



Perkins Coie LLP  
1120 N.W. Couch Street  
10th Floor  
Portland, OR 97209-4128

T. +1.503.727.2000  
F. +1.503.727.2222  
perkinscoie.com

March 12, 2025

**VIA U.S. MAIL AND EMAIL**  
**TMABBOTT@MORROWCOUNTYOR.GOV**

Steven L. Pfeiffer  
Partner  
SPfeiffer@perkinscoie.com  
D. +1.503.727.2261

Tamra Mabbott, Planning Director  
Morrow County Planning Department  
215 NE Main Ave.  
Irrigon, OR 97844

**Re: Threemile Canyon Farm LLC – Revised Application for Comprehensive Plan and Zoning Map Amendments**

Dear Tamra:

This office represents Threemile Canyon Farms, LLC (“Threemile”). On January 27, 2025, Threemile submitted a Morrow County Land Use Application Form; rezone application materials, including supporting reports; and a \$7,500.00 application fee. On February 26, 2025, Morrow County (the “County”) sent its “Completeness Review for Threemile Canyon Farms Rezone Application” which identified six outstanding submittal items necessary to deem the application complete.<sup>1</sup> And on February 27, 2025, the County transmitted a memo prepared by Todd Mobley, PE, regarding “Threemile Canyon Farms Zone Change Transportation Planning Rule Analysis Completeness Review” (“Mobley Memo”).

Enclosed, please find attached revised and additional application materials, which address the six items identified in the County’s completeness determination, as well as issues raised in the Mobley Memo. For ease of review and record keeping, the materials enclosed today are intended to completely replace the initial submittal, which was transmitted on February 27.

Further, to facilitate the County’s review of completeness items, below is list of where to find responsive information:

1. Soils report for proposed downzone area (**new Exhibit 10.B**)
2. Additional narrative to address applicable criteria for the downzone request (**revised Mackenzie Application Narrative, pages 67-94**)
3. Port of Morrow water service letter (**new Exhibit 17.A**)

---

<sup>1</sup> One of the items—the Cultural Resources Report—was on the list of items but the County made clear that this is “not necessary for completeness as the Mackenzie report addresses Goal 5 resources”).

March 12, 2025

Page 2

4. Additional Findings and data as required, to address Article 8 as part of the TPR analysis (**revised David Evans TPR Report, Exhibit 9**)
5. Additional Findings to address Article 8.040B relative to transportation infrastructure (**revised David Evans TPR Report Exhibit 9**)
  - a. Road classification of Boardman Airport Lane (**new David Evans Supplemental Traffic Memo, Exhibit 9.A**)
  - b. Emergency and secondary access (**new David Evans Supplemental Traffic Memo, Exhibit 9.A**)
  - c. Future connectivity – see Future Connectivity 4-7 of the Transportation System Plan (**new David Evans Supplemental Traffic Memo, Exhibit 9.A**)
  - d. A letter from Port of Morrow for the use of Boardman Airport lane would be beneficial but not a completeness requirement (**new Exhibit 17.C**)
6. Goal exception analysis to address extension of Boardman Airport Lane outside an existing urban area (**revised Mackenzie Application Narrative, pages 30-31**)

Please provide me with copies of all notices, correspondence, staff reports, decisions, and public testimony associated with this matter. Let us know if you have questions or if you need any additional information.

We look forward to working with the County toward approval of this application. Thank you for your courtesies in this matter.

Sincerely,



Steven L. Pfeiffer

Enclosure