

EBER, Ron
August 27, 2015
Agenda #: R.1

August 26, 2015

Multnomah County Board of Commissioners
501 SE Hawthorne
Portland, OR

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AUG 26 2015

RE: Proposed Sauvie Island/Multnomah Channel (SIMC) Rural Area Plan

Dear Commissioners:

Please accept these comments regarding the proposed Sauvie Island Rural Area Plan. I was part of the consultant team that prepared background materials on "Agriculture and Agri-Tourism" for the CAC and staff to use in its preparation.¹

I have followed the development of the plan and reviewed the plan and policies proposed by the Planning Commission and want to also submit private comments, based on my long involvement with farmland issues and EFU zoning under ORS Chapter 215 and OAR 660 Division 33.2. Because of this involvement, **I want to lend my full support to what the County Planning Commission is proposing.**

Oregon has a longstanding commitment to the protection of its agricultural land base and to promoting the bounty produced. Despite the Legislature's intent to only provide for those promotional activities directly related to farm use at farm stands, such events inevitably take on a life of their own and quickly overrun farm areas with many unintended consequences to the agricultural community. This was the prime concern of the Island community that led to this plan update.

The proposed Agriculture & Agri-Tourism Policy Framework is an excellent set of focused policies for the protection of Sauvie Island's agricultural land base from activities and events unrelated to the Island's primary farm use. They will provide clear guidance to decision makers in the implementation of this plan. This is very important since Oregon law requires jurisdictions to implement the plan after its adoption and conform prior conflicting zoning ordinances to it. No land use may occur which would exceed the limits set by the plan between the time of the enactment of the comprehensive plan and the implementing zoning ordinances.³

¹ See Appendix 2 "Agriculture and Agri-Tourism"

² DLCD Agricultural Lands Policy Specialist 1976 to 2008 (retired) and Special Assistant to Anne Squier, Governor Barbara Robert's Natural Resources Policy Advisor, 1993 and co-author with Ed Sullivan of "The Long and Winding Road: Farmland Protection in Oregon 1961-2009," 18 San Joaquin Agricultural Law Review # 1 (2008-2009).

³ See generally, *Baker v. City of Milwaukie*, 271 Or 500 (1975).

Only with clear policies can the plan fulfill its function to be the “controlling land use instrument” and provide guidance in determining whether any future land use or code provisions will exceed the policy limits established by the plan.

Governor Tom McCall advocated a land use system “that is courageous and comprehensive...” and it is now time to deliver on that promise.⁴ I urge your adoption of the Agricultural and Agri Tourism Policy Framework recommended to you by your Planning Commission. They and the citizens involved in its development should be commended for these policies that make real choices and decisions to guide future land use on Sauvie Island.

Sincerely,

Ronald Eber
Box 249
Port Gamble, WA 98364

⁴ Special Message to the 55th Oregon Legislative Assembly on Land-Use Planning and Zoning (February 7, 1969)