



February 25, 2025

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VIA EMAIL (Alex.R.Thomas@odav.oregon.gov)

Alex Thomas
ODAV Planning and Programs Manager
Oregon Department of Aviation

RE: Anderson Hay & Grain Co. Comments on ODAV's Next Steps

Dear Alex:

This office represents Anderson Hay & Grain Co. ("AHG"). This letter supplements our prior comment letter submitted on January 21, 2025. Please find below AHG's comments on the Oregon Department of Aviation's ("ODAV") statutory obligations to seek local land use compatibility and the State Aviation Board's (the "Board") adoption obligations thereafter. As outlined below, AHG is very concerned with ODAV's messaging regarding the agency's next steps. Our client participated in the last Planning Advisory Committee ("PAC") meeting, but ODAV staff provided no additional clarity on this timeline. Likewise, ODAV staff did not address any of our client's concerns about the proposed relocation of the Hubbard Highway.

For further background on AHG's business and relationship with the Aurora Airport Master Plan Update, please see our January 21, 2025, comment letter. Please include the below comments in the administrative record related to the Master Plan.

A. Questions and Comments Related to Refined Preferred Alternative.

When and how does ODAV intend to engage in its land use compatibility obligations?

In the powerpoint presentation for the February 11, 2025 PAC meeting, ODAV stated that the final step after Airport Layout Plan ("ALP") approval by the Federal Aviation Administration ("FAA") would be the Board's Master Plan approval process. However, that presentation noted that this step is "beyond the scope of this project." Before the Board can adopt this master plan, ODAV must engage in consultation with local governments affected by the project pursuant to OAR 738-130-0055(2)-(4). When does ODAV intend to publish its proposed timeline for this local government consultation process and any opportunities for public engagement? AHG understands that this step may be beyond the scope of the consultant's scope of work, but ODAV should be transparent about how it intends to meet its regulatory obligations.

When does ODAV intend to present findings of compatibility to the State Aviation Board?

The Master Plan update must also be adopted by the Board alongside findings that it is compatible with all applicable local land use comprehensive plans and other regulations, pursuant to OAR 738-130-0055(6). When does ODAV intend to seek Board approval? AHG understands that this final step cannot occur until the FAA approves the ALP and ODAV completes the local jurisdiction consultation process, but ODAV should be transparent about when it expects to present its findings to the Board.

Unfortunately, the limited engagement with the property owners west of the Hubbard Highway during the PAC process has necessitated AHG's engagement at this stage to ensure that AHG can fully participate in any future discretionary decision-making regarding the Aurora Airport. As we outlined in our January 21, 2025 letter, the refined preferred alternative as currently proposed would substantially disrupt AHG's business operations. Given AGH's experience with the PAC process (and ODAV's failure to engage with AHG and other neighbors that will be impacted by the refined alternative), AHG seeks to ensure that it does not learn about any future opportunities for public engagement after it is too late to engage.

As noted in our prior letter, AHG would welcome a one-on-one conversation with ODAV staff related to the master planning process and the next steps discussed above. Jason Paolo can be reached directly at jason.paolo@anderson-hay.com or 971-237-0510.

Thank you in advance for any information you can provide.

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