedule.

6) Provide sufficient project definition and detail for subsequent environmental evaluations that may be required before the project is approved.

7) Present a plan that adequately addresses the issues and satisfies local, state, and Federal regulations.

The underlined items (6 and 7) appear to be minimally discussed and unplanned for in this document.

Oregon Land Use Planning requirements

While the State identifies that the AMP is not a 'county land use plan or a transportation plan', it nevertheless is a "facility" plan subject to ORS 197.180(1) and Goal 11.

The following Oregon Administrative Rules (OAR) and Oregon Revised Statutes (ORS) are requirements for planning documents, and consequently, discussion is expected to be included in this document:

OAR 125-110 Land Use Coordination Rules

OAR 660-031 Land Conservation and Development-State Permit Compliance

ORS 197.180 Comprehensive Land Use Planning-State agency planning responsibilities

OAR 125-110 Land Use Coordination, discusses statewide coordination rules. Section 0001 describes requirements for project approval. Subsection 1(e) specifically states that *approval of projects is required related to land use criteria.*

Subsection (2) states:

In order to approve or undertake a project under a program listed in subsections (1)(a)–(e) of this rule, the Department shall find that the project complies with the Statewide Planning Goals and is compatible with acknowledged city and county comprehensive plans and land use regulations. To make its goal compliance and plan compatibility findings, the Department shall comply with sections (2)–(6) of this rule and shall also adhere to the procedures in the Department's state agency coordination program which is hereby adopted by reference.

Nothing in the AMP indicates any coordination with these land-use coordination rules or compliance with land-use requirements.

OAR 660-031 discusses compliance with local government plans.

The purpose of this rule is to clarify state agency responsibilities to apply the Statewide Planning Goals and acknowledged Comprehensive Plans during permit reviews (ORS 197.180(1) through (7)). The rule

establishes procedures and standards which require consideration of Goals and Acknowledged Plans prior to approval of state permits. The rule establishes a process for state agencies to rely on a local determination of compliance with the State Planning Goals and the Acknowledged Comprehensive Plan when issuing certain permits. The rule also requires that affected state agencies develop and submit to LCDC procedures for consistency review.

There is no discussion or evidence within the Aurora AMP that any review or compliance with local government plans has occurred. As part of the Class B airport permit process (OAR 660-031-0010), assurances of compliance with Statewide Planning Goals and compatibility are required; again, there is no discussion of compliance.

ORS 197.173 and .180 discuss responsibilities and coordination with agencies. There is no discussion or evidence that this has been performed in the creation of this document.

OAR 660-015 – Statewide Goals and Guidelines

Goal 2 - Land Use planning mandates that local government coordinate and achieve statewide goals. It also discusses the need for coordination with agency plans. There is no discussion of planning goals in the Aurora AMP document, and Marion County may need to update its existing plan to comply with state requirements for agency coordination.

Goal 6 - This goal requires local comprehensive plans and the implementation of measures to be consistent with state and federal regulations on matters such as groundwater pollution. This should be discussed within the septic (sewer) and stormwater sections; there is no discussion of potential pollution or steps to protect the area.

Goal 11, Public Facilities and Services, addresses civil engineering requirements for land-use planning.

Goal 11 states - "*To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development. Urban and rural development shall be guided and supported by types and levels of urban and rural public facilities and services appropriate for, but limited to, the needs and requirements of the urban, urbanizable, and rural areas to be served.* Public facilities and services for rural areas should be provided at levels appropriate for rural use only and should not support urban uses."

There is no discussion related to urban services. The airport is an urban land use that lacks the customary urban public facilities and services such as sanitary sewer, storm sewer, and potable water.

Local Jurisdictions

Marion County zones the airport and adjacent private airport-related properties as Public (P). Surrounding properties to the east and south of the airport are zoned Exclusive Farm Use (EFU). Properties to the west of the airport, across Hwy 551, are zoned exclusive EFU and Acreage Residential (AR). The Airport is located outside of the Aurora Urban Growth Boundary (UGB). Land use actions

related to the airport property and its immediate surroundings are under the jurisdiction of Marion County.

The Master Plan and Airport Layout Plan show expansion of the airport into the EFU and AR zones. Public airports are not listed as permitted uses or conditional uses in those zones.

2.1 Airport Specific items/Impacts

Century West Engineering (Bend, Oregon) provided the recent draft AMP document (2025) for the State in conjunction with the FAA requirements. However, there appears to be minimal review and issue addressing relative to the adequate public facilities and services required by Goal 11.

Appendix 9 discusses Noise contours. The Aurora city code establishes day-night average sound levels with LDN values at 55. The FAA considers levels of 65 A-weighted decibels (dBa) or higher unsuitable for residential housing. It is unclear whether this level (55) is reachable, but there is limited discussion in the AMP addressing this requirement. The noise level contours towards Aurora are expected to expand (Appendix 9-Figure 5), resulting in possible violation of the city code. The figures and tables (Appendix 9) do not even address the 55 LDN level. This factor should be further evaluated and addressed in this document. The Marion County Comprehensive Plan mentions noise concerns at the Aurora airport, including "*In addition, special regulations in the Zoning Ordinances require that noise impacts be considered before approving new uses within the 1995 NEF 30 area shown on the Aurora Airport Master Plan*." There is no evidence that the State has incorporated any data regarding this county plan.

2.2 Farmlands

The Farmland Protection Policy Act (FPPA) was enacted under the Agriculture and Food Act of 1981 to minimize the impact of federal programs on the unnecessary and irreversible conversion of farmland to nonagricultural uses. According to the FPPA, farmland is classified as either "prime farmland, unique farmland, or farmland of statewide or local importance." There are no farmlands located on ODAV-owned Airport property; however, some of the private lands adjacent to the Airport are zoned EFU, as are Residential, Commercial, and publicly owned rights-of-way.

Goal 3 of the Oregon Statewide Planning Goals requires the counties to 'preserve and maintain' farmlands; there is no discussion related to any effort to address this, except to have zoning changed.

According to Chapter 5 (of the AMP), the south Runway Extension Option has been eliminated; however, the Master Plan still shows expansion onto EFU land for expansion of the Runway Safety Area. The Master Plan also shows expansion onto EFU land east and south of the existing airport for landside activities, described as Aviation Reserve. The Master Plan also shows the Hwy 551 right-of-way moving west onto EFU land. All of these "improvements" result in "damages" to the local prime farmland. This impact should be coordinated with the appropriate public agencies for the change of use.

2.3 Recommendations

The airport is in a rural area. The Master Plan does not address the requirements of Goals 2 and 11 that public facilities and services, including potable water, firefighting water, sanitary sewer, stormwater, and surface transportation, be appropriate for rural uses only. Yet the airport is clearly an urban-density land use, as evidenced by approximately 1 million square feet of hangar space.

Table 1: Zoning Items of Concern - Recommendations

Description	Status	Recommendation
Land-use master planning: comparison and inclusion.	No description of Goal 2 in the AMP	The AMP needs to address
Noise levels created by airport use.	No Discussion	Develop a plan to evaluate current levels and establish future land-use levels; address noise violations caused by aircraft outside designated flight paths and training impacts.
Farmland impacts	AMP shows expansion onto approximately 62 acres of EFU land, not in conformance with Goal 3.	The 2012 Master Plan stated that such expansion onto EFU land may not be feasible and would require a Goal 3 exception. This AMP should address that topic.
Land use master planning – groundwater impacts	No identification or discussion of Goal 6 in the AMP	Discuss regulations on groundwater pollution.
Land use master planning-public utility discussion	No description of Goal 11 in the AMP	The AMP should address Goal 11 requirements and each specific public utility and/or service required for an urban airport.
Maintaining a 200’ ODOT right-of-way (ROW) width for Hubbard Highway.	Plan to maintain a 200’ corridor.	Reduce corridor to 100’ with additional right of way if needed at projected major intersections.
Noise impact potential	Unaddressed	Further discussion of levels and how they will be addressed with future expansion.

3.0 WATER – DRINKING, FIRE SUPPRESSION, STORAGE

3.1 AMP Summary – Water Utility

Water at airports is not a primary need but is nevertheless critical for normal operations, fire suppression, and support of standard business operations. It seems odd that utility information and details concerning water (water, stormwater-surface water – water quality) and wastewater needs are relegated to the appendices rather than included within the document. This focus minimizes discussion in Chapter 2 – Existing Conditions (limited to a single page) of the AMP and seems to conveniently circumvent state planning regulations.

In 2002, with assistance from Marion County, the Aurora Airport Water Control District was formed to provide non-potable water for fire protection for the Airport and adjacent privately owned lands near ODAV property. The District installed a 247,800-gallon fire suppression water storage system to support the Aurora Fire District. The system includes two wells on Airport property, a pump house, underground storage tanks, underground distribution piping, fire hydrants, and multiple fire-sprinkler connections serving on-airport facilities.

The overall plan lacks clarity on the provision of potable water uses within the airport. There is no discussion at all about potable water to the site. This needs to be evaluated, including signage for all non-potable uses for personnel safety.

Emergency response is provided by the Marion County Sheriff's Department and the Aurora Fire District (fire suppression, rescue, emergency medical service, and hazardous materials response). The nearest fire station is located in the City of Aurora, less than two miles from the Airport. Based on typical fire apparatus pumping rates of 1,000–1,500 gallons per minute (gpm), a full 247,800-gallon storage tank could support pumping for approximately three to four hours (order-of-magnitude estimate).

Several environmental and water-quality considerations warrant further documentation in the AMP. Previous water testing has identified arsenic above EPA maximum contaminant levels in wells on and surrounding the Airport property. Earlier planning efforts (2014, Aron Faegre & Associates) reportedly found three of six wells exceeding recommended arsenic levels. They recommended connecting to the City of Aurora water system (which has arsenic treatment in place). The Water Control District also requested Marion County's support (2013) regarding arsenic impacts and firefighting supply volumes; these items are not clearly addressed in the AMP. While the AMP references recommended pump and filtration mitigation, it does not clearly state whether these measures are proposed or how they would be implemented. Conveniently, there is no current water testing data to review regarding arsenic or overall water quality.

The AMP's Environmental Science Associates (ESA) Environmental Overview (2021) identifies adjacent regulatory and environmental considerations (including nearby RCRA/hazardous waste facilities and National Pollutant Discharge Elimination System (NPDES)-related stormwater monitoring) but does not

clearly address potential onsite sources of hazardous or deleterious materials relevant to water and firefighting operations, including per and poly-fluoroalkyl substances (PFAS)/foam (FFF/F3 transition) and arsenic. In addition, the National Wetlands Inventory maps a wetland adjacent to the Airport's northeastern corner; this feature is described as a concrete water retention pool maintained by Columbia Helicopters and has been discussed as a possible backup firefighting water source, but its role and availability remain unconfirmed.

Overall, while the AMP acknowledges the existence of the water/fire protection system and identifies arsenic exceedance with a general mitigation concept, the AMP does not clearly document: (a) system condition and capacity, (b) current status and quality of existing water supply, (c) commitments and implementation steps for arsenic mitigation (or alternative supply options), or (d) fire suppression storage/flow adequacy and operating assumptions.

3.2 FAA Master Plan Requirements – Water Utility

FAA AC 150/5070-6B (Airport Master Plans) indicates the master plan should include utilities in the inventory and planning effort, including:

- A utilities inventory that includes the "major elements" serving airport demand for water (and sanitary sewer) and also includes stormwater drainage.
- Where necessary, historical consumption data to help quantify and project future utility loads.
- Evaluation of future utility needs, and verification that existing utility system capacity is adequate at the airport boundary (i.e., not just a narrative description, but an evaluated/verified system).
- Consideration of backup water for emergencies as part of the utility planning discussion.

(Note: FAA AC 150/5070-6B is master planning guidance; Part 139 ARFF requirements apply only where the airport is certificated under Part 139.)

3.3 Recommendations – Water Utility

The following recommendations are suggested to bring the water utility section of the Aurora Master Plan into compliance with FAA standards.

- Part 139 safety benchmark: FAA discusses safety/rescue/firefighting for Part 139 airports. While Aurora is not a Part 139 airport, Windsor recommends that water measures to comply with Part 139 be evaluated.
- Arsenic: Water testing revealed arsenic above EPA maximum contaminant levels (MCLs) on and surrounding airport property. Windsor notes that arsenic discussion is minimal in the AMP, and while pump/filtration mitigation was recommended, there is no clear discussion that these

measures are proposed in the AMP. In addition, there are no current records or discussions of the current condition.

- Operational/resilience planning: Windsor notes the need to evaluate supply and volume (including coordination/contracting with local agencies such as the City of Aurora) and to verify adequacy for both drinking water and fire suppression storage/flow.
- With no real breakdown on uses within the airport facility, it is difficult to evaluate flow needs. Well capacities should be tabulated, system capacity should be tabulated, and water quality should be evaluated.

Table 2: Water Items of Concern - Recommendations

Description	Status	Recommendation
Water need, quality, and capacity are not addressed; there is no discussion of the condition of the system	Undescribed	• Further review and description of the existing system. Provide an overview map. • Provide evaluation of need and contract with local agency for supply and volume or backup supply. • Provide a projection of future water use within the service area • Determine adequacy of emergency backup water • Testing of current wells and determination of current arsenic levels. • Elaborate on the provision of potable water supply to the airport site.
Firefighting (water supply interface)	Aurora Airport Water Control District	• Add additional information; show evidence or a memo of understanding or contract with the City of Aurora. • Compute storage, piping, hydrant, and pumping sizing and determine if existing volumes and flow are adequate. • Describe the number and location of hydrants.

Description	Status	Recommendation
		• Provide contact information for fire protection service, repairs, and the owner.
Fluorine Free Foam firefighting (water quality/environmental interface)	Unknown	• Determine and discuss the use of an F3 system and the resulting impact on water needs.
Deleterious materials (PFAS, arsenic) (water quality / compliance interface)	Undescribed	• Provide description and compliance with State requirements for PFAS and arsenic.
Capital Improvement Plan	Undescribed	• Provide suggested CIP projects as related to the water system. Not required per FAA, but highly recommended by Windsor

4.0 SEPTIC SYSTEMS – WASTEWATER MANAGEMENT

The existing airport is 'served' by multiple septic tanks and drainfields. It seems odd that utility information and details concerning water (water, stormwater-surface water – water quality) and wastewater needs are relegated to the appendices rather than included within the document. This focus minimizes discussion in Chapter 2 – Existing Conditions (limited to a single page) of the AMP and seems to conveniently circumvent state planning regulations. Septic service does not equal sanitary sewer service, and there are ongoing issues with the septic drainfield's capacity.

It is our understanding that Marion County has denied past requests for upgrades to the current drainfields (2014, 2019). In addition, it is noted that the airport is pumping and hauling septage from many of the existing tanks indicating at best a system (or systems) that is under designed and at worst a system (or systems) that has failed.

Sanitary sewer 'service' is provided by individual and shared drain field/septic tank systems. There are reported to be six individual drain fields located on ODAV-owned property, with three proposed for the south end of the runway safety area (RSA) near the existing one used by the South End Airpark. The drain fields are shared for both aviation-related uses on both private and publicly owned land. Existing drainfields are discussed for removal due to their proximity to the airfield and concerns about loading. Interestingly, there is no discussion of upgrading the installations for adequate treatment capability or capacity.

4.1 Existing Site

Chapter 5 states - *Septic drain fields located inside the existing and future RSA will be improved to meet FAA surface gradient and load-bearing standards, or removed if they cannot meet those standards. There are multiple drainfields called out as non-standard conditions and according to Chapter 5 (Page 5-19) are not acceptable in their current location.*

Two existing septic drain fields located in the existing and future Runway Object Free Area (ROFAs) are to either be improved to meet FAA surface gradient and weight-bearing standards or removed. These installations should be evaluated for effectiveness and treatment, and removed/relocated if necessary. The AMP discusses location within the ROFA; it contains no discussion of relocation or even land suitability for this treatment methodology. Consequently, there is no clear discussion about how existing drainfields will be located, designed and function, especially when the existing drainfields operate in a failure mode.

4.2 Soils

The soil is mapped as "Am" – Amity silt loam - with 0-3% slopes by the USDA Natural Resources Conservation Service (NRCS). This soil type is described as hydric and considered 'somewhat poorly drained' with a depth to water table of only 6-18 inches. Past inspections show 'distinct redoximorphic

features within 8 inches of the ground surface, indicating high groundwater and saturation likely from a high seasonal water table. The report prepared by the Environmental Science Associates (ESA) states that onsite wastewater treatment (septic systems) is not feasible on this site. In addition, there is concern that the existing septic tanks and systems are not functioning properly, necessitating regular pumping of the onsite tanks.

Goal 6 of the Oregon Statewide Planning Goals addresses pollution. This goal requires local comprehensive plans and implementing measures to be consistent with state and federal regulations on matters such as groundwater pollution.

Table 3: Wastewater and Septic System Items of Concern - Recommendations

Description	Status	Recommendation
The current system seems to be in a failure condition.	Generally described as pumping.	Further review and description of the existing system.
Site conditions are unfavorable for septic systems.	Described in the AMP Appendix 3	Further describe the existing system, including ground–soil conditions. Provide evaluation of need and contract with the local agency (City of Aurora) for discharge and transfer to a sewer system.
Legal ability to serve with the sanitary sewer.	Undescribed	Work with the County (and City) to update the airport overlay code to allow for tightline sanitary sewer service outside of urban areas.
Aurora Airport Water Control District's role	Undescribed	Describe the District's role, responsibility, etc.

5.0 ACCESSIBILITY - ROADWAYS

The Airport is located between Interstate 5 and State Highway 99E. Interstate 5, which is an essential north-south commerce link for the western United States, runs west of the Airport, providing access to the Portland metro area. Access to the Airport is also provided by Highway 551 (Canby-Hubbard Highway) from the north and south, Arndt Road from the east and west, and Airport Road from Aurora. Keil Road is located south of the Airport and provides additional access to airport businesses from Highway 551 and Airport Road. State Highway 99E, accessible via Ehlen Road off Highway 551 and Airport Road, provides access to the nearby communities of Canby and Oregon City.

5.1 External Accessibility

While Aurora State Airport is not located within the Aurora UGB, its proximity to the City of Aurora but its impact on residents warranted its inclusion in the plan. The following excerpt from the City's plan outlines recommendations regarding the Airport. "…*For planning purposes, the City needs to continue to work with the Aurora State Airport and ODAV to help maintain and improve roadway access to and from the airport, as well as understand and address the effects of increased traffic flow on Airport and Ehlen Roads caused by airport growth. The increased growth will likely impact operations at intersections under the jurisdiction of the City, County, and ODOT. Mitigation for these impacts may be required in the future to ensure safety and efficient traffic operations."*

Marion County has jurisdiction over the non-state roads in the area. The overall external roadway appears to lack any review or discussion of improvements.

Most of the highways are two-lane, with minimal shoulders (2'-4' wide) and scratch (1'-2' deep) ditches. Left-turn lanes are in place, but minimal widening is available, even though the flat topography would otherwise allow for more. Arndt Road and Keil Road are extremely narrow. Some of the roadways have a level of service D (Arndt Road), with an intersection rating below D.

Highway 551, while an improved arterial, has a narrow shoulder and has experienced several documented accidents.

5.2 Internal accessibility

There is currently no dedicated vehicle service road within the airport. Access for support and delivery vehicles is largely via taxiways. Because of the lack of service roads within the airport, there is a high rate of vehicle-pedestrian deviations (V/PDs). The taxiway is on the east side of the single runway.

According to Chapter 5, a vehicle service road will be established; However, this has been removed from the preferred alternative with continued review and development moving forward. Given the frequency of V/PDs, removing this appears to be shortsighted.

5.3 Other

There is a discussion about using Aurora Airport as an emergency medical flight facility. This could result in additional impact on adjacent highways. Review of this should be performed with the County, State, and City.

Table 4: Transportation Items of Concern - Recommendations

Description	Status	Recommendation
Address road designations	Undescribed	Establish roadway designations with Marion County to determine ROW widths – Marion County reduced some classifications in the past.
Reinstate on-site vehicle service road.	Removed	Add a dedicated vehicle service road on site for safety.
Hubbard Road ROW	Undescribed	Work with ODOT to reduce ROW width for less impact on adjacent properties.

6.0 STORMWATER, RUNOFF

Stormwater is minimally discussed and realistically not included in the AMP. It seems odd that utility information and details concerning water (water, stormwater-surface water – water quality) and wastewater needs are relegated to the appendices rather than included within the document. This focus minimizes discussion in Chapter 2 – Existing Conditions (limited to a single page) of the AMP and seems to conveniently circumvent state planning regulations.

The current site is largely flat. It is located adjacent to runoff tributary areas, primarily the Pudding River to the east. Current conditions are the use of "roadway" ditches to send runoff to area culverts. The overall area is bounded by the Pudding River (~0.85 miles east), the Molalla River (~3 miles northeast), and Mill Creek (~0.75 miles southeast). All of these watercourses are downstream of the airport's stormwater discharge and are classified as sensitive habitat for salmonids.

The AMP includes an Environmental Overview performed by ESA in 2021 (Appendix 3). The document states that:

"*The purpose of this Environmental Overview is to describe the environmental conditions of the Airport and identify any known or potential environmental conditions or issues that could be affected by proposed development at the Airport."* It further states that a desktop analysis was performed of the following:

- Air Quality.
- Biological Resources (including fish, wildlife, and plants).
- Department of Transportation Act, Section 4(f).
- Hazardous Materials, Solid Waste, and Pollution Prevention.
- Natural Resources and Energy Supply.
- Visual Effects.
- Water Resources (including wetlands, floodplains, surface waters, water quality, stormwater, groundwater, and wild and scenic rivers).

The review only addresses 'inside the fence' issues and does not address any of the larger environmental issues or impacts of the area. They clearly state: "*Stormwater runoff from the Airport property flows into the Chinook and steelhead critical habitat areas as well as the Chinook and coho Effective Fish Habitat (EFH) areas. From the Airport property, overflow culverts direct stormwater to unnamed tributaries to Deer Creek. From Deer Creek, stormwater runoff flows to Senecal Creek, to Mill Creek, to the Pudding River, the Molalla River, and the Willamette River, where critical habitat is designated."*

6.1 Current uses and flow

The Airport's stormwater system is made up of a network of edge drains, culverts, and surface drainage features that generally flow to the east, west, and south sides of the Airport. Most of the stormwater runoff originating on ODAV-owned property and airfield facilities, like the runway, taxiway, and apron, flows to the west side of the Airport.

Two wetland delineations have been completed on portions of the Aurora State Airport Property. In 2003, WHPacific delineated several non-jurisdictional wetlands on the Airport property (2003). The delineated non-jurisdictional wetlands on Airport property are man-made drainage swales located in historic uplands with non-hydric soils. According to Oregon Department of State Lands (ODSL) Rule 141-085-0515 Removal-Fill Jurisdiction by Type of Water, these swales with wetland hydrology, vegetation, and soils are not considered waters of the state because they are artificially created for stormwater detention and/or treatment. These delineated non-jurisdictional wetlands all occurred within drainage swales on the eastern side of the runway. Since the original wetland delineation conducted by WHPacific, the locations of the paved taxiways and the swales delineated in that report have changed. The remaining swales identified in the two previous delineations were observed during the field reconnaissance. They were functioning as water retention facilities, with three culverts leading off Airport property to drain excess water during high-water events. In addition to the swales delineated on the east side of the runway, swales on the west side of the runway were also observed functioning as water retention facilities and may be non-jurisdictional wetlands. The delineated swales remain after the movement of the paved taxiway.

The National Wetlands Inventory maps a wetland adjacent to the Airport's northeastern corner; this feature is described as a concrete water retention pool maintained by Columbia Helicopters and has been discussed as a possible backup firefighting water source, but its role and availability remain unconfirmed.

Three culverts on Airport property conduct water off the Aurora State Airport boundaries. One culvert is near the northern extent of the runway, and two culverts are located at the southern boundary of the Airport property.

- The northern culvert connects the swales on both sides of the runway and is piped approximately 1,700 feet under the runway and Hwy 551 (also called Hubbard Cutoff Road NE) (see Figure 1). From there, water is discharged into an approximate 0.05-acre vegetated swale from which it then is piped under Boones Ferry Road and discharges into an unnamed tributary to Deer Creek. Deer Creek flows into Senecal Creek, which confluences with Mill Creek, which flows into the Pudding River that then confluences with the Molalla River before it is discharged into the Willamette River.

- The two southern culverts connect the southernmost swale on Airport property to a swale that continues south and west of Airport property. Satellite imagery and LiDAR data indicate that the off-site swale wraps around the northern and eastern edges of the agricultural field south of the Airport until it reaches a culvert that passes under Hubbard Cutoff Road NE and Boones Ferry Road NE, and through a residential area until it is discharged into an unnamed tributary to Deer Creek approximately one-mile south of where the northern culvert discharges to.

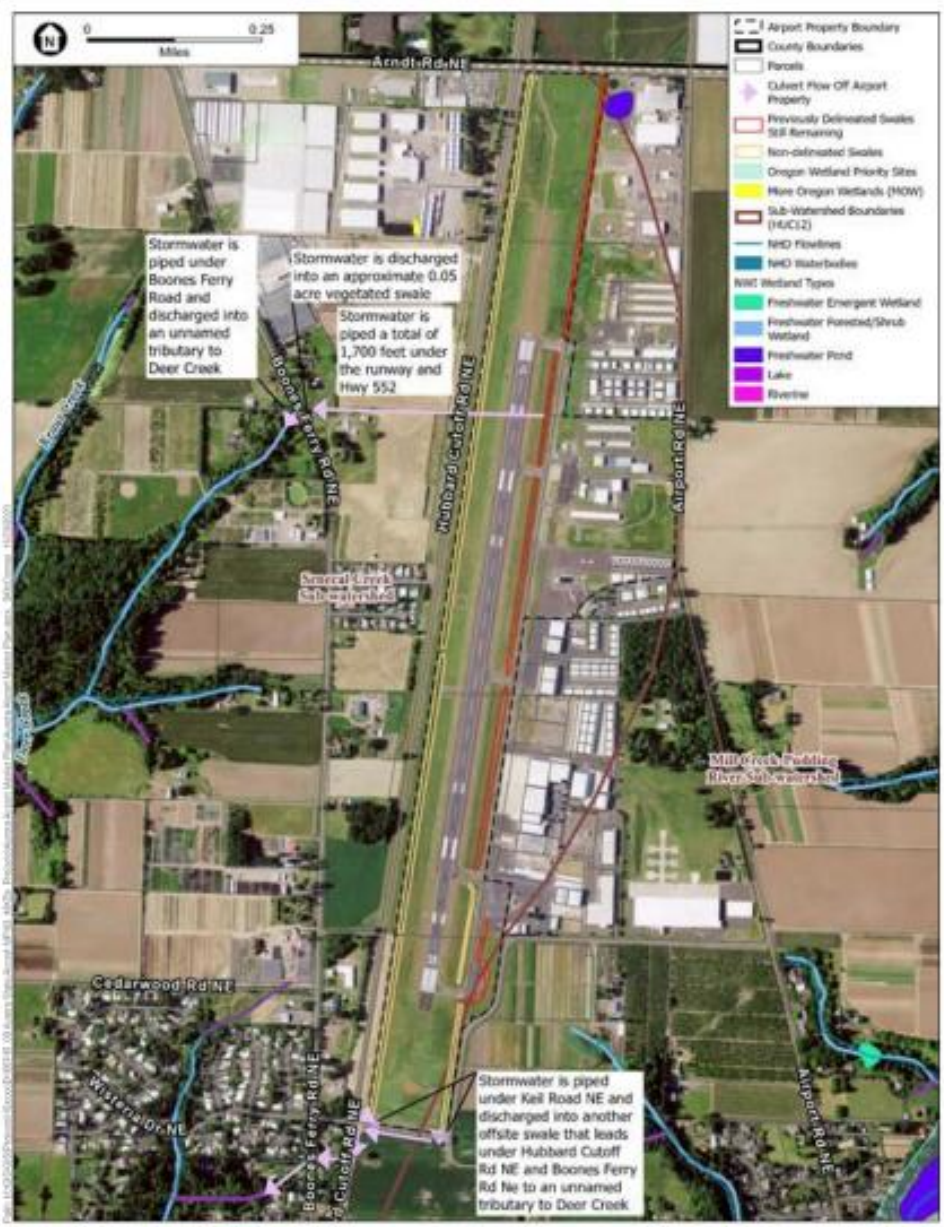

Figure 1: Airport Site

SOURCE: Century West Engineers Aurora State Airport Master Plan, Appendix 2 – Figure 1 - Basemap: (ESRI 2018); NWI: (USFWS 2021d); NHD: (USGS 2021); Oregon Wetland Priority Sites: (Oregon Spatial Data Library 2019); MOW: (Oregon Spatial Data Library 2019); Swales: Environmental Science Associates D201600745.05 Figure 1 Water Resources

The existing soils, as discussed in the septic section (Section 6), are largely hydric and poorly drained. This is why the existing swales and ditches are acting more like detention facilities than as treatment and discharge facilities.

The AMP describes the area waterways as contaminated (AMP Chapter 2) but provides no discussion for airport responsibility or efforts for onsite treatment or control. The airport is immediately adjacent to the Pudding River tributary area – basin (AMP Figure 2-8) and a 303(d) listed sub-watershed. It would be negligent for development in this area not to address the downstream impacts.

6.2 Other

With the potential use of deicing chemicals, fueling, and uncontained fuel storage, there is concern that runoff could be untreated.

The AMP includes (in Appendix 3) an Environmental Overview performed by ESA in 2021. Related concerns include the RCRA, the EPA hazardous waste treatment, storage, and disposal facility (adjacent), and the current status of the NPDES permits for site stormwater monitoring and discharge in the surrounding areas (1200Z stormwater permit). These items are discussed, but no description of concern or substantive action is included in the plan. No data is provided regarding compliance with or noncompliance with state discharge requirements.

Table 5: Stormwater Items of Concern - Recommendations

Description	Status	Recommendation
Water runoff is not discussed; there is no spill control plan described	Undescribed	Further review and description of the existing system, downstream impact, and sizing are necessary.
Chemicals	Undescribed	Provide a discussion of spill controls, runoff, and treatment onsite.
Deleterious materials	Undescribed	Provide a description and compliance with State requirements for PFAS and arsenic. Tie in discussion with potential septic system overflows.
Treatment facilities	Undescribed	Development a plan for treatment, control and discharge of runoff.
Overall stormwater plan	Undescribed	Develop an overall plan to identify and direct runoff, provide treatment and controls.
Fluorine Free Foam firefighting (water quality / environmental interface)	Unknown	Determine and discuss the use of an F3 system and the resulting impact on water need.

7.0 OTHER - GENERAL

7.1 Safety

The safety of the general public and the community seems largely absent from this document. This seems odd and quite concerning. It would seem that safety would be paramount and addressed by the state as a high priority. While safety is not listed as one of Oregon's Planning Goals, it would seem to be part of each AMP, as well as the overall development goal requirements, and should be thoroughly and thoughtfully included in any planning updates. Although Aurora is not a Part 139 airport, which relieves it of some aviation safety requirements, it seems that the State, as the licensed owner–operator, is remiss in failing to address or minimize safety measures at this facility.

The FAA discusses safety, rescue, and firefighting requirements for Part 139 airports. While Aurora is not classified as a Part 139 airport, fire protection and life-safety measures should be evaluated against Part 139 benchmarks to confirm adequacy for current and planned airport development. In addition, FAA guidance and related safety circulars (including the 150/5200 series) address firefighting considerations, and the FAA has required a transition to fluorine-free foam (F3) beginning in 2024, which is intended to reduce or eliminate PFAS in the environment. Again, Aurora is not a Part 139 airport, but Oregon water-quality requirements should take precedence over the convenience of noncompliance with state and federal guidelines. Oregon is implementing Federal EPA MCLs for five specific PFAS compounds and a hazard index for others. Public water systems were required to participate in the Fifth Unregulated Contaminant Monitoring Rule (UCMR5) between 2023 and 2025. In addition, Senate Bill 91 (2025) prohibits the use of PFAS-containing foam for training and for fire suppression.

With fueling services including 30,000 gallons of storage (12,000 gallons of aviation gas and 20,000 gallons of jet A) and annual fuel 'flowage' of over 1 million gallons/year, it seems like fire suppression should be a higher priority than the airport or AMP discusses. It appears that there are no containment structures in place at the current storage tanks.

Table 6: Safety Items of Concern - Recommendations

Description	Status	Recommendation
Fire Protection	Undescribed	• Further review and description of the existing program; required or responsible improvements. • Provide evaluation of need and contract with local agencies for backup support.

Mayors of the Aurora State Airport Area Communities

Aurora **Wilsonville**

December 13, 2021

The Honorable Kate Brown, Governor of Oregon
c/o Staff of the Office of the Governor — *Submitted via email to:*
Gina Zejdlik, Chief of Staff — *gina.zejdlik@oregon.gov*
Amira Streeter, Policy Advisor–Climate, Energy and Transportation — *amira.streeter@oregon.gov*
Annie McColaugh, Director–Federal Affairs — *annie.mccolaugh@oregon.gov*
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Leah Horner, Director–Regional Solutions — *leah.horner@oregon.gov*
Jody Christensen, Mid Valley Regional Solutions Coordinator — *jody.christensen@oregon.gov*

RE: Issues of Public Concern with Oregon Department of Aviation's Aurora State Airport Master Planning Process

Dear Governor Brown:

We write to you as the elected leaders of the communities located in closest proximity to the Aurora State Airport to express our profound disappointment at the Oregon Department of Aviation's biased handling of the Aurora State Airport Master Planning process. Our communities bear the brunt of impacts of the airport's operations, and yet the Aviation Department appears to be discounting our concerns and is primarily responsive to vested financial interests at the airport.

This observation is true in general, as Department of Aviation staff and board members indicate meeting constantly with private-sector airport interests, while rarely meeting with local community members, city councilors and staff. Multiple communications from officials at the Cities of Aurora and Wilsonville to the Aviation Department over the past several years are generally ignored and not responded to.

The Cities of Aurora and Wilsonville, along with other Planning Advisory Committee (PAC) members to the Department of Aviation's Aurora State Airport Master Planning process such as 1000 Friends of Oregon and Friends of French Prairie, seek to raise significant issues of public concern. This federally funded master plan has gotten off to a rocky start in a manner that demonstrates the Department's apparent bias and inability at providing fair public processes that meet Oregon's standards for meaningful public engagement.

We are concerned that the Department of Aviation is again making similar mistakes as it did with the 2011 or 2012 Aurora State Airport Master Plan process that both the Oregon Supreme Court and the Oregon Court of Appeals found in 2021 violated Oregon land-use and public-process laws. We request that the Governor's Office demonstrate decisive leadership that provides confidence to local-government officials that federal and state planning processes are

conducted in a legal and ethical manner above reproach, which at this time appears questionable.

A primary concern pertains to the extremely lopsided membership composition of the Planning Advisory Committee (PAC). The Department of Aviation has stacked the Planning Advisory Committee with self-dealing financial interests at the Airport that benefit from taxpayer-funded Airport operations and capital improvements. A review of the PAC membership demonstrates that well over half of the PAC membership is comprised of entities with direct pecuniary interest in furthering airport expansion at taxpayer expense.

The same pro-airport expansion entities are represented multiple times on the PAC. Two associations placed on the PAC are composed of a majority of Airport financial interests:

- The attorney for the Aurora Airport Improvement Association represented at the June 3, 2021, Oregon Aviation Board meeting that most of the businesses at the Aurora State Airport belonged to the Aurora Airport Improvement Association.
- In a similar manner, most of the same airport entities are also members of Positive Aurora Airport Management association, a local airport operations management group.

By all appearances, the process and committee composition has the appearance of a "tick the box" exercise in public involvement. This leaves us to conclude that the outcome is predetermined and that the inevitable result will lead to airport expansion regardless of the impacts on safety, the environment and surrounding infrastructure.

Another key problem is that the Department of Aviation has omitted two key state agencies as PAC members: Department of Agriculture and Department of Environmental Quality (DEQ). The Aurora State Airport is located in the heart of the Oregon's best "foundation farmland" of French Prairie, which hosts some of Oregon's foremost traded-sector ag producers, nurseries and food processors. Real-estate speculation and uncontrolled urban-level development—as are occurring at the Aurora State Airport area—are harmful to this prime ag-sector economic cluster. By excluding the Department of Agriculture from the public process, the Department of Aviation continues a trend of excluding parties that may provide valuable information or may question the Aviation agency's objectives.

We read in the media that the US Environmental Protection Agency (EPA) indicates that 750 Oregon sites could expose residents to 'forever chemicals' of per- and poly-fluorinated substances or PFAS, where growing evidence points to their adverse health effects, including some cancers. In Oregon, the state Department of Environmental Quality (DEQ) is testing locations including the Aurora State Airport for known or suspected PFAS use. Again, the Department of Aviation's exclusion of DEQ demonstrates an on-going pattern of discriminatory conduct.

We understand that the Governor's Office Executive Order 20-04 on Climate Action "Directing State Agencies to Take Actions to Reduce and Regulate Greenhouse Gas Emissions" (GHG)

directs DEQ to develop strategies that "Cap and Reduce Greenhouse Gas Emissions." We are concerned that representatives of the Governor's Office appointed to the Oregon Aviation Board and Department of Aviation staff simultaneously are advocating for major expansion of the Aurora State Airport that results in substantial increases in aviation-gas fossil-fuel consumption and GHG emissions, contrary to the Executive Order on Climate Action.

One of the major reasons stated by aviation interests for Aurora State Airport runway extension is to increase the sale of aviation fuel so that a larger class of aircraft may takeoff from the airport with full tanks of gas. We note that the tax on aviation fuel is the primary source of operational revenue for the Department of Aviation. Thus, the Department of Aviation has a direct pecuniary interest in advocating for increased aviation-gas fuel sales that would accompany expansion of the Aurora State Airport, seemingly in direct conflict with the Governor's Executive Order on Climate Action.

Additionally, DEQ data appears to indicate that the NMPDES (National Pollution Discharge Elimination System) permit for the Department of Aviation's Aurora State Airport discharge into Mill Creek-Pudding River watershed expired June 30, 2017. We understand that area residents have expressed concerns for surface-water, ground-water and well-water quality due to prospective airport run-off pollutants, unregulated septic systems and potential ground water pollution. Cumulatively, these all appear to be good reasons from the Department of Aviation's perspective to exclude DEQ from Airport planning efforts.

The Department of Aviation's tightly controlled master planning process fails to meet the test for meaningful public engagement. The Zoom meeting format used by the Department of Aviation does not list or show all participants in the meeting and provide clear labeling of names and affiliations. It is unclear to the public who is attending the meetings and who or what entity that participants represent. At the November 16, 2021, PAC meeting, it was difficult to ascertain from many of the name labels who was attending in what role. Names and affiliations of all PAC members and staff/consultants should be clearly evident.

Additionally, some PAC members were allowed to have two representatives participate in the meeting, while some PAC members were ignored and not allowed to participate in the meeting. These elements indicate a failure of meaningful public process.

The facilitators for the PAC meeting used a series of unscientific "polls" to gauge participants' thoughts or perspectives; however, it was unclear who was participating — was it PAC members, Aviation staff and consultants, and/or the public? Moreover, the facilitators interpreted the results of the poll that may or may not be an accurate reflection of the participants involved.

The Department of Aviation states that "As the airport sponsor, ODA staff will be the final decision-making authority. They will decide what is included in the Master Plan." Setting aside the fact that this pronouncement at the start of a "public involvement" process sends a message that is contrary to Oregon's Statewide Planning Goal Number 1, we believe this is false

information; only the appointed body *(i.e.,* the Oregon Aviation Board) can legally approve a master plan. The failure of the Aviation Board to adopt the 2011 or 2012 Aurora State Airport Master Plan was a centerpiece for the Oregon Supreme Court's affirmation of the Court of Appeal's decision against the Department of Aviation for failure to comply with Oregon law.

During the November 16, 2021, PAC meeting, aviation consultants indicated that they would consider nearby external "outside the fence" proposed urban-level developments in the Airport master-planning process — implying that such proposed developments would favor Airport expansion. However, the consultants gave no indication of reviewing such information in light of Oregon's EFU land-use laws, nor the potential reality of such proposed developments ever actually occurring. Additionally, consultants gave no indication of considering the "negative" aspects of proposed developments outside the Airport, such as increased surface-transportation impacts/traffic congestion and potential mitigation, increased land-speculation harming the ag industry, and increased pollution and environmental impacts.

The Department of Aviation has allowed and promoted the dissemination of false information about the seismic resilience of the Aurora State Airport. At the October 6, 2021, Oregon Aviation Board planning session and at the November 16, 2021, PAC meeting, misinformation about the seismic conditions of the Aurora State Airport area was provided without rebuttal. At the October meeting, the Aviation Board had considerable discussion on resilience, and the importance of selling the resilience concept to the public and government officials as a component of building support for state and federal funds for the Aurora State Airport expansion. Aviation Board Chair Meeker indicated a desire to improve "lines of communication" between the Governor's Office and airport businesses to promote resilience.

Contrary to statements that depict the Aurora State Airport as a crucial facility for the projected 9.0 Cascadia Subduction Zone Earthquake, the Aurora State Airport is listed at the lowest-level of Tier 3 airports in the Oregon Resilience Plan. The Tier designations "indicate the priorities for making future investments." In other words, the Department of Aviation is effectively targeting one of the lowest priority airports to prepare for recovery in the Oregon Resilience Plan for potentially one the largest airport capital improvement projects ever planned by the state.

With respect to the airport's ability to withstand a Cascadia Subduction Zone Earthquake, reports by the Oregon Department of Geology and Mineral Industries (DOGAMI) show that the Aurora State Airport is located in an area subject to major potential damage in a projected 9.0 Cascadia Subduction Zone Earthquake. The "Mid/Southern Willamette Valley Geologic Hazards, Earthquake and Landslide Hazard Maps, and Future Earthquake Damage Estimates," DOGAMI publication IMS-24, shows that the Aurora State Airport specifically is located in an area:

- Rated High for Ground Shake Amplification
- Rated High for Amplification Susceptibility
- Rated Moderate to High for Liquefaction Susceptibility

The same deep, fine soils that make the French Prairie area such exemplary foundation farmland also mean these soils are subject to amplification and liquefaction. As a result of such an earthquake, the airport runway would likely be unserviceable for a long period of time (6-12 months) post-earthquake. Rather than allow aircraft to take off or land due to an inoperable runway, the most likely role of the Aurora State Airport will be to accommodate vertical take-off and landing of heavy-lift helicopters with locally-based Columbia Helicopters and Helicopter Transport Services, neither of which require a runway extension to operate.

In all of our years of government service, we have never seen a state agency act with such disregard to the concerns of the local communities, and appropriate and fair public process. We request your intervention now to provide for an unbiased process that produces trust-worthy results. We believe that if the Department of Aviation were to comply with—rather than seek to evade—the letter and spirit of Oregon's land-use and public-process laws, judicial intervention to set a course correction would not be a necessary remedy that must be pursued by local governments and concerned citizens.

Again, we appreciate your time and consideration of these important issues, and we look forward to your response. Thank you.

Sincerely,

Brian Asher, Mayor
City of Aurora

Julie Fitzgerald, Mayor
City of Wilsonville

Enc:

- Letter from Cities of Aurora and Wilsonville to Sen. Lee Beyer and Rep. Susan McLain, Co-Chairs Joint Committee on Transportation, RE Request for Public Hearing on HB 2497 – Proposed Legislation to Create Transparent Public Process for State Aviation Department Agency Communications and Coordination with Local Governments and Communities on Aurora State Airport Issues of Concern, March 11, 2021
- Aurora State Airport in Relation to The Oregon Resilience Plan and DOGAMI Earthquake Susceptibility Maps – 2019

cc: Oregon Aviation Board
Senator Ron Wyden
Senator Jeff Merkley
Congressman Kurt Schrader
Congresswoman Suzanne Bonamici
House Speaker Tina Kotek
Senate President Peter Courtney
Representative Susan McLain (HD 29)
Representative Courtney Neron (HD 26)
Representative Christine Drazan (HD 39)
Senator Bill Kennemer (SD 20)
Metro Council President Lynn Peterson
Metro Councilor Garrett Rosenthal
Clackamas County Board of County Commissioners
Marion County Board of County Commissioners
FAA Mountain Region staff
Heather Fernuik, Director
Chris Schaffer, Planning & Programming Manager
Warren Ferrell (Acting) Manager, Seattle Airports District Office