

**Subject: Testimony re: HB 4153 House Committee on Agriculture, Land Use, Natural Resources and Water**

HB 4153 prompts my concern about how Oregon balances support for agricultural viability with the protection of farmland and rural communities. The bill represents a meaningful shift in land-use policy with implications that deserve careful, deliberate consideration—particularly for places like Sauvie Island.

**Key points of concern:**

1. **How current law keeps farm stands tied to farming.** Existing EFU regulations require farm stands to be closely connected to agricultural production. Seventy-five percent of sales must come from crops grown on the farm or nearby farms, with only limited incidental retail or fee-based activity allowed. Events are constrained and intended to remain secondary to crop sales, ensuring that farmland does not evolve into commercial—retail, events, non-agricultural—activity.
2. **Why those limits matter.** These standards protect the agricultural purpose of EFU land by preventing a gradual shift toward retail or entertainment uses. They help maintain a clear distinction between working farmland and commercially zoned property.
3. **Recognition of real economic pressure on farmers.** Many farmers understandably find the current framework challenging. Market conditions are difficult and margins are thin. Supporting farmers' economic viability is necessary.
4. **Misalignment with long-term agricultural sustainability.** Agritourism may provide short-term income, but it does not substitute for policies that sustain agricultural production itself. Without safeguards, the bill risks accelerating a transition from farming to commercial use rather than reinforcing the agricultural base it aims to support.
5. **HB 4153's shift away from production-based safeguards.** The bill removes existing revenue-based limits and replaces them with a broadly defined “farm store” use. Rather than regulating commercial intensity, the focus shifts to whether part of a parcel is in “farm use,” while allowing the remainder to support buildings, parking, and events without meaningful limits.
6. **Allowance of farm stores without on-site agriculture.** For EFU, MUA, and mixed farm and forest parcels under 20 acres, the bill permits farm stores even when no cultivation occurs on the parcel itself, so long as it operates “in conjunction with” a qualifying farm

elsewhere. This relationship is not clearly defined, nor is income required to derive from agricultural production on the parcel.

7. **Risk of expanding commercial activity on agricultural land.** The bill allows parcels with little or no farming activity to host retail and event uses potentially qualifying through income generated by operations elsewhere. Through affiliation with larger farm operations, this structure could enable multiple small parcels to qualify for farm stores even when little or no farming occurs on-site.
8. **Cumulative impacts that are difficult to manage locally.** Because the use would be permitted outright and control shifted from local to state, counties would have limited ability to evaluate cumulative effects or to deny or regulate the activities on the land itself. This makes local oversight and assessment of cumulative impacts much more challenging.
9. **Particular vulnerability of Sauvie Island.** Sauvie Island has a single access road used by existing commerce, school transportation, residents, visitors, and emergency services; heavy seasonal congestion; limited parking and narrow shoulders; and sensitive wildlife habitat. On an island with limited infrastructure, the combined effects of increased traffic, visitor volume, year-round events, and commercial activity will affect emergency access, working farms, ecological areas, and residents' quality of life. Is the prospective near-term gain worth the likely trade-off?
10. **Protecting land, communities, and farming livelihoods.** Oregon's farmland and the people who work it are essential to our rural economy and heritage. Policies intended to support agriculture should do more than provide temporary financial relief—they should strengthen active farming, maintain the integrity of the land, safeguard rural communities, and protect the ecological systems that sustain both farms and residents.

A healthy agricultural future depends on policies that actively sustain farming, support those who work the land, and preserve the communities, open spaces, and natural systems that make productive, rural landscapes possible. Thoughtful legislation must recognize and protect all these aspects.

Respectfully submitted,

Ruth Metz