
From: Devin Kesner <devin@friends.org>
Sent: Tuesday, June 27, 2023 3:45 PM
To: Tamra Mabbott <tmabbott@co.morrow.or.us>
Subject: Comments on AC-145-23, AC(Z)-146-22, and AZM-147-23

STOP and VERIFY This message came from outside of Morrow County Gov

Hi Tamra,

On behalf of 1000 Friends of Oregon, please accept the following comments as part of the record in Application Nos. AC-145-23, AC(Z)-146-22, and AZM-147-23, a comprehensive plan amendment from EFU to MG on behalf of applicant Rowan Percheron, LLC. Please include me in any notice related to this application, including notice of decision and any future hearings. **Please confirm receipt.**

1000 Friends additionally requests that the June 27 Planning Commission hearing be continued to allow additional review of this extensive application involving three separate goal exceptions.

The applicant has not made an adequate showing to justify a Goal 3, 11, or 14 exception for the proposed use.

Soils. The proposed use will have irreversible impacts on valuable soils and surrounding agricultural uses. The subject properties include 20% Class IV soils, farmland of statewide importance, and almost 50 acres of Columbia Valley American Viticultural Area soils. Additionally, the remaining soil classes are based on non-irrigated classification and do not address capability with irrigation.

Although the application indicates that the project footprint will avoid some of these soils, it does not address how those soils will nonetheless be impacted by the proposed development. Even if the project footprint is not directly sited on those soils, the soils will still be limited in terms of future agricultural use and impacted by activities on the subject property. They also will no longer be protected under Goal 3 and EFU designation from future development. Nothing will prevent the applicant or future landowners from developing those higher value soils—applicant even indicates flexibility in its design plans and that exact locations and scale may change.

Additionally, the applicant has not adequately addressed impacts to surrounding agricultural activities or demonstrated that the proposed use is compatible with adjacent uses. OAR 660-004-0020(2)(d); MCZO 8.040.C. The surrounding land use is primarily agricultural. The proposed activities may, for example, impact agricultural operations dependent on Tower Road. The proposed use may also impact groundwater and water access for surrounding farms.

The applicant has also not adequately demonstrated that the property cannot be put to any farm use. ORS 215.203(2)(a). That the current owners have not utilized the parcel is not sufficient evidence that the parcel is not agriculturally viable under any of the many farm uses listed in ORS 215.203(2)(a). This is a necessary showing to demonstrate that reasons justify the location of the proposed use despite surrounding farm uses and EFU designation. OAR 660-004-0020.

Water. The applicant notes that it will require 20 to 60 million gallons of water annually for the proposed use, but that it has not yet secured a water source. It is not possible to adequately evaluate the proposed use's impact under MCZO

8.040 and Goal 3 without an identified water source. Both of the options proposed by applicant (securing water rights from surrounding properties or receiving a water supply from the Port of Morrow) would have significant impacts on surrounding agricultural properties. The applicant has not addressed the impact of either of those options on agricultural operations surrounding the property, including impacts related to infrastructure required for a Port of Morrow water supply and impacts to water availability for agricultural uses in the area.

Goal 14. The application has failed to demonstrate reasons to justify the introduction of a dense urban industrial use onto resource land located many miles from the nearest urban center. OAR 660-004-0020, 660-014-0040. Providing economic benefit to the property owners, regardless of their status as farm operators, is not sufficient reason to deviate from the policy of Goal 14 and other statewide planning goals. The use is not dependent on a nearby natural resource and the applicant has not provided adequate justification to deviate from the policy against urbanization of rural lands.

Goal 11. The applicant relatedly fails to demonstrate why it is appropriate to utilize urban water services over 9 miles from the nearest urban area. Reasons cannot justify an exception for an unconfirmed use that does not include analysis of impacts related to transporting water over 9 miles from the Port of Morrow for the proposed use.

For these reasons, the applicant has not demonstrated compliance with the applicable criteria and should not be approved.

Best,

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[she/her/hers](#)



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