

Written Public Comments

Item	Name	Topic	Date Received
Item 01	Kelly Peterson The Humane Society of the United States	Resolution 275 – Cougar Management Plan	06/01/2023
Item 02	Su Libby Great Old Broads for Wilderness	Resolution 275 – Cougar Management Plan	06/01/2023
Item 03	Dan Hoynacki Oregon Agritourism Partnership/Oregon Farm Loop	Resolution 310 – Siting of agri-tourism, entertainment activities and associated activities on agricultural lands.	06/01/2023
Item 04	John Zielinski	Resolution 310 – Siting of agri-tourism, entertainment activities and associated activities on agricultural lands.	06/01/2023
Item 05	Linda Budan	Agri-tourism	06/07/2023
Item 06	Sarah Deumling	Agri-tourism	06/07/2023
Item 07	Valley Vista Farms	Agri-tourism	06/07/2023
Item 08	Mary and Dave Weil	Agri-tourism	06/08/2023
Item 09	Friends of French Prairie	Resolution 310 – Siting of agri-tourism, entertainment activities and associated activities on agricultural lands.	06/08/2023
Item 10	Thrive Hood River	Resolution 310 – Siting of agri-tourism, entertainment activities and associated activities on agricultural lands.	06/09/2023
Item 11	Abraham	Resolution 310 – Siting of agri-tourism, entertainment activities and associated activities on agricultural lands.	06/09/2023
Item 12	Cherry Amabisca – Save Helvetia	Resolution 310 – Siting of agri-tourism, entertainment activities and associated activities on agricultural lands.	06/09/2023

Written Public Comments

Item	Name	Topic	Date Received
Item 13	Dan Keeley	Resolution 310 – Siting of agri-tourism, entertainment activities and associated activities on agricultural lands.	06/11/2023
Item 14	Roger Kaye	Resolution 310 – Siting of agri-tourism, entertainment activities and associated activities on agricultural lands.	06/11/2023
Item 15	Jim Gilbert	Resolution 310 – Siting of agri-tourism, entertainment activities and associated activities on agricultural lands.	06/10/2023
Item 16	Julia Wayne	Resolution 310 – Siting of agri-tourism, entertainment activities and associated activities on agricultural lands.	06/10/2023
Item 17	Sid Friedman	Resolution 310 – Siting of agri-tourism, entertainment activities and associated activities on agricultural lands.	06/10/2023
Item 18	Mike McCarthy	Resolution 310 – Siting of agri-tourism, entertainment activities and associated activities on agricultural lands.	06/09/2023

Subject: Cougar Management Plan Board Resolution (Coalition Comments)
Date: Thursday, June 1, 2023 at 8:55:36 AM Pacific Daylight Time
From: Kelly Peterson
To: VALNESS Karla * ODA
CC: Kelly Peterson, Brian Posewitz, bigwiscon@gmail.com, Jennifer Hauge, Mark Salvo, Brooks Fahy, wally_sykes2000@yahoo.com, Adam Bronstein, nwarren1@earthlink.net
Attachments: image001.jpg, image002.jpg, image003.jpg, image004.jpg, Oregon Board of Agriculture Cougar Resolution-Coalition Comments.pdf, BoardResolution Packet_June2023_cougar resolution_suggestedchanges.docx

Dear Chair Santamaria and Members of the Board:

On behalf of the Humane Society of the United States and multiple national and state-based conservation organizations, we submit the following comments on the Cougar Management Resolution before the Oregon Board of Agriculture (Board).

We call on the Board to withdraw this resolution considering the best available research which shows that indiscriminate hunting and predator control of cougars can result in increased livestock depredations, at the expense of livestock, wildlife, and ranchers.

If the Board wishes to renew this resolution, we ask that it be updated to support the implementation of more effective, proactive measures to prevent livestock depredations within the Cougar Management Plan. (See proposed resolution attached.)

Thank you for your consideration. I look forward to hearing back from you.

Respectfully,
Kelly

Kelly Peterson

(she/her/hers)

Oregon Senior State Director

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June 1, 2023

Luisa Santamaria, Chair
Oregon Board of Agriculture
635 Capitol St NE
Salem, OR 97301

Submitted via email: karla.valness@oda.oregon.gov

RE: Cougar Management Plan Board Resolution

Dear Chair Santamaria and Members of the Board:

On behalf of the undersigned organizations and our supporters in Oregon, we submit the following comments on the Oregon Board of Agriculture (“Board”) Cougar Management Plan Resolution. We call on the Board to suspend this resolution in light of the best available research that shows the indiscriminate hunting and predator control of cougars (*Puma concolor*), as perpetuated by the Oregon Department of Fish and Wildlife (“ODFW”) Cougar Management Plan, can result in increased livestock predations, at the expense of livestock, wildlife and ranchers. If the Board wishes to renew this resolution, we ask that it be updated to support the implementation of more effective, proactive measures to prevent livestock predations within the Cougar Management Plan.

The current resolution states simply that the Board supports ODFW’s Cougar Management Plan and “recognizes the threat that cougar predation poses to the livestock industry in Oregon.” Yet, this resolution is misguided as it assumes that the management strategies outlined in the Cougar Management Plan will be beneficial to Oregon’s livestock operators. This plan relies on recreational hunting and heavy-handed predator control tactics to remove hundreds of cougars lethally and indiscriminately from Oregon’s landscape every year.

For the reasons that follow, we urge you to suspend this resolution or, alternatively, update it to reflect the very real need for effective solutions that the current Cougar Management Plan sorely lacks.

Hunting of cougars increases complaints and livestock predation: Recreational hunting of cougars and the use of target area removals, both of which are indiscriminate, are not effective tools to prevent livestock predations as numerous studies in the U.S. have shown.¹ In other words, these practices simply kill cougars randomly but do not actually target the individuals who are involved in livestock predations. In fact, if hunters do select for specific cougars, it is for the large, territorial males whose removal can have harmful effects on human communities. Moreover, ODFW already allows any cougar that poses an immediate threat or is found in an urban area or farmstead to be killed. Therefore, a hunting season is entirely unnecessary to reduce potential threats to humans and livestock and may, in fact, exacerbate conflicts.

Heavy hunting of cougars can result in increased conflicts as the practice is disruptive to the sensitive social structure that ensures stability in their population.² The largest sources of unwanted mortality in

¹ R. J. Lennox et al., “Evaluating the Efficacy of Predator Removal in a Conflict-Prone World,” *Biological Conservation* 224 (2018).

² Kaylie A. Peebles et al., “Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations,” *Plos One* 8, no. 11 (2013); Kristine J. Teichman, Bogdan Cristescu, and Chris T. Darimont, “Hunting as a Management Tool? Cougar-Human Conflict Is Positively Related to Trophy Hunting,” *BMC Ecology* 16, no. 1 (2016); L. Mark Elbroch and Howard Quigley, “Social Interactions in a Solitary Carnivore,” *Current Zoology* 63, no. 4 (2017).

Oregon's livestock, such as weather, illness and birthing problems, cause significantly more losses (~88% of unwanted cattle losses; ~59% of unwanted sheep losses) compared to losses from cougars (~1% of unwanted cattle losses; 2.6% of unwanted sheep losses).³

While we understand that livestock producers view any unwanted losses as a serious threat, we believe widespread lethal removal of cougars is not an effective or meaningful approach to preventing conflicts. Rather, this approach likely only results in more livestock predations as it can result in the killing of established, territorial cougars. If the cougar in a home range is removed or killed, the vacancy will likely attract a younger, dispersing cougar that is more likely to be involved in human or livestock conflicts.⁴ As such, hunting can easily destabilize the cougar population, leading to increased conflicts.⁵ Research shows that while livestock conflicts with cougars are extremely low in Oregon,⁶ conflict with these wild cats is higher in areas with trophy hunting and indiscriminate predator control.⁷

A Washington state study shows that as cougar complaints increased, wildlife officials lengthened seasons and increased bag limits to respond to what they mistakenly assumed was a rapidly growing cougar population. However, the public's perception of an increasing cougar population and the increased numbers of livestock predations were actually a result of a declining female and increasing male cougar population.⁸ Heavy hunting of cougars skewed the ratio of young males in the population by causing compensatory immigration and emigration by young male cougars, even though it resulted in no net change in the population.⁹

Study authors found that the hunting of cougars to reduce complaints and livestock predations had the opposite effect. Killing cougars disrupts their social structure and increases both complaints and livestock depredations.¹⁰ Peebles et al. (2013, p. 6) write:

. . . each additional cougar on the landscape increased the odds of a complaint of livestock depredation by about 5%. However, contrary to expectations, each additional cougar killed on the landscape increased the odds by about 50%, or an order of magnitude higher. By far, hunting of cougars had the greatest effects, but not as expected. Very heavy hunting (100% removal of resident adults in 1 year) increased the odds of complaints and depredations in year 2 by 150% to 340%.¹¹

³ The Humane Society of the United States, "Government Data Confirm That Cougars Have a Negligible Effect on U.S. Cattle & Sheep Industries," (2019). See Figs. 5a/b.

⁴ Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations.," C. M. S. Lambert et al., "Cougar Population Dynamics and Viability in the Pacific Northwest," *Journal of Wildlife Management* 70 (2006); Kristine J. Teichman, Bogdan Cristescu, and Chris T. Darimont, "Hunting as a Management Tool? Cougar-Human Conflict Is Positively Related to Trophy Hunting," *BMC Ecology* 16, no. 1 (2016).

⁵ Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations.," Teichman, Cristescu, and Darimont, "Hunting as a Management Tool? Cougar-Human Conflict Is Positively Related to Trophy Hunting.," L. Mark Elbroch and Howard Quigley, "Social Interactions in a Solitary Carnivore," *Current Zoology* 63, no. 4 (2017).

⁶ The Humane Society of the United States, "Government Data Confirm That Cougars Have a Negligible Effect on U.S. Cattle & Sheep Industries," (2019).

⁷ Teichman, Cristescu, and Darimont, "Hunting as a Management Tool? Cougar-Human Conflict Is Positively Related to Trophy Hunting.," Lennox et al., "Evaluating the Efficacy of Predator Removal in a Conflict-Prone World.," J. A. Dellinger et al., "Temporal Trends and Drivers of Mountain Lion Depredation in California, USA" *Human-Wildlife Interactions* 15, no. 1 (2021).

⁸ Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations.," citing Lambert et al. 2006 and Robinson et al. 2008

⁹ Teichman, Cristescu, and Darimont, "Hunting as a Management Tool? Cougar-Human Conflict Is Positively Related to Trophy Hunting."

¹⁰ Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations."

¹¹ Ibid

Hunting disrupts cougars' sex-age structure and tilts a population to one that is composed of younger males, who are more likely to engage in livestock predations than animals in a stable, older population.¹²

Furthermore, few Oregon livestock owners use non-lethal methods to protect their cattle and sheep.¹³ Across the western U.S., ranchers and livestock operators are making significant strides with non-lethal methods, including tools and changes to husbandry practices, to prevent the loss of livestock from native carnivores. These tools are effective, inexpensive, and avoid losses from occurring in the first place, rather than dealing with conflicts after livestock have already been killed.

The Cougar Management Plan allows excessive hunting and predator control of cougars that exceeds sustainable levels and disrupts their social structures: The Resolution assumes that ODFW's Cougar Management Plan is necessary to prevent predation of livestock from cougars. Yet, we know from the best available science that the tactics ODFW relies on to manage cougars are unnecessary and, indeed, counterproductive to ensuring stable cougar populations, and lead to increased conflicts. Cougars occur at low densities relative to their primary prey, making them sensitive to bottom-up (prey declines) and top-down (human persecution) influences.¹⁴ In order to survive, their populations must stay at a smaller size relative to their prey's biomass or risk starvation.¹⁵ They do this by regulating their own numbers.¹⁶ When prey populations decline, so do cougar populations.¹⁷ Cougar populations also require expansive habitat, with individual cats maintaining large home ranges, or territories, that overlap with one another.¹⁸ Because of their dependence on prey numbers and their territorial nature, recreational hunting is not necessary to limit cougar densities to sustainable levels.

ODFW relies on a statewide cougar population estimate of more than 6,400 cats. However, this estimate is not only widely disputed as likely inaccurate, but also presents a false picture of the state of cougars in Oregon by including a rough guesstimate of the number of cougar kittens on the landscape. Cougar kittens have high mortality rates, frequently dying before they've even left their mother's care, and are not legally hunted. Therefore, they should not be considered when setting management goals, strategies or hunting quotas.

As stated above, research shows that high rates of killing are correlated with increased conflicts. Disrupting cougar communities can cause negative effects and increase conflicts by causing social chaos within their populations.¹⁹ Hunting can easily destabilize cougar populations, causing increased conflicts

¹² Ibid

¹³ The Humane Society of the United States, "Government Data Confirm That Cougars Have a Negligible Effect on U.S. Cattle & Sheep Industries," (2019). See Figs 38 and 39.

¹⁴ D. Stoner, M. , M.L. Wolfe, and D. Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics," *Journal of Wildlife Management* 70 (2006).

¹⁵ I. A. Hatton et al., "The Predator-Prey Power Law: Biomass Scaling across Terrestrial and Aquatic Biomes," *Science* 349, no. 6252 (2015).

¹⁶ A. D. Wallach et al., "What Is an Apex Predator?," *Oikos* 124, no. 11 (2015).

¹⁷ Stoner, Wolfe, and Choate, "Cougar Exploitation Levels in Utah: Implications for Demographic Structure, Population Recovery, and Metapopulation Dynamics."

¹⁸ K. Hansen, *Cougar: The American Lion* (Flagstaff, AZ: Northland Publishing, 1992); A. Kitchener, *The Natural History of the Wild Cats* (Ithaca, New York: Cornell University Press, 1991).

¹⁹ H. S. Robinson and R. Desimone, "The Garnet Range Mountain Lion Study: Characteristics of a Hunted Population in West-Central Montana: Final Report," *Montana Fish, Wildlife & Parks* (2011); H. S. Robinson et al., "A Test of the Compensatory Mortality Hypothesis in Mountain Lions: A Management Experiment in West-Central Montana," *Journal of Wildlife Management* 78, no. 5 (2014); H. S. Cooley et al., "Does Hunting Regulate Cougar Populations? A Test of the Compensatory Mortality Hypothesis," *Ecology* 90, no. 10 (2009); R. B. Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence," *Biological Conservation* 167 (2013); C. M. S. Lambert et al., "Cougar Population Dynamics and Viability in the Pacific Northwest," *Journal of Wildlife Management* 70 (2006); S. Creel et al., "Questionable Policy for Large Carnivore Hunting," *Science* 350, no. 6267 (2015); D. E. Ausband et al., "Recruitment in a Social Carnivore before and after Harvest,"



**THE HUMANE SOCIETY
OF THE UNITED STATES**

with humans, pets and livestock.²⁰ Based on the adult and subadult cougar population estimate, ODFW's annual hunting quota of 970 cougars amounts to nearly 28% of the population, or double what experts believe is sustainable.²¹ And while such a high level of mortality is typically not reached in most of Oregon's cougar hunting zones, it has been reached in Zone A. Approximately 30% of cougars were killed in Zone A during the 2018 hunting season, primarily from recreational hunting, the highest level for any region. This high level of hunting has been a common trend in Zone A over recent years. Notably, Zone A is the only region of the state that has experienced an increase in conflicts with cougars, as the research predicts.

For these reasons, we urge the Board to suspend the Resolution. If you intend to renew the Resolution, we urge you to update it with a call to action for ODFW to include a more meaningful approach for effectively and proactively preventing cougar conflicts with livestock, rather than relying on scientifically unsound and inhumane tactics of recreational hunting and indiscriminate predator control. We welcome the opportunity to discuss such a rewrite to the Resolution with this Board. Thank you for your consideration.

Sincerely,

Kelly Peterson
Oregon Senior State Director
The Humane Society of the United States

Nancy Warren
Executive Director
National Wolf Watcher

Brooks Fahy
Executive Director
Predator Defense

Adam Bronstein
Oregon Director
Western Watersheds Director

Brian Posewitz
Director
Humane Voters Oregon

Su Libby
Great Old Broads for Wilderness
Pacific Northwest (Wildlife Interest Team)

Wally Sykes
Co-Founder
Northeast Oregon Ecosystems

Mark Salvo
Conservation Director
Oregon Natural Desert Association

Jennifer Hauge
Legislative Affairs Manager
Animal Legal Defense Fund

Animal Conservation 18, no. 5 (2015); Chris T. Darimont et al., "The Unique Ecology of Human Predators," *Science* 349, no. 6250 (2015).

²⁰ Peebles et al., "Effects of Remedial Sport Hunting on Cougar Complaints and Livestock Depredations."

²¹ R. A. Beausoleil et al., "Research to Regulation: Cougar Social Behavior as a Guide for Management," *Wildlife Society Bulletin* 37, no. 3 (2013).

Oregon State Board of Agriculture Resolution	
Title: Cougar Management Plan	Number: 275 Effective Date: updated upon 2023 review
Workgroup: Allen, Lopez, Orem, Santamaria, Zielinski ODA Staff Contact: Isaak Stapleton	Next Review Date: 00/00/2023 – Under Review Date of Last Review/Revision: 12/02/2020 Original Resolution Date: 03/02/2006
Board Chair: Updated upon 2023 review	Signature on file

Proposed action: Active Resolution under review

Background

Due to concerns about threats to people and livestock, bounties were offered for cougar in Oregon as early as 1843 and continued until 1961, when the Legislature discontinued the bounty system. Since then, the Oregon cougar population across all age classes has increased to approximately 6,610 in 2019 according to ODFW monitoring and projection data. As cougar populations have increased, so have concerns related to livestock predation and other game animal populations.

To address these concerns, the Oregon Department of Fish and Wildlife (ODFW) developed and adopted the state's first cougar management plan in 1987. Much of the state's first plan involved gathering more information to better understand population densities, movement patterns, and harvest and damage control take rates. The plan also included strategies to allow the state's cougar population to increase while controlling conflicts with people and livestock.

ODFW has adopted revised cougar management plans in 1993, 2006, and 2017. Over time, the management plans have reflected the state's increasing cougar populations, and have included strategies such as managed hunting, maintenance of deer, elk, and cougar habitat, and removing animals causing damage. The plan's objectives remain maintaining viable and healthy cougar populations in Oregon, reducing conflicts with cougars, and managing cougars in a manner compatible with other game mammal species.

Resolution

Whereas the Oregon State Board of Agriculture recognizes ~~the threat~~ that cougars are a species of predation-poses to the livestock industry in Oregon wildlife that is valued and appreciated by many residents.

Whereas cougars may sometimes pose a risk of harm to farm animals in Oregon; and

Whereas the best available science indicates that indiscriminate killing of cougars is not effective to reduce the risk of harm by cougars to farm animals and may increase the risk of harm.

Be it resolved that the Board of Agriculture supports the use of non-lethal measures to reduce the risk of harm to farm animals by cougars, or, if non-lethal measures have been exhausted, through the killing of only specific cougars known to be harming farm animals; and ~~Cougar Management Plan as adopted in October 2017 by the Oregon Department of Fish and Wildlife.~~

Be it resolved further that the Board of Agriculture does not support attempts to manage Oregon's cougar population generally through indiscriminate killing of cougars.

Summary

Supports anon-lethal measures to manage cougar conflicts with farm animals; opposes to attempts to manage

~~cougar populations through indiscriminate killing of cougars, which can management plan proposed by the Oregon Department of Fish and Wildlife; recognizes that cougar predation poses a increase threats~~ to the livestock industry in Oregon.

Proposed action: Active Resolution under review

Resolution number: 275

Resolution title: Cougar Management Plan

Page 1 of 1

Subject: Re: Cougar Management Plan Board Resolution (Coalition Comments)
Date: Thursday, June 1, 2023 at 11:40:51 AM Pacific Daylight Time
From: Su Libby
To: Kelly Peterson
CC: Adam Bronstein, Brian Posewitz, Brooks Fahy, Jennifer Hauge, Mark Salvo, VALNESS Karla *
ODA, nwarren1@earthlink.net, wally_sykes2000@yahoo.com
Attachments: image004.jpg, image003.jpg, image002.jpg, image001.jpg

Great Job Kelly and others who have created these common sense, biologically sound suggestions for inclusion of mandatory primary attempts at non-lethal means , lethal force only if proven necessary second, and targeting of individual predators rather than the current scattershot deadly mass approach.

A bit surprised though at those I might have hoped would sign. CBD, Oregon Wild, Cascadia Wildlands, Advocates for the West, Defenders, etc.....others. ?
Let me know if I can help in any way.

Su Libby
Great Old Broads for Wilderness

On Thu, Jun 1, 2023 at 8:54 AM Kelly Peterson <kpeterson@humanesociety.org> wrote:

Dear Chair Santamaria and Members of the Board:

On behalf of the Humane Society of the United States and multiple national and state-based conservation organizations, we submit the following comments on the Cougar Management Resolution before the Oregon Board of Agriculture (Board).

We call on the Board to withdraw this resolution considering the best available research which shows that indiscriminate hunting and predator control of cougars can result in increased livestock depredations, at the expense of livestock, wildlife, and ranchers.

If the Board wishes to renew this resolution, we ask that it be updated to support the implementation of more effective, proactive measures to prevent livestock depredations within the Cougar Management Plan. (See proposed resolution attached.)

Thank you for your consideration. I look forward to hearing back from you.

Respectfully,

Kelly

Kelly Peterson

(she/her/hers)

Oregon Senior State Director

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June 1, 2023

Dear Board of Directors – Oregon Department of Agriculture:

This letter is submitted to urge you to not impose any new restrictions on Oregon farmers and their ability to sell their products, and experiences, directly to the public. I currently manage a 3-year USDA grant ODA21029GR PCA 20634, entitled “Building Capacity for New Direct Markets for Oregon’s Specialty Crops Farmers” on behalf of the Oregon Agritourism Partnership (OAP). OAP is an all-volunteer* not-for-profit, and currently has 83 farm loop partners, who are primarily small family farms that produce products and experiences to sell directly to the public. Our board of directors are farm producers. We currently promote four farm loops and are adding farms and an additional loop later this year. USDA defines Agritourism and Farm Direct as Specialty Crops.

This letter is specific to the proposed action in Resolution 310. Within the Whereas points, this proposal sites unfair competitive advantage to like operations. A farm business should enjoy the privilege of ingenuity of other businesses, including enhancing existing products and combining them with genuine, value-added experiences, so long as it doesn’t impede natural resource degradation or restrict business activities of neighboring farms. *No one told Henry Ford he couldn’t build a Model T because his competitors had not yet figured out how to do the same.*

The Whereas also ignore the primary reasons for farms seeking to generate direct income beyond a desire to educate the public: Farms face more than incremental increases in wholesale supplies – seed, fertilizer, etc. – with no matching increase from food processors or other product outlets. New restrictions on farm marketing activities – without any reference to actual market conditions - especially those that add value to the farmer that he can pocket – would be a serious hit to his bottom line in these inflationary times. *What other type of business is restricted from developing a new product or service that is consistent with his primary business?*

Resolutions comments:

In Resolution 1, strongly suggest it read: **Supports the use of agricultural lands for activities related to public access beyond direct purchase of farm products under clearly defined circumstances, consistent with county land use, exceptions process and permitting procedures.**

In Resolution 2 b., the proposal to determine an activity *subordinate* to the farm use is a Pandora’s Box of variables that need to consider market conditions beyond “farm use” with economic, environmental and sustainability benchmarks that any other business would face when attempting to expand its products for sale. Every county is unique, as is every family farm. To try to impose a “one size fits all” is overly burdensome to both government and the farmer.

In Resolution 2c., your proposed goal of *compatibility* with area farms is another deep historical dive in Henry Ford’s competitors determining how he should run his business; not Henry. Resource management, including access, are prime considerations and should be part of each county’s judgment on these uses. An evening farm event, for example, is unlikely to impede another farms’ reasonable access to its normal operations.

In Resolution 4, food service has already been established in relation to wineries and distilleries and should be applied evenly to other farms without having to plant a vineyard.

In conclusion I urge you to seek methods and opportunities for family farmers to expand rather than continue to reduce income for their farms. Thank you for this opportunity.

Dan Hoynacki, Grants and Development manager

Subject: comments for Resolution #310
Date: Thursday, June 1, 2023 at 7:44:17 PM Pacific Daylight Time
From: John Zielinski
To: VALNESS Karla * ODA
Attachments: image001.png

Hello Karla,
Please confirm that you received this email.
Regards,
John Zielinski

Members of the ODA Board,

I am writing to share my concerns about Resolution #310. I agree with much that is stated regarding the siting of Agritourism and Agritainment. As stated in the whereas section, these activities can be “beneficial to operators and help to educate the public, there is increasing interest in rural tourism and entertainment activities”. There have, on rare occasions, been compatibility issues with farming practices for neighboring operations. However, in my involvement in other ag organizations the main complaint that I usually hear is that the neighboring direct marketer/agritourism operation is inconvenient. One farmer in Hood River complained to me that he had to wait to pull out onto the county road because of increased traffic. Farmers need to share the roads just as all drivers do.

The fourth whereas statement refers to uneven application of the laws. Though I believe the statement was referring more to the difference between how county governments handle agritourism, to me it pointed out the uneven playing field between what some operations such as vineyards/wineries can do and what agritourism and farm direct marketers cannot do. I know that the grape and wine industry is more “romantic” and frankly they had good lobbyist when they were able to obtain carve outs from the land use laws for their industry. I am not stating that agritourism wants all the carve outs that the wine industry has, but please don’t impede our ability to survive and prosper.

I have concerns about resolution #310, as I read the various points, many seem to state that any agritourism must be subordinate and accessory to the farm operation. I believe that agritourism should be based in providing an agricultural experience, not carnivals and music festivals. However, sometimes the farm “is the product”. As an example, if I had, let’s say a 3–5-acre lavender farm, I could sell fresh and dried bouquets, distill essential oils and other lavender products. In addition, I could offer the experience for people to visit the farm, educate them about growing lavender, take photos, senior pictures, perhaps even host a few weddings. If the revenue from the farm admissions and other non-product related revenue surpassed the revenue of the products, the farm would not be complying. An experience not necessarily a product can help small operations survive and thrive. But if I had a hundred acres of lavender to sell as cut bouquets and essential oils, I would be compliant. Is this resolution designed to protect land use planning? The subordinate and accessory standards are not even handed for small operations.

Direct retailing and selling the agricultural experience allow many small operations to survive. Farms for the most part are getting bigger, not status quo or smaller. Many small operations do not have the means to grow their operation substantially in commodity-based products. As I read resolution #310, I see that it is prejudiced against small agritourism entrepreneurs.

In the second point of resolution #310, section C, it is stated that Agri-tourism needs to be determined to be compatible or can be made compatible with other farming and ranch operations. Does the ODA board choose which new agricultural commodities are compatible with existing agricultural operations? Several years ago, hemp was grown widely through the state. Do new commodities on the horizon need to be proven compatible with existing operations? If it can be grown, or herded it is acceptable. However, if you bring people to your operation, it must be deemed compatible. This seems like a double standard.

I believe that there should be “side boards” for agritourism. I agree with the part of the 5th point of the resolution, urging the department to work with stakeholder groups. I hope that agritourism stakeholder groups such as the Oregon Farm Loop will be included. Please develop new resolution language that acknowledges the many beneficial aspects of agritourism such as, survival of small farm operations, education of the public about agriculture, and diversity in production types.

Thank you for your time.

John Zielinski
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Wednesday, June 7, 2023 at 09:07:55 Pacific Daylight Time

Subject: Preserve agricultural and wild lands

Date: Wednesday, June 7, 2023 at 8:51:29 AM Pacific Daylight Time

From: linda budan

To: VALNESS Karla * ODA

Dear friends,

I recently learned there is an effort to expand tourism in Yamhill county's agricultural areas. I am writing to express my concern, not only to preserve land for our needed food production but also to preserve the open, quiet, low traffic areas for our wildlife. I live on a designated habitat and notice with more traffic and noise which comes with increased tourism, we have fewer wild animal visitors on our habitat.

Please keep the current guidelines in place and do not expand agri-tourism.

Thanks for relaying my concerns

Linda Budan

Subject: Agri-tourism

Date: Wednesday, June 7, 2023 at 3:51:37 PM Pacific Daylight Time

From: Sarah Deumling

To: VALNESS Karla * ODA

From: Sarah Deumling
Zena Forest LLC
4550 Oak Grove Rd.
Rickreall, OR 97371

To The Board of Agriculture

We manage a forest in the hills amid farmland in Polk County. In the almost 40 years since this project started we have seen a continued and growing acceleration of non-farm, agri-tourism uses of the land around us. For each application the topic of "cumulative effect" comes up and, to my knowledge, it has never been acted upon by our county. One new use has very little cumulative impact, how about 5 or 10 or more in the same area? I am convinced that when a use has been allowed once there is no going back. You can no longer say no to the next applicant. Most of these uses cater to folks with spare time and financial resources that allow them to recreate at lovely rural sites, increase traffic on rural roads, use our diminishing water supplies, pave or rock over areas of farm soil for parking, etc.

Meanwhile our rural towns languish, trying to attract businesses and recreate themselves in sustainable ways. Many, if not most, of agri-tourism related applications/projects could be located in these rural towns where they would be accessible easily by many more people with fewer means - a more democratic approach, if you will. Furthermore they would bring life and business to struggling smaller communities.

Finally, all state agencies are now required to consider GHG emissions reductions - reducing their energy footprints - when engaging in planning. Agri-tourism incentivises more VMTs (vehicle miles traveled) while locating such businesses in towns would do the opposite.

Please strengthen the requirements for agri-tourism and certainly don't loosen them. There have to be better ways for us to help those in agriculture who are struggling to make a living. And those who are not struggling must think of the common good for future generations, not an extra few bucks.

Sincerely,m
Sarah Deumling

Subject: Agritourism Standards in Oregon

Date: Wednesday, June 7, 2023 at 4:36:47 PM Pacific Daylight Time

From: Valley Vista Farm

To: VALNESS Karla * ODA

CC: ODA_info

Please do NOT recommend that agritourism standards in Oregon be relaxed. They are there to protect agritourism participants, other agricultural businesses, and the neighbors of agritourism businesses.

In our neighborhood we had a problem with a Vineyard that wanted to call itself a winery, but did not qualify to be a winery. The location was not suitable for large events, as it is at the end of a narrow road. The owners started having events that violated various restrictions. Drunken visitors made it unsafe to walk, bike or otherwise travel in the neighborhood. In the event of an emergency, it would have been difficult if not impossible for emergency vehicles to get to the site. Had there been a fire, it would have put our neighborhood and the surrounding agricultural and residential areas at risk. We are very happy that the regulations in place did not allow these activities to continue.

Agritourism can be great when there are specific regulations followed by the business to ensure it is done well. It should be a part of a greater agricultural operation and should not interfere with other local farming activities or cause problems for neighbors.

Please keep current standards and limitations for agritourism and consider adding more as needed.

Thank you for your consideration,

Catherine Keith
Valley Vista Farm
11355 NW Valley Vista Road
Hillsboro, OR 97124

Subject: do not relax wine tourism standards

Date: Thursday, June 8, 2023 at 8:26:33 AM Pacific Daylight Time

From: Mary Weil

To: VALNESS Karla * ODA

Living on Worden Hill Rd Dundee since 1981 give us a pretty good view of the changes in what Exclusive Farm Use means. We continue to resist any encroachment to our peace and safety. At present we have seven new wineries/tasting rooms being built within 3 miles of our 40 acres. That is in addition to the existing number in the Dundee AVA.

Any increase in entertainment events, amplified or not, puts our road safety at risk, challenges water consumption, and violates the basic Land Use laws so wisely enacted decades ago.

Mary and Dave Weil

11109 NE Worden Hill Rd

Dundee Or. 97115

Friends of
French Prairie

Friends of French Prairie
is an Oregon non-profit corporation

PO Box 403 | Donald, Oregon 97020 | www.friendsoffrenchprairie.org

June 8, 2023

TO: Oregon Department of Agriculture

SUPPORT: RESOLUTION 310

We write in support of Resolution 310 and its intent to weaken agritourism standards. We are a local land use advocacy organization in the north Willamette Valley, home not only to the original center of Oregon agricultural, but holding the highest quality and most productive ag lands in the state.

While agritourism may be an attractive concept, and one that **may** provide economic benefit to **some** farms and ranches, it always comes with a cost and carries a significant risk. In just the past year have seen attempts in French Prairie alone to convert an 84 acre blueberry farm into a private ag-related school, siting of a paintball complex on EFU lands and efforts to allow mass gatherings (i.e. concerts) on existing farm properties with no significant requirements or restrictions and multiple negative impacts.

If agritourism is to be allowed on Oregon's invaluable ag lands, it must be done so in controlled fashion because the fact is that once converted to a secondary purpose ag land seldom is returned to agriculture!

Given the loopholes that exist in the current rules, we would argue for tighter standards, or at a minimum the following:

- The use of agricultural lands for activities related to entertainment and tourism and other events **only under strictly defined circumstances**.
- Better definition of what comprises certain land uses established by law in the exclusive farm use zone that are currently being used to authorize agritourism related activities. It is presently **too easy for Counties to make their own rules or override state rules and regulations**.
- Land use standards that assure that any food service and overnight accommodation related to bonafide, agritourism are **accessory to the agritourism activity and associated farm use**.
- That ODA work with Counties and stakeholder groups to better define the circumstances when commercial activities are appropriate on agricultural lands, specifically including a comprehensive evaluation and analysis, including **an analysis of the cumulative impacts** to agricultural operation, before any proposed actions are taken.
- That ODA works for consistent and even application of land use standards relating to agritourism to and for all types of agricultural operations, similar to what was enacted by the Legislature in SB 960.

We urge you to stand strong for Oregon agriculture and support Resolution 310.

Sincerely



Ben Williams, President



June 10, 2023

karla.valness@oda.oregon.gov

State Board of Agriculture
635 Capitol St, NE
Salem, OR 97301-2532

Dear Board:

Thrive Hood River urges your renewal of Resolution 310: Siting of Agri-tourism, Entertainment Activities and Associated Activities on Agricultural Lands as currently proposed. The intent is clear, the issues are real, and the refined definitions and standards that the resolution envisions are essential.

Hood River County is increasingly losing irreplaceable farmland to tourism and entertainment venues. Exploiting the vagueness in existing regulations, farmable land is being irrevocably paved over for commercial activities incompatible with surrounding farms, orchards, and ranches. Too often, folks drive from Portland and elsewhere to Hood River's Exclusive Farm Use land to consume products that were themselves trucked in from Portland and elsewhere. Meanwhile, legitimate cafes, Bed and Breakfast hotels, and brew pubs on commercially zoned land, which could be the heart of small vibrant communities like Parkdale, struggle as traffic is siphoned onto rural roads.

Individual counties like Hood River are too often asked to interpret and enforce unclear agricultural land regulations. Navigating nebulous laws strains to the breaking point rural county staff capacity and legal budgets. It would be invaluable for county staff, and much more consistent for applicants, to have the principled, refined and enforceable definitions and limits envisioned in this resolution.

Since 1977, Thrive Hood River's mission has been to protect Hood River's farmland, forests, wild places and the livability of its cities and rural communities. To that end, we urge the Board to maintain and promote the position that agritourism needs to be subordinate and accessory to a farm operation by renewing and implementing this resolution.

Sincerely,

A handwritten signature in blue ink that reads "Chris Robuck".

Chris Robuck
Board Member
chris@thrivehoodriver.org

Friday, June 9, 2023 at 11:35:14 Pacific Daylight Time

Subject: Oregon Board of Agriculture Public Comment

Date: Friday, June 9, 2023 at 10:34:34 AM Pacific Daylight Time

From: abrahamsutfin@proton.me

To: VALNESS Karla * ODA

Karla,

Could you please submit my comment to the board of agriculture for the up coming meeting on June 13th?

I am a farmer in Dundee, Oregon, and I am writing in support of upholding Resolution 310. I'm concerned that once we move to a place of allowing farms and ranches to have unchecked commercial events, late night hours of operation and/or music events, or restaurants that we will start stripping away at the tranquility and vitality of "the country life". Yamhill county officials have already been granting unreasonable permits to developers under conditional permits in our area, putting a stress on natural resources (water specifically). I'm concerned that increasing commercial activities will further put unnecessary strain on those resources and increase opportunity of wild land fires, leaving residents to take the blow when those resources are in high demand or gone altogether.

Further, I have noticed an increase in late traffic and accidents along out roads. Later operational hours and more events greatly increases the risk of alcohol related accidents and deaths, especially because people come to wine country to drink.

Please uphold the language in Resolution 310 and keep farm country quiet and safe and please help protect the resources we have so we can continue to farm into the future.

Thanks,

Abraham



Save Helvetia
13260 N.W. Bishop Road
Hillsboro, Oregon 97124

www.SaveHelvetia.org

9 June 2023

Board of Agriculture
Oregon Department of Agriculture

Att: Karla Valnes
karla.valness@oda.oregon.gov

Re: Resolution 310: Agri-tourism Standards Should be Strengthened, not Relaxed

Save Helvetia is a private, non-profit advocacy organization that has been working for over the past decade to protect farm and forestlands in Washington County. Many of our board members have been active in related efforts for many years prior to our formal organization in 2010, during the Washington County Urban and Rural Reserves planning process. Our success as a partner in litigation, when Washington County wrongly evaluated their reserves lands, was a key factor that led to the passage of H.B. 4078, the Grand Bargain. Save Helvetia continues to be an active stakeholder in assuring that our urban and rural reserves function appropriately.

Save Helvetia has a history of assessing and commenting on standards for agri-tourism and short term rentals, beginning in 2014. Several of our board members served on Washington County's Agri-tourism TAG (technical advisory group). One later served on the county's final Advisory Group. We then submitted comments to the county Board of County Commissioners. We have also evaluated legislation before the Oregon Legislature and submitted comments when others have sought to expand on allowable farm uses.

We are concerned that the Advisory Board might create resolutions in this area. We consider this a matter of local land use that should most properly involve county governments in the lead, with robust citizen involvement.

The Helvetia area of Washington County has a 30 year experience with variations on “agri-tourism”. A local farm began staging corporate picnics and Halloween events, selling pumpkins grown in another county, and receiving development “fill dirt” to improve the event setting. A winery became a wedding mill with the county declining/unable to intervene. Citizens had to organize and pay for legal services. They prevailed at LUBA.

Counties typically have slim resources in their rural unincorporated areas. Law enforcement staffing is thin compared to the landmass. Who will shoulder the cost of enforcement brought on by expansion of agri-tourism? Who will shoulder the liabilities associated with agri-tourism? Washington County was unwilling to provide any staffing over the weekends when many agri-tourism events occur. This sets up conflict between neighbors in the rural communities when there is nobody to contact when an event goes bad. Washington County relies on a “complaint based system” for code violations; accompanied with inadequate resources equals frustration and community conflict.

Our noise ordinance is not equipped for agri-tourism. Sunday is a day of quiet, yet this is when many events take place, often accompanied by amplified music. Our ordinance does not have a decibel limit. Noise must be “witnessed” by a sheriff. We currently have 1 deputy per shift for a third of the county’s landmass. Noise is a “tier 4” event that typically does not get same-day response by law enforcement.

Rural agricultural areas are typically on narrow two lane rural roads with gravel shoulders. We have observed urban drivers come into rural areas at high speeds. There have been many roll-over accidents when cars catch a wheel in the gravel shoulders. When they transition onto gravel roads, they often do not recognize the damage that dust causes to neighboring crops. Many of our crops require high purity for market: the importation of noxious weeds on cars is a threat for grass seed crops. Cars can become a threat to farm machinery moving throughout the summer months. Dust from plowing becomes a threat to unfamiliar drivers.

We found that Washington County was not willing to address the impact of alcohol and/or cannabis on the safety of rural communities surrounding agri-tourism events. This was the responsibility of the individual, they said. Well, while we agree that individual responsibility is key to our civic life, enforcement is also a requirement in our current circumstance. Reports indicate that impaired driving from cannabis has increased. Many agri-tourism events (weddings and other celebratory events) promote alcohol consumption. Combining this with the narrow roads and the gravel shoulders creates unsafe conditions.

When we studied the impacts of short-term rentals in rural unincorporated areas, we found that our noise ordinance was ineffective. Nobody was available on weekends to respond. Sheriffs lacked the resources to respond to their responsibilities under the ordinance.

We learned that weapon use was part of the short-term rental phenomenon in rural areas, not lawful in urban settings where customers came from. We have two elk herds that might tempt an urban hunter in short-term rental.

Fire danger is ever-present in the rural areas, most typically in the summer. Rural residents learn of rural burn permits and whom to call to check on burn season conditions and restrictions. All of this is foreign to those entering the areas for events or short term use.

Some can benefit economically from agri-tourism. Many urban dwellers can be entertained by events and venues. However, there are many downsides for farmers and the small rural communities impacted. **What mitigation strategies should be required for agri-tourism to be safe for all?**

Respectfully,

Robert Bailey, Secretary
Save Helvetia
Board of Directors

Subject: Resolution 310, "Siting of Agri-tourism, Entertainment Activities and associated activities on Agricultural Lands."

Date: Sunday, June 11, 2023 at 10:15:25 PM Pacific Daylight Time

From: JoAnn

To: VALNESS Karla * ODA

[You don't often get email from djkeeley@stpaultel.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hon. members of the Board of Agriculture:

I understand you will shortly be considering Resolution 310 and other policy affecting agriculture. I am writing in support of Resolution 310 as written. I urge you not to dilute or reduce the protections we in commercial agriculture have from land uses unrelated to agriculture. As you know agriculture is vulnerable to many types of interference; Traffic making it impossible or unsafe to move equipment, court suits over smells, dust and sprays, competition with residential uses for land, vandalism, theft and many more. Many of these problems are created or made worse by agritourism and other uses unrelated to agriculture being allowed in farm zones. Please hold the line and keep agriculture viable in Oregon.

Dan Keeley
5975 Buyserie Road NE
Saint Paul, OR



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Laurel Hines
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Linda Peterson
Kasia Quillinan

June 11, 2023

Board of Agriculture
Oregon Dept. of Agriculture
635 Capitol St., NE
Salem, OR 97301

RE: Vote "NO" on Weakening Agri-Tourism Rules

To: Board of Agriculture, Oregon Dept. of Agriculture

Dear Chair Santamaria and Members of the Board of Agriculture:

Friends of Marion County (FoMC) is an independent 501(c)(3) farmland protection organization founded in 1998. Our mission is to protect farm and forestland, parks, and open space in Marion County.

There are so many reasons the Board should reject the weakening of current Agri-Tourism rules and I will list just a few here.

1. In 2018, Marion County rejected an application for a large mass gathering, the Bi-Mart Country Music Festival, that was scheduled over 4 days with 30,000 attendees/day during the harvesting season.

2. In 2023, LUBA rejected a proposal in Marion County for events as a home occupation on EFU of up to 750 persons/day and many events per year over a period of 4 days. Weddings were the main proposal and most likely occurring during the planting and harvest seasons.

Agri-tourism is just another way that subjects farm operations to interferences of vehicular and pedestrian traffic. While one framer is attracting urban visitors his neighbor might be in active farming mode causing a conflict and therefore another threat to our farm base. As more framers seek to increase their income, this may actually reduce the effort to practice farming and negatively affect the agricultural landscape.

Thank you for listening.

Roger Kaye, President
503-743-4567
rkaye2@gmail.com

Subject: Challenges of Agritourism

Date: Saturday, June 10, 2023 at 6:02:33 PM Pacific Daylight Time

From: Jim Gilbert

To: VALNESS Karla * ODA

You don't often get email from jgilbert@oregonsbest.com. [Learn why this is important](#)

Hello, I understand the Board of Agriculture is considering modifying its current position regarding agri-tourism. I encourage the Board to maintain and even strengthen its position that agritourism should be subordinate to agricultural use of Oregon's farmland and clearly and carefully defined and permitted.

Oregon's agricultural industry is the second largest economic sector in our state. It is important not only for the income it brings to Oregon, it also provides many thousands of jobs in both direct farming and ranching operations and the associated businesses that provide supplies and services essential to its success. In addition, with the challenges posed by climate change and drought in other regions, Oregon's productive farms and ranches will likely have an increasingly important role in providing food and other farm products to our nation and the world.

Agri-tourism poses significant problems to our agricultural industry. Some of those are:

1. Conflicts with farming operations. Spraying for pest control, dust from tilling the land and noise from tractor and machinery operation are just some of the conflicts between tourism and farming operations.
2. Increased traffic on rural roads. Our narrow, rural roads are not designed for large amounts of traffic and tourist traffic conflicts with the movement of farm machinery and the transport of farm products. Increasing traffic in rural areas also increases fossil fuel use and further contributes to the negative effects of climate change.
3. Agri-tourism should not be a substitute for good farming practices. Oregon's fertile farmland and mild climate permits many types of successful farm and ranch operations. If a farmer or rancher is failing to operate successfully, that operation is best turned over to another who can farm it successfully.
4. Support the local communities that have the infrastructure for wineries, cafes, wedding venues and other tourist-related activities. They are the place for such activities and will prosper with the additional income.

Thank you for taking comments on this issue. I look forward to the continued wise and thoughtful recommendations submitted by the Board of Agriculture.

Jim Gilbert

Jim Gilbert

Northwoods Nursery

28696 S. Cramer Rd.

Molalla, OR 97038

wk. 503-651-3737

cell 503-502-6925

www.northwoodsnursery.com

Documentary Coming Soon! An Oregon Story - Saving Our Farmland & More For information & updates

www.anoregonstory.com

Subject: Do Not Change Resolution 310

Date: Saturday, June 10, 2023 at 3:12:58 PM Pacific Daylight Time

From: Julia Wayne

To: VALNESS Karla * ODA

CC: Julia Wayne

You don't often get email from jstewara@pacifier.com. [Learn why this is important](#)

Dear members of the Oregon Board of Agriculture;

PLEASE DON'T WEAKEN THE LANGUAGE OF RESOLUTION 310!

The concessions already made to wineries and other agricultural entities seeking to expand their business into agritourism and entertainment are quite enough. My main concern is that with extended hours and events at tasting rooms the odds of inebriated drivers on our narrow roads will increase. People go off the winding road near our place periodically. Sometimes they are just going too fast, sometimes they are drunk or high. Fortunately they were alone on the road, and the traffic will only increase.

Don't forget that in addition to the businesses of vineyards, wineries and farms ours is a community of families living and raising our children. Worden Hill Road is busy with neighbors walking, cyclists enjoying the challenging terrain, school busses, farm trucks, tractors and other heavy equipment that are part of the increasing traffic as more land is planted and wineries and tasting rooms are built.

It's nice to drive into beautiful wine country and sample our excellent wines but tasting should not be drinking. Wineries should not be bars. Tasting rooms should close in time for folks to head into town for a meal at one of the county's notable restaurants.

Having a firm limit on number of events is just courteous to neighbors. It would also be polite if neighbors were informed of events pending at neighboring wineries. I've spent time in summers past lying in bed waiting for the loud speakers from a neighboring winery to go silent so I could sleep.

Thank you for considering my ideas,

Julia Wayne

Abbey Ridge Vineyard/Cameron Winery

Item 17

Sid Friedman
14286 NW Old Moores Valley Rd.
Yamhill, Oregon 97148

June 10, 2023

Oregon Board of Agriculture
Jim Johnson, Land Use & Water Planning Coordinator
635 Capitol St NE
Salem, OR
97301-2532

Re: Resolution 310 (Agri-tourism)

Dear Commissioners and Staff,

My wife and I operate a 170-acre hay and timber ranch west of Yamhill and Carlton. I served two terms on the Yamhill County Planning Commission and have watched with alarm the exponential growth in number and scope of agri-tourism events in our area. I have reviewed draft Resolution 310 and offer the following comments.

Agri-tourism is an important part of the local economy that can support and complement our agricultural industry. However, many so-called agri-tourism activities have little or nothing to do with agriculture, drive up the price of farmland, create unacceptable conflicts for farmers and neighbors, overburden rural infrastructure, and unfairly compete with in-town businesses which pay for city services and urban infrastructure. For these reasons, ordinance strict sideboards are essential for agri-tourism events.

Unfortunately, under our current standards we have seen a destabilizing proliferation of commercial activities that are not unrelated to agriculture under guise of agri-tourism. Portions of our county are reaching a tipping point that threaten the continued viability of commercial farming.

We have Boutique hotels, masquerading as Bed and Breakfasts, Taverns masquerading as a brewery tasting room, Event centers that charge \$20,000 a wedding and offer to host "any event you'd like." (See attached web page screen shots)

Clearly, the current standards need to be strengthened. I support the intent of Resolution 310 and offer two suggestions to better achieve its purposes:

1. Add "Home Occupations to Item 3. Many of the most objectionable activities are approved as home occupations. Better definition of what qualifies as a home occupation is overdue.
2. Food service is particularly problematic. I strongly support the intent of item 4. Any food that isn't foraged is by definition an agricultural product, but any event that serves food, even if an ingredient is or ingredients are locally-sourced, is not by definition "supportive of agriculture." Stricter standards for food service should apply not only to those agri-tourism events that are "regular and ongoing", but also to those that occur on a less regular basis.

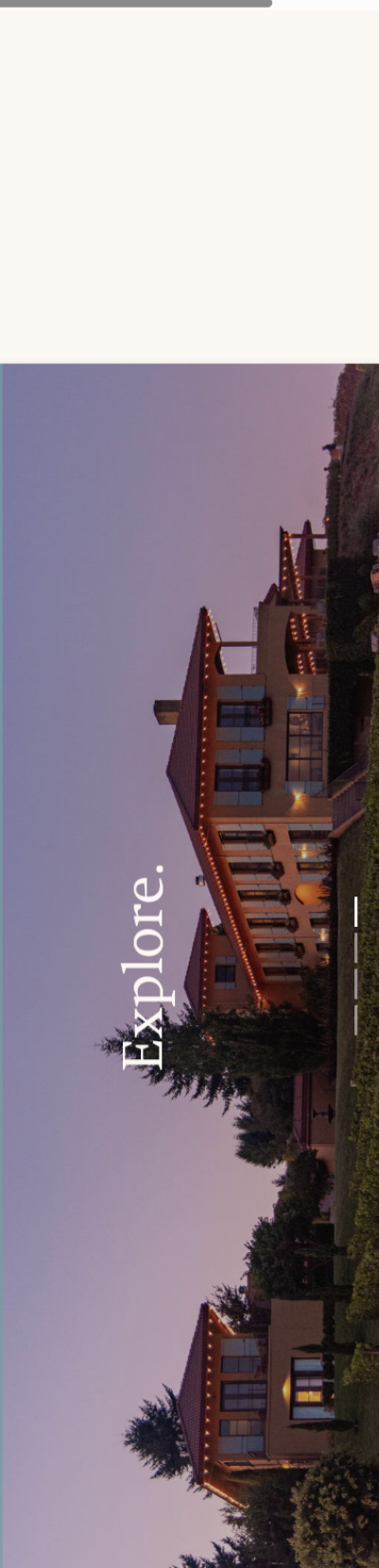
In closing, agricultural land is not vacant land waiting for development. It is already developed industrial land that supports the state's second largest industry- agriculture. Pressure from commercial uses significantly pushes up the price of farmland, making it more difficult to acquire, more difficult to pencil-out for farming and in many areas its cumulative impacts threaten the overall stability of our rural land base.

Thank you for considering these comments. I hope they are helpful.

Sincerely,

A handwritten signature in black ink, appearing to read "Sid Friedman", followed by a long horizontal flourish.

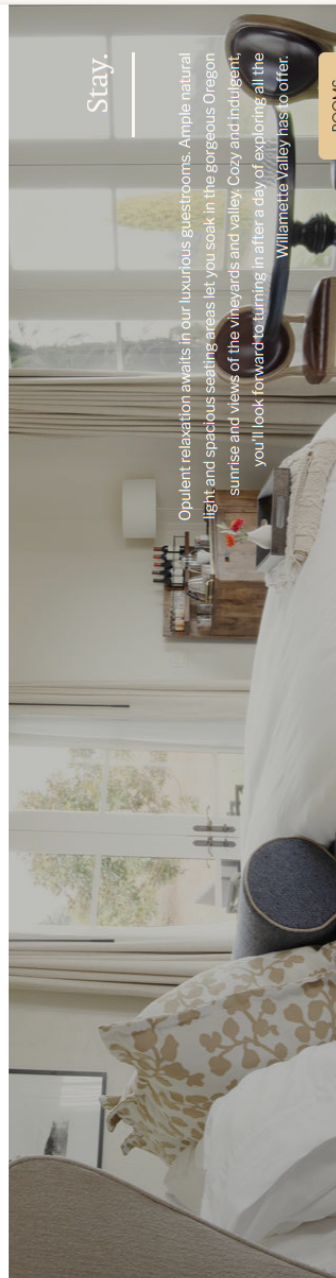
Sid Friedman

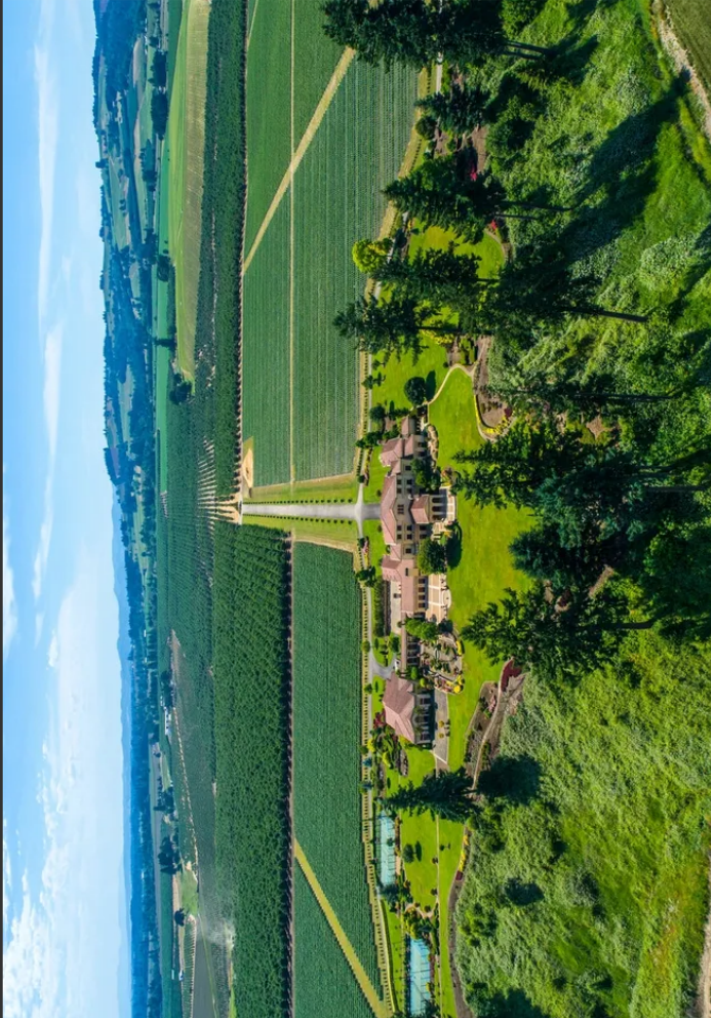


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Vacation rental rates vary from \$1,995 - \$5,595+ per night.

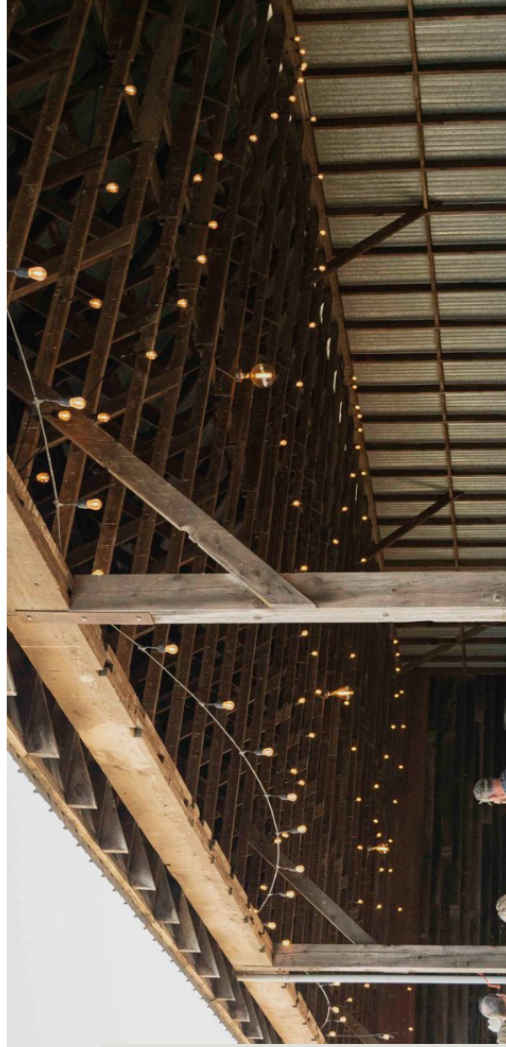
Low Season: January - March
Mid Season: April - May + Nov - Dec
High Season: June - October

- 3 night minimum.
- No pets allowed.
- Weddings start at \$20,000/wknd. Maximum 80 guests. Inquire for more information on weddings & events.
- Available for rent for conferences, vacations, events, workshops, retreats, weddings & more!

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DRAFT
Full 12oz / Half 6oz



POSTMAN 5.6%
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Full \$7 / Half \$3.5 / 4pk cans \$16

VERS 6.6%
Belgian farmhouse blond

Meaning "fresh" in Dutch (pronounced "vares"), this is a new Belgian farmhouse blond (yes, they drop the "e") with grainy backbone, spicy & fruity aromatics thanks to an addition of some local, super fresh Crosby farm Sterling hops, smooth mouthfeel via gentle lagering in tank, and a dry finish.

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CARA STOUT 4.3%
Dry Irish Stout

Brewed for our friend and woodworking neighbor Jack O'Brien, this smooth sipping dry Irish stout is named *Cara* or "friend" in Gaelic as a thanks for all Jack has done to help the brewery grow and thrive over the years.

Full \$7 / Half \$3.5 / Crowler \$13

NEUBERG 5.4%
Foeder Lager

GREEN LIMOUSINE 6.2%
Old School American IPA

EYE OF PI 3.14%
Table Beer

Subject: Agritourism

Date: Friday, June 9, 2023 at 2:22:39 PM Pacific Daylight Time

From: Aol !!

To: VALNESS Karla * ODA

Oregon Dept of Agriculture Board and Staff:

I am writing to encourage you to support the language in Resolution 310 or to improve the language to reduce the number of uses in the Exclusive Farm Use zone.

I am a first generation farmer in Parkdale in Hood River County where I have raised pears, apples, cherries, cattle and hay for 42 years.

I purchased with my family orchard property in 1980 and later other property with the understanding that the zone was EFU. This was important to me as I wanted to be in a zone where I could invest everything I had in a secure zone committed to farming and real food production. My farm use is threatened by encroaching uses in the zone that have nothing to do with food production. Hood River County is "ground zero" for the attack on the farm zone by non-farm and tourism uses.

One of the unfortunate things is that the push for Agritourism was to sell items produced on that farm to the public to help move the farm products. The truth is much of what is sold on the farm with Agritourism comes in a United Grocers truck or a beer truck from Portland. This is not helping the farm zone. .

I have observed several things from these uses over the last many years:

1. These Agritourism uses are incompatible with farm uses in the zone. It is becoming very difficult to carry out normal farming practices in the county now.
2. The rural road safety concerns are truly compounding everyday. Some roads we can no longer use at harvest time to haul our products to market. It is too dangerous to risk. This causes us and our employees to drive farther on other routes to avoid accidents.
3. The customers of these Agritourism venues "leak" over on to our land to trespass, take fruit, park, damage irrigation, block our driveways and limit our farm work.
4. Many of these venues take valuable farm land out of production. Venue buildings, beer gardens, paved wide driveways and parking lots permanently harm farm land, in opposition to Oregon's Goal 3.
5. Agritourism takes business away from commercial businesses in struggling rural communities. Commercial business in communities, paid commercial prices to conduct business in the correct zone. it is unfair for them to have to compete with venues who paid farm prices for commercial venues. In our community 3 delis/restaurants have ceased operation having lost business to agritourism.
6. At a time when we are all concerned about GHG production, the carbon footprint of attracting millions of people to travel from cities out into rural Oregon for Agritourism is appalling. The carbon footprint of this can easily exceed that of all of farming in Oregon, which actually results in food.
7. Farm land prices are escalating in areas where Agritourism is prevalent. Prices are moving toward commercial prices. This means that these farms can never be used just for food production again. And can not be purchased by young farmers who just want to farm.
8. For the problems caused to the farm zone, the economic benefits of Agritourism and venues to farming overall is relatively insignificant.

9. A major problem is that issues caused by Agritourism and venues is that enforcement of compliance with the laws and permits is left to neighboring farmers. Many of these venues are out of compliance with parking, safety, trespass on neighbors, type of products sold. Many are out of compliance now. How can we expect them to comply with more open rules?
10. Agritourism uses give a distorted view of farming and food production and are not really helpful for educating the public about what we do.

The farm zone is for food production, seed production and plant production. As water shortage, climate extremes and development destroy farm land all over the globe Oregon's most important asset is its farmland. Protect it for farming, only!!

Mike McCarthy, PhD
McCarthy Family Farm
Parkdale, Oregon 97041
541 806-6476