

8/17/2020

co.polk.or.us Mail - Page 7 Correction

Exhibit E



Mulder, Sidney <mulder.sidney@co.polk.or.us>

Page 7 Correction

Sun, Aug 16, 2020 at 12:57 AM

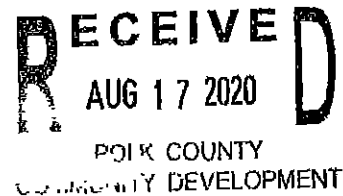
Wallace Lien <WLien@lienlaw.com>
To: "Mulder, Sidney" <mulder.sidney@co.polk.or.us>
Cc: Wallace Lien <WLien@lienlaw.com>

Sidney

On Page 7 of the Final Argument there was a typo reference to the AF-10 zone. Please replace the original page 7 with the attached correction page with the correct zone reference.

Sorry the inconvenience.

Wally



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The Applicant has submitted several Transportation Impact Analysis, including a recent update. The opponents, while worrying about traffic, present no expert views or information to support their fears. The Recommendation recognized that there were no real issues with traffic based on the TIA reports, and rebuked the opponents on this issue.

Applicants' ask this Board to carefully review all the evidence in this Record, and compare the credential of those providing testimony. When that is done, any reasonable person would conclude that the information provided by recognized experts should be followed over the unfounded complaints of a few area residents.

3. Polk County Comprehensive Plan

All of the information about the Subject Property and the rationale for allowing this Exception has been previously examined in the Polk County Comprehensive Plan. The Plan, dated over 11 years ago (July 1, 2009), indicates that 2% of the county land mass should be devoted to Rural Lands, hence rural residential uses. The county is shy of accomplishing that goal, with the amount of land allocated for this use at only 1.8%, which no doubt accounts for the high demand for this sector of housing. See Plan, Page 5. Approval of this project would raise the percentage slightly, but still less than that targeted 2%.

According to the Plan, the Rural Lands Plan designation applies to lands in the County which for the most part lie between the relatively flat agricultural areas and the foothills. These lands are generally hilly, heavily vegetated, and have low densities of residential development. It is the intent of the Rural Lands Plan designation to provide an opportunity for a segment of the population to obtain acreage home sites in a rural area, while at the same time encouraging and protecting agriculture and forestry, that is to say to encourage "hobby farms". It is further recognized that where an Exception to Goal 14 is not sought, the appropriate zoning would be AF-10, exactly what is being applied for here, thus complying with the Plan. See Page 58 of the Plan.

In justifying its own Exception Areas in the Plan, Polk County uses the same theories and rationale as are being used by the Applicants here, including satisfying the need for rural residential housing to meet the area's growing population; and by plan designating areas of marginal farmland for rural residential use, the county would be helping to protect quality agricultural lands.

The county policy is stated to provide an opportunity for a segment of the county population to live in rural areas on acreage home sites. This policy is the result of many hours of input received through citizen involvement during Polk County's planning program and the development and updating of the Comprehensive Plan. One of the criteria for selection of Exception areas is that the land had to offer only marginal suitability for agricultural or forestry use. Plan, Page 71. Another is the recognition that the best areas for rural residential uses are in the "foothills" which is defined as 275 feet in elevation up to 1100 feet. Plan, Page 74.

In discussing the need for more rural residential lands to be made available through the Exceptions process the Plan at page 72 states:

Page 7 - Applicant's Final Argument

RECEIVED
AUG 17 2020
POLK COUNTY
COMMUNITY DEVELOPMENT

BEFORE THE BOARD OF COMMISSIONERS
FOR
POLK COUNTY, OREGON

In the Matter of the Application of:)
)
SIMMONS FAMILY PROPERTIES, LLC,)
CHRISTOPHER and KIMBERLY GRAY,)
KEVIN STONE, and JONATHAN E. and)
TAMARA E. PUGMIRE,)

Case No. CPA 18-01
ZC 18-02

RECEIVED
AUG 17 2020
POLK COUNTY
COMMUNITY DEVELOPMENT

For an amendment to the Polk County)
Comprehensive Plan Map Designation from)
Agriculture to Rural Lands, and taking an)
Exception to Goals 3 and 4, and changing)
the zone from Exclusive Farm Use (EFU))
to Agriculture and Forestry with a 10 acre)
minimum lot size (AF-10) on seven)
contiguous parcels adjacent to Best Road,)
Salem, consisting of a total of 228 acres)
comprised of Tax Lots 601, 602, 603, 604)
and 605 on Map 7.4.14, and Tax Lots 100)
and 101 on Map 7.4.23)

APPLICANT'S
FINAL ARGUMENT FOR APPROVAL
OF THIS APPLICATION

COMES NOW the above named applicants, by and through Wallace W. Lien, of Wallace W. Lien, PC, and does hereby present to this Board their Final Argument for approval of this application.

This final argument will only address the new arguments that have been raised before this Board. All arguments previously raised to the Hearings Officer have been addressed and rebutted in the Applicant's Response Memo to the Recommendation of the Hearings Officer.

1. Response to Issues Already Raised and Addressed

It has to be noted that no new factual evidence was turned in by any opponent to this application during the open record period, therefore no factual rebuttal is necessary. What was received was repetition of issues already raised and addressed in this proceeding. By way of summary without repeating the response already entered in this Record, each open record submittal is responded to below:

Mr. Tom Huggins sent in a letter that basically repeated his testimony before this Board. His first issue was a fear of complaining neighbors. Applicants fully agree with the sentiments of Mr. Huggins, and this concept is one of the primary reasons why the irrevocably committed exception

is warranted in this case. As to the specifics of the Huggins vineyard property, there is no potential for complaining neighbors to come from the Subject Property for two primary reasons. The first is the dramatic change in elevation between the vineyard property located on the flat land, and new parcels that would be created on the Subject Property some 800-900 feet higher in elevation. The steepness of the slope and the sheer distance between the new home locations at the top elevation and the vineyard property below basically eliminate any potential contact between the two uses. The second reason is that what is proposed here are 10 acre parcels, which are much larger than the other parcels allowed near EPU properties which can be 5 acres or less. The larger the parcel, the lesser potential for conflicts between rural residential folks and vineyard owners because the sheer distance. While his concern is a legitimate one in general terms, it simply is not an issue here as it relates specifically to this vineyard property and the adjoining hillside of large tract homesites.

Mr. Huggins second concern was for the protection of two springs. As pointed out at the hearing, the entire hydrogeology of the area was studied a second time by Mr. John Rehm, a registered professional geologist. Mr. Rehm determined that the Subject Property could be served by domestic wells for each potential new homesite based on recharge rates into the basalt aquifer, of which there are two, the first at 100 feet deep, the second lies between 350-400 feet in depth. His study includes maps of the areas that he reviewed, and Figure 8 (Exhibit X to the original application) specifically shows the two springs referenced by Mr. Huggins as being quite some distance to the north of his Study Area, and therefore having no influence either from or on the provision of domestic wells on the Subject Property. Finally, it should be pointed out that the Hearings Officer in her Recommendation found no flaw in the Rehm report, and determined that domestic wells could be constructed for the project without adverse impact on the aquifers in the area.

The comments regarding the so called bullying tactics of the Applicants should be totally ignored as untrue gossip. The Applicants here have been nothing but cordial to their neighbors as well as those appearing in this process. Such gossip has no place in a land use hearing and must be disregarded.

Pat Wheeler sent in a letter that repeats two issues that have previously been raised and fully addressed. Her first issue is that the Study Area for the Land Use Inventory presented by the Applicants was too large. It is highly likely that a complaint would be entered against the size of the Study Area regardless of how big it was or how it was determined. If the Study Area was smaller, there is no doubt the complaint would be the Applicant did not study enough properties. If the Study Area was determined based on an irregular parcel selection basis, instead of taking entire Assessor Maps, the complaint would be that the Applicants were picking and choosing the boundary that best suits their position. Such is always the issue with the selection of a Study Area. The concept behind the determination of a Study Area is to present enough information to get a good solid picture of the surrounding area, including how big the parcels are, how many homes are there, what are the properties being used for, etc. That was done in this case, and the Applicants firmly believe the Study Area accurately depicts the neighborhood, and provides this Board with enough information to make a decision on the Exception, which is the goal of any Study Area.

As to the argument that only the contiguous parcels should be considered, the case law already cited in the Applicants' Response Memo to this Board demonstrates that the proper review of surrounding properties is a neighborhood view, and not just a review of those parcels that are contiguous. It is ridiculous to try to make a lawful determination on an irrevocably committed exception if you ignore the surrounding neighborhood.

The argument that the Applicants have not addressed the potential impact for future commitment of surrounding resource land from this application is simply false and shows that this opponent has not availed herself of the material, which is voluminous, in this Record on this topic. This issue was first addressed in the original Applicant's Justification at pages 21-26. When this issue was first complained of before the Hearings Officer, it was again addressed in the Applicants' Final Argument, see Section 4(D) pages 8 and 9. Finally, the issue was fully addressed for a third time in the Applicants' Response to the Recommendation in Section 2(C) at pages 19-21.

The concept that DLCD raised this issue is of no importance, as DLCD did not review or comment on any of the information presented by the Applicant that is referenced above. The DLCD comment came on September 30, 2019, before any public hearings or the submission of several additional reports and memoranda. DLCD has made no comments since, so it could be assumed they were satisfied by the Applicants' submittals made during the hearings process before the Hearings Officer and before this Board. The lack of participation by DLCD throughout is very telling, that DLCD does not care enough about this plan amendment to file any objections beyond that first short letter.

The opposition testimony from Ms. Sarah Deumling for the most part provides her lifestyle commentary on why progress is not good for Polk County. The tax revenue to be generated by the new homes that would be built if this application were approved is not important to her, even though, as was pointed out this new tax money could be used to fund a sheriff's deputy or two, or repair and maintain several miles of county roads. To this opponent, it is more important to provide public funded low cost housing, than to consider the entire spectrum of housing needs in the county.

This testimony also argues approval here would act as a domino effect resulting in a cumulative effect of turning the entire Eola Hills into one big residential subdivision. Presumably her rhetoric is an attempt to say an approval here could result in other property owners also applying for an Exception. This concept has been fully addressed and debunked as noted previously. Finally on this point, it must be said that each Exception is reviewed on its own basis and with its own specific set of facts. There is no precedent set here by approving this application, as every application is different. In any event, if a property owner can justify an Exception on its own merits, then that application should be approved just like this one should be.

With regard to the comments from Ms. Deumling that the subject property is suitable for forestry operations, compare that to the opposition commentary made in the Supplemental Report of Cliff Barnhart. Please note that Ms. Deumling has no professional credentials in forestry, and that Mr. Barnhart has a BS degree in Forest Engineering, with multiple continuing education credits. He has 33 years experience in the field, and has been the Past National President of the Association

of Consulting Foresters of America (ACF), the Past Western Regional Director of ACF, as well as Past Chair of the local ACF Chapter. He is also a member of the Council on Forest Engineering. When weighing evidence of the suitability of land for forestry it is clear that the opinion of Mr. Barnhart far exceeds that of Ms. Deumling.

Mr. Barnhart has submitted three reports for this Record. The original report that was submitted with the application, an Addendum submitted during the hearings process, and a Supplemental submitted during this open record period. In his final submittal, Mr. Barnhart points out that the industry standard for timber land acquisition is a discount rate in forest investment of 5%, which is the smallest percentage discount rate ever used in the evaluation of land for timber purposes. Mr. Barnhart presented detailed modeling of the Subject Property to demonstrate that the resulting internal rate of return for growing timber on the Subject Property ranges between 1.78% and 2.03%, well below the industry standard of 5%. To quote Mr. Barnhart: "No knowledgeable investor would make that investment tying up their cash for a 55-year commitment." He goes on to say, "The modeling clearly demonstrates this land is not desirable forest land, and should not be classified as such, and should not be reserved for such a use that will never come to pass."

At the hearing before this Board, and in a written submittal during the open record period, Mr. Simmons, the lead applicant here, pointed out a critical flaw in the soil analysis of the Subject Property, and most likely the reason for most crop failures, is the low ph value on the Subject Property. A ph value of from below 5 to 5.5 causes the aluminum in the high concentration of bauxite in the soil of the subject property to be absorbed into the plants. The toxicity from the aluminum inhibits root growth thus lowering crop yields. Photos of this effect can be seen in the submittal by Mr. Simmons on the presence of bauxite on the Subject Property. Mr. Simmons attempted to raise the ph on the land but even the application of lime did not raise the ph enough to improve the land for farm crop production.

This information confirms that the Subject Property is not suitable or practicable for farm use as that term is defined in Oregon law.

The arguments of Mr. Malone on behalf of the Friends of Polk County present no new issues or arguments. All of these arguments have been fully addressed in the Applicants' submittals, and specifically the Applicants' Response to Recommendation. Since there is nothing new presented, the Applicants rely on the positions, facts and legal justification already presented.

The Applicants did wish to address one flaw that Mr. Malone continues to make in his arguments relating to the size of the Study Area. The Study Area is a total of 4 square miles with the Subject Property basically in the center, therefore the distance from the Subject Property to the outward most land is less than 2 miles,¹ not the 4 miles that Mr. Malone continues to refer to.

¹Note that the Salem City Limits and Urban Growth Boundary to the southeast is approximately one mile from the Subject Property, and no part of the Study Area extended into the city limits/UGB.

As to the material attached to Mr. Malone's testimony, none of it is site specific to the Subject Property, and none has any relevance for consideration here, and should be given no weight whatsoever as discussed previously in the Applicants' Final Rebuttal.

Mr. Mulkey submitted an entire sheaf of papers that had already been accepted into this Record, and some soil data that duplicates what was already submitted. As pointed out earlier, the 2019 material submitted has already been addressed and rebutted in prior Applicant submittals, and except for the lack of information on ph levels on the Subject Property, there was nothing new to address.

Similar to the Malone letter, Mr. Mulkey simply rehashes the same points made by his group throughout this process, all of which have already been addressed in the Applicants' Response Memo to this Board.

The issue of how large the Study Area is continues to be a source of aggravation for these opponents, yet they never address what the appropriate size of the Study Area should be, only that the size the Applicants picked was too big. Applicants submit that the Study Area could be cut in half and the results would be substantially the same. The typical parcel in this area is under 10 acres in size, is not on farm tax deferral, and has a non-resource dwelling located on it. That typical parcel will be reflected regardless of the size of the Study Area, which is no doubt why these opponents have not submitted any Study Area different from that which the Applicants' utilized. They bicker about the size of the Study Area, while ignoring the results of what this neighborhood looks like. If the Study Area was a mile square, or even half a mile, both of which have been found to be acceptable by LUBA, the result of that typical parcel would be the same.

Further, these folks ignore the fact that the Recommendation in this case uses only the contiguous parcels as the Study Area, and ignores the entire surrounding neighborhood. By ignoring this, it would appear they agree such a narrow interpretation can not be upheld under the law. Again, the flaw in these so-called "friends" opponents argument is challenging what was produced by the land owners, but offering nothing in the alternative. To these groups, the answer is always "no." If it were up to these groups, Polk County would never approve another land use change. That is their goal to stop progress and freeze the land patterns in helpless oblivion.

The opponents continue to argue that the Applicants have not shown activities that can lawfully justify this Exception, while ignoring LUBA case law that clearly indicates that activities such as trespass, smoke from agricultural burning, farm noise, irrigation spill over, and pesticide application are legitimate uses that can conflict with nearby residential uses and which are sufficient to justify an Exception. *Scott v Crook County*, 56 OR LUBA 691 (2008). Each of these same activities are present in this case and have repeatedly been argued throughout this case as justifying the Exception.

Mr. Mulkey would have this Board ignore the public record and the impact of Covenants, Conditions & Restrictions have on the use of the land. The Options and the Homeowner's

Association documents are lawful and fully apply to the Subject Property. These documents can not be ignored, and the restrictions imposed, however slight as in this case, must be recognized.

Finally, Mr. Mulkey dredges up Goal 5, and the argument that Polk County does not have a program to comply to protect groundwater resources. This is a spurious argument in a quasi-judicial land use application, and Mr. Mulkey does not even make an attempt to relate this argument to how or why it impacts this application. The Record in this case is replete with hydrogeologic information from a registered professional engineer, that indicates that the homes to be generated by this approval will be served by domestic wells that come from an aquifer that has sufficient regeneration to serve the new homes, but also to have no adverse impacts on the aquifer itself or any surrounding water users. Again, the opponents pop off making an argument without any evidence to back it up, or without even attempting to relate the argument to this application.

2. Weighing the Evidence

In reviewing a land use case, the Board is charged with the responsibility of reviewing and weighing evidence. This sometimes can be a difficult task when selecting between competing expert opinions, or sorting out conflicting testimony from area residents. However, in this case there is a dramatic distinction in the quality of evidence submitted between the applicants and the opponents.

Here, the applicants have provided the county with recognized experts who each provided detailed professional reports. The opponents have introduced no experts at all, and submitted no expert reports or site specific recommendations. Opponents rely only on lay opinion, hearsay and innuendo.

With regard to the availability of domestic water for the new homes proposed here, and the lack of adverse impacts on the areas aquifer, the Applicant produced an abundance of expert testimony in the first case, and a highly technical and detailed hydrogeology study by a registered professional engineer, all of which indicated there was no issue with water. The opponents hired no expert, and simply complain of "fears" about water. Land use decision are made on the basis of facts not fears.

Similarly, the Applicant has provided three reports from one of the most respected and experienced foresters in the region, all of which indicate the Subject Property can not practicably support a forestry use. Opponents have hired no expert, and again simply offer lay opinions and assumptions that are not even based on true facts.

The same is true of vineyard operations. The Applicant introduced reports from several vineyard experts, from one dealing with soil, one dealing with elevation and climate and one that deals in marketing. Opponents have hired no expert, and aside from Mr. Huggins indicating that he might try to grow grapes on the lower portions of the Subject Property that adjoin his vineyard, and Ms. Casteel, who works at Bethel Heights Winery, but has no credential in viticulture, and who only testified that she would like to see the wine industry grow. The difference in the quality of testimony between the experts and these folks is striking.

The Applicant has submitted several Transportation Impact Analysis, including a recent update. The opponents, while worrying about traffic, present no expert views or information to support their fears. The Recommendation recognized that there were no real issues with traffic based on the TIA reports, and rebuked the opponents on this issue.

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In justifying its own Exception Areas in the Plan, Polk County uses the same theories and rationale as are being used by the Applicants here, including satisfying the need for rural residential housing to meet the area's growing population, and by plan designating areas of marginal farmland for rural residential use, the county would be helping to protect quality agricultural lands.

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In discussing the need for more rural residential lands to be made available through the Exceptions process the Plan at page 72 states:

In order to develop some estimation of how much rural residential housing the county should provide for, it was decided to base an estimation on rural population projections.

Consider the following:

Between 1975 and 2000, total population growth in Polk County is projected to increase to 59,219 - an increase of 18,953. Twenty-five percent of that total, or 4,710 residents, are projected for the rural areas (Siegel, 1977, p. 26). The average household size by 2000 is expected to be 3.03 members. Accordingly, there will be a need for approximately 1,554 dwelling units to meet rural population housing needs. Assuming one dwelling unit per parcel, there will be a need for 1,554 developable parcels. It is further assumed that the units will be single-family.*

*The number of additional dwelling units that can be developed in "lands no longer available for farm use" is 264. (Refer to Table 1). The number of units that can be developed in "lands needed for non-farm use" is 1573. (Refer to Table 2). Total potential is 1,837. However, based on past averages, 24 percent of all site evaluations for septic system installation will be denied.** Therefore, the total number of developable parcels (and the number of single family units that can be constructed) is estimated at 1,396.*

This discussion shows a short-fall of nearly 200 units, and remember this is using extremely old data (reference to 2000 population figures), and given the dramatic increase in population since 2000 it can easily be assumed this short fall is significantly higher in 2020.

Following up on this analysis, that county determined that generally areas located in the alluvial bottomlands and terraces offer more agricultural potential than those areas situated in the foothills, even though the areas might exhibit soils with identical land capability ratings. Plan, Page 75. The county goes on to state that when recommending areas for Exceptions, the focus is on lands where "agricultural activity is judged greatly inhibited by the existence of nonfarm use interference and conflicts." Plan, Page 76. The county further recognized that rural residential uses are best sited where agricultural use is limited or non-existent because of slopes, terrain, and difficulty of obtaining irrigation, and where agricultural uses are problematic because of interference and conflicts from adjacent areas. Plan, Page 83.

Finally, at Plan, Page 88, the county concludes that acreage housing is a compatible use in areas of marginal agricultural or forestry activity. Small parcel tracts created under the Rural Lands policies, would allow farm and forest activities to continue, albeit on a smaller, part-time basis. It was the intent of the Plan to demonstrate that the areas proposed for rural residential use are marginal agricultural or forestry lands because of physical (e.g., lack of productive soils) or cultural (e.g., the predominance of non-farm interference) constraints. In addition, other areas are designated rural residential because the county believes their development would help to keep non-farm uses and

interference concentrated in the vicinity of existing urban areas; as well as allow for the future provision and maintenance of public facilities and services at maximum efficiency.

All of these Comprehensive Plan findings and conclusions apply directly to this application, and justify its approval.

4. Rebuttal to Late Evidence Submitted by 1000 Friends

Applicants have moved to strike the four Capital Press articles that were untimely submitted. Applicants assert that such new evidence blatantly violated the procedures mandated by the Board, and that these four articles should be rejected and not be included as a part of this Record.

However, upon review of this untimely material, it is clear that this information only helps the Applicants in showing how the conversion of the Subject Property to "hobby farm" potential is a viable proven argument, contrary to the position taken by the opponents. Despite the fact that these articles favor the positions taken by the Applicants, their submission violates the procedures for submission of evidence established by this Board. Since, a decision on the Applicants' motion won't be made until the Board makes a final decision on the application, the Applicants have to respond to these articles in the event the Board includes them in the Record.

The first Capital Press article is dated November 28, 2019, and relates to a Spokane, Washington 3 acre chicken farm. What this article does is indicate that hobby farms are important and can be done where the family lives on the parcel even when one of the residents works full time at their profession in the nearby city. The article further explains that 32.2% of the farms in Washington are less than 10 acres in size, even though it is recognized that these small farms "can't live off the profit" generated by the hobby farming activity and rely on the income from the wages earned at their regular jobs for survival. What this article affirms, is exactly what the Applicants have been arguing all along, that when a land owner lives on the land, they have the ability and desire to do intensive activities that could never be implemented by a normal farm operation.

The second is dated May 23, 2019, and involves a 17 acre parcel south of Monmouth that raises ducks, chickens and rabbits. The article clearly shows this operation as a hobby for the owner who then provides "all my own food now" and makes some money on the side selling eggs and meat at Farmer's Markets. Both property owners in this situation have full time jobs away from the land, making this a true example of a hobby farm. This is again exactly the kind of situation that can take place on the Subject Property and turn land that is otherwise unproductive into a boutique food operation for this family and providing some extra spending money to boot.

The third is dated August 21, 2010, and involves a chicken farm in Southern Oregon. This article points out that large farms are mechanized and automated which increases the costs. In small farm units that are labor managed without mechanization, it makes more sense (and money) to engage in hobby farm activities and add extra income to the family through sales at Farmer's Markets.

The last is dated August 5, 2020, and involves a 5 acre tract near Albany. This article points out that the husband and wife property owners both work full time at jobs away from this land, and rely on their daughters and their own after work efforts to make the small dairy operation work. As with the other articles, this one points out what land owners can do on small parcels with agriculture that a normal farmer can not and would never be able to accomplish.

5. Conclusion

This is as good an application for an irrevocably committed exception as there can be. If this application can not meet the criteria, then there is no land in Polk County that could ever satisfy the standards for a plan amendment of agriculture or forest lands to any other use. This application is really a touchstone for Polk County to grow and progress, or to stand still and idle.

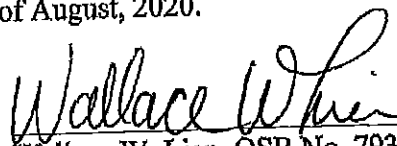
This application includes an abundance of facts presented by qualified experts in the fields of hydrogeology, forestry management, land use planning, viticulture and soil science. The amount of information submitted to justify this application covers hundreds of pages of reports and analysis, all of which support and justify approval of this application.

On the other hand there are the "friends" groups, and a couple of land use advocates that don't want the county to ever change or progress. These opponents have provided no expert facts, no reports, nothing to support their opposition. These folks only have their personal opinions, and land use planning can not be done based on lay opinions, especially when the opinions are not well founded and countered by reports and analysis from recognized experts in their fields.

The Eola Hills is in serious transition from junk land with scrub brush and trees on side hill slopes, to beautiful view properties with exceptional homes. These homes hurt no one, and help Polk County by providing a much needed inventory of rural residential homesites on 10 acre parcels, as well as significant tax revenue for the county to use in balancing its budget in these hard times.

This application satisfies all the mandatory approval criteria in the Polk County Comprehensive Plan, the Polk County Zone Code and in the Exception process of the ORS and Administrative Rules. It is an application that deserves to be approved, and in doing so the county weighs in for progress in its land use planning program, instead of establishing a moratorium against change.

Respectfully submitted this 14th day of August, 2020.


Wallace W. Lien, OSB No. 793011
Of Wallace W. Lien, PC
Attorney for Simmons Family Properties; LLC