

March 4, 2025

Morrow County Planning Department
Tamra Mabbott, Planning Director (VIA EMAIL)
Post Office Box 40
Irrigon, Oregon 97844

Ms. Mabbott,

The City of Boardman is writing to express support for the proposed Comprehensive Plan and zoning map amendments for property west of the Boardman Airport owned by Threemile Canyon Farms, LLC. It is our understanding that the proposal seeks to rezone up to 1,264 acres from Exclusive Farm Use (EFU) and Space Age Industrial (SAI) to General Industrial (MG) with a Limited Use Overlay to accommodate the next generation of data center development.

As you are aware the City of Boardman is home to a data center campus with many more in the Boardman area. Over the past several years Boardman has been working to develop needed housing and commercial opportunities for residents of Boardman, workers at the Port of Morrow, and the larger region as the growth in data centers continues. This has all led to The Oregonian pronouncement last year that Boardman was the fastest growing city in Oregon.

Who knew in 2008 when the first data center was sited in the Port of Morrow East Beach Industrial Park that less than 20 years later the region would be experiencing such tremendous growth in this industrial sector. Here are some facts:

- Data centers are an increasingly vital component of the digital economy, providing essential infrastructure for cloud computing, artificial intelligence, e-commerce, and other emerging technologies.
- Oregon, Boardman, and the Port of Morrow have been leaders in attracting and retaining data center investment, thanks to our favorable business climate, skilled workforce, abundant and affordable energy, strategic location, and ability to successfully accommodate this use.
- But the demand for data centers is outpacing the supply of suitable sites in Oregon, especially for hyperscale and exascale data center campuses. These large-scale facilities require large, flat sites, proximity to high-capacity transmission lines, and ability to access water services, fiber optic connectivity, and transportation infrastructure. Continuous growth over the last five years indicates that large technology companies have the will and resources to develop large data center campuses at an increasing pace, and that Oregon currently lacks sufficient large industrial sites to attract such growth without proactive planning.

This proposal for the land owned by Threemile Canyon Farms, LLC will create an opportunity for the City of Boardman and Morrow County to capture a significant share of this growing market with limited impacts on agriculture and natural resources. The

proposed site is already partially zoned for industrial use and is immediately adjacent to the Boardman Airport and land that supports data center development currently. There is also limited agricultural opportunity on the subject site with shallow soil depth, rocky outcroppings, and difficulty delivering irrigation. It should also be noted that the swap of zoning that is a critical component of this application will result in protections applied to productive farm land and allowing industrial development of some of the least productive farmland.

The City of Boardman has determined that the proposed amendments are consistent with the State of Oregon's economic development goals and policies as well as the Morrow County Comprehensive Plan Policies found in the Goal 9 Economic Element, specifically:

Goal 2 To expand job opportunities and reduce unemployment, reduce out-migration of youth, and accommodate the growth of the County work force.

Policy 2A: To maximize the utilization of the local workforce as job opportunities increase.

Policy 2B: To increase the income level of County residents by providing good job training and educational programs in response to employer needs and by encouraging the location of industries in the County which will hire local residents.

Policy 2C: To facilitate and encourage communications and coordination between industry and education to assist in the development and maintenance of a quality work force.

And while not in the City of Boardman it would be consistent with our Goal 9 Economic Needs Policy 1: Advance the position of Boardman as a regional center for industry, power generation, commerce, recreation, and culture.

The City of Boardman urges Morrow County, through its Planning Department, Planning Commission, and Board of Commissioners to approve the proposed amendments and grant the necessary goal exceptions to enable this large scale data center development. It is proposed adjacent to other industrial lands with similar data center development currently underway.

We appreciate your consideration of this request and your commitment to economic development in Morrow County. Please do not hesitate to contact our City Manager Brandon Hammond or Planning Official should you have any questions or need additional information.

Cordially,

Paul Keefer, Mayor