



Date: July 7, 2025

To: Hearings Officer

From: Scott & Stacy Reed, Property Owners
12424 NW Springville Road, Portland, OR 97229

Re: Response to Carol Chesarek letter dated June 27, 2025
Public Hearing on Appeal of Case File T2-2021-14981, COA-2025-0004

The purpose of this Memorandum is to summarize Scott and Stacy Reeds' responses to the comments made by Carol Chesarek in her June 27, 2025 letter.

Farm Activity

One of Ms. Chesarek's primary concerns is that "the applicant's Schedule F forms don't appear to correspond with the activity visible on the farm." The 84-acre farm is comprised of rolling hills with trees and streams. Only pasture #8 and #9 are visible from the NW Springville Road. The other eight pastures which represent 90%+ of fenced pasture area are not visible from NW Springville Road. So, it is understandable why she does not see the Boer goat herd, or the pasture raised layers from the road.

Ms. Chesarek also provided some aerial photos from the County website of the farm primarily taken during the summer months of July and August. The summer timing of the aerial photo is clear because the grasses are brown and mowed. We mow the farm once a year during the summer when the grass turns brown and we put the goats in pastures #6 and #10 because of the tree cover for shade and the available leafy greens. The chickens stay in pasture #3 all year. The goats and chickens (plus their mobile housing and waterers) are all visible to the experienced eye in all the aerials provided from the County website.

Farm Income Test

The question posed in the Condition of Approval 1a is whether the subject tract is currently employed for a farm use, as defined in ORS 215.203, at a level capable of producing the annual gross sales required by OAR 660-033-00135(2)(B). For this test the undisputed amount for the test is \$14,942.91 in annual gross sales (see chart below). Not the County or Ms. Chesarek has disputed the amount for the income test.

Table 2 - Potential Earning Capacity for Each Tract									
Tract Name	Acres in Each Land Class				Gross Sales Per Acre by Class				Potential Earning Capacity
	Class 2	Class 3	Class 4	Class 6	Class 2	Class 3	Class 4	Class 6	
Andrews	0.01	0.93	0.00	0.00	484.11	397.66	203.89	103.74	\$ 374.66
Azhar	0.00	3.48	1.48	0.00	484.11	397.66	203.89	103.74	\$ 1,685.61
Beovich	0.00	43.81	36.70	12.97	484.11	397.66	203.89	103.74	\$ 26,249.76
Blumenkron	0.00	12.67	7.82	0.00	484.11	397.66	203.89	103.74	\$ 6,632.77
Bothum	0.27	2.38	3.11	0.00	484.11	397.66	203.89	103.74	\$ 1,711.24
Burnham	3.57	73.16	31.75	6.21	484.11	397.66	203.89	103.74	\$ 37,938.81
Charlie Potatoes LLC	2.99	3.51	1.60	0.00	484.11	397.66	203.89	103.74	\$ 3,169.50
Fox	0.70	0.44	0.14	0.00	484.11	397.66	203.89	103.74	\$ 542.39
Hyde	0.00	0.91	0.07	0.00	484.11	397.66	203.89	103.74	\$ 376.14
Kolander	0.00	8.85	7.11	0.00	484.11	397.66	203.89	103.74	\$ 4,968.95
Malinowski	12.13	13.62	7.35	0.00	484.11	397.66	203.89	103.74	\$ 12,786.98
Tri-County Investments	1.01	35.44	1.77	0.00	484.11	397.66	203.89	103.74	\$ 14,942.91
Wolf Creek	0.00	4.58	0.00	0.00	484.11	397.66	203.89	103.74	\$ 1,821.28
Zahler	0.28	30.16	6.96	0.00	484.11	397.66	203.89	103.74	\$ 13,548.05
Subject Tract (Reed)	7.10	30.42	30.10	16.64	484.11	397.66	203.89	103.74	\$ 23,397.32
Median Annual Gross Sales Figures for County Indicator Crops within Study Area									\$ 14,942.91

The Reeds have provided a copy of their 2020 Schedule F, which would be the Schedule F as of August 18, 2021 (income required by this condition set at the timing of the application filing). The 2020 Schedule F details annual gross sales at \$44,511. The 2020 Schedule F is included in the Multnomah County website (Attachment 1 – 2020 Schedule F & Letter from CPA 05.02.2025 AA.14) and includes a letter from Taylor Bethell, CPA with the accounting firm RF Associates LLC that prepared the tax return.

Ms. Chesarek states that “the applicant provided an amended, unverified IRS Schedule F for 2020, but as noted in the staff report failed to provide substantial evidence that this is the form filed with the IRS originally.” This statement is incorrect. The Reeds submitted Attachment 2 – IRS Form 4506 & USPS Certified Mail Receipt 04.02.2025 (Multnomah County website exhibit AA.15). Form 4506 was provided to the Reeds by the County. The Reeds then completed this form and sent it via certified mail to the IRS on April 2, 2025. On May 2, 2025, the Reeds received the “Account Transcript” from the IRS for tax period ending December 31, 2020, which confirmed tax return has been received and filed by the IRS (Multnomah County website Attachment 3 – 2020 IRS Account Transcript 05.02.2025 AA.16).

Goat Meat

Ms. Chesarek questions if the farm sells 6,000 pounds of goat meat per year, she noted in her letter “folks have seen 10 to 15 goats on the property.” She cites the Northernhomesteading .com as a source that a Boer goat at 8 months will weigh 90 pounds. Ms. Chesarek also cites the Lebanonauctionyard.com website to show that “one 85 lb buck goat sold for \$250.” She then concludes that “the applicant would need to sell 120 goats a year to yield 6,000 lbs of goat meat.” This conclusion by Ms. Chesarek is completely wrong.

The Reeds have raised goats on the farm for over 10 years and are members of the American Boer Goat Association. Bucks and does are sold from the farm when they are between 12 and 24 months old, which produces a live weight goat of 150 to 250 pounds. Sometimes a full-grown buck is sold to mix up the genetics of the herd. A full-grown Boer buck weighs between 250 and 325 pounds. Then

approximately 25 Boer does average a set of twins each birth (birth once a year). Some does have triples or quadruples. Each year the farm will raise about 50+ new goat kids. In a typical year, the farm will sell approximately 30+ goats. The average live weight of a sold goat is approximately 200 pounds. On June 28, 2025, the farm sold five bucks with a total live weight slightly over 800 pounds. These young goats average about 160 pounds each. On June 5, 2025, the farm sold two full-grown bucks over 250 pounds each. The average Boer goat sold off the farm has a live weight of approximately 200 pounds. Thirty goats sold a year from the farm with an average live weight of 200 pounds equals annual sales of approximately 6,000 pounds of goat meat sold per year.

Topsoil

In Ms. Chesarek's letter she states that at the farm "the primary activities have been grading, accepting thousands of truckloads of construction fill, and road construction."

When the Reeds purchased the farm in 2014, it had been in a non-operable state for over 20 years. The farm had no power, no water, no usable roads, the fences were falling down, and the topsoil had eroded off the pastures. The Reeds have pulled three different grading permits with the County to fix the infrastructure and topsoil on the farm. These repairs have come at a great cost to the Reeds, but have secured the future of the farm and made the farm far more productive.

Cash Sales

Ms. Chesarek states that it isn't credible that the farm sells "directly to individuals and through all cash sales with no receipts of any kind." If she has spent anytime on a farm selling eggs or livestock, then she would know that all farm sales are cash and final. NO customer has ever asked the Reeds for a receipt for eggs or goats.

On the Reed's farm, sales are done in cash exclusively. Reeds do not take checks or credit cards. Anytime the Reeds buy goats, feed, or equipment from another farm the transaction is also done in cash.