



September 19, 2024

**RE: Major Modification #23-0244 of Farm Stand Permit #16-0122**

Dear Planning Commission members:

The staff decision on the Packer farm stand is the result of meticulous research and thorough analysis. It is a necessary interpretation of the minutiae of the county code, state law and administrative rule, and case law. We believe it is appropriate and legally defensible, with one exception.

We disagree with County staff's conclusion, on page 15 of the notice of decision, that events need not promote "the sale of farm crops or livestock sold at the farm stand" (HRCZO 3.04 G.1.). We believe that allowing farm stands to have events that do not promote the crops and livestock they sell, but rather promote anything grown in Oregon, exceeds the allowance in ordinance and statute. However, having seen the County work with this particular applicant over several years to rein in inappropriate events and activities, we chose not to appeal that conclusion.

This decision accomplishes the following.

- Distinguishes between farm crops and prepared food items. Sales of prepared food items are limited by law so that farm stands do not morph into delis and fast-food restaurants.
- Precludes event admissions fees from being inappropriately counted as sales of farm crops and livestock.
- Clarifies allowable promotional events.
- Requires compliance with building and zoning codes regarding the design and use of structures at farm stands.
- Provides for annual reporting consistent with precedent and the county's obligation to ensure that permit conditions are honored.

Overall, the interpretations and conditions set a clear roadmap for both this applicant and other future farm stand applications. We urge you to uphold this decision.

Respectfully,



Chris Robuck  
Co-President