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Via Email

State Aviation Board
Oregon Dept. of Aviation
3040 25th Street SE
Salem, OR 97302
mail.aviation@odav.oregon.gov

Re: Draft Aurora State Airport Master Plan and Draft Agency Findings

Dear Chair Stephens and Members of the State Aviation Board,

On behalf of Friends of French Prairie and 1000 Friends of Oregon, please accept the following comments on the Draft Aurora State Airport Master Plan and draft findings.

The May 2025 draft Aurora State Airport Master Plan ("draft plan" or 2025 plan) fails to comply with OAR 660-012-0065(3)(n). The Agency (Aviation Board) last adopted an airport master plan for the Aurora Airport in 2000. The 2000 master plan described the reference design aircraft as B-II. The current draft plan seeks to design for a larger class of aircraft, C-II. Although the Aurora Airport meets the itinerant use threshold to qualify to design for C-II aircraft, the airport has not previously been designed for that category of aircraft. If approved, this would be the first master plan that contemplates expansion of the airport design to accommodate the C-II class of aircraft.

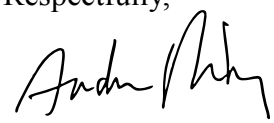
The draft plan explains that the FAA design standards listed in the FAA Advisory Circular 150/5300-13B for AAC/ADG C-II aircraft require an Runway Object Free Area (ROFA or OFA) with a width of 800 feet and 1000 feet of length beyond the runway end. *See* AC 150/5300-13B, Figure 3-1, and Table G-8 (listing design standards matrix for AAC C/D/E and ADG II). In contrast, AAC/ADG B-II aircraft only require an ROFA width of 500 feet and 300 feet of length beyond the runway end. *See* AC 150/5300-13B, Figure 3-1 and Table G-4 (listing design standards matrix for AAC A/B and ADG II).

The draft plan at 4-6 and 4-18 explains that the current ROFA fails to meet the C-II design criteria because "Hubbard Highway is partially located within Runway 17/35 OFA" and "Keil Road is partially located within Runway 17/35 OFA." Draft Plan at 4-6. The draft plan lists other improvements that are located within the RSA (See Figure 3-1, and Table G-4, G-8), including drain fields, drainage ditches, and other features.

Because the draft plan proposes to expand the airport facilities (including the RSA and ROFA) to permit service to a larger class of aircraft (from previous master plan design for B-II to current draft plan C-II), the proposed realignments of Keil Road and Hubbard Highway do not meet the requirements listed in OAR 660-012-0065(3)(n). For that reason, the draft plan cannot rely on OAR 660-012-0065(3)(n) to demonstrate compliance with Goals 3, 4, 11, and 14. ORS 215.283(3)(b). The proposed expansion of the airport facilities shown on the proposed alternative and ALP include road re-alignments therefore require an exception to Goals 3, 11, and 14. ORS 215.283(3)(a). These expansions would occur on rural lands, including EFU, and therefore do not meet the requirements in OAR 660-012-0065(3); *see id.* (1) ("identifying transportation facilities, services, and improvements which may be permitted on rural lands consistent with Goals 3, 4, 11, and 14 without a goal exception.").

For those reasons, the proposed findings fail to demonstrate compliance with the goal exception process required by ORS 197.732 and LCDC's implementing rules. The draft plan identifies the airport as an urban use, which is not allowed on rural lands. Without demonstration of compliance with Goals 3, 11, and 14 or the exceptions process required by ORS 197.732, the proposed findings fail to comply with the requirements in ORS 197.180 or the agency's State Agency Coordination rules at OAR 738-130-0055. Specifically, the draft plan and findings fail to demonstrate compatibility with the Marion County comprehensive plans that protect farm land or planning Goals 3, 11, and 14, all of which violates OAR 738-130-0055(5) and (6).

Respectfully,



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