

**SUMMARY OF ISSUES RAISED/COMPARE TO APPLICABLE STANDARD**

TOPIC	CRITERIA	ENTITY	DISCUSSION	REMEDY/REVISED FINDINGS
Farm land	Goal 3, ORS 215.203(2)(a) OAR 660-004-0020	1,000 Friends  Tallman	Demonstrate property cannot be put to any farm use ORS 215.203(2)(a)	See supplemental information from applicant
Soils and AVA		1,000 Friends	20% class IV; 50 acres within Columbia Valley AVA	See supplemental information from applicant
Impacts to adjacent Farmland	OAR 660-004-0020(2)(d) MCZO 8.040.C		Direct impacts Indirect impacts due to Tower Road, Water	
Water 20-60 mg/year	Goal 3, MCZO 8.040	1,000 Friends DLCD  Killion  Tallman	Identify source and impacts to surrounding farmland and identify impacts to ground and surface water; evaluate whether Port has capacity to serve and not detract from providing water to existing urban uses.  calculation not consistent; clarify full buildout water use. Identify location of well. Is well within CGWA? Well certified to provide volume requested? General concern about water use.	
Traffic Impacts	Goal 12	DLCD, 1,000 F MoCoPub Works Tallman Killion	Impacts to farming, safety impact to Tower Road surface. Road Use Agreement proposed. Traffic safety, volume.	
Goal 3	Reasons exception	Killion	Reasons evaluation limited to proximity to infrastructure. Alternatives not fully analyzed.	
Goal 11 Exception		1,000 Friends  DLCD	Explain why urban water service is appropriate Requires Findings that analyze impacts related to 9 miles of new water line case law Foland v Jackson Co requires evaluation of Goal 11 exception on rural lands and compare to impacts on alternative sites.	
Goal 14 Exception	OAR 660-004-0020 OAR 660-014-0040(3)(A) and (B)  660-014-0040(2)  660-014-0040(3)	1,000 Friends DLCD	Economic benefit to farmer not adequate reason These standards not addressed. Required to show urban use is compatible with adjacent use (A) Whether Urban devel at site detracts from ability of cities and service districts to provide services (B) Assure resource mgmt at present level on surrounding lands can continue Compatibility with adjacent uses; identify assurances. Potential impacts include traffic on farm equipment, noise impacts on livestock, dust and litter impacts on crops, changes to air quality, water quality and quantity. Requires explanation on how "economic activity is dependent upon an adjacent natural resource. Alternative area analysis not sufficient detail. Evaluate urban areas in Um and Mo Co. ESEE analysis does not evaluate other sites stormwater and wastewater requires more explain in relation to impacts to air, water, energy and land resources. Water servie "likely to be provided in a timely manner" is not sufficient. Criterion (e) not addressed	

Alternatives Analysis



Large amounts of lands nearby that are not protected for resource use.  
Army Depot lands, Space Age Industrial zoned lands, Port of Morrow and Umatilla.  
Large vacant lands inside existing UGBs, Hermiston and Umatilla.  
Application did not consider expansion of a UGB.