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June 27, 2025

Multnomah County Land Use Planning
1600 SE 190th Avenue
Portland, OR. 97231

Submitted by e-mail:
lup-hearings@multco.us

Re: Conditions of Approval Review for T2-2021-14981
LUBA No 2022-097 (Remand Proceeding)
Case File T2-2021-14981
12424 NW Springville Road

>> Please enter this letter into the record for the Conditions of Approval Review hearing June 13, 2025.

Dear Hearings Officer,

I remain concerned that the applicant's Schedule F forms don't appear to correspond with the activity visible on his farm and the realities of modern farming.

I am the Chair of the Forest Park Neighborhood Land Use Committee, but have been submitting comments as an individual to try to minimize the neighborhood's exposure to the applicant's frustration. I have family who have ranched in Montana for generations, and during the extended Urban and Rural Reserves process I worked closely with 1000 Friends of Oregon and the farmers in the Save Helvetia group to ensure that the Helvetia area was not included in Washington County's urban reserves. I still see one of those farmers weekly at the Beaverton Farmer's Market. I have attended Washington County Farm Bureau meetings, but not recently. In Multnomah County, I worked with the neighborhood to protect the applicant's property from being included in an Urban Reserve, which was the previous property owner's goal.

Happily, all of the rural portions of our neighborhood are protected by a Rural Reserve that will protect against urbanization for about another 40 years. The regional agreement not to urbanize land that can't be provided with urban services by a city also helps protect it.

The Hearings Officer Decision requested “a definitive statement from an accountant of actual income received” (at 7), but no such definitive statement has been provided. 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. The farm income and gross sales information provided by the applicant for 2020 is still inconclusive.

We still haven’t seen any invoices or receipts to support their statements about farm sales (not expenditures on purchases).

The definition of farm use at 215.203 means current employment of the land for the purpose of obtaining a profit in money. We don’t question that there is a low level of current farm use, but it isn’t clear these activities are intended to create farm profits at the level shown on the Schedule F forms.

The applicant stated during the June 13 hearing that he is selling 6,000 (six thousand) pounds of goat meat a year. I spoke to some local stores who sell Halal goat meat. They don’t buy directly from farmers, they don’t buy butchered goat meat. They buy whole goats at auction and have them slaughtered themselves to ensure a Halal process. I would expect someone selling to them to talk about the number of head of goats of each type sold at auction, not a number of pounds of goat meat.

I would also expect a livestock auction to produce receipts for animals sold.

Internet sources (see the end of this letter) say that a mature Boer goat sold for meat will yield about 50 lbs of meat. So the applicant would need to sell 120 goats a year to yield 6000 lbs of goat meat. Presumably the herd would be much larger, so that 120 goats could be culled each year for sale. There is no large flock of goats visible in any of the aerial photos of this property. Folks have seen 10 to 15 goats on the property, but not a flock of 200 plus animals.

I am going to submit separate documents with aerial photos and other images of the applicant’s farm. The primary activities have been grading, accepting thousands of truckloads of construction fill, and road construction. There are now several farm buildings on the property, and I do believe that chickens are being raised and eggs sold. But it isn’t credible that 80 dozen eggs a week are being sold directly to individuals and through all cash sales with no receipts of any kind.

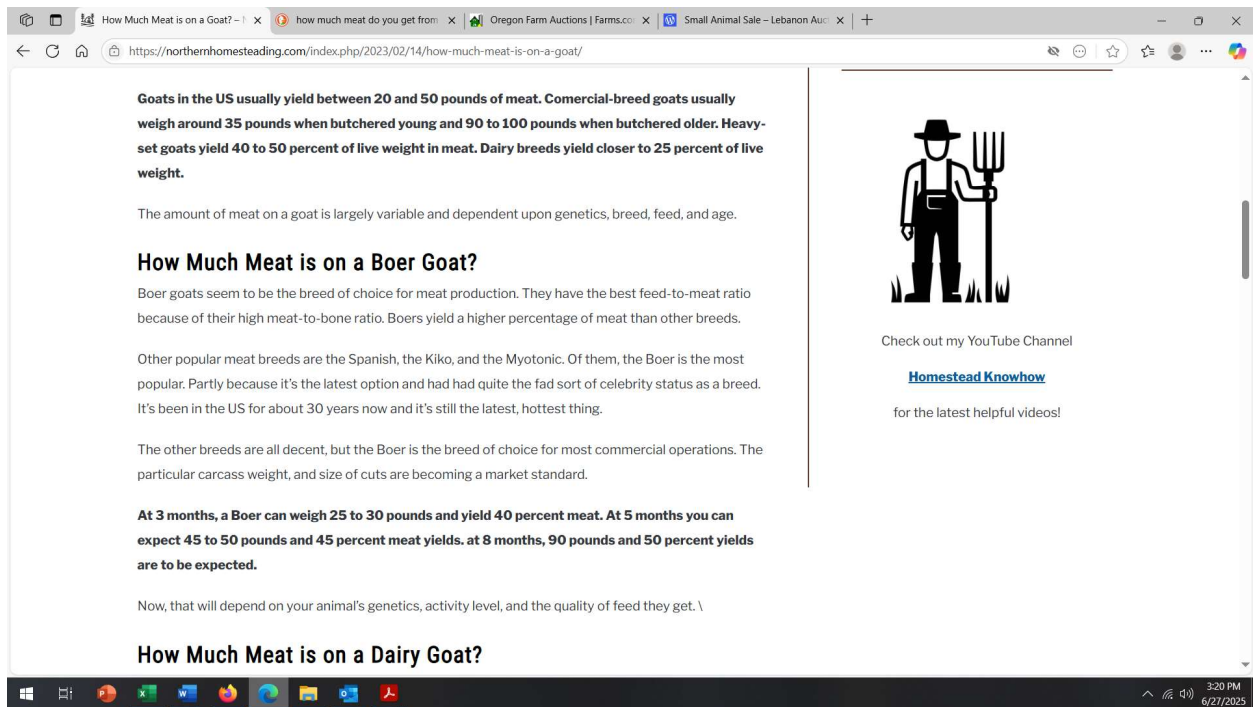
The Hearings Officer Decision requested “a definitive statement from an accountant of actual income received” (at 7), but no such definitive statement has been provided for 2020 or 2021.

To satisfy Condition (1), the applicant needs to provide at least the original, verified Schedule F for 2020 showing the required level of farm or gross sales established at the time the application was filed on August 18, 2021.

The applicant has not met the requirements for proof of commercial farm income or gross sales at the level required to qualify for a dwelling permit for 2020 as required by Condition of Approval (1).

Thank you for your consideration.

Carol Chesarek



The screenshot shows a web browser window with several tabs open. The active tab is titled "How Much Meat is on a Goat?" and the address bar shows the URL "https://northernhomesteading.com/index.php/2023/02/14/how-much-meat-is-on-a-goat/". The main content area of the browser displays an article with the following text:

Goats in the US usually yield between 20 and 50 pounds of meat. Commercial-breed goats usually weigh around 35 pounds when butchered young and 90 to 100 pounds when butchered older. Heavy-set goats yield 40 to 50 percent of live weight in meat. Dairy breeds yield closer to 25 percent of live weight.

The amount of meat on a goat is largely variable and dependent upon genetics, breed, feed, and age.

How Much Meat is on a Boer Goat?

Boer goats seem to be the breed of choice for meat production. They have the best feed-to-meat ratio because of their high meat-to-bone ratio. Boers yield a higher percentage of meat than other breeds.

Other popular meat breeds are the Spanish, the Kiko, and the Myotonic. Of them, the Boer is the most popular. Partly because it's the latest option and had had quite the fad sort of celebrity status as a breed. It's been in the US for about 30 years now and it's still the latest, hottest thing.

The other breeds are all decent, but the Boer is the breed of choice for most commercial operations. The particular carcass weight, and size of cuts are becoming a market standard.

At 3 months, a Boer can weigh 25 to 30 pounds and yield 40 percent meat. At 5 months you can expect 45 to 50 pounds and 45 percent meat yields. at 8 months, 90 pounds and 50 percent yields are to be expected.

Now, that will depend on your animal's genetics, activity level, and the quality of feed they get. \

How Much Meat is on a Dairy Goat?

On the right side of the browser window, there is a sidebar with a black and white illustration of a farmer wearing a hat and holding a pitchfork. Below the illustration, the text reads: "Check out my YouTube Channel [Homestead Knowhow](#) for the latest helpful videos!"

The Windows taskbar is visible at the bottom of the screenshot, showing various application icons and the system clock displaying 3:20 PM on 6/27/2025.

The nearest livestock auction is in Lebanon, OR. This is their most recent sales report, showing one 85 lb buck goat sold for \$250.

Monday June 23, 2025 08:14:11

TAG	HD	DESCRIPS	SEX	WEIGHT	PRICE	TOTAL
10011	2	MISC	WEATH G	235	HEAD	\$400.00
10020	1	MISC	WEATH G	65	HEAD	\$200.00
10091	2	MISC	KID	0	HEAD	\$20.00
10018	1	ROAN	KID	25	HEAD	\$15.00
10016	1	BLK	KID	20	HEAD	\$25.00
10007	14	MISC	KID	475	HEAD	\$420.00
10003	5	MISC	KID	165	HEAD	\$200.00
10022	1	MISC	KID	30	HEAD	\$45.00
10006	3	MISC	KID	90	HEAD	\$157.50
10015	1	MISC	KID	45	HEAD	\$60.00
10004	2	MISC	KID	85	HEAD	\$150.00
10017	1	MISC	KID	75	HEAD	\$75.00
10005	2	MISC	KID	95	HEAD	\$160.00
10013	1	MISC	KID	80	HEAD	\$97.50
10014	1	MISC	KID	60	HEAD	\$130.00
10012	3	MISC	KID	210	HEAD	\$547.50
10021	1	BLK/WHT	KID	70	HEAD	\$270.00
10019	1	MISC	NANNY	45	HEAD	\$47.50
10010	9	MISC	NANNY	615	HEAD	\$675.00
10025	1	BLK/WHT	NANNY	80	HEAD	\$85.00
10024	1	MISC	NANNY	135	HEAD	\$180.00
10023	1	RED	BUCK	85	HEAD	\$250.00
10009	12	MISC	DOE	650	HEAD	\$960.00
10008	10	MISC	BUCKLING	385	HEAD	\$400.00