

Exhibit B

CITY OF EUGENE ORDINANCE NO. _____
LANE COUNTY ORDINANCE NO. PA 1380
FINDINGS IN SUPPORT OF THE ADOPTION OF
AN UPDATE TO THE EUGENE AIRPORT MASTER PLAN
(FILE# RA 19-2 AND PA 19-5770)

Introduction

The current update to the Eugene Airport Master Plan replaces and updates the previous version (adopted in 2010) as a refinement to the Eugene-Springfield Metropolitan Area General Plan (Metro Plan). The purpose of this plan is to provide guidance regarding specific airport functions including commercial aviation, general aviation, and airport-related commercial and industrial services associated with the airport. As stated in the plan goals and objectives, the current master plan update focuses on the refinement of “landside” components (such as future development of airport-supporting commercial services) and ways to make the airport more financially self-reliant, but also includes improvements within the existing airport boundary to accommodate the Eugene Airport’s projected aviation demands. This update uses 2016 as the base year for data and analytical purposes and serves as a development guide through the planning horizon of 2035.

Similar to the 2010 update, the current update does not include any amendments to the Metro Plan or other regionally or locally adopted plans. No changes to existing land use designations, zoning, or adopted policy are proposed. The current update does include recommendations for a variety of airport improvements that will accommodate the Airport’s needs into the future, some of which will require further research and analysis to determine the need and timing for any future Metro Plan amendments or zone changes in the vicinity. Those recommendations are further addressed in the findings below and it is emphasized that any specific Metro Plan amendments or zone changes necessary to implement the recommendations of the Eugene Airport Master Plan will require additional public process and formal adoption by the affected jurisdiction(s) in the future.

As addressed in the findings below, the current update of the Eugene Airport Master Plan is consistent with the process and regulations established for airport planning and administered by the Federal Aviation Administration (FAA) and the Oregon Department of Aviation (ODA). The master plan update follows the process set forth in FAA Advisory Circular 150-5070-6B Change 2, Airport Master Plans, and complies with the State’s airport planning regulations including applicable Oregon Revised Statutes (ORS) and Oregon Administrative Rules (OARs). The findings below further demonstrate that adoption of the Eugene Airport Master Plan update is consistent with the applicable local approval criteria for adoption as a refinement to the Metro Plan.

The need for joint City of Eugene and County adoption of the updated master plan stems from the location of the Eugene Airport outside the City’s urban growth boundary (UGB), but within the Metro Plan boundary. As a matter of Metro Plan policy, the airport is located outside the UGB to protect aviation functions from incompatible development, as well as to reduce airport-related impacts on development within the UGB. Due to this location, land use regulations for the airport property are under Lane County jurisdiction, and adoption of the refinement plan for this City-owned facility includes both governing bodies. The joint adoption is also appropriate as the updated Eugene Airport

Master Plan will replace the existing plan, which was also adopted jointly.

Approval Criteria and Evaluation

Eugene Code (EC) 9.8424 requires that the following criteria (in **bold**) must be met for adoption of the updated Eugene Airport Master Plan, as a refinement to the Metro Plan:

- (1) The refinement plan amendment is consistent with all of the following:**
 - (a) Statewide planning goals;**
 - (b) Applicable provisions of the Metro Plan;**
 - (c) Remaining portions of the comprehensive plan.**

- (2) The refinement plan amendment addresses one or more of the following:**
 - (a) An error in the publication of the refinement plan.**
 - (b) New inventory material which relates to a statewide planning goal.**
 - (c) New or amended community policies.**
 - (d) New or amended provisions in federal law or regulation, state statute, state regulation, statewide planning goal, or state agency land use plan.**
 - (e) A change in circumstances in a substantial manner that was not anticipated at the time the refinement plan was adopted.**

Lane Code (LC) criteria at LC 12.225, for approval of a Metro Plan refinement plan amendment, are also included below:

The following criteria will be applied by the Board of Commissioners and other applicable governing body or bodies in approving or denying a Metro Plan amendment application:

- (1) The proposed amendment is consistent with the relevant Statewide Planning Goals; and**
- (2) The proposed amendment does not make the Metro Plan internally inconsistent.**

The findings below address consistency with the applicable approval criteria in support of adoption.

Statewide Planning Goals -- EC 9.8424(1)(a) and LC 12.225

Goal 1 - Citizen Involvement: To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.

The City of Eugene and Lane County have acknowledged provisions for citizen involvement that ensure the opportunity for citizens to be involved in all phases of the planning process and set out requirements for such involvement. Adoption of this update to the Eugene Airport Master Plan, as a refinement of the Metro Plan, does not amend the citizen involvement program of either jurisdiction. The process for reviewing this refinement plan update complies with Goal 1 since it complies with, and surpasses the requirements of, the citizen involvement provisions.

Beyond the locally required public notice and hearings which are described below, as part of the

master planning process, a public communication program was established to provide access to information and provide a conduit for comments and concerns. A Technical Advisory Committee comprised of key airport users, Airport staff, and other technical experts, and a Community Advisory Committee of local community leaders and other local/regional airport stakeholders were convened quarterly for the planning process of the Master Plan. In addition, two public open houses for the development of the master plan update were held, one in downtown and one at the airport.

The City of Eugene and Lane County implement Statewide Planning Goal 1 by requiring that notice of the proposed adoption be given, and public hearings be held prior to adoption. Consideration of the proposed adoption began with a joint public hearing by the Eugene and Lane County Planning Commissions. The joint Planning Commission public hearing on the proposed adoption was duly noticed to the City of Springfield, Lane County, community groups and individuals who have requested notice. The City also mailed notice of the proposed refinement plan update to the Department of Land Conservation and Development, in accordance with State statutes. Notice and opportunity to comment was also provided to the Oregon Department of Transportation (ODOT), and other interested parties including members of the Eugene Airport Advisory Committee. In addition, notice of the public hearing was published in the Register Guard newspaper. The Eugene City Council and Lane County Board of Commissioners also held a duly noticed joint public hearing to consider adoption of the Eugene Airport Master Plan, prior to final action by each local jurisdiction.

These notice requirements and public hearing processes, in addition to the work of the Airport Advisory Committee, have afforded ample opportunity for public input and involvement consistent with the State's citizen involvement provisions required by Statewide Planning Goal 1.

Goal 2 - Land Use Planning: To establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual base for such decisions and actions.

Under Goal 2, the Metro Plan serves as the area's comprehensive, policy framework plan. The current update to the Eugene Airport Master Plan replaces previous version (adopted in 2010) as a refinement to the Eugene-Springfield Metropolitan Area General Plan (Metro Plan) and is found to be consistent with the policy framework already established by the Metro Plan, and related adopted plans. As required by the approval criteria for adoption of this refinement plan update, findings regarding consistency with the relevant provisions of the Metro Plan are provided later in this evaluation. The proposed update also follows applicable procedures for coordinated adoption by the local governing bodies including the City of Eugene and Lane County.

In addition to its status as a component of the overall comprehensive planning framework, the master plan update is also required to meet FAA requirements for aviation planning and remain eligible for FAA funding for needed Airport improvements. As in the past, the current master plan update was developed consistent with the FAA guidelines for Airport master plans and also accounts for numerous aviation standards relating to airport operations safety, noise and compatibility with surrounding land uses contained in applicable FAA Federal Aviation Regulations. The current update is also consistent with state airport-related objectives outlined in the Oregon

Aviation Plan and promulgated through the state's adopted Aviation System Plan (ASP) and related statutes and administrative rules.

ORS 836.610, Airports and Landing Fields, requires that local comprehensive plans and land use regulations accommodate airport zones and uses for certain publicly owned and privately-owned public use airports. Pursuant to OAR 738-090-0030, the Eugene Airport (a.k.a. Mahlon Sweet Field) is listed as one of the publicly owned airports registered, licensed, or otherwise recognized by the Oregon Department of Transportation (ODOT) and Oregon Aviation Department (ODA). For airports so listed, ORS 836.610 requires that comprehensive plans be consistent with the provisions in ORS 836.616, which establish rules for airport uses and activities, and ORS 836.619, relating to state rules establishing safety and compatibility standards of land uses near airports.

The Airport Planning Rules contained in OAR 660, Division 13 implement ORS 836.600 through 836.630 and Statewide Planning Goal 12, Transportation. These rules establish parameters for airport planning to support the vitality and economic function of airports and their host communities. As stated in OAR 660-013-0010(1):

The policy of the State of Oregon is to encourage and support the continued operation and vitality of Oregon's airports. These rules are 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.

OAR 660-013-0030 requires that local plans for airport operations and development be consistent with the state's adopted Aviation System Plan. The current master plan update serves as the local aviation plan consistent with the Aviation System Plan, under the requirements of ORS 836.600 through 836.630 and applicable OARs. Beyond consistency with these statutory requirements, the current update complies with applicable FAA regulations as described in the master plan update.

Under the state's Transportation Planning Rule, OAR 660-012-0065(1) and (3)(n), permit expansions or alterations of public use airports on rural lands when such improvements do not permit service to a larger class of airplanes and preclude the need to take an exception to Statewide Planning Goals under the standards outlined in Goal 2. The current master plan update does not include any improvements that are proposed which would permit service by a larger class of airplanes and no goal exceptions are required. Conformance with the state's Transportation Planning Rule will be further addressed below as part of the findings relative to Goal 12.

Further, as noted elsewhere in this evaluation, adoption of the current master plan update as a refinement to the Metro Plan remains consistent with and does not include any additional plan amendments to the Metro Plan or other regionally or locally adopted plans. The following policy language from the Metro Plan Transportation Element (Policy F.30, Page III-F-12), is particularly relevant under Goal 2:

Support public investment in the Eugene Airport as a regional facility and provide land use controls that limit incompatible development within the airport environs. Continue to use the Eugene Airport Master Plan as the guide for improvements of facilities and services at the airport.

The current update includes recommendations for a variety of airport improvements that will accommodate the Airport's needs into the future, some of which will require further research and analysis to determine the need and timing for any future Metro Plan amendments or zone changes in the vicinity. Those recommendations are further addressed in the findings below and it is emphasized that any specific Metro Plan amendments or zone changes necessary to implement the recommendations of the Eugene Airport Master Plan will require additional public process and formal adoption by the affected jurisdiction(s) in the future.

As such, the current master plan update is consistent with Statewide Planning Goal 2 as it relates to updating a refinement to the Metro Plan and does not create internal inconsistencies with the Metro Plan.

Goal 3 - Agricultural Land: To preserve and maintain agricultural lands.

Adoption of the current master plan update does not include any changes to existing Agricultural land use designations in the surrounding area, and OAR 660-012-0065(1) and (3)(n), allowing airport improvements contemplated in the master plan update without the need for a Goal exception.

The current master plan update does consider impacts related to noise from airport operations and possible impacts from surrounding land uses on aviation safety. Existing and proposed airport improvements are compatible with agricultural uses per standards set forth in OAR 660-013-0040, et seq; ODOT's Oregon Airport Land Use Compatibility Guidelines; and relevant Metro Plan policies and local ordinances.

As such, adoption of the current master plan update is consistent with Statewide Planning Goal 3 and will not otherwise affect Metro Plan compliance with this Goal.

Goal 4 - Forest Land: To conserve forest lands.

There are no parcels within the airport boundary or surrounding area currently designated as Forest Land. Also, even if forest resources were feasible in the subject area, such uses could be considered incompatible with airport operations given height restrictions and air safety standards.

Adoption of the current master plan update does not include any changes to existing Forest Land use designations, and OAR 660-012-0065(1) and (3)(n) allow airport improvements contemplated in the master plan update without the need for an exception to Goal 4.

As such, adoption of the current master plan update is consistent with Statewide Planning Goal 4 and will not otherwise affect Metro Plan compliance with this Goal.

Goal 5 - Open Spaces, Scenic and Historic Areas, and Natural Resources: To conserve open space and protect natural and scenic resources.

Adoption of the current Eugene Airport Master Plan update does not include any plan

amendments that would affect Goal 5 resources. The following administrative rule (OAR 660-023-0250) is applicable to post-acknowledgement plan amendments concerning Goal 5:

- (3) Local governments are not required to apply Goal 5 in consideration of a Post-Acknowledgment Plan Amendment (PAPA) unless the PAPA affects a Goal 5 resource. For purposes of this section, a PAPA would affect a Goal 5 resource only if:
 - (a) The PAPA creates or amends a resource list or a portion of an acknowledged plan or land use regulation adopted in order to protect a significant Goal 5 resource or to address specific requirements of Goal 5;
 - (b) The PAPA allows new uses that could be conflicting uses with a particular significant Goal 5 resource site on an acknowledged resource list; or
 - (c) The PAPA amends an acknowledged UGB and factual information is submitted demonstrating that a resource site, or the impact areas of such a site, is included in the amended UGB area.

Adoption of the Eugene Airport Master Plan update as a refinement to the Metro Plan will not create or amend a list of Goal 5 resources, a plan or a land use regulation adopted in order to protect a significant Goal 5 resource or to address specific requirements of Goal 5. Adoption of the master plan update will not allow any new conflicting uses or amend the acknowledged Urban Growth Boundary. Therefore, adoption does not trigger the need to consider Goal 5 pursuant to OAR 660-023-0250(3).

The only Lane County Goal 5 waterway identified in the vicinity traverses the boundary of the site near its southwest corner and is not impacted by any of the recommendations in the master plan update. To the extent that construction of future airport improvements contemplated in the master plan update may impact other jurisdictional wetlands in the area, as discussed in Chapter 4, Airport Development Alternatives, avoidance and minimization alternatives have been considered. Some of the wetland areas considered in alternative development scenarios for the airport have already been filled and mitigated through past permitting. Prior to any development in areas not already delineated or filled, further wetlands analysis and delineation will be required. If wetlands are in fact present, then state and federal wetlands regulations and permitting processes will need to be satisfied before construction, in addition to any related County requirements.

As such, adoption of the current master plan update is consistent with Statewide Planning Goal 5 and will not otherwise affect Metro Plan compliance with this Goal.

Goal 6 - Air, Water and Land Resources Quality: To maintain and improve the quality of the air, water, and land resources of the state.

Goal 6 addresses waste and process discharges from development, and is aimed at protecting air, water and land from impacts from those discharges. The proposed refinement plan update does not amend the metropolitan area's air, water quality or land resource policies. Future

development recommended in the updated master plan will be required to comply with all local, state, and federal regulations regarding land, air, and water discharges and emissions. To the extent that any of the future airport improvements within the updated master plan may create additional impacts to air, water or land resources, state and local permitting processes will ensure that discharges do not exceed allowable standards.

The updated Eugene Airport Master Plan otherwise demonstrates that future development can be reasonably expected to comply with applicable environmental laws. As such, adoption of the current master plan update is consistent with Statewide Planning Goal 6 and will not otherwise affect Metro Plan compliance with this Goal.

Goal 7 - Areas Subject to Natural Disasters and Hazards: To protect life and property from natural disasters and hazards.

Goal 7 requires that local government planning programs include provisions to protect people and property from natural hazards such as floods, landslides, earthquakes and related hazards, tsunamis and wildfires. The updated Eugene Airport Master Plan is consistent with Goal 7 because the only identified potential natural hazards are areas within the 100-year floodplain located inside the airport boundary, and future development proposed must comply with local, state, and federal regulations pertaining to building and construction relative to floodplain areas.

Limited areas within the airport boundary are in the 100-year floodplain (Zone A). These areas are associated with drainages carrying runoff to the Clear Lake Channel and Amazon Canal system at the periphery of the airport within runway protection zones and other areas not scheduled for immediate development and currently have no operational impacts. If future development were to impact any areas within the 100-year floodplain, it would be subject to applicable regulatory standards and local permitting requirements for floodplain development to ensure life and property is adequately protected.

The airport is too far from the ocean and significant landforms to be subject to natural disasters or hazards such as landslides or tsunamis. Although much of western Oregon is subject to potential earthquake hazards, detailed fault locations have not been mapped for the subject area. Future construction recommended in the updated master plan will be subject to current earthquake standards contained in building codes and will therefore pose minimal risk associated with potential earthquakes. Other potential hazards, such as severe winter storms and wildfires can also be mitigated at the time of development based on accepted building codes and building techniques.

As such, adoption of the current master plan update is consistent with Statewide Planning Goal 7 and will not otherwise affect Metro Plan compliance with this Goal.

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.

The updated Eugene Airport Master Plan is consistent with Goal 8 because there are no public

parks and no land within or near the Eugene airport boundary that are zoned or designated for park use. The nearest public park, Golden Gardens Park, is located approximately 2.1 miles from the airport (driving distance to the park is 3.2 miles). The nearest developed public park is Lane County's Orchard Point Park, located at the northeast edge of Fern Ridge Reservoir, approximately 5.5 miles west of the airport. None of the proposed development at the airport for the 20-year planning period requires the use or acquisition of publicly owned park or recreation area.

As such, adoption of the current master plan update is consistent with Statewide Planning Goal 8 and will not otherwise affect Metro Plan compliance with this Goal.

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.

The Administrative Rule for Statewide Planning Goal 9 (OAR 660, Division 9) requires cities to evaluate the supply and demand of commercial land within an urban growth boundary relative to community economic objectives. Since adoption of the master plan update does not include any land within the urban growth boundary, nor any change to existing land use designations (particularly no conversion of industrial or commercial use to another designation), no additional analysis is required under the implementing provisions of OAR 660-009-0010.

The current update of the Eugene Airport Master Plan is consistent with Goal 9 because proposed improvements will continue to enhance the viability of the Eugene Airport which supports the area's economic vitality as Oregon's second largest airport. It is identified in the adopted Oregon Aviation Plan as a Level 1 commercial service airport, the most significant type within the state's system of public airports. The improvements proposed in the current master plan update will assure that necessary facilities will be available to support airport functions through 2035, and consequently the area's economic development needs.

The current Eugene Airport Master Plan update is otherwise consistent with state policy governing local government airport regulations. ORS 836.600 states:

In recognition of the importance of the network of airports to the economy of the state and the safety and recreation of its citizens, the policy of the State of Oregon is to encourage and support the continued operation and vitality of Oregon's airports. Such encouragement and support extend to all commercial and recreational uses and activities described in ORS 836.616(2).

Because the Metro Plan, the state's adopted Aviation Plan, and state policy acknowledge the airport's role in meeting the area's economic development objectives, the current master plan update is consistent with Statewide Planning Goal 9, and approval will not affect Metro Plan compliance with this Goal.

Goal 10 - Housing: To provide for the housing needs of the citizens of the state.

Goal 10 requires communities to plan an adequate supply of residential buildable land to accommodate estimated housing need for a 20-year planning period, within an urban growth

boundary. Because the Eugene Airport is not within an urban growth boundary, it is not included within any supply of residential buildable land. No land is being re-designated from residential to a nonresidential use, and the update does not otherwise diminish the amount of land available for residential use. Nonetheless, it is notable that the master plan update thoroughly considers two operational issues that relate to the compatibility of nearby housing or residential uses and the airport: safety and noise.

The FAA establishes safety rules regarding airspace safety within airport environs through Federal Aviation Regulation (FAR) Part 77. Part 77 establishes safety zones around runways to preclude the location of structures or other land uses that would create obstructions or pose undue hazards to air navigation. The two- and three-dimensional “imaginary surfaces” created in Part 77 are codified through requirements outlined in OAR 738-0070 and local codes (Lane Code and Eugene Code). Additional runway protection zones at and near the ends of runways are defined by the FAA relative to airport design criteria to assure safe and efficient airport operations.

These imaginary surfaces and runway protection zones are described and depicted in the master plan update. In the event of any extension of runway protection zones or changes to protected airspace as described in the master plan update, additional analysis is necessary to determine the extent of any needed changes to local zoning and plan designations. Future property acquisition and land use designation changes may also be necessary to accommodate extended runway protection zones in the future. The master plan update recommends a detailed analysis of existing land use protection measures and what changes may be needed to accommodate future airport improvements, prior to implementation.

Another compatibility issue between the airport and residential development pertains to noise impacts. FAA regulations define acceptable noise exposure contours as measured in yearly day-night average sound levels (DNL). The FAA and other federal agencies establish 65 DNL as the threshold considered as a significant noise impact. Airport noise contours were updated for the baseline year (2016) and forecast year (2025). There are no incompatible land uses within the 65 DNL contours and as stated in the updated master plan, all residential areas are considered compatible with cumulative noise levels below DNL 65 dba.

As such, adoption of the current master plan update is consistent with Statewide Planning 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.

The Eugene Airport is currently served by the full range of urban services through previous exceptions allowing such services to be extended to the airport outside of the UGB and as provided for in the Metro Plan Public Facilities and Services Element (Policy G.26, Page III-G-12). Findings in the Metro Plan also confirm that the area of the airport designated Government and Education on the Metro Plan diagram receives municipal water, wastewater, fire and police services. Proposed improvements in this area would therefore be served by extension of currently available key urban services.

The City of Eugene provides wastewater sewer facilities to the airport as well as police and fire protection. The City's Airport Rescue and Firefighting station is supplemented by response as necessary from the Lane Rural Fire Protection District. Other services are provided by other local and regional utilities. Water service is provided by the Eugene Water and Electric Board (EWEB), and EWEB and the Emerald People's Utility District both provide electrical service to the airport. Telecommunications services are provided by CenturyLink and Lane Council of Governments. Natural gas is provided by Northwest Natural. On-site storm water runoff is controlled by piped and open channel drainage systems in the area.

Adoption of the master plan update will not require new services beyond those currently available to serve airport and airport-related functions. Furthermore, extension of services for future development to meet the demands outlined in the master plan update is wholly consistent with the Metro Plan and prior City determinations.

In addition to the demonstration made through the above findings, an exception from Statewide Planning Goal 11 is not necessary based upon OAR 660-012-0065(1) and (3)(n). As previously described, these administrative rules preclude the need to take an exception to Goal 11 (and Goals 3, 4, and 14) if the proposed amendments do not permit service to a larger class of airplane. The current master plan update does not include any amendments to land use designation or proposed improvements through the planning horizon of 2035 that would permit service to a larger class of aircraft than is currently provided.

As such, adoption of the current master plan update is consistent with Statewide Planning Goal 11 and will not affect Metro Plan compliance with the Goal.

Goal 12 - Transportation: To provide and encourage a safe, convenient and economic transportation system.

Goal 12 is implemented through the Transportation Planning Rule (TPR), as defined in Oregon Administrative Rule OAR 660-012-0000, *et seq.* The TPR states that when land use changes, including amendments to acknowledged comprehensive plans, will significantly affect an existing or planned transportation facility, the local government must put in place measures to assure that the allowed land uses are consistent with the function, capacity, and performance standards of those transportation facilities.

As previously described, adoption of the current master plan update does not include any amendments to the Metro Plan, adopted land use designations or existing zoning. No changes are proposed to the functional classification of any roadways serving the airport. Adoption of the updated refinement plan is not anticipated to reduce any existing transportation facilities below accepted levels of service or otherwise significantly affect any transportation facilities as outlined in the TPR. The proposed updated master plan is proposing to improve the loop road along with adjacent parking, reconfigure the entryway to the airport with a roundabout, and also proposing a cell phone waiting lot for future use off Northrup Drive. With these improvements the current master plan does not include any new planned transportation facility projects or major roadway realignments that would require formal plan amendments.

As noted in Chapter 2 of the updated master plan, the Eugene Airport will continue to accommodate the Boeing 737-300 aircraft which has an FAA Airport Reference Code (ARC) of C-III. The current air carriers at the Eugene Airport use a mix of regional jet aircraft and medium sized passenger jets such as the Airbus A319 and the Boeing 737. To the extent that future airport improvements may result in additional motor vehicle traffic impacts, County traffic impact analysis requirements will be addressed as development and permitting occurs.

As the current master plan update is consistent with OAR 660-012-0065 as well as other OARs within the state Transportation Planning Rule and ORS, adoption is consistent with Goal 12 and will not affect Metro Plan compliance with the Goal.

Goal 13 - Energy Conservation: To conserve energy.

The current master plan update is consistent with Goal 13 because the proposed airport development will strengthen the substantial investments made in the existing airport, enhance the viability of air transportation for people and goods proximate to the state's second largest population center, and offer an alternative to potentially less fuel-efficient transportation modes.

The recommendations contained in the master plan update will support a vital airport serving the air cargo, air mail, and commercial and general aviation needs of Eugene, Springfield, Lane County and the greater Eugene Airport service area. In meeting the updated master plan's demand projections and facility capacity requirements, considerable energy will be conserved from export passengers and air freight to more distant airfields, including Portland International Airport. Using alternative airports to meet commercial and general aviation demands and transporting air freight, mail, and cargo to more distant airfields by other transportation modes (i.e., truck or rail) for shipping would result in potentially less efficient energy use, contrary to Goal 13.

There are a number of past and future examples that further illustrate the airport's ongoing commitment to energy conservation consistent with Goal 13. The airport has in the past and will continue to strive for ways to reduce energy consumption. As individual projects and improvements contemplated in the updated Eugene Airport Master Plan are implemented over time, new technology and opportunities for energy conservation are certainly considered to reduce cost and impact on the environment.

For example, in 2010, the airport received Leadership in Energy and Environmental Design (LEED) certification by the U.S. Green Building Council for the air cargo building. This building represents the first City of Eugene LEED building. Additionally, in 2011, the airport received LEED Silver certificate for the Aircraft Rescue and Fire Fighting building. The airport has committed to implementing sustainable initiatives during its development projects.

While Lane Transit District (LTD) bus service is not currently available to the airport, shuttle service is provided, and the airport continues to explore possibilities that would support economically viable public (or shared private) transportation options to reduce non-renewable energy use and parking demand at the airport. All airport vehicles running diesel fuel are now operating off of Bio-5 or Bio-20 fuel and analysis will also be conducted on the feasibility of adding electric vehicle charging stations to the public parking lots in the future. Bicycle storage lockers are also available

at the airport to accommodate and support alternative transportation options.

Based on these findings and the available information, adoption of the current master plan update is consistent with Statewide Planning Goal 13 and will not affect Metro Plan compliance with the Goal.

Goal 14 - Urbanization: To provide for an orderly and efficient transition from rural to urban land use.

Goal 14 requires that comprehensive plans provide for orderly and efficient transition from rural to urban land uses, and the establishment of Urban Growth Boundaries (UGBs) around incorporated cities to assure compact and efficient urban growth inside the UGB and protection of rural resources outside of it.

Findings included in the Metro Plan Transportation Element (Page III-F-11) specifically note that the Eugene Airport is located outside the UGB to protect it from incompatible development as well as to reduce airport-related impacts on development within the UGB. It also notes that the area of airport designated government and education on the Metro Plan diagram receives municipal water, wastewater, fire, and police services. As previously discussed with respect to Goal 11, adoption of the master plan update will not require new urban services beyond those currently available to serve airport and airport-related functions. Furthermore, extension of services for future development to meet the demands outlined in the master plan update is wholly consistent with the Metro Plan and prior City determinations. Metro Plan Policy F.30 also supports the use of the Eugene Airport Master Plan as the guide for improvements of facilities and services at the airport.

As previously noted, OAR 660-012-0065(1) and (3)(n) preclude the need to take an exception to Goal 14 because the proposed improvements do not permit service to a larger class of airplanes.

As such, adoption of the current master plan update is consistent with Goal 14 and will not affect the Metro Plan compliance with Statewide Planning Goal 14.

Goal 15 - Willamette River Greenway: To protect, conserve, enhance and maintain the natural, scenic, historical, agricultural, economic and recreational qualities of lands along the Willamette River as the Willamette River Greenway.

The Eugene Airport is not within the boundaries of the Willamette River Greenway. Therefore, Statewide Planning Goal 15 is not relevant, and adoption of the master plan update will not affect compliance with Statewide Planning Goal 15.

Goal 16 through 19 - Estuarine Resources, Coastal Shorelands, Beaches and Dunes, and Ocean Resources:

There are no coastal, ocean, estuarine, or beach and dune resources in proximity to the Eugene Airport. Therefore, these goals are not relevant, and adoption of the master plan update will not affect compliance with Statewide Planning Goals 16 through 19.

Metro Plan Consistency -- EC 9.8424(1)(b) and LC 12.225

The Metro Plan serves as the area’s comprehensive, policy framework plan. The current update to the Eugene Airport Master Plan replaces earlier versions as a refinement to the Metro Plan and is found to be consistent with the policy framework already established by the Metro Plan. As previously discussed, adoption of the updated master plan is supported by a variety of Metro Plan policies including the following from the Transportation Element (Policy F.30, Page III-F-12):

Support public investment in the Eugene Airport as a regional facility and provide land use controls that limit incompatible development within the airport environs. Continue to use the Eugene Airport Master Plan as the guide for improvements of facilities and services at the airport.

As stated previously, similar to the 2010 update, the current update does not include any amendments to the Metro Plan or other regionally or locally adopted plans. No changes to existing land use designations, zoning, or adopted policy are proposed. The current update does include recommendations for a variety of airport improvements that will accommodate the Airport’s needs into the future, some of which will require further research and analysis to determine the need and timing for any future Metro Plan amendments or zone changes in the vicinity. It is emphasized that any specific Metro Plan amendments or zone changes necessary to implement the recommendations of the updated Eugene Airport Master Plan will require additional public process and formal adoption by the affected jurisdiction(s) in the future.

Based on the available information and findings above, adoption of the current master plan update is consistent with the Metro Plan and will not otherwise make the Metro Plan internally inconsistent, as required.

Refinement Plan Consistency -- EC 9.8424(1)(c) and (2)

Adoption of the current Eugene Airport Master Plan update will entirely replace the previously adopted version and there are no remaining portions of prior plan to be addressed under EC 9.8424(1)(c). The need for adoption of the updated refinement plan is based on federal and state and local requirements for coordinated aviation planning. Consistent with EC 9.8424(2)(b), new inventory information contained in the master plan update, concerning airport facilities and projected demand, supports the recommendations for future improvements to accommodate the Eugene Airport’s needs through the planning horizon of 2035.