



Pacific Northwest Planning

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May 13, 2026

Marion County Commissioners,

As the Applicants representative we are writing in support of the request for a Comprehensive Plan Amendment from Special Agriculture to Commercial, a corresponding zone change to Rural Commercial, and a Statewide Planning Goal 3 exception for the subject property located at 5355 Gaffin Rd SE.

Based on a detailed review of the property, surrounding land uses, and applicable approval criteria, the proposal is consistent with the Marion County Comprehensive Plan and satisfies the requirements for approval. Which both Planning staff and the Hearings Officer recommended based on these findings.

The subject parcel is no longer suitable for traditional agricultural use. The property has been in long-term commercial use since approval of a conditional use permit in 1992 for a hay storage and compression facility, resulting in the development of significant on-site infrastructure, including large-scale buildings, accessways, gravel storage areas, and substantial site modifications. These developments, in combination with site constraints such as wetlands and poorly drained soils, have rendered the property effectively nonfarmable. The previous commercial operation represented a niche use that is no longer active, and the existing site conditions substantially limit the viability of future agricultural use. The parcel has also been disqualified from farm/forest tax deferral for more than 20 years, further demonstrating its longstanding departure from agricultural use.

Additionally, the property is physically and functionally isolated from surrounding agricultural lands. It is bordered by the Salem Urban Growth Boundary, major transportation infrastructure including Highway 22, and a pattern of surrounding industrial, commercial, and institutional development. Nearby uses include the Salem-Keizer School District transportation facility, industrial campuses, including the Amazon facility, and other large-scale commercial operations. This context prevents the subject property from functioning as part of a larger agricultural unit and supports its reclassification.

The proposed Commercial designation and Rural Commercial zoning are appropriate given the surrounding development pattern and represent a logical extension of existing commercial and industrial uses in the area. Use of the Rural Commercial zone would allow development that is compatible with surrounding uses and would likely serve as a transitional buffer between more intensive development to the east and farm-

zoned parcels to the west. The site is also well-positioned to utilize existing infrastructure, including access to Gaffin Road, proximity to a major highway interchange, and availability of public services such as water and emergency response. Transportation analyses for the surrounding area demonstrate that the proposed change will not adversely affect the capacity or function of the existing transportation network.

The request also satisfies the applicable criteria for a Statewide Planning Goal 3 exception. The property is irrevocably committed to nonagricultural use due to the extent of existing development and surrounding land use patterns. The proposal will not adversely impact nearby agricultural operations, as there are no significant or contiguous farm uses in the immediate vicinity that would be affected. Adjacent industrial and commercial development has made farm use increasingly impractical on the subject property. Traffic, noise, and ongoing nonfarm development create conflicts with many traditional agricultural activities, in addition to the substantial physical alterations already present on the site. Furthermore, the long-term environmental, economic, and social impacts of the proposal are consistent with, or less significant than, comparable development approved under similar Goal exceptions.

In summary, we believe the proposal is consistent with applicable approval criteria, reflects the existing development pattern of the area, and represents an appropriate and justified reclassification of the subject property. We kindly ask that the Board approve the Comprehensive Plan Amendment, zone change, and Goal 3 exception.

Sincerely,

A handwritten signature in black ink that reads "Lindsey King, CFM". The signature is written in a cursive, flowing style.

Lindsey King, CFM
Pacific Northwest Planning