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.

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.

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.

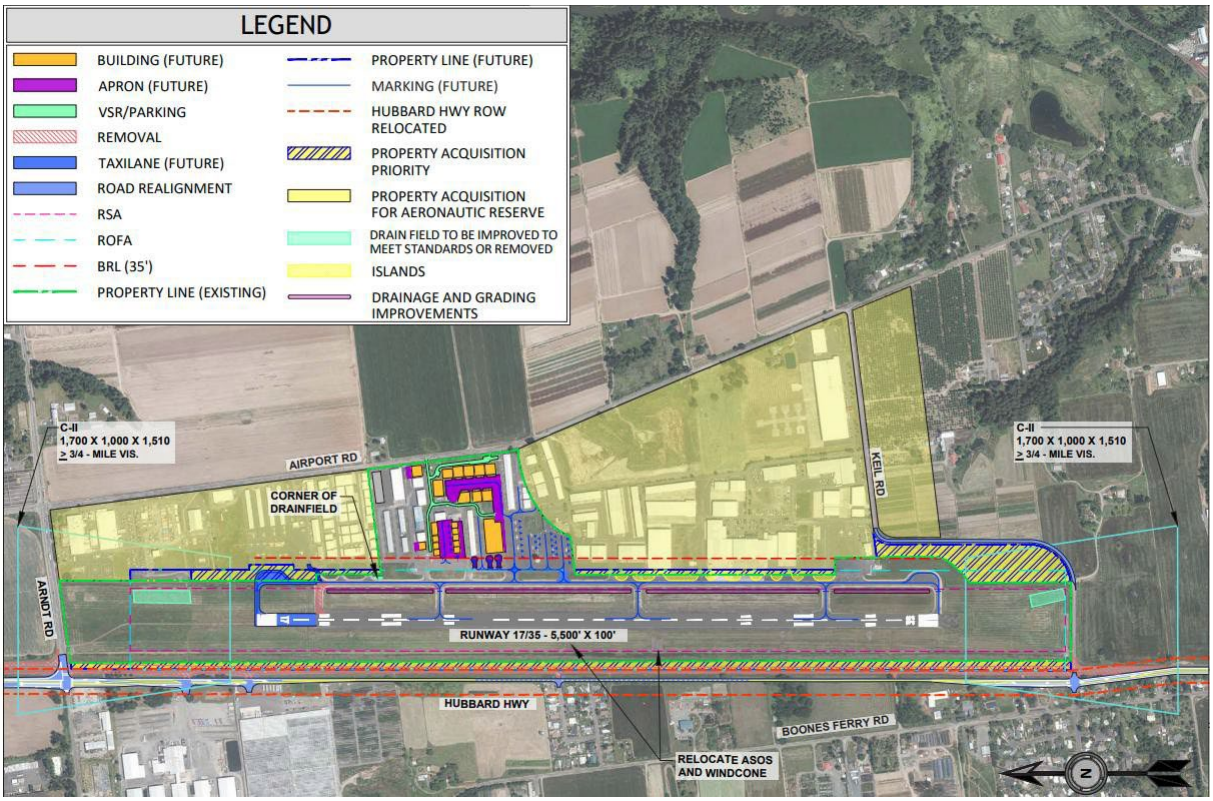
Following this process, the Department selected a preferred alternative, which is described in detail in Chapter 5 of the UAO Master Plan. The Airport Layout Plan that forms the basis of the preferred alternative is illustrated in Chapter 6. Chapters 5 and 6 together set out the Department's preferred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

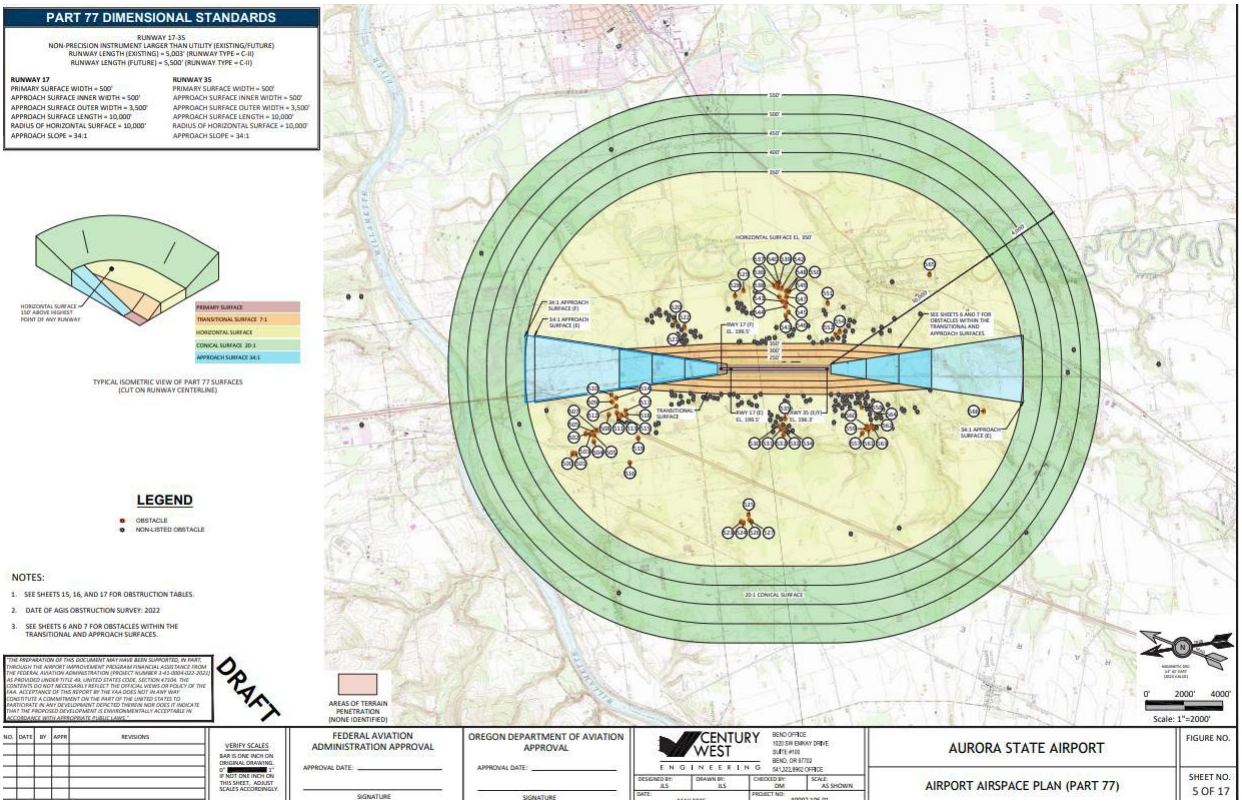
All of the future physical improvements will occur within the Marion County planning jurisdiction. However, as a result of a proposed project to modify the runway, there will also be a change to the current airport imaginary surfaces as shown in the image below. As established in 14 CFR 77.19, the civil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

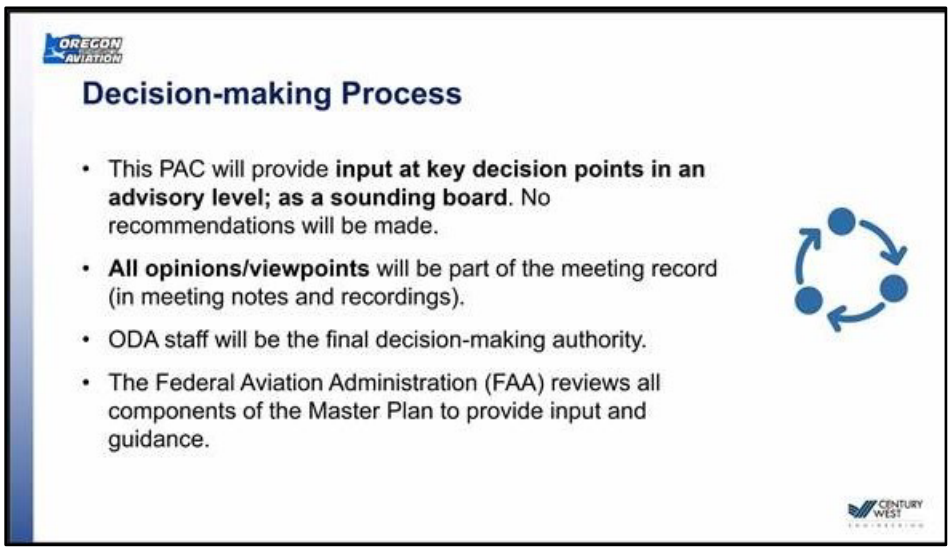
Finding: As discussed above, throughout the airport master planning process, the Department has made citizen involvement a major priority. Between November 2021 and February 2025, ODAV conducted 14 public meetings to address the components of the master plan and discuss concerns and solutions brought 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.

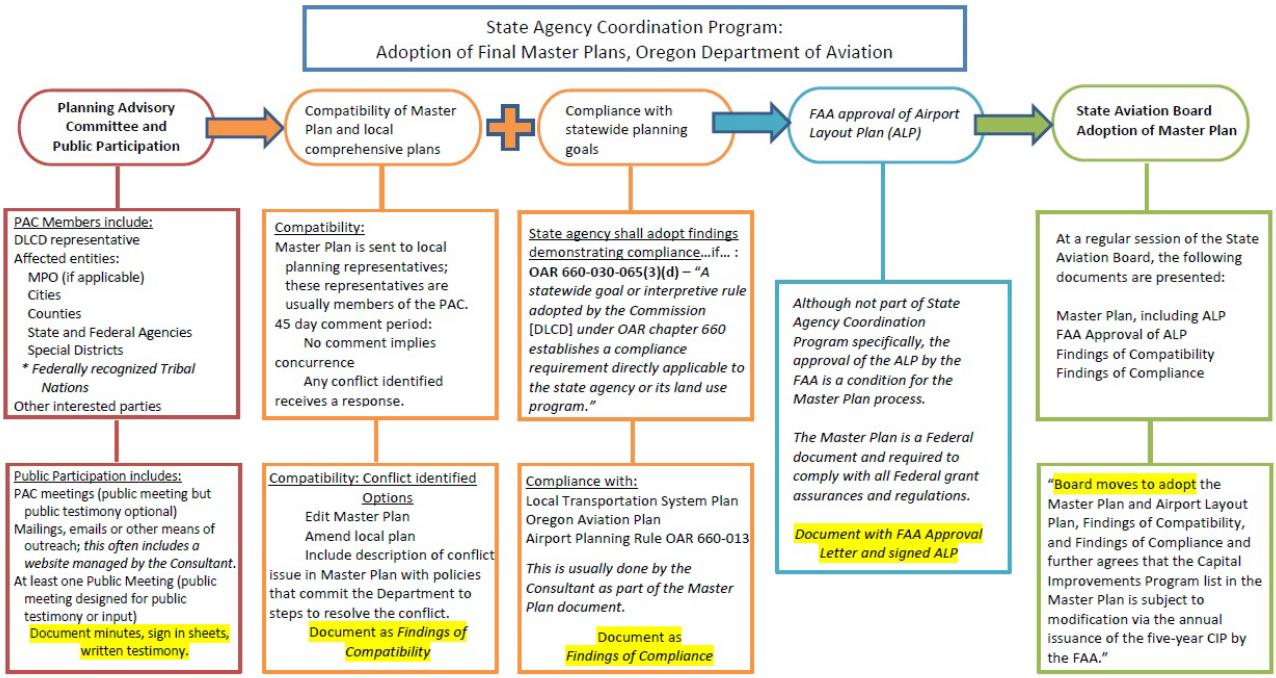
In addition, the Department has adopted its state agency coordination rules to ensure that the Department's planning actions comply with statewide planning goals and are compatible with acknowledged comprehensive plans. The Department has followed the coordination process established in these state agency 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]

---

[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

---

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

City of Aurora Comprehensive Plan Update 2009, Updated 2019 via Ordinance 488 and 2022 via Ordinance 496. https://www.ci.aurora.or.us/media/32671

City of Aurora Transportation System Plan, August 2009. https://www.ci.aurora.or.us/media/33801

City of Barlow Comprehensive Plan, Adopted November 29, 1978. https://scholarsbank.uoregon.edu/items/700cc298-7cfe-479a-8808-ccc9d12bd4c5/full

City of Wilsonville Transportation System Plan, Amended by Ordinance No. 877, May 1, 2023. https://www.wilsonvilleoregon.gov/sites/default/files/fileattachments/community_development/page/30371/03._ord.no_.877_exhibit_a_tsp_amendments.pdf

Clackamas County Comprehensive Plan, Amended May 3, 2001. https://www.clackamas.us/planning/comprehensive.html

Clackamas County Transportation System Plan, Amended July 17, 2025. https://dochub.clackamas.us/documents/drupal/4f347d01-968b-47c4-ae92-7eaac0776a0f

Clackamas County Zoning and Development Ordinance, Public Use Airport and Safety Overlay Zones, Amended October 2, 2018. https://www.clackamas.us/planning/zdo713

Clackamas County Zoning and Development Ordinance, Exclusive Farm Use District (EFU), Amended September 3, 2024. https://www.clackamas.us/planning/zdo401

Federal Aviation Administration AC 150/5020-1: Noise Control and Compatibility Planning for Airports, Effective August 5, 1983. https://www.faa.gov/documentLibrary/media/Advisory_Circular/AC_150_5020-1.pdf

Marion County Code, A Codification of the General Ordinances of Marion County, Oregon. Ordinance 1481, Ordinance 1489, passed April 15, 2026. https://www.codepublishing.com/OR/MarionCounty/#!/MarionCountyNT.html

Marion County Code, Comprehensive Plan. Ordinance 1489, passed April 15, 2026. https://www.codepublishing.com/OR/MarionCounty/#!/MarionCompNT.html

Marion County Rural Transportation System Plan: 2005 Update. https://www.codepublishing.com/OR/MarionCounty/#!/MarionComp02/MarionComp0206.html#02.06

Marion County Rural Transportation System Plan (RTSP) - February 2026. https://marion-county-rtsp-deagis.hub.arcgis.com/pages/library

Metro 2023 Regional Transportation Plan. Adopted November 30, 2023. https://www.oregonmetro.gov/projects/2023-regional-transportation-plan#outcome