



Adam Barber <adam.t.barber@multco.us>

Fwd: Submission by Mail of Testimony + Request to Testify - Edward Hill

land.use.planning land.use.planning <land.use.planning@multco.us>
To: Adam Barber <adam.t.barber@multco.us>

Mon, Jun 7, 2021 at 11:18 AM

EXHIBIT H.4
PC-2021-14207

----- Forwarded message -----

From: **Black Food NW** <bfscpx@gmail.com>

Date: Mon, Jun 7, 2021 at 10:54 AM

Subject: Submission by Mail of Testimony + Request to Testify - Edward Hill

To: <land.use.planning@multco.us>, <heidie.konopnickl@multco.us>

Cc: <bfscpx@gmail.com>, <edward@blacfoodnw.org>, <jamese@ecotrust.org>, <lauren.gwin@oregonstate.org>

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5020 NE MLK Jr Blvd. Ste. F
Portland, OR 97214

June 7, 2021

Multnomah County Planning Commission
1600 SE 190th Ave
Portland, OR 97233VIA EMAIL: heidie.konopnickl@multco.us

RE: Comments on Proposed Amendments to Multnomah County Code Section 39.4265(B)(3)

Dear Commissioners:

We, Black Food Sovereignty Coalition, appreciate the opportunity to comment in serious and severe opposition to the proposed removal of Multnomah County Code Section 39.4265(B)(3), which provides a customary farm dwelling option that is primarily used by new (Greenhorn) farmers entering the industry and family farms. BFSC is concerned about the removal of this provisions because it will limit an important housing opportunity for farmers in the County.

For background, the Black Food Sovereignty Coalition (BFSC) serves as a collaboration hub for Black and Brown communities in Oregon to confront the systemic barriers that make food, place and economic opportunities inaccessible to us. BFSC is focused on meeting these barriers with creative, innovative, and sustainable solutions. Built on a decade of food justice work of founding members of the Black Food Sovereignty Council and other Black-identified leaders and stakeholders in the Pacific Northwest, the BFSC mission is to ignite Black and brown communities to participate as owners and movement leaders within food systems, placemaking, and economic development. Today, BFSC represents nearly 150-members engaged in the food system in our region and 7 new farms in the county that need housing allowances to

make their future work. BFSC is the voice of BIPOC agriculture in Multnomah County, representing new and established farmers and growers of color who would be impacted by this proposal.

As stated earlier, the customary farm dwelling option that is proposed to be deleted by the County can be used by individuals new to the industry or those that hold small, but productive, operations. Specifically, it is available for those who are capable of producing the median level of annual gross sales, but whose farm is not located on high-value soils and is less than 160 acres, which is most of the farms in Multnomah County. Based upon recent NASS data, of the 600+ farms located in Multnomah County, the average size of a farm is just 39 acres, with over 50% of the farms in the County being between 1-9 acres.¹ Given the demographics of farming in Multnomah County, this housing option is one the County should actively retain and strengthen, not remove.

From a broader systemic perspective, it is unclear why Multnomah County would seek to remove an important housing option for People of Color when Oregon is taking profound steps to create more opportunities for housing in the state. Further, the County should be actively promoting our local food system as an economic growth tool. Oregon's farmers and ranchers continue to provide, through this disaster, the healthy food we depend on, and new BIPOC and other farmers bring the EQUITY of diversity into our food system. Removing this important housing option from code works against these important objectives and against equity.

Additionally, BFSC is seriously disappointed with the lack of outreach from Multnomah County to our BIPOC farming community when considering this proposal. BFSC and our partners can recount any outreach to farmers in the region about whether this housing option is important to the industry before it was proposed to be deleted. BFSC would welcome the opportunity to assist in evaluating the usefulness of this provision and to help resolve other implementation obstacles the County may be having in permitting dwellings under the code.

Further, we question the timing of this proposal as the industry tries to rebound from the devastating impacts of COVID-19, racial tensions, and economic trauma. Prior to COVID-19, producers were already under tremendous pressure – net income on farms is half of what it was five years ago, Oregon faces recent market collapses across several industries due to trade disruptions, new markets are collapsing, and long-time processor, NORPAC, recently closed. Market prices are at record lows across many commodities, and farmers are already grappling with significant recent regulatory costs imposed by the Oregon legislature and agencies.

At the same time, farming is seasonal in nature and cannot respond to changing market pressures overnight. Immediate impacts from COVID-19 included failure of markets for those who sell directly to restaurants, cancellation of markets and direct marketing opportunities many farms depend upon, closure of international markets to shipments due to the virus, and enormous pressure on the food system to shift processing and distribution from restaurant and food service to retail. Moreover, recent devastating wildfires and ice storms have caused immense loss for farmers around the state, including those in Multnomah County.

In short, Oregon's BIPOC and Non-POC farmers have been severely impacted by the historically unique challenges of this year, and our farmers and growers want Multnomah County's support at this critical time of the season.

This support should include the creation of more innovative and creative opportunities for farmers to affordably build housing types that support our local food economy, not the ending and removal of key

housing options necessary for the growth of this growing local industry.

Therefore, we urge the Commission to not move forward with the removal of Multnomah County Code Section 39.4265(B)(3).

Respectfully,

Edward Hill, Urban Planner
Co-Director/Land Use & Sustainability
Black Food Sovereignty Coalition

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Multnomah County

Department of Community Services - Land Use Planning Division

[1600 SE 190th Ave., Portland OR 97233](#)

T: 503-988-3043

Our public counter hours are: Tuesday - Friday, 8am - 4pm