



October 13, 2025

via email to brandon.pike@odav.oregon.gov

Oregon Aviation Board
c/o Department of Aviation
Brandon Pike
Airport Planner
3040 25th Street SE
Salem, OR 97302

RE: City of Wilsonville Comments on 2025 Aurora Airport Master Plan

Dear Commissioners:

The City of Wilsonville (herein referred to as “the City”) appreciates the opportunity to comment regarding the proposed Aurora State Airport Master Plan “Airport Master Plan.” The Aurora State Airport is part of Area of Special Concern O of the City’s Comprehensive Plan—an acknowledged land use regulation under Oregon law that would be impacted by the proposed Airport Master Plan. Area of Special Concern O states:

“This Area is focused on the Aurora State Airport and adjacent properties. Aurora State Airport is a Category II, Urban General Aviation Airport operated by Oregon Department of Aviation and located approximately 1.6 miles south of Wilsonville city limits. The Airport is within Marion County, but it extends northward to the shared boundary with Clackamas County. Arndt Road serves as the northern boundary, Boones Ferry Road NE is the western boundary, and Area O extends south and east to include the Aurora State Airport and adjacent parcels. The boundary of Area O encompasses the Aurora State Airport property, adjacent properties with through-the-fence access, and adjacent rural properties that form a buffer around developed areas near the Airport.

The City of Wilsonville and Aurora State Airport are separated by a portion of a larger agricultural district known as the French Prairie. Although the Airport is outside of the City of Wilsonville’s boundaries, the runway at the Aurora State Airport is oriented in a north-south direction and aircraft taking off and landing fly over Wilsonville bringing noise and air pollution. Existing environmental and infrastructure issues at and in the vicinity of the Aurora State Airport have the potential to negatively impact the City of Wilsonville. These issues could worsen due to development and intensification of use in Area O. The Interstate 5 Freeway, State Route 551, and other major roadways in the vicinity connect

to the transportation system within the City of Wilsonville. Sewage treatment via septic systems for large industrial scale development and stormwater runoff in and around the airport can negatively impact the Willamette River watershed, in turn effecting water quality, natural habitat, and recreational opportunities for the surrounding communities. The existing federal and state framework of regulations, policies, and guidance specific to airport compatibility planning focuses primarily on protecting airports and aviation operations from intrusion of incompatible uses, rather than limiting or mitigating the impacts of aviation on nearby communities. These aviation policies include limiting physical hazards to air navigation in the area surrounding the Aurora Airport, but do not address potential impacts of existing operations and potential growth to public and private infrastructure and services, natural and environmental systems, and local residents. The designation of Area O provides policy direction for the City when reviewing proposed development and participating in planning efforts in the Area. Area-specific objectives both recognize the Aurora Airport's role in the state transportation system and local economy and identify the impacts to Wilsonville of airport expansion and intensification of use in Area O.

The City has identified a range of potential impacts from aviation operations at Aurora State Airport and development on the airport property and surrounding lands, including:

- Noise and air pollution from flight patterns over Wilsonville, particularly in residential areas, that negatively impact quality of life.
- Water pollution in the vicinity of, and to, the Willamette River, which the City of Wilsonville relies on as its primary source of water. The Willamette River is also an important environmental and recreational resource for the region and is designated and protected as part of the Willamette River Greenway by Statewide Planning Goal 15.
- Loss of high-quality farmland. The fertile agricultural land of French Prairie has been designated by the United States Department of Agriculture (USDA) as "Prime Farmland" due to having the best combination of high-quality soils, growing season, and moisture supply. These high-quality agricultural lands surround the Aurora State Airport and "through the fence" properties (adjacent lands which gain access to the Airport and operate aviation services and businesses) and are designated Rural Reserve, by Clackamas County and zoned Exclusive Farm Use (EFU) by Marion County, consistent with existing policies adopted by the State of Oregon and Metro region. The City acknowledges and supports the Airport's contribution to various sectors of the local economy, and also recognizes agricultural activity in French Prairie is exceptional and contributes substantially to the State's and Wilsonville's economy. French Prairie is a distinctive place in Oregon and some businesses locate in the City to have close proximity and access to these farm goods. Preservation of high-quality farmland in the French Prairie and its designation as a Rural Reserve continues to be a City priority.
- Negative impacts to the development of industrial and employment land in Wilsonville. The Metro Urban Growth Management Functional Plan designates several locations within the Wilsonville Urban Growth Boundary as Regionally Significant Industrial Areas, Industrial Areas, or other Employment Lands. The City

of Wilsonville and other public agencies have adopted standards to preserve these areas for the purpose of meeting regional employment need and set aside resources to provide infrastructure supporting their development. Potential development of industrial or other employment uses in "through-the-fence" areas or other parcels adjacent to the Airport, conflicts with regional and state policy in directing industrial growth towards designated employment lands within urban areas, including Wilsonville.

- Surface transportation access and adequate levels of service, or in the case of ODOT facilities adequate volume to capacity (v/c) ratios, in the City of Wilsonville, Area O, and routes connecting across the French Prairie. The Aurora State Airport is a component of the State's transportation system and provides economic benefits to Wilsonville residents and businesses by providing nearby access to general aviation and helicopter facilities. Surface transportation facilities, including I-5, Highway 551, Arndt Road, Airport Road, and Boones Ferry Road all connect to and impact the effective function of the transportation system in Wilsonville, and provide access between Wilsonville and French Prairie, the Aurora Airport, and Willamette Valley to the south. These transportation routes are designed to cross rural areas and could be negatively impacted by increased development intensity on rural land in the vicinity of the Airport.
- Resiliency and capacity for emergency response. The Airport provides an operational base for emergency service providers and could support the resilience of the region in the event of a natural disaster or other emergency. Changes to the configuration of the Airport, type of operations housed there, or development and intensification of use in Area O, could lead to impacts that may diminish the overall benefits provided by the Airport.

Objectives

- 1) Engage as an Affected Jurisdiction in Aurora State Airport master planning or other processes to review future development plans and policy for the Airport and through-the-fence properties. Advocate for operational and development policies for the Airport that include adequate provision of infrastructure, protection of environmental systems, and noise control measures.
- 2) Evaluate and respond to proposals for changes to the type and intensity of aviation activities at the Aurora State Airport to minimize noise and pollution impacts to residents, businesses, and environmental or public resources in the Wilsonville Urban Growth Boundary.
- 3) Maintain ongoing coordination with applicable agencies and organizations, including Oregon Department of Aviation, Oregon Department of Environmental Quality, Airport operators and aviation stakeholders to reduce the impacts of aviation on noise-sensitive areas like residential districts and environmental resource areas such as the Willamette River. Support a Federal Aviation Regulation Part 150 study to develop Noise Exposure Maps defining the existing and future noise exposure boundaries surrounding the Airport.
- 4) Evaluate and respond to public and private development and infrastructure projects in Area O to ensure that rural development patterns and agricultural activities are

- protected, supporting regional food security, the agricultural economy, and protection of environmental resources, consistent with policies adopted by the State of Oregon, Metro Region Rural Reserves, and County Exclusive Farm Use zoning.
- 5) Ensure that development within Area O maintains rural development patterns and includes appropriate, concurrent upgrades to public and private infrastructure and services to prevent negative impacts to the water, sewer, stormwater, and transportation systems serving Wilsonville and surrounding areas.
 - 6) Advocate to maintain the general aviation designation and existing services at Aurora State Airport, as an air transportation resource supporting Wilsonville-based businesses, as a hub in emergency management plans, and as an operational base for emergency service providers. Evaluate and respond to development proposals proposing to increase development intensity in Area O that could hinder safe, convenient, and efficient access to the Airport.

The concerns outlined in this language are not meaningfully addressed in the draft Airport Master Plan.

The City's other primary comment is that the **Airport Master Plan** lacks sufficient clarity regarding its legal and regulatory character—specifically, whether it constitutes only a “**business master plan**” developed by an entrepreneurial state agency or also a “**land use master plan**” through which a state agency is making land use decisions or directing affected local governments subject to Oregon's acknowledged land use framework. This distinction is critical, because, as stated in the notice email from August 29, under ORS 836.610(1) and OAR 660-013-0040, local governments are required to adopt comprehensive plan amendments and land use updates for airport facilities. These updates must also be found consistent with statewide planning goals, acknowledged land use regulations, and other applicable rules and statutes.

A business-oriented master plan, while potentially useful for internal agency operations or economic development, does not inherently satisfy Oregon's land use laws. The current draft of the Airport Master Plan fails to demonstrate how local jurisdictions—such as the City of Wilsonville, the City of Aurora, Clackamas County, or Marion County—are expected to make the necessary land use findings or adopt regulatory updates without a clear demonstration of compliance with applicable land use statutes and administrative rules.

As an example of the lack of attention to applicable law, there is the absence of analysis or findings demonstrating how the proposed State action aligns with the requirements of the **Climate-Friendly and Equitable Communities (CFEC) program**, adopted pursuant to **Governor Kate Brown's Executive Order 20-04**. This program, administered by DLCD and ODOT, requires State agencies and local governments to implement land use and transportation planning reforms that reduce greenhouse gas emissions, including demonstrating **no net increase in vehicle miles traveled (VMT) per capita**. The Airport Master Plan does not provide sufficient information to enable local governments to make findings of compliance with CFEC rules, particularly with respect to impacts on surface transportation systems and location of land uses, to not increase VMT per capita.

These land use concerns must be thoroughly addressed to determine whether the business-oriented Airport Master Plan is legally feasible under Oregon's land use framework. The current draft appears to prioritize the future operational and economic needs of the airport, while failing to adequately address the land use regulations that are integral to Oregon's comprehensive planning system. As an example, designating adjacent land as appropriate for through-the-fence uses without addressing reduction of protected farmland and how locating industrial uses on these lands will impact VMT per capita. This omission is particularly problematic given that land use planning is not optional—it is a mandatory component of any development proposal subject to Oregon's acknowledged land use laws.

The approach taken in the draft Master Plan is analogous to a private enterprise preparing to expand its physical footprint without first confirming whether such expansion is permissible under applicable zoning regulations. Such a process would be considered procedurally deficient and legally indefensible. Accordingly, the Airport Master Plan must be revised to incorporate a clear and comprehensive analysis of land use compliance before it can be considered for adoption or implementation.

Respectfully submitted,

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