



June 4, 2021

Multnomah County Planning Commission  
1600 SE 190th Ave  
Portland, OR 97233

**EXHIBIT H.1**  
**PC-2021-14207**

VIA EMAIL: [heidie.konopnickl@multco.us](mailto:heidie.konopnickl@multco.us)

RE: *Comments on Proposed Amendments to Multnomah County Code Section 39.4265(B)(3)*

Dear Commissioners:

Thank you for the opportunity to comment in opposition to the proposed removal of Multnomah County Code Section 39.4265(B)(3), which provides a customary farm dwelling option that is primarily used by new farmers entering the industry and family farms. Oregon Farm Bureau (OFB) and Multnomah County Farm Bureau (MCFB) are concerned about the removal of this provisions because it will limit an important housing opportunity for farmers in the county.

By way of background, OFB is a voluntary, grassroots, nonprofit organization representing Oregon's farmers and ranchers in the public and policymaking arenas. As Oregon's largest general farm organization, its primary goal is to promote educational improvement, economic opportunity, and social advancement for its members and the farming, ranching, and natural resources industries in general. Today, OFB represents nearly 7,000-member families professionally engaged in the industry and has a total membership of over 60,000 Oregon families. MCFB is the voice of agriculture in Multnomah County, representing new and established farmers who would be impacted by this proposal.

As stated earlier, the customary farm dwelling option that is proposed to be deleted by the County can be used by individuals new to the industry or those that hold small, but productive, operations. Specifically, it is available for those who are capable of producing the median level of annual gross sales, but whose farm is not located on high-value soils and is less than 160 acres, which is most of the farms in Multnomah County. Based upon recent NASS data, of the 600+ farms located in Multnomah County, the average size of a farm is just 39 acres, with over 50% of the farms in the County being between 1-9 acres.<sup>1</sup> Given the demographics of farming in Multnomah County, this housing option is one the County should actively retain, not remove.

From a broader policy perspective, it is unclear why Multnomah County would seek to remove an important housing option when Oregon is taking profound steps to create more opportunities for housing in the state. Further, the County should be actively promoting our local food system. Oregon's farmers and ranchers provide the healthy food we depend on, and new farmers bring needed diversity into our

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<sup>1</sup> [st41\\_2\\_0001\\_0001.pdf\(usda.gov\)](#)

food system. Removing this important housing option from code works against these important objectives.

Additionally, OFB and MCFB are disappointed with the lack of outreach from Multnomah County to the farming community when considering this proposal. Neither MCFB nor OFB can recount any outreach to farmers in the region about whether this housing option is important to the industry before it was proposed to be deleted. MCFB would welcome the opportunity to assist in evaluating the usefulness of this provision and to help resolve other implementation obstacles the County may be having in permitting dwellings under the code.

Further, our organizations question the timing of this proposal as the industry tries to rebound from the devastating impacts of COVID-19. Prior to COVID-19, producers were already under tremendous pressure – net income on farms is half of what it was five years ago, Oregon faces recent market collapses across several industries due to trade disruptions, new markets are collapsing, and long-time processor, NORPAC, recently closed. Market prices are at record lows across many commodities, and farmers are already grappling with significant recent regulatory costs imposed by the Oregon legislature and agencies.

At the same time, farming is seasonal in nature and cannot respond to changing market pressures overnight. Immediate impacts from COVID-19 included failure of markets for those who sell directly to restaurants, cancellation of festivals and direct marketing opportunities many farms depend upon, closure of international markets to shipments due to the virus, and enormous pressure on the food system to shift processing and distribution from restaurant and food service to retail. Moreover, recent devastating wildfires and ice storms have caused immense loss for farmers around the state, including those in Multnomah County.

In short, Oregon's farmers have been severely impacted by the trials of this year, and they need Multnomah County's support at his time. This support should include the creation of more opportunities for farmers, not the removal of key housing options necessary for the growth of the industry.

Therefore, we urge the Commission to not move forward with the removal of Multnomah County Code Section 39.4265(B)(3).

Respectfully,



Samantha Bayer  
Policy Counsel  
Oregon Farm Bureau Federation



Larry Bailey  
President  
Multnomah County Farm Bureau