



January 21, 2025

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VIA EMAIL ([Alex.R.Thomas@odav.oregon.gov](mailto:Alex.R.Thomas@odav.oregon.gov))

Alex Thomas  
ODAV Planning and Programs Manager  
Oregon Department of Aviation

**RE: Anderson Hay & Grain Co. Comments on Refined Preferred Alternative**

Dear Alex:

This office represents Anderson Hay & Grain Co. (“AHG”). Please find below AHG’s comments on the Refined Preferred Alternative that was distributed to the Aurora State Airport Master Plan (“Master Plan”) Planning Advisory Committee (“PAC”) on January 7, 2025. As outlined below, AHG is very concerned with the Oregon Department of Aviation’s (“ODAV”) lack of engagement with AHG and other neighboring properties that would be impacted by the Refined Preferred Alternative. Please include the below comments in the administrative record related to the Master Plan.

**A. AHG Background**

Established during the 1960’s in Washington State’s Kittitas Valley, AHG is a leading supplier of hay products to the dairy, beef and horse industries. AHG operates two production facilities, one located in Ellensburg, Washington and the other located in Aurora, Oregon. The Aurora plant is focused on providing straw products grown in Oregon’s Willamette Valley to markets in Asia, primarily Japan and South Korea. AHG sells products domestically throughout the U.S. and to over 30 countries internationally. The AHG brand is recognized worldwide for quality, consistency, and reliability.

AHG’s Oregon operation is located across the Hubbard Highway from the Aurora State Airport. AHG’s Oregon location is strategically positioned to be linear with supply locations relative to port locations to optimize operational overhead. To meet customer demands, AHG requires a substantial amount of onsite storage capacity at the Aurora location to store products produced during a 3-month harvest period but distributed over 12 months. Because onsite storage at the Aurora location is critical to AHG’s global operations, any reduction in footprint would require AHG to locate product offsite and contribute to increased operational costs.

**B. Questions and Comments Related to Refined Preferred Alternative.**

***Has ODAV done any outreach to neighboring property owners related to the Refined Preferred Alternative?***

AHG was aware that ODAV had formed the PAC to provide feedback related to a proposed update to the Master Plan but only recently learned that the alternatives under consideration would impact AHG's Aurora location. Importantly, AHG did not receive any official communications from ODAV related to the master planning process or potential impacts to its property or business. Instead, AHG learned that the PAC was reviewing proposed alternatives for the future airport layout and that certain alternatives might impact AHG's operations through informal contact with Ben Williams, the PAC representative for the Friends of French Prairie.

Although the materials on the Master Plan website indicated that ODAV included a "robust and varied membership" in the PAC, including "adjacent property and business owners," it does not appear that any of the adjacent Hubbard Highway property owners were included in the PAC. Perhaps more troubling, it does not appear that ODAV made any effort to reach out to Hubbard Highway property owners when it began to consider alternatives that would move Hubbard Highway and impact the properties adjacent to the Hubbard Highway.

AHG is concerned that the interests of the Hubbard Highway property owners were not considered in the development of the Refined Preferred Alternative. Did ODAV reach out to neighboring property owners? What information was provided? What input was considered when developing the Refined Preferred Alternative?

***What is ODAV's rationale for choosing an alternative that relocates a major state highway and impacts multiple private businesses over expanding runway facilities to the east within the existing Aurora State Airport?***

AHG understands that the Refined Preferred Alternative would require the relocation of Hubbard Highway. Based on review of the Refined Preferred Alternative figures, it appears that the necessary right-of-way acquisition would significantly encroach on AHG's Aurora location and reduce overall storage capacity for AHG's product. It would also impact many other property owners that operate adjacent to the Hubbard Highway.

AHG is concerned that interests of users within the existing Aurora State Airport footprint were considered but the interests of property owners adjacent to Hubbard Highway were not. Perhaps more importantly, the existing documents available on the Master Plan website do not explain why ODAV is pursuing the Refined Preferred Alternative (which requires the relocation of a state highway) over alternatives that would have expanded the runway within the existing Aurora State Airport footprint. Why were other alternatives rejected? How were competing concerns and interests evaluated as part of the master planning process?

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AHG Plant Manager Jason Paolo is planning to attend the PAC meeting scheduled for February 11, but AHG would welcome a one-on-one conversation with you or other ODAV staff related to the process and the Refined Preferred Alternative. Jason Paolo can be reached directly at [Jason.Paolo@anderson-hay.com](mailto:Jason.Paolo@anderson-hay.com) or 503-678-7332.

Thank you in advance for your careful consideration of these comments.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Sarah Stauffer Curtiss', with a long horizontal flourish extending to the right.

Sarah Stauffer Curtiss