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MARION COUNTY PUBLIC WORKS

September 19, 2025

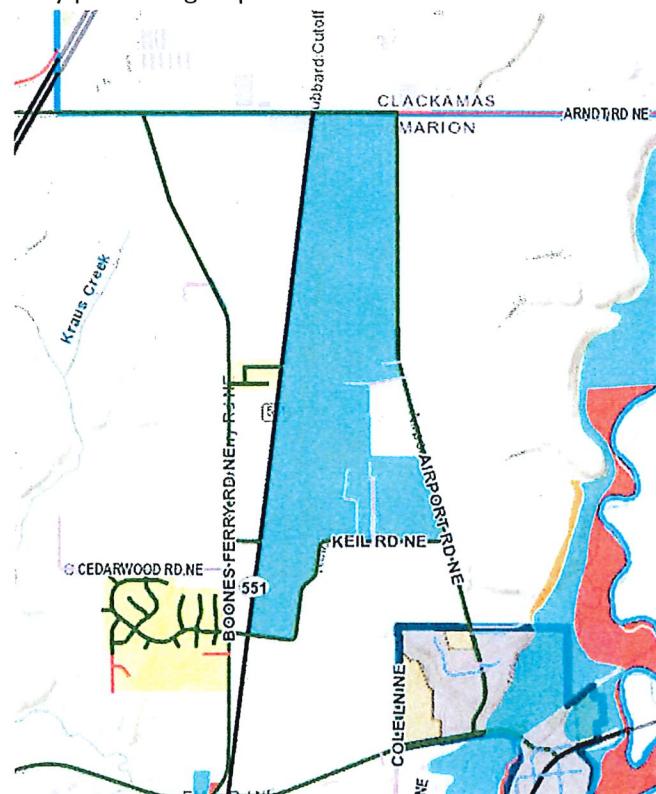
Brandon Pike, Aviation Planner
Oregon Department of Aviation
3040 25th St SE
Salem OR 97302

Dear Mr. Pike:

Thank you for the opportunity to review the Aurora Airport Final Draft Airport Master Plan. These comments are intended to provide feedback on the likely permitting requirements for items contained in the plan. Additionally, the plan is comprehensive and could be implemented in stages. I recommend you meet with Marion County Planning to discuss specific activities and developments to determine exactly what land use approvals are required to implement the plan.

Airports and airport-related commercial and industrial uses are a conditional use in the Public Zone in Marion County Code 17.171.030. New uses, changes of existing uses, new structures, and new airport components in the Public Zone require conditional use approval from the county.

If airport uses or airport structures are proposed to be placed on land currently zoned Exclusive Farm Use, it will be necessary to obtain a zone change to Public, and then conditional use approval, before uses or structures can be established. Some uses may also be able to be established as a utility facility necessary for public service through an administrative review application.



The zoning at the airport showing the Public zone in blue, the Exclusive Farm Use zone in white, and the Acreage Residential zone in yellow is provided with these comments.

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Roadway realignments, for both Highway 551 and Keil Road, which cause structures to be removed, require conditional use approval. If structures are not removed and new lots are not created, no county land use approval is required.

Conditional use approval requires demonstrating that applicable criteria are satisfied as well as property development standards are met by the proposal, including, but not limited to, sewage disposal and traffic analysis.

The County is in the process of revising both the Marion County Engineering Standards and Rural Transportation System Plan (TSP). While copies of the existing standards and TSP are provided with this letter, the airport development will be subject to the most current standards and policies adopted by the County at the times of application and development.

Regarding submission of the master plan to the county, the Department has three options:

- Oregon Department of Aviation may choose not to submit the master plan for county consideration of approval and instead apply for consideration of conditional use approvals for individual items or groups of items contained within the plan.
- The Department may choose to submit the master plan for consideration of conditional use approval if, with submission of the master plan, a conditional use application is made that addresses applicable criteria.
- The Department may choose to submit the master plan for consideration of incorporation into the county's comprehensive plan if, with submission of the master plan, a comprehensive plan amendment application is made that addresses applicable criteria in statute, administrative rule, statewide planning goals, and the Marion County Comprehensive Plan and a conditional use application is made that addresses applicable criteria for the conditional use.

The master plan also includes language that the county would adopt new zoning at the airport and a new overlay zone, consistent with requirements in ORS 836.610. Subsection (2) of that statute provides that planning work be performed when funding is made available. I will discuss the request and the applicable statute with the Marion County Board of Commissioners when the master plan is submitted to the county.

Additionally, there may also be issues that arise as part of the process when a master plan is submitted to the county. For example, the current draft does not appear to ensure that land identified as suitable for airport related development in the new master plan is shown consistent with the 1976 master plan adopted by the county as well as the county's recent approval of airport uses in Conditional Use/Comprehensive Plan Amendment Case 24-038. Issues like this will require continued coordination to address these concerns as they arise.

Regarding compatibility of the draft master plan with the Marion County Comprehensive Plan, consistent with the requirements for coordination provided in OAR 738-0130-0055, findings are not present in the

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master plan that would allow the county to determine its compatibility. To demonstrate compatibility with the Marion County Comprehensive Plan, the draft airport master plan must demonstrate compliance with applicable statutes in ORS 215 and 836 and administrative rules 660-004, 660-011, 660-012, 660-013, Statewide Planning Land Use Goals, the Marion County Comprehensive Plan, Rural Transportation System Plan, and Chapters 112, 115, 119, 123, 126, 136, 171 and 177 of the Marion County Zoning Code, among other criteria depending on the final draft proposal for development contained in the master plan.

While some of these rules and laws are referenced in the draft master plan, no discussion of how the plan would satisfy applicable criteria is contained in the plan and no findings are presented in the draft master plan, so it is not possible to determine compatibility with the information available at this time.

A summary of the criteria which would apply to the state's request is attached to this letter with copies of the applicable county zoning code chapters and other documents containing relevant criteria. The summary is provided as a courtesy and the county reserves the right to review any other applicable criteria as additional information becomes available. There may also be specific criteria and policies within the Oregon Aviation Plan which we can discuss at any future meetings.

ODAV should be sure to coordinate with ODOT about criteria and other requirements regarding the Hubbard Highway realignment.

Additionally, a determination of compatibility consistent with the Marion County Comprehensive Plan and land use goals must be made by the Marion County Board of Commissioners through a legislative amendment. The determination is necessary if the compatibility determination were to give county approval for the master plan, or portions of the master plan, since a master plan is a component of the Marion County Comprehensive Plan. Alternatively, ODAV can obtain approval for many individual items contained within the plan through the conditional use or administrative review process.

Please reach out to me or Austin Barnes, Principal Planner, at 503-588-5038, if you wish to discuss these comments. We also welcome the opportunity to meet with you to discuss additional details about the plan and next steps in both the state and county process.

Thank you,



Brandon Reich
Planning Director