Name	Mark Kendall
Group/Organization	League of Women Voters of Oregon
Address	1330 12th St SE, OR 97302
Email	lwvor@lwvor.org
Public Comment Topic	Aurora State Airport Master Plan

Public Comment

October 28, 2026

To: Oregon Aviation Board (OAB)
Re: Aurora State Airport Master Plan (UOA Master Plan)

The League of Women Voters of Oregon appreciates the opportunity to submit written comments ahead of the December 3, 2026, vote of the OAB on whether to approve the final draft of the UOA Master Plan. We have been following the issues surrounding the proposed expansion of the Aurora State Airport for many years and are aware of the challenges involved in reconciling competing statewide land use goals with the needs of local jurisdictions and those who live and work in the area surrounding the airport.

The following comments are based on the League's long-standing positions in support of Oregon's statewide land use planning program with local implementation. We believe that the state should have the primary responsibility for establishing the broad framework of planning goals and for coordinating comprehensive land use plans, but the implementation of these plans must include a review by local government.

We believe that the final draft of the UOA Master Plan presents some clear conflicts with Oregon's Statewide Land Use Planning Goals and the League's positions, specifically:
- Failure to align with the goals of Oregon's statewide land use planning system, which includes coordination with established municipal and counties' comprehensive land use plans and Urban Growth Boundary (UGB) expansion goals.
- Detrimental impacts on the environment, including water, air, and noise pollution.
- The taking of Exclusive Farm Use (EFU) land by eminent domain.
- Absence of careful weighing of economic benefits vs. environmental and other costs.

Goal 2: Land Use Planning
The objective of Goal 2 is to ensure land use decisions are established based on factual information and coordinated with other governments. The UAO Master Plan final draft and planning process failed to comply with this goal. Statewide land use planning processes and the concerns of the four local governments directly impacted by the airport expansion were largely ignored. OAB approval of the UAO Master Plan will mean that local jurisdictions will be required to adopt land use zoning changes that directly contradict local comprehensive plans mandated by Oregon's statewide land use program.

Further, the stated goal of the UAO Master Plan is to accommodate the airport's projected use in the next 20-30 years, as per FAA requirements. However, the plan is based on projected population growth data from 2021, and OAB has consistently refused to update the data, even though the final draft was not completed until 2025.
Moreover, the forecast is not based on actual airport activity. Population growth is not necessarily a reliable predictor of total airport activity. While ODAV's forecast implies a 0.98% population growth between 2021-2025, according to FAA public data, airport operations between 2022-2025 declined by over 15%, calling into question the validity of the forecast that underlies the UOA Master Plan.

Goal 3: Agricultural Land
Oregon's land use objectives include the preservation of agricultural land, mainly through exclusive farm use (EFU) zoning. The League supports protection of private property rights commensurate with overall consideration of public health and environmental protection. However, the final draft of the UOA Master Plan includes the conversion of 62 acres of exclusive farm use (EFU) land that is highly valued because it has some of the richest soil, best growing climate, and diversity of crops in the country. Moreover, this conversion, executed through takings, would have numerous detrimental environmental impacts.

Goal 6: Air, Water, and Land Resources Quality
Oregon's land use goals call for maintaining and improving the quality of air, water and land resources. The League supports water resource programs and policies that reflect the interconnectedness of water quality, water quantity, groundwater, and surface water that addresses the potential depletion or pollution of water supplies. We believe that the UOA Master Plan is in violation of the State's objective because it does not include any mention of mitigation plans for water runoff into tributaries of the Pudding River. Nor does it discuss or offer mitigation plans for the impact on agricultural and potable water due to increased well water demand or inadequate septic field sewage disposal. The impact on the increased sales and use of lead aviation fuel on air quality is also not addressed.

Goal 9: Economic Development
The League supports Oregon's land use Goal 9, which calls for "providing opportunities and adequate land for economic development for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens." We believe that airport expansion jeopardizes the health of surrounding communities without providing sufficient economic benefit to Oregon citizens. The likely primary beneficiaries of the expansion

will be owners and operators of larger aircraft, many of whom reside outside the state and stand to benefit from the absence of a sales tax in Oregon.

Goal 11: Public Facilities and Services; Goal 14: Urbanization
The State's goals include the orderly and efficient planning and arrangement of public facilities for urban and rural developments. It also calls for an orderly and efficient transition from rural to urban land use, mainly through urban growth boundaries (UGB). It is clear from the data included in the UOA Master Plan that long-term aviation demand will necessitate larger jets, increased air traffic, greater demand for transportation improvements, and increased demand for water and wastewater services.
It is our view that the UOA Master Plan fails to account for the fact that over the years the airport has become an increasingly urbanized area while remaining unconnected to municipal urban infrastructure services. We believe that coordination with the City of Aurora's comprehensive plan and current UGB expansion efforts is a much more appropriate path for addressing the airport's long-term development and infrastructure requirements. The City of Aurora has provided assurance on many occasions that it has more than adequate capacity for providing city services to the airport. A transition to city services through inclusion into Aurora's UGB should be required before any expansion plans are proposed.

Goal 12: Transportation
Even though alternative solutions were proposed, the UOA Master Plan includes provisions to move Highway 551 approximately 80 feet to the west and realign Keil Road to the east. This decision was made without coordination with local governments and is accomplished by condemning and demolishing
several homes and businesses. We believe these provisions conflict with Goal 12's mandate to coordinate transportation plans and "minimize adverse social, economic, and environmental impacts and costs." We also point out the negative impacts of airport reconfiguration on the main hanger of Life Flight, an important medical transport provider, which has asked for a postponement of the UOA Master Plan decision.

Lastly, we question the premise that there is a pressing need for the Aurora Airport to lengthen its runway in order to accommodate larger aircraft when Salem-Willamette Valley Airport is located only 30 miles to the south. It is located inside the Salem UGB and is already equipped to handle aircraft of all sizes. It does not appear to be a prudent use of taxpayer dollars to move a major state highway, eliminate high value farmland, and take homes and businesses just to duplicate what already exists in Salem.

On the basis of these stated reasons the League urges a no vote on the current version of the UOA Master Plan. Thank you for the opportunity to submit our comments.

Mark Kendall, President
LWV Oregon

Nilly Essaides, Action Chair
LWV Marion/Polk Counties

Allie Barnes, President
LWV Clackamas County

Please attach public comment and any supporting materials here:	https://www.formstack.com/admin/download/file/20240138567
Would you like to subscribe to emails about the State Aviation Board?	No

LEAGUE OF WOMEN VOTERS® OF OREGON

The League of Women Voters of Oregon, established in 1920, is a grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

October 28, 2026

To: Oregon Aviation Board (OAB)

Re: Aurora State Airport Master Plan (UOA Master Plan)

The League of Women Voters of Oregon appreciates the opportunity to submit written comments ahead of the December 3, 2026, vote of the OAB on whether to approve the final draft of the UOA Master Plan. We have been following the issues surrounding the proposed expansion of the Aurora State Airport for many years and are aware of the challenges involved in reconciling competing statewide land use goals with the needs of local jurisdictions and those who live and work in the area surrounding the airport.

The following comments are based on the League's long-standing positions in support of Oregon's statewide land use planning program with local implementation. We believe that the state should have the primary responsibility for establishing the broad framework of planning goals and for coordinating comprehensive land use plans, but the implementation of these plans must include a review by local government.

We believe that the final draft of the UOA Master Plan presents some clear conflicts with Oregon's Statewide Land Use Planning Goals and the League's positions, specifically:

- Failure to align with the goals of Oregon's statewide land use planning system, which includes coordination with established municipal and counties' comprehensive land use plans and Urban Growth Boundary (UGB) expansion goals.
- Detrimental impacts on the environment, including water, air, and noise pollution.
- The taking of Exclusive Farm Use (EFU) land by eminent domain.
- Absence of careful weighing of economic benefits vs. environmental and other costs.

Goal 2: Land Use Planning

The objective of Goal 2 is to ensure land use decisions are established based on factual information and coordinated with other governments. The UAO Master Plan final draft and planning process failed to comply with this goal. Statewide land use planning processes and the concerns of the four local governments directly impacted by the airport expansion were largely ignored. OAB approval of the UAO Master Plan will mean that local jurisdictions will be required to adopt land use zoning changes that directly contradict local comprehensive plans mandated by Oregon's statewide land use program.

Further, the stated goal of the UAO Master Plan is to accommodate the airport's projected use in the next 20-30 years, as per FAA requirements. However, the plan is based on projected population growth data from 2021, and OAB has consistently refused to update the data, even though the final draft was not completed until 2025.

Moreover, the forecast is not based on actual airport activity. Population growth is not necessarily a reliable predictor of total airport activity. While ODAV's forecast implies a 0.98% population growth between 2021-2025, according to FAA public data, airport operations between 2022-2025 declined by over 15%, calling into question the validity of the forecast that underlies the UOA Master Plan.

Goal 3: Agricultural Land

Oregon's land use objectives include the preservation of agricultural land, mainly through exclusive farm use (EFU) zoning. The League supports protection of private property rights commensurate with overall consideration of public health and environmental protection. However, the final draft of the UOA Master Plan includes the conversion of 62 acres of exclusive farm use (EFU) land that is highly valued because it has some of the richest soil, best growing climate, and diversity of crops in the country. Moreover, this conversion, executed through takings, would have numerous detrimental environmental impacts.

Goal 6: Air, Water, and Land Resources Quality

Oregon's land use goals call for maintaining and improving the quality of air, water and land resources. The League supports water resource programs and policies that reflect the interconnectedness of water quality, water quantity, groundwater, and surface water that addresses the potential depletion or pollution of water supplies. We believe that the UOA Master Plan is in violation of the State's objective because it does not include any mention of mitigation plans for water runoff into tributaries of the Pudding River. Nor does it discuss or offer mitigation plans for the impact on agricultural and potable water due to increased well water demand or inadequate septic field sewage disposal. The impact on the increased sales and use of lead aviation fuel on air quality is also not addressed.

Goal 9: Economic Development

The League supports Oregon's land use Goal 9, which calls for "providing opportunities and adequate land for economic development for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens." We believe that airport expansion jeopardizes the health of surrounding communities without providing sufficient economic benefit to Oregon citizens. The likely primary beneficiaries of the expansion will be owners and operators of larger aircraft, many of whom reside outside the state and stand to benefit from the absence of a sales tax in Oregon.

Goal 11: Public Facilities and Services; Goal 14: Urbanization

The State's goals include the orderly and efficient planning and arrangement of public facilities for urban and rural developments. It also calls for an orderly and efficient transition from rural to urban land use, mainly through urban growth boundaries (UGB). It is clear from the data included in the UOA Master Plan that long-term aviation demand will necessitate larger jets, increased air traffic, greater demand for transportation improvements, and increased demand for water and wastewater services.

It is our view that the UOA Master Plan fails to account for the fact that over the years the airport has become an increasingly urbanized area while remaining unconnected to municipal urban infrastructure services. We believe that coordination with the City of Aurora's comprehensive plan and current UGB expansion efforts is a much more appropriate path for addressing the airport's long-term development and infrastructure requirements.

The City of Aurora has provided assurance on many occasions that it has more than adequate capacity for providing city services to the airport. A transition to city services through inclusion into Aurora's UGB should be required before any expansion plans are proposed.

Goal 12: Transportation
Even though alternative solutions were proposed, the UOA Master Plan includes provisions to move Highway 551 approximately 80 feet to the west and realign Keil Road to the east. This decision was made without coordination with local governments and is accomplished by condemning and demolishing several homes and businesses. We believe these provisions conflict with Goal 12's mandate to coordinate transportation plans and "minimize adverse social, economic, and environmental impacts and costs." We also point out the negative impacts of airport reconfiguration on the main hanger of Life Flight, an important medical transport provider, which has asked for a postponement of the UOA Master Plan decision.

Lastly, we question the premise that there is a pressing need for the Aurora Airport to lengthen its runway in order to accommodate larger aircraft when Salem-Willamette Valley Airport is located only 30 miles to the south. It is located inside the Salem UGB and is already equipped to handle aircraft of all sizes. It does not appear to be a prudent use of taxpayer dollars to move a major state highway, eliminate high value farmland, and take homes and businesses just to duplicate what already exists in Salem.

On the basis of these stated reasons the League urges a no vote on the current version of the UOA Master Plan. Thank you for the opportunity to submit our comments.

Mark Kendall, President
LWV Oregon

Nilly Essaides, Action Chair
LWV Marion/Polk Counties

Allie Barnes, President
LWV Clackamas County