BEFORE THE LAND USE BOARD OF APPEALS

OF THE STATE OF OREGON

CENTRAL OREGON LANDWATCH,
Petitioner,

vs.

CROOK COUNTY,
Respondent,

and

JAMES D. COX,
Intervenor-Respondent.

LUBA No. 2016-107

FINAL OPINION
AND ORDER

Appeal from Crook County.

Carol Macbeth, Bend, filed the petition for review and argued on behalf of petitioner.

Jeffrey M. Wilson, County Counsel, Prineville, filed a response brief and argued on behalf of respondent.

Tamara E. MacLeod, Bend, filed a response brief and argued on behalf of intervenor-respondent. With her on the brief was Schwabe, Williamson & Wyatt.

HOLSTUN, Board Chair; BASSHAM, Board Member, participated in the decision.

RYAN, Board Member, did not participate in the decision.

1 REVERSED 03/07/2017

2

3 You are entitled to judicial review of this Order. Judicial review is
4 governed by the provisions of ORS 197.850.

1 Opinion by Holstun.

2 **NATURE OF THE DECISION**

3 Petitioner appeals a county decision that approves intervenor-
4 respondent's (intervenor's) application for approval of a nonfarm dwelling on
5 land zoned Exclusive Farm Use-1, Post-Paulina Area (EFU-1) that is located in
6 a county-designated Critical Deer Winter Range.

7 **FACTS**

8 The property at issue in this appeal is made up of four parcels that were
9 created in 1973. Those parcels are referred to in the decision as tax lots 103,
10 104, 107 and 115. Record 87. The parcels are located north of SE Beaver
11 Creek Road in what the parties call an "unrecorded subdivision" known as
12 "Paulina Ranches."[1] A map from the record showing the four tax lots is
13 attached as an appendix to this opinion.

14 On March 23, 2016, intervenor submitted an application for approval of
15 a nonfarm dwelling on five-acre tax lot 115. Record 305-18. In a May 3, 2016
16 decision, the planning division approved the application, but that decision
17 approved a nonfarm dwelling to be located on tax lots 103, 104, 107 and 115.
18 Record 230-43. Intervenor acquired one of the additional tax lots on March 31,
19 2016 and acquired the other two tax lots on July 12, 2016. Record 101-102;

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[1] We assume the reference to an "unrecorded subdivision" mean the parcels that make up the unrecorded subdivision were created by deed rather than by recording a subdivision plat.

284-85. The planning division's approval included the following condition of approval:

> "10. Tax Lots * * * **115**, * * * **103**, * * * **104**, and * * * **107** shall be combined by deed to prevent their being sold separately prior to issuance of a building permit for development. **A copy of said deed shall be submitted prior to approval of Building Permits**." Record 238 (bold face in original).

Petitioner appealed that decision to the planning commission. Record 226-29.

In a July 13, 2006 decision, the planning commission approved the application and imposed the same condition 10 that the planning division had imposed in its May 3, 2016 decision. Record 86. On July 17, 2016, petitioner appealed the planning commission's decision to the County Court. Record 77-79.

On July 25, 2016, after petitioner's appeal of the planning commission decision to the County Court, but before the County Court's hearing and decision in that appeal, intervenor submitted an application to combine tax lots 103, 104, 107 and 115. Record 70-74. That application was approved on August 5, 2016. We set out a portion of the August 5, 2016 decision below:

> "* * * Approval is hereby granted, based upon the following:
>
> "1. CCC 17.24.080(2) The property line adjustment of a parcel by the relocation or elimination of all or a portion of the common property line between abutting properties that does not create an additional lot or parcel and either parcel is not reduced below the minimum lot size established by the applicable zoning ordinance * * * may be approved by the planning department. On land zoned for exclusive farm use, forest use or mixed farm or forest use the requirements of

1 ORS 92.192(3) must also be met. A filing fee shall be
2 required. A survey may not be required by the planning
3 department and the county surveyor for parcels that can be
4 legally described by aliquot part.[[2]]

5 "* * * * *

6 "3. The combination of tax map lots * * * **115**, * * * **103**, * * *
7 **104**, * * * and **107** will result in **<u>one</u>** developable parcel.

8 "* * * * *

9 "6. A copy of a deed restriction must be recorded and received
10 PRIOR to the issuance of building permits, is to be filed no
11 later than 5:00 p.m. on **August 5, 2018** and in accordance
12 with Section 17.24.080 of the Crook County Code and ORS
13 92.060(7)." Record 52 (boldface and underscoring in
14 original).

15 Although it does not appear to be included in the record, we assume a deed
16 subsequently was executed and recorded to complete the property line
17 adjustment as required by ORS 92.190. [3]

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[2] The text in paragraph 1 is the text of Crook County Code (CCC) 17.24.080(2). CCC 17.24.080 is entitled "Special partitioning and property line adjustment regulations."

[3] ORS 92.190 provides, in part:

"(3) The governing body of a city or county may use procedures other than replatting procedures in ORS 92.180 and 92.185 to adjust property lines as described in ORS 92.010 (12), as long as those procedures include the recording, with the county clerk, of conveyances conforming to the approved property line adjustment as surveyed in accordance with ORS 92.060 (7).

1 The County Court held a hearing on petitioner's appeal of the planning
2 commission decision on September 21, 2016 and on October 5, 2016 denied
3 the appeal and affirmed the planning commission's decision. This appeal
4 followed.

5 **FIRST ASSIGNMENT OF ERROR**

6 The first assignment of error is based in part on a statutory standard
7 governing the date of lot or parcel creation, and in part on a county minimum
8 parcel size requirement. ORS 215.284(2) authorizes nonfarm dwellings
9 outside the Willamette Valley. One of the requirements under ORS 215.284(2)
10 is ORS 215.284(2)(c), which requires that the nonfarm dwelling "will be sited
11 on a lot or parcel created before January 1, 1993[.]" ORS 215.284(2) does not
12 specify a minimum parcel size.

13 The relevant county standard was adopted by Ordinance 259.[4] Among
14 other things, Ordinance 259 adopts the following comprehensive plan policy:

15 "8. Parcel sizes for non-farm dwelling approvals in Paulina
16 Ranches * * * shall be a minimum of 20 acres in size. * * *"
17 Ordinance 259, page 6.

"(4) A property line adjustment deed shall contain the names of the parties, the description of the adjusted line, references to original recorded documents and signatures of all parties with proper acknowledgment."

[4] Ordinance 259 was appealed to LUBA in 2013 by three different petitioners. Those appeals were suspended at the request of the parties, but the appeals were recently reactivated and a briefing schedule was established on February 24, 2017.

Ordinance 259 does not establish a "date of creation" requirement. Thus ORS 215.284(2) establishes a "date of creation" requirement but no minimum lot or parcel size, while Ordinance 259 establishes a minimum parcel size for non-farm dwelling parcels but no "date of creation" requirement.

We understand petitioner to argue that although the parcels designated tax lots 103, 104, 107 and 115 were all created before January 1, 1993, the property line adjustment that the county approved to combine those tax lots on August 5, 2016, establishes a new date of creation, so that the combined 20-acre parcel was not "created before January 1, 1993." Petitioner's "date of creation" argument relies on OAR 660-033-0020(4). OAR chapter 660, division 33 is the Land Conservation and Development Commission's rule governing Goal 3 (Agricultural Lands). OAR 660-033-0020 is the definition section for that division. OAR 660-033-0020(4) provides:

> "'Date of Creation and Existence'. When a lot, parcel or tract is reconfigured pursuant to applicable law after November 4, 1993, the effect of which is to qualify a lot, parcel or tract for the siting of a dwelling, the date of the reconfiguration is the date of creation or existence. *Reconfigured means any change in the boundary of the lot, parcel or tract*." (Emphasis added.)

There is no dispute that the 20-acre parcel was created to allow approval of the disputed nonfarm dwelling. Petitioner contends that because the August 5, 2016 property line adjustment resulted in changes to the boundaries of tax lots 103, 104, 107 and 115, the date of creation of the combined 20-acre parcel is August 5, 2016, and therefore the application does not comply with the ORS

215.284(2)(c) requirement that a parcel that qualifies for a nonfarm dwelling must have been created before January 1, 1993.

The County Court's decision contends that tax lots 103, 104, 107 and 115 were created before January 1, 1993 and the county's requirement for a 20-acre parcel size does not require that the 20-acre parcel must be created before January 1, 1993. Record 4. That contention is not responsive to petitioner's argument. Petitioner is not arguing that the proposal violates a *county* "date of creation" requirement. Petitioner is effectively arguing that the action the intervenor and county took on August 5, 2016 to comply with Ordinance 259, Policy 8's 20-acre minimum parcel size requirement resulted in a new date of creation for that combined 20-acre parcel under OAR 660-033-0020(4). That means that, unlike tax lots 103, 104, 107 and 115, which were all created before January 1, 1993, the combined 20-acre parcel was created on August 5, 2016, which means the 20-acre parcel does not comply with the *statutory* requirement in ORS 215.284(2)(c) that the parcel must have been created before January 1, 1993.

Both the county and intervenor take the position that combining the five-acre tax lots 103, 104, 107 and 115 to create a single 20-acre parcel does not "reconfigure" those tax lots, as OAR 660-033-0020(4) uses that term. Intervenor-Respondent's Brief 2; Respondents Brief 5. That position simply cannot be squared with the above emphasized language of OAR 660-033-0020(4), "[r]econfigured means *any* change in the boundary of the lot, parcel or

1 tract." (Emphasis added.) A map from the record has been included as an
2 appendix to this opinion. If tax lots 103, 104, 107 and 115 have been
3 combined to create a 20-acre parcel, there can be no question that the common
4 property lines (boundaries) between tax lot 115 and 103, tax lot 107 and 103,
5 and 104 and 103/107 have been "changed" by eliminating those common
6 property lines. Therefore, if the property line adjustment to combine the four
7 tax lots into a single 20-acre parcel was completed on August 5, 2016, or on
8 some other date before October 5, 2016, as the decision and all parties assume,
9 the 20-acre parcel was not "created before January 1, 1993," as ORS
10 215.284(2)(c) requires.[5] Because no party argues otherwise, we assume that

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[5] The challenged decision states:

> "* * * The applicant has created a 20-acre parcel through the lot combining process and the 20-acre parcel is in compliance with all applicable planning zoning, and partitioning ordinances and regulations." Record 4.

In its petition for review, petitioner argues:

> "* * * On August 5, 2016, Crook County approved a lot line adjustment to combine the four parcels into a 20-acre parcel [and o]n October 5, 2016, the County approved Intervenor's application for a nonfarm dwelling on the newly-configured 20-acre property." Petition for Review 6.

In its brief, the county argues:

> "* * * Those four separate 5-acre parcels were 'combined' on August 5, 2016, to create a 20-acre parcel." Respondent's Brief 4-5.

1 such is the case. We agree with petitioner that the date of creation of that 20-
2 acre parcel is governed by OAR 660-033-0020(4) and that date of creation is
3 after January 1, 1993. When the County Court approved the nonfarm dwelling
4 application on October 5, 2016, the 20-acre parcel where the nonfarm dwelling
5 was to be sited did not qualify as a parcel that was created before January 1,
6 1993. The decision therefore is inconsistent with ORS 215.284(2)(c) and OAR
7 660-033-0020(4). Because the decision is based on a misconstruction of
8 applicable law, the first assignment of error must be sustained. ORS
9 197.835(9)(a)(D).

10 The first assignment of error is sustained.

11 **SECOND ASSIGNMENT OF ERROR**

12 CCC 18.16.081 is entitled "Wildlife policy applicability." CCC
13 18.16.081 provides

> 14 "All new *nonfarm dwellings* on existing parcels within the deer
> 15 and elk winter ranges must meet the residential density limitations
> 16 found in Wildlife Policy 2 of the Crook County comprehensive
> 17 plan. Compliance with the residential density limitations may be
> 18 demonstrated by calculating a one-mile radius (or 2,000-acre)
> 19 study area. * * *." (Emphasis added.)

20 Ordinance 259 repealed the Wildlife Policy 2 residential density limits.
21 However, Ordinance 259 adopted new "Non-Farm Dwelling Density

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Intervenor's brief argues:

> "* * * The lots were combined in August 2016 using the County's
> lot combining process." Intervenor-Respondent's Brief 3

requirements in the Greater County and West County Areas * * *" to replace Wildlife Policy 2. The dwelling density limit specified in Ordinance 259 for the Greater County Area in the EFU-1 zone in the Deer Winter Range is "1DU/160AC". Ordinance 259, page 12, Petition for Review, Appendix 40.

The challenged decision found that the applicable study area around the subject property is 2,643.5 acres, which is approximately the area within one mile of the exterior boundary of the 20-acre parcel. For purposes of computing the existing density to determine if the nonfarm dwelling application could be approved consistent with the Deer Winter Range density limitation, the county divided the 2,643.5 acres by 160 acres and determined the maximum allowable number of dwelling units in the study area is 16.5 dwellings. Record 5.

The parties apparently agree that in applying the density limitation the county is required to consider both existing dwellings and potential new dwellings. The reason the county considers potential new dwellings in addition to existing dwellings is not apparent to us, but since no party questions that aspect of the decision we do not question it either.[6] The parties also apparently agree that within the study area there are 11 existing dwellings, five existing

[6] As will soon become apparent, considering potential dwellings in applying the density limitation greatly complicates the required analysis. Doing so could also result in areas where no new dwellings are allowed, even if there are no existing dwellings in that area, if the *potential* for new dwellings exceeds the applicable density limit.

1 farm dwellings and six existing nonfarm dwellings. However, that is the end of
2 the parties' agreement on the application of the density limitation.

3 The planning division found that there is potential in the study area for
4 15.25 additional dwellings.[7] Record 231.[8] The planning commission found
5 the potential for 12.25 additional dwellings.[9] Record 82. County Court also
6 found that there is the potential for 12.25 additional dwellings, but found that
7 some of those 12.25 potential additional dwellings would be located on parcels
8 of greater than 80 acres and should therefore be considered farm dwellings
9 rather than nonfarm dwellings.

10 "* * * Parcels greater than 80 acres are considered to be farm
11 parcels. The density test adopted in Ordinance 259 is designed to
12 limit the density of non-farm dwellings, not farm dwellings. The
13 proper assessment of potential for new non-farm dwellings should
14 consider only the parcels currently less than 80 acres, to wit: 14.25
15 dwellings (rather than the 16.25 potential dwellings in the Staff
16 Report, or the 22.25 dwellings in the Appellant's summary). This
17 is within the limit of 16.5 dwellings established using the density
18 requirement in Ordinance 259." Record 5.

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[7] That estimate is based on 6.25 vacant nonfarm parcels of less than 40 acres; four vacant nonfarm parcels of 40-80 acres; and five divisible farm parcels of more than 80 acres.

[8] We have no idea how the county arrived at a potential for a fractional dwelling.

[9] That smaller estimate is based on 6.25 vacant nonfarm parcels of less than 40 acres; two (rather than four) vacant nonfarm parcels of 40-80 acres; and four (rather than five) divisible farm parcels of more than 80 acres.

1 It is not easy to follow the County Court's reasoning or its math. But
2 apparently the County Court began with the planning commission's estimate of
3 12.25 additional dwellings, and then subtracted the four potential dwellings
4 that would be sited on parcels of greater than 80 acres (which the County Court
5 considers would be farm dwellings) to arrive at 8.25 potential *nonfarm*
6 dwellings. Adding the 8.25 potential *nonfarm* dwellings to the six existing
7 *nonfarm* dwellings results in 14.25 existing and potential *nonfarm* dwellings.
8 Under that scenario, approval of the disputed nonfarm dwelling would not
9 exceed the 16.5 dwelling density limitation.

10 Although CCC 18.16.081, quoted above, only applies when approving
11 nonfarm dwellings, petitioner argues there is simply no textual basis in CCC
12 18.16.081 or the Ordinance 259 "1DU/160AC" density limit that replaced
13 Wildlife Policy 2 to conclude that CCC 18.16.081 is only concerned with the
14 density of nonfarm dwellings.[10] To the contrary, petitioner argues, the plan
15 text that the density policy was adopted to implement refers to "residences" and
16 "residential dwellings," without distinguishing between farm and nonfarm
17 residences or dwellings.[11]

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[10] Petitioner also argue there is no reason to believe the mule deer that the density limit was adopted to protect "distinguish between farm dwellings and nonfarm dwellings." Petition for Review 21.

[11] Petitioner sets out the following text from the CCCP:

1 In addition to pointing out that CCC 18.16.081 only applies to approval
2 of nonfarm dwellings, and does not apply to approval of farm dwellings, the
3 county points to other requirements that apply only to nonfarm dwellings. We
4 understand the county to argue that those regulatory distinctions between farm
5 and nonfarm dwelling support the county's interpretation of the "1DU/160AC"
6 density limit in Ordinance 259 to only be concerned with nonfarm dwellings
7 when computing the required one dwelling unit per 160 acre density limit. The
8 county argues the county's interpretation is entitled to deference under ORS
9 197.829(1), *Siporen v. City of Med*ford, 349 Or 247, 261, 243 P3d 776 (2010),
10 and *Clark v. Jackson County*, 313 Or 508, 515, 836 P2d 710 (1992).[12]

"Crucial deer winter range and waterfowl nesting habitat shall be protected and preserved. * * *" Crook County Comprehensive Plan (CCCP) Natural/Scenic/Buffer Area Policy 4, page 109.

"Crook County in its acknowledged Comprehensive Plan contains policies for the protection of wildlife habitat, including Wildlife Policy 2 which states 'Density with a Crucial Wintering Area for deer shall not be greater than one residence per 160 acres and for the General Winter Range not more than one residence per 80 acres.' * * *" CCCP, page 141.

"The most significant conflicting use to big game habitat in Crook County is an increase in density of residential dwellings in the habitat area. * * *" *Id*.

[12] ORS 197.829(1) provides:

"The Land Use Board of Appeals shall affirm a local government's interpretation of its comprehensive plan and land

1 Although the outer limit of *Siporen* deference is not well defined, we do
2 not agree that *Siporen* deference is appropriate here. Neither the Ordinance
3 259 density limit of "1DU/160AC" nor the comprehensive plan language that it
4 was adopted to implement distinguish between farm and nonfarm dwellings. In
5 making that distinction in its interpretation of the density limit, the County
6 Court reads in a limitation that has no textual support in Ordinance 259. To the
7 contrary, although no party cites them, Ordinance 259 adopts plan policies that
8 seem to say the Ordinance 259 density limit applies to both farm and nonfarm
9 dwellings.[13]

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use regulations, unless the board determines that the local government's interpretation:

"(a) Is inconsistent with the express language of the comprehensive plan or land use regulation;

"(b) Is inconsistent with the purpose for the comprehensive plan or land use regulation;

"(c) Is inconsistent with the underlying policy that provides the basis for the comprehensive plan or land use regulation; or

"(d) Is contrary to a state statute, land use goal or rule that the comprehensive plan provision or land use regulation implements."

[13] Ordinance 259 adopts the following CCCP policies:

"1. Density calculations for Big Game Habitat shall utilize the same study area as used for a non-farm dwelling approval when calculating density.

1 Interpretations of ambiguous laws almost always could run afoul of the
2 ORS 174.010 admonition not to "insert what has been omitted," if that
3 admonition is interpreted and applied in its broadest and most literal sense. But
4 in this case we conclude the county interpretation of the Ordinance 259 density
5 limit to distinguish between farm and nonfarm dwellings when counting
6 existing and potential dwellings, inserts a distinction in the density limit that
7 has no textual support and seems to be at odds with a CCCP policy that was
8 also adopted by Ordinance 259, which provides relevant context. *See* n 13. In
9 reading in that farm dwelling/nonfarm dwelling distinction, the county violated
10 ORS 174.010 and in doing so adopted an interpretation that is "inconsistent
11 with the express language of" the density limit, such that the interpretation is
12 not entitled to deference under *Siporen* and ORS 197.829(1)(a). *See* n 12.
13 The second assignment of error is sustained.
14 **THIRD ASSIGNMENT OF ERROR**
15 As explained below, based on our disposition of the first and second
16 assignments of error, reversal rather than remand is the appropriate disposition
17 of this appeal. Given that disposition, it may be unnecessary to address

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> "2. Dwelling approvals other than non-farm dwellings shall use the study area criteria found in OAR 660-033-0130(4)(D)(i) to calculate dwelling density in a Big Game Habitat area as provided by law."

The county does not appear to have amended CCC 18.16.060, which sets out standards for approval of farm dwellings in the EFU-1 zone, to require that new farm dwellings comply with the Ordinance 259 density standard.

1 petitioner's third assignment of error, which if sustained would at best result in
2 remand to adopt additional findings. However, for completeness in the event
3 of further appeals, we briefly address the third assignment of error.

4 ORS 215.284(2)(b) imposes the following requirement for approval of a
5 nonfarm dwelling:

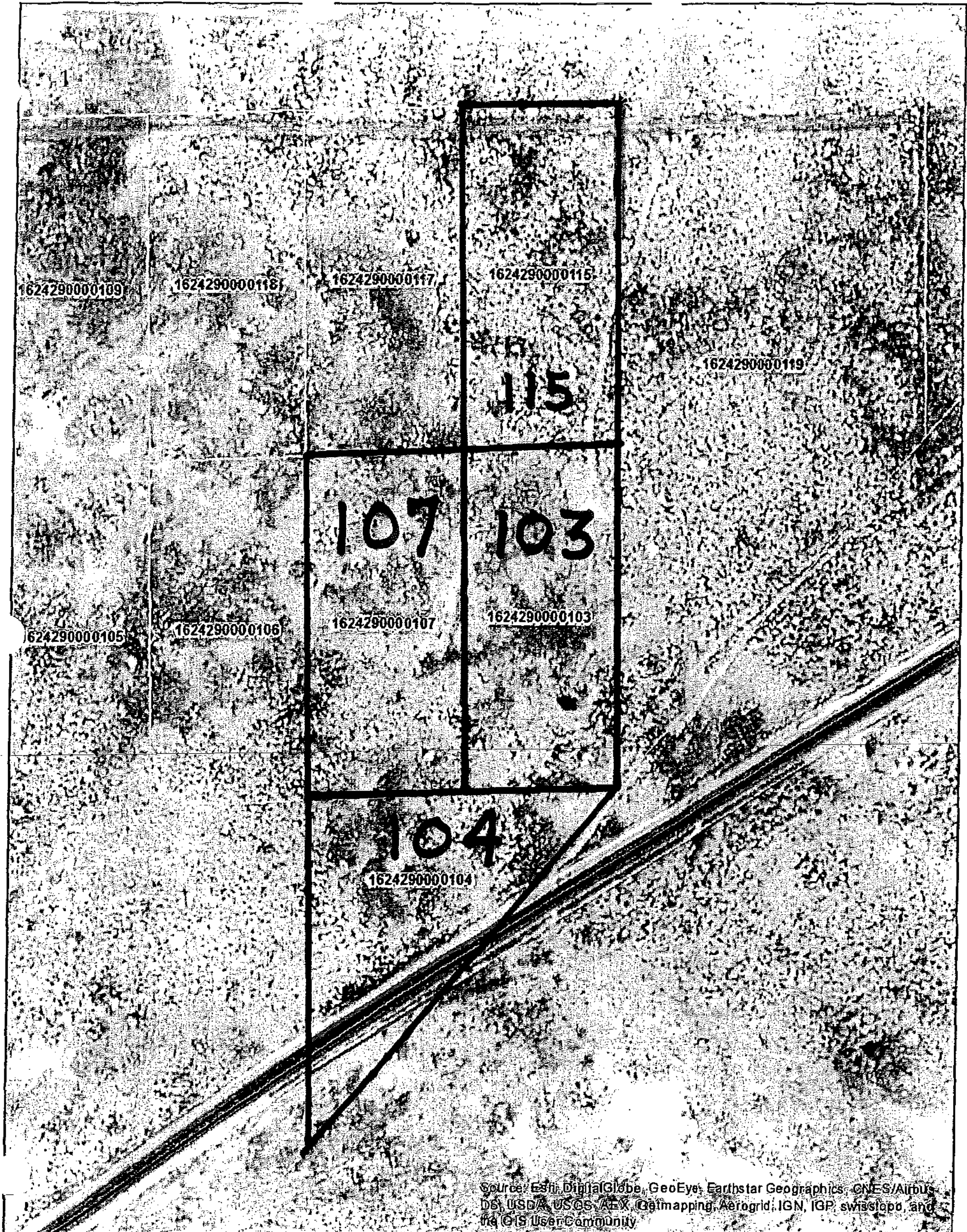
6 "The dwelling is situated upon a lot or parcel or portion of a lot or
7 parcel that is generally unsuitable land for the production of farm
8 crops and livestock or merchantable tree species, considering the
9 terrain, adverse soil or land conditions, drainage and flooding,
10 vegetation, location and size of the tract. A lot or parcel or portion
11 of a lot or parcel may not be considered unsuitable solely because
12 of size or location if it can reasonably be put to farm or forest use
13 in conjunction with other land[.]"

14 CCC 18.16.080(3)(a) restates the above language from OR 215.284(2)(b) and
15 includes the following admonition from OAR 660-033-0130(4)(c)(B)(ii) "[a]
16 lot or parcel * * * is presumed to be suitable * * * if it is composed
17 predominantly of Class I-VI soils." The subject property is composed
18 predominantly of Class I-VI soils.

19 An adjoining property owner's cattle apparently grazed on the subject
20 property in the past before it was fenced, although that adjoining property
21 owner did not have permission to allow its cattle to do so. Petitioner argues
22 that the county's findings fail to address that past history of grazing in
23 conjunction with adjoining land, and the presumption this parcel is suitable for
24 grazing because it is made up of predominantly Class I-VI soils. Accordingly,
25 petitioner contends that the county's conclusion that the subject property is

1 generally unsuitable for the production of livestock is not supported by
2 adequate findings or substantial evidence.
3 We agree with petitioner that the county's findings are inadequate for
4 failing to address the fact that cattle apparently have grazed on the subject
5 property and the presumption that the subject property is suitable for farm use
6 given its predominant soil types. For the reasons set out in the County Court's
7 decision, the subject property may have limited value for growing crops or for
8 grazing as a stand-alone operation. Nonetheless, such limited value is not the
9 sufficient to establish that the parcel is generally unsuitable for farm use under
10 ORS 215.284(2)(b) and OAR 660-033-0130(4)(c)(B)(ii), which require the
11 county to apply the presumption that the soil quality renders the property
12 suitable, and to consider the historical use of the property for grazing in
13 conjunction with adjoining property. The county failed to adopt any findings
14 specifically addressing the CCC 18.16.080(3)(a) presumption or the limited
15 historical use of the property for grazing. The county's failure to do so was
16 error.
17 The third assignment of error is sustained.
18 **CONCLUSION**
19 OAR 661-010-0073(1)(c) provides that reversal rather than remand is
20 appropriate where "[t]he decision violates a provision of applicable law and is
21 prohibited as a matter of law." Our resolution of the first and second
22 assignments of error appear to require reversal of the County Court's decision.

1 The 20-acre parcel that resulted from the property line adjustment approved on
2 August 5, 2016, does not and cannot comply with the ORS 215.284(2)(c)
3 requirement that the parcel must have been created before 1993. Similarly, the
4 density limitation imposed by Ordinance 259, because the county applies it to
5 both existing and potential dwellings, has already been exceeded. That density
6 limit therefore would appear to preclude approval of a nonfarm dwelling on the
7 subject property. Although respondent and intervenor argue the county's
8 decision should be affirmed, neither argues remand rather than reversal is
9 appropriate if LUBA sustains the first two assignments of error.
10 The county's decision is reversed.
11



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