

Submitted to: Planning@ColumbiaCountyOR.gov

To the Columbia County Planning Commission:

My name is Mike Seely, and my family owns and operates Seely Mint Farm at Port Westward. We require access to fields from Kallunki Rd, on the north side of Kallunki Rd. Kallunki Rd. now provides our only reliable access to areas we farm.

NEXT proposes to block Kallunki Rd. with long trains carrying feedstock or other materials, at least six times per week (three trains in, three trains out). Due to trains slowing as they approach the rail yard or gaining speed as they leaves, the train will block the road for lengthy periods of time. NEXT and the Staff Report fail to address this issue adequately. I have personally experienced long delays from train traffic in the area, already. The issue of blocking Kallunki Rd. is also important for emergency access for people who live in the area, which includes Johns District.

The proposed rail yard will negatively impact our farm business. The portion of the rail yard on agricultural land will interfere with road access to farm land north of the proposed rail development. Staff refers to this as a "branch line," a description that LUBA rejected. Their proposal involves two applications for a rail yard that straddles industrially zoned land and agriculturally zoned land. Attempting to piecemeal the operation of one portion from the other makes little sense when the rail yard will be accepting mile-long trains that will impact a large area when trains arrive or leave.

Additionally, the addition of an above-grade ponds in both agricultural and industrial areas will impact drainage, and the impacts to the drainage system are not yet understood well enough to determine that they can be adequately mitigated. It is unreasonable to conclude that these impacts can be mitigated in the absence of an agreement, or at least a common understanding, with the BDIC.

Additionally, NXT's proposed realignment is a drastic change to the proposed project. The change could impact groundwater levels, water in drainage systems, and the interconnected water systems and dikes that both protect our area from floods and provide irrigation. NXT now proposes ponds in new areas, a departure from the previous application. NXT does not fully understand groundwater levels. NXT relies on an outdated Geotechnical report. These are flaws that cannot be ignored, and the County must find that the application does not identify and mitigate potential water-related and erosion-related impacts to farms. My business would be negatively impacted if water levels become unpredictable or water becomes too polluted for use, both of which are very likely in the current proposal.

My business would be negatively impacted by traffic and train delays. Delays of hours or even minutes - any delay whatsoever - will have a negative impact on our farming. When mint is ready for harvest, we move quickly. We sometimes work multiple shifts in a day to complete harvest when the mint is ready. The timing of harvest is unpredictable. County rules require NEXT to consider and mitigate impacts to land uses in the area. We harvest over many months, depending on the weather in any given year.

Mint farming is nuanced, and soil moisture is highly important. Some mint crops cannot handle standing water for lengthy periods of time, and so changes to water levels will have a major

impact on our operation. Changes in weather will cause mint to be ready for harvest on short notice.

NXT has not provided adequate information to determine how the rail yard, in its entirety, will impact farmers in the BDIC. Farming is a long-recognized land use in the area. Our mint can become unusable if not properly handled, quickly after harvest. Weather is a major factor in our operation, and weather is highly variable. Hence, access to fields needs to be flexible, and we access fields for harvest exclusively from Kallunki Rd. Further, delays in mint processing that could be caused by the proposed modification will impact our ability to fill our orders in a timely manner. Our farm grows high-value mint, producing unique mint products. We simply cannot afford the risk that the modification would create for our business.

Additionally, our farm relies on water supplies and drainage provided by the Beaver Drainage Improvement District (BDIC). The farm will be negatively impacted if the proposed modification alters the drainage infrastructure in our area. The system of drainages and ditches are interconnected. Pollution entering the water system could harm our mint crops. Altered drainage could impact soil moisture levels in ways that harm our farm and others in the area. No alterations to the operations of the BDIC and the distribution of water resources are allowed without permission from the BDIC and two-thirds of its members.

Air-borne pollution from the proposed rail yard and other modifications could also potentially impact area crops. NEXT and the Staff Report do not evaluate these impacts. Particulate matter or other pollutants could harm mint crops, causing crop failures or unusable products for producing high-grade mint oil.

For these reasons, as well as reasons identified by other commenters, I request that the Planning Commission reject the proposed modification. The findings are inadequate and do not evaluate or mitigate impacts to area farmers.

I request that you keep the record open for no less than 7 days following the public hearing.

Sincerely,

Michael P. Seely

