

# MACKENZIE.

July 12, 2021

Columbia County Land Development Services  
Attention: Matt Laird  
230 Strand Street  
St. Helens, OR 97051

Re: **NEXT Renewable Fuels Site Design Review DR 21-03 and Variance V 21-05**  
*Incompleteness Determination Response*  
Project Number 2200315.00

Dear Matt:

In response to your land use application completeness review letter dated February 17, 2021, we have addressed the items below, with our responses following your comments. Additionally, we would note that the facility layout has changed since the original land use submittal as NEXT Renewable Fuels has refined its site design. The narrative has been updated as needed to match the new facility layout.

1. *You will need to send the payment for the Stormwater and Erosion Control review. The fee amount is \$350.00.*

**Response:** Payment has been provided by the applicant's attorneys at Schwabe, Williamson & Wyatt.

2. *Need information on the location, size and type of sanitary sewer system, storm drain system and water system that will be used. Currently the application states that it will connect to the Port of Columbia County system. (See Sheet C1.30 and Application pages 3 and 8).*

**Response:** The Port of Columbia County has provided a letter regarding the capacity of their existing infrastructure systems. Sheet C1.30 and the narrative have been updated to reflect this information. See new Exhibit 16.

3. *Provide documentation from the Port of Columbia County approving the connection to the sewer, storm and water systems of Port Westward.*

**Response:** The Port of Columbia County has provided a letter regarding the capacity of their existing infrastructure systems. Sheet C1.30 and the narrative have been updated to reflect this information. See new Exhibit 16.

4. *Provide additional detail (curve radius, lane width, regarding the driveway connection with Hermo Road. Can a semi-truck make the turn into the facility if there are cars in the driveway waiting to turn left out of the facility? (Sheet C1.13).*

**Response:** Mackenzie civil engineers have performed truck turning simulations to confirm that the driveway connection has adequate width for incoming and outbound vehicles. See Sheet C1.13.

5. *Need details on the type and wattage of exterior lighting to be used. Also please clarify that all on structure lighting will be shielded and focused on the work area. Reference CCZO 1561(A), and 1563(E), Sheet C1.51, Application page 29).*

**Response:** The lighting details on Sheet C1.51 have been updated to provide information on the specific light fixtures proposed. All lighting is proposed to be shielded and directed to the work area.



6. *Need information on the secondary access driveway connection to Kallunki Road. Please provide construction details, width, depth of rock, surface type, curve radius, rail crossing, etc. Also please clarify the signage to be used for this driveway, such as traffic, facility, and informational signs. Indicate this is not the primary entrance to the facility. Will there be a gate? If so, where? (Reference CCZO, 1563(G), Sheet C1.11 and C1.13 and C1.40, Application pages 24, 25 and 29).*

**Response:** There is an existing paved roadway from Kallunki Road to the PGE Beaver Generation site and this road has an existing paved rail crossing as pictured below.



The applicant's proposed secondary driveway is the existing gravel driveway that connects to this existing paved roadway west of the rail line, so no rail improvements are required. No changes are proposed to this existing paved roadway or rail crossing. Sheet C1.11 has been updated to specify that the secondary driveway will be 20 feet wide and surfaced with gravel. Final design of signage and gates will be deferred to the building permit stage of the project, though conceptual wording of the "emergency access only" signage is shown on Sheet C1.40.

7. *Provide a draft lot combination covenant to bind the tax lots together so there are no parcel size or internal setback issues. (Reference CCZO 685.1, Application page 21).*

**Response:** The site for the production facility, which consists of property owned by NEXT Renewable Fuels and property leased by NEXT Renewable Fuels from the Port of Columbia County, will have an area of approximately 109 acres, which is of adequate size for the proposed operations. CCZO 685 does not call for internal setbacks but does require "Setbacks necessary to adequately protect adjacent properties" in 685(2)(c). The site provides adequate separation from adjacent properties as illustrated in the site and landscaping plans. Therefore, no lot combination covenant is needed.

8. *Revise landscape plan to show Type A planting continued along the south property line all the way to Hermo Rd. Continue Type B planting along the east property line all the way to the north property line. (Sheet L1.10 and L1.11, Application page 26).*

**Response:** We understand that County staff would like the continuation of the landscaping where adjacent to the laydown yards. The applicant has clarified that the gravel laydown yard will be used on a temporary basis for construction of the facility, so no landscaping is proposed in that area. The applicant has added trees south of the proposed rail branchline south of the site. The paved permanent laydown yard has been eliminated. Type B planting is proposed along the eastern fence line to avoid planting trees under the electrical transmission line. While this planting is not located directly on the property line, it will meet and exceed the intent of screening by locating the plantings closer to the facility itself. See Sheets C1.13 and L1.10 and new Exhibit 17.

9. *Provide details of proposed fence, type, height and elevation. (Reference CCZO 1504 and 1562(D)(.1), Application page 28 and 51).*

**Response:** Fencing details have been provided on Sheet C1.11. The variance request has been revised to indicate the proposed fence height (seven feet plus one foot of barbed wire) as required by ASTM F2611-15.

10. *Review internal vehicular access and circulation. Remove landscape strip between driveway and truck turn around area. Provide truck turning radius information for access to scale and for turnaround area in front of warehouse/laydown outdoor storage area. Consider moving guard shack closer to the gate and moving scale slightly to the east. Provide truck turnaround area at the end of the internal driveway in the southeast corner of the site near the hydrogen unit. (Reference CCZO 1406(1) and 1408(.1)(B), Sheet C1.11 and L1.10, Application pages 42 and 43).*

**Response:** The landscape strip has been removed as requested, see Sheets C1.11 and L1.10. Internal drives have been reconfigured to accommodate vehicle movement and truck turning information is shown on Sheet C1.12. The guard shack location has been adjusted to better meet security needs for portions of the facility east of the loading area. See Sheets C1.11 and C1.12.

11. *Reconfigure parking area north of the main office to provide turn around area at the east end. Consider adding additional guest parking spaces. (CCZO 1415.2 and 1416.5, Sheet C1.12, Application page 44 and 46).*

**Response:** The parking has been reconfigured and ten parking spaces have been added to the site. Accessible spaces have been relocated to the south of the office building. See Sheet C1.12.

12. *Provide additional details regarding type and location of internal traffic control, safety, and directional signage. Provide safety plan for building and area numbering for emergency response. (Reference CCZO 1313.6, Sheet C1.40, Application page 40).*

**Response:** Sheet C1.40 has been revised to indicate that the applicant proposes to defer internal site signage design to the permitting stage to provide the opportunity for coordination with the Fire Marshal. The anticipated protocol is that emergency responders would be escorted by facility staff from the security gate to any locations requiring assistance.

13. *Provide additional detail and information regarding the size and location of wetland mitigation area. Provide number of acres impacted and number of acres mitigated. (Reference CCZO 1563(B) and 1180 and 1184(C), Sheet C2.11, Application page 28).*

**Response:** The narrative has been updated to indicate that the applicant is proposing 488 acres of wetland mitigation south of the site.

In accordance with ORS 215.427, the applicant is providing the noted material and requesting that the County deem the application complete within the 180th day of application submittal. Of course, we understand that questions, comments and suggestions from staff come up within the review process. We welcome such dialogue and intend to respond timely to queries and suggestions as they may arise.

Please contact me if you have any questions, I may be reached at [bvarricchione@mcknze.com](mailto:bvarricchione@mcknze.com) or (971) 346-3742.

Sincerely,



Brian Varricchione  
Land Use Planner

Enclosure(s): Revised application materials

c: Christopher Efird, Gene Cotten – NEXT Renewable Fuels  
Garrett Stephenson – Schwabe, Williamson & Wyatt