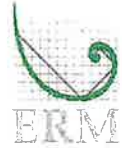


## Memorandum



<b>To</b>	Rowan Percheron LLC
<b>From</b>	David Weymann, P.E.
<b>Date</b>	February 2023
<b>Reference</b>	Percheron Data Center Project, Morrow County, Oregon
<b>Subject</b>	Soils Analysis

## INTRODUCTION

Environmental Resources Management, Inc. (ERM) prepared this soils analysis for Rowan Percheron, LLC (Rowan or Applicant). Rowan proposes to develop a data center on the Project Parcel (Project Parcel or Project). The Project Parcel includes approximately 275 acres of vacant land on one parcel owned by Threemile Canyon Farms. The Project is adjacent to Portland General Electric's (PGE) Carty Generating Station, approximately 10 miles southwest of Boardman on Tower Road, Morrow County (County), Oregon. The Project Footprint will be up to approximately 190 acres of the Project Parcel. This memorandum summarizes the soil classifications for the 275-acre Project Parcel. Figure 1 shows the Project Parcel, the Project Footprint, and site soils.

## SOIL TYPES

Applicant evaluated the soil types within the Project Parcel and the Project Footprint. Applicant then classified the soils under the Natural Resource Conservation Service (NRCS) Land Capability Classification System (LCCS).

Attachment A provides the NRCS Soil Survey Report for the Project Parcel. Table 1 lists the soil types and farmland designations for the non-irrigated lands of the Project Parcel.

**Table 1: Soil Types**

Mapping Unit Symbol	Soil Mapping Unit	NRCS Capability Class <sup>(1)</sup>	Project Parcel		Project Footprint		Farmland Designation (Project Parcel) <sup>(2, 3)</sup>
			Acres	%	Acres	%	
26B	Koehler loamy fine sand, 2 to 5 percent slopes	7e	109.2	40	107.8	57	Not prime farmland
26C	Koehler loamy fine sand, 5 to 12 percent slopes	7e	8.1	3	8.1	4	Not prime farmland
58B	Taunton fine sandy loam, 2 to 5 percent slopes	6e	33.8	12	33.8	18	Not prime farmland
40C	Quincy loamy fine sand, 2 to 12 percent slopes	7e	38.4	14	7.3	4	Not prime farmland
58C	Taunton fine sandy loam, 5 to 12 percent slopes	6e	23.9	9	23.7	12	Farmland of state-wide importance
53A	Royal silt loam, 0 to 3 percent slopes	6e	4.5	2	—	—	Not prime farmland
55B	Sagehill fine sandy loam, hummocky, 2 to 5 percent slopes	4e	33.9	12	9.5	5	Not prime farmland
55C	Sagehill fine sandy loam, hummocky, 5 to 12 percent slopes	4e	22.3	8	—	—	Farmland of state-wide importance
<b>TOTALS</b>			<b>274.1</b>	<b>100</b>	<b>190.2</b>	<b>100</b>	

**Notes:**<sup>(1)</sup> NRCS class: Non-irrigated<sup>(2)</sup> Soil Survey Farmland Designation, 7 Code of Federal Regulations (CFR) Part 657  
<https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx><sup>(3)</sup> None of the Project Parcel is irrigated

— =Not present within Project Footprint

In total, the Project Parcel is comprised of approximately 57 percent Class 7 soil, 23 percent Class 6 soil, and 20 percent Class 4 soil. Within the Project Parcel, the Project Footprint is comprised of about 65 percent Class 7 soil, 30 percent Class 6 soil, and 5 percent Class 4 soil. The Project Footprint is sited within the Project Parcel to minimize impact to Class 4 soils, which are predominately located near the existing wetlands that will be avoided.

## HIGH-VALUE, PRIME AND STATE-WIDE IMPORTANCE FARMLAND

ERM also evaluated whether the Project Parcel and Project Footprint are comprised of any high-value, prime, or farmland of state-wide importance. The Project Parcel, while predominately Class 7 soil, has Class 6 and some Class 4 soils adjacent to or intermingled with the Class 7 soil and the County, therefore, inventoried the Project Parcel as "agricultural land" under Oregon Administrative Rules (OAR) 660-033-0020(1).<sup>1</sup>

The Project Parcel is not irrigated and contains no Class 1 or 2 soils. It is not, therefore, considered "high-value farmland" under OAR 660-033-0030(8).<sup>2</sup> In addition, the NRCS Morrow County Soil Survey Report (Attachment A) identifies farmland as prime or not prime based on its soil characteristics and irrigation status. The Project Parcel is not irrigated and none of the Project Parcel is designated as prime farmland based on the NRCS LCCS (Table 1).<sup>3</sup>

The NRCS Morrow County Soil Survey Report also identifies about 17 percent of the Project Parcel as "farmland of state-wide importance," with Class 6e soils comprising about 9 percent and Class 4e soils comprising about 8 percent of the farmland of importance. The Project Footprint would impact no Class 4e farmland of statewide importance. Of the Class 6e soil impacted within the Project Footprint, the soils are considered nonarable soil and not suitable for cultivation notwithstanding its classification of "important." Overall, the underlying soil characteristics within the Project Parcel

<sup>1</sup> OAR 660-033-0020 provides the definition of "agricultural land":

- (1)(a) "Agricultural Land" as defined in Goal 3 includes:
- (A) Lands classified by the U.S. NRCS as predominantly Class I-IV soils in Western Oregon and I-VI soils in Eastern Oregon.
  - (B) Land in other soil classes that is suitable for farm use, as defined in Oregon Revised Statutes (ORS) 215.203(2)(a), taking into consideration soil fertility; suitability for grazing; climatic conditions; existing and future availability of water for farm irrigation purposes; existing land use patterns; technological and energy inputs required; and accepted farming practices.
  - (C) Land that is necessary to permit farm practices to be undertaken on adjacent or nearby agricultural lands.
- (b) Land in Capability Classes other than I-IV/I-VI that is adjacent to or intermingled with lands in capability classes I-IV/I-VI within a farm unit, shall be inventoried as agricultural lands even though this land may not be cropped or grazed.

<sup>2</sup> OAR 660-033-0020 also provides the definition of "high value farmland"

- (8)(a) "High-Value Farmland" means land in a tract composed predominantly of soils that are:
- (A) Irrigated and classified prime, unique, Class I or II; or
  - (B) Not irrigated and classified prime, unique, Class I or II.
- (b) In addition to that land described in subsection (a) of this section, high-value farmland, if outside the Willamette Valley, includes tracts growing specified perennials as demonstrated by the most recent aerial photography of the Agricultural Stabilization and Conservation Service of the U.S. Department of Agriculture taken prior to November 4, 1993. "Specified perennials" means perennials grown for market or research purposes including, but not limited to, nursery stock, berries, fruits, nuts, Christmas trees, or vineyards, but not including seed crops, hay, pasture or alfalfa;
- \*\*\* [applies to land in Willamette Valley]  
 \*\*\* [applies to land west of the Coast Range summit]  
 \*\*\* [applies to land west of Highway 101]

<sup>3</sup> 7 CFR Part 657 includes regulations for the Department of Agriculture and defines "prime" farmlands. Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops, and is available for these uses. The states define farmlands of state-wide importance based on the soil properties and information on specific high-value food and fiber crops that are grown in a particular area.

demonstrate that the land, while considered agricultural, has low agricultural productivity with high risk for erosion, and other severe or very severe limitations.

ORS 195.300(10) also provides definitions of "high value farmland" for purposes of [ORS 195.301 \(Legislative Findings\)](#) and [195.305 \(Compensation for restriction of use of real property due to land use regulation\)](#) to [195.336 \(Compensation and Conservation Fund\)](#) (Measure 49). The Department of Land Conservation and Development's siting standards for wind and energy facilities specifically reference ORS 195.300 when defining "high value farmland," although the statutory definitions have not been directly incorporated into any Goal 3 agricultural lands framework. Nonetheless for completeness, ERM evaluated the Project Parcel against the definitions in ORS 195.300(10). ORS 195.300(10) includes the "high value farmland" definition from OAR 660-033-0020(8) and expands upon it.<sup>4</sup> By application of law, the Project Parcel contains "high-value farmland" within the meaning of ORS 195.300(10)(f) because portions of the Project Parcel are within the Columbia Valley American Viticultural Area (AVA). In total, the Project Footprint may impact up to 49.8 acres of land located within the Columbia Valley AVA.

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<sup>4</sup> ORS 195.300 provides:

(10) "High-value farmland" means:

(a) High-value farmland as described in ORS 215.710 that is land in an exclusive farm use zone or a mixed farm and forest zone, except that the dates specified in ORS 215.710 (2), (4) and (6) are December 6, 2007.

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(c) Land that is in an exclusive farm-use zone or a mixed farm and forest zone and that on June 28, 2007, is:

(A) Within the place of use for a permit, certificate or decree for the use of water for irrigation issued by the Water Resources Department;

(B) Within the boundaries of a district, as defined in ORS 540.505; or

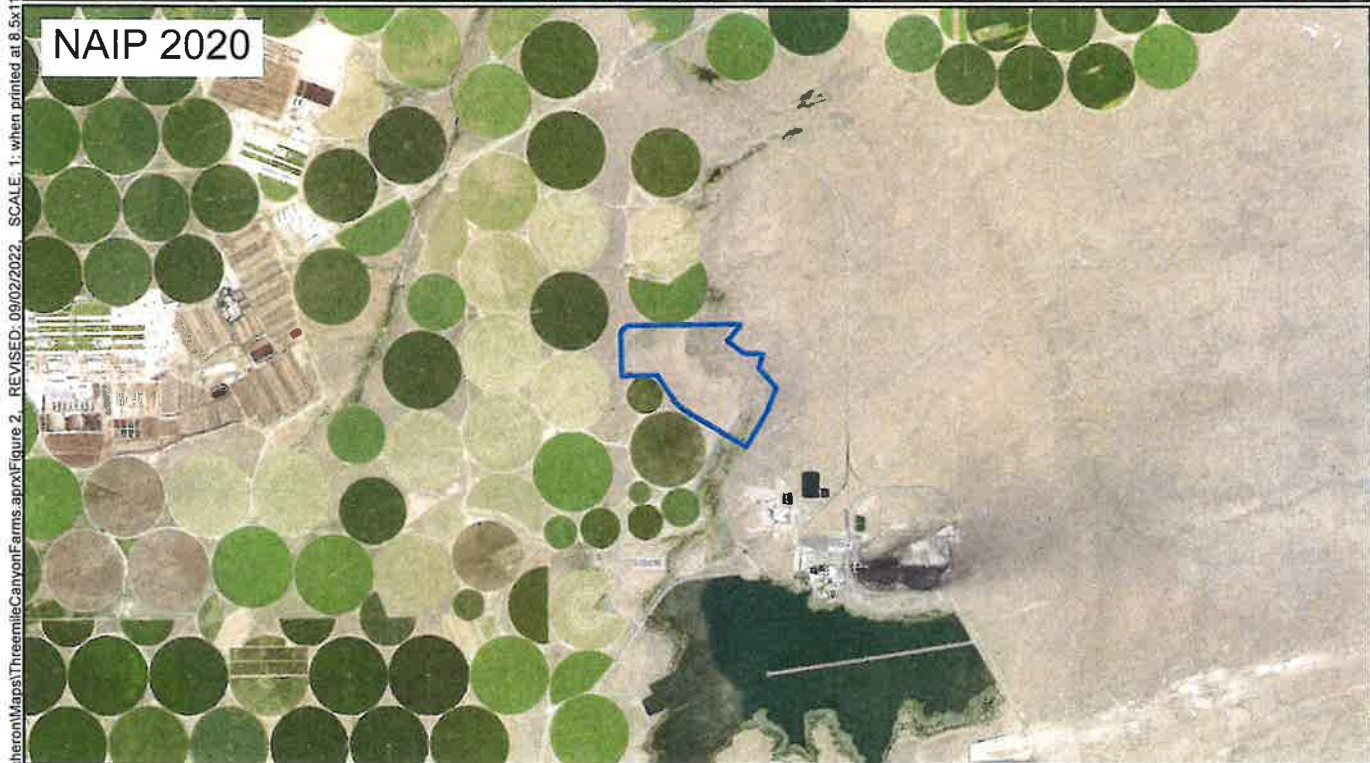
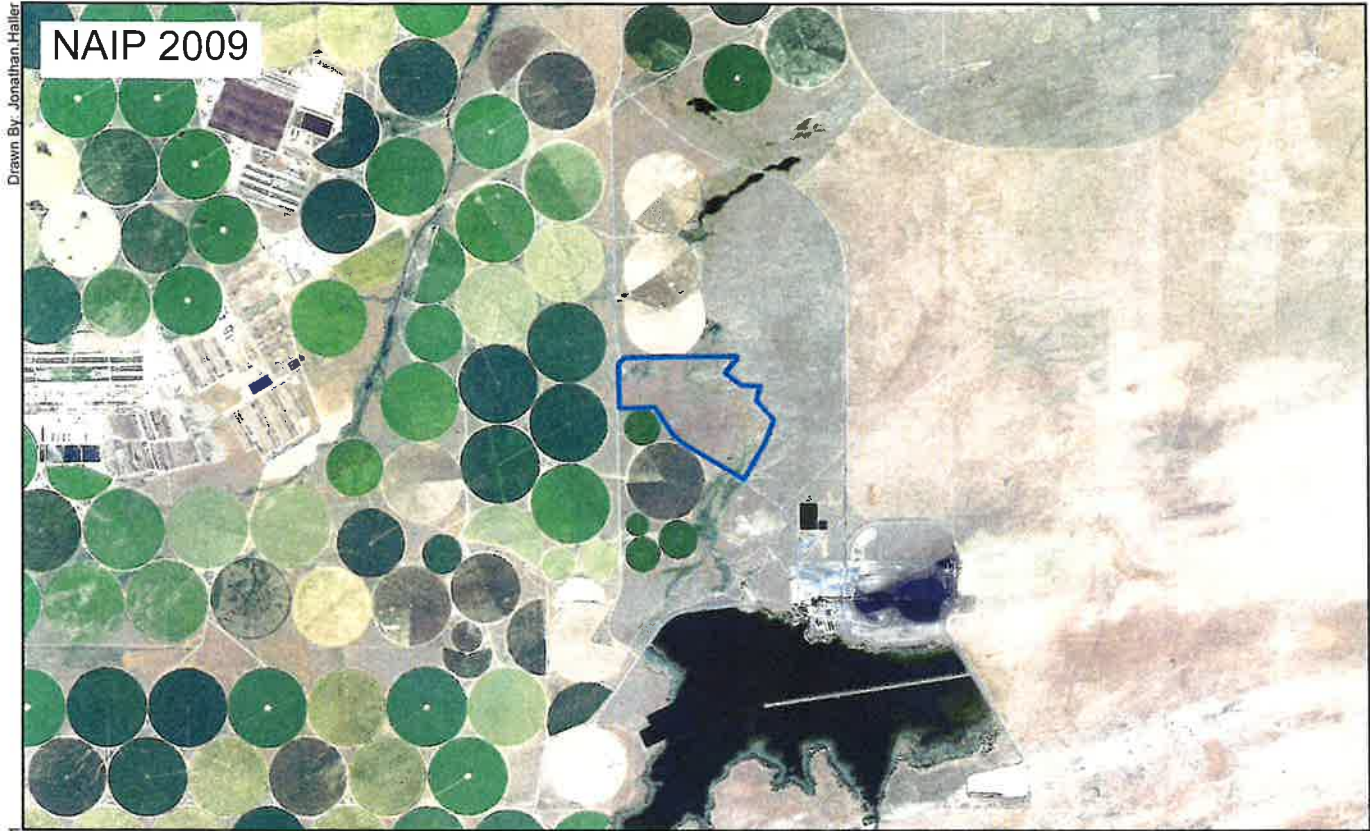
(C) Within the boundaries of a diking district formed under ORS Chapter 551.


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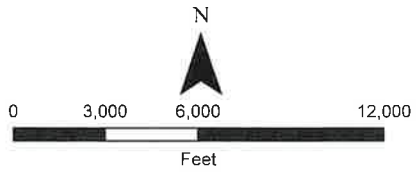
(f) Land that is in an exclusive farm-use zone and that is no more than 3,000 feet above mean sea level, with an aspect between 67.5 and 292.5 degrees and a slope between zero and 15 percent, and that is located within:

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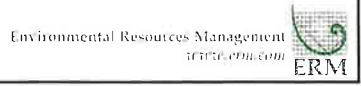
(C) The portion of the Columbia Valley viticultural area as described in 27 CFR 9.74 that is within the State of Oregon.



**Legend**  
 Site Location



**Figure 2**  
**Aerial Imagery**  
 Threemile Canyon Farms  
 Rowan Digital Infrastructure  
 Morrow County, Oregon



Source: Esri - World Topographic Map; NAD 1983 2011 StatePlane Oregon North FIPS 3601 F1 Intl