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November 21, 2011

VIA EMAIL

Planning Commission
Multnomah County
c/o Chuck Beasley
Land Use and Transportation Program
1600 SE 190th Ave., Suite 116
Portland, OR 97233

Re: 2012 Work Program
Senate Bill 960 – Agri-Tourism Events

Dear Commissioners:

I represent Skyline Gardens, LLC and John and Renee Orlando. Skyline Gardens, LLC is an existing farm operation located in the Skyline Boulevard area of Multnomah County. We are writing to request that the Planning Commission prioritize Senate Bill 960 for consideration and implementation in the 2012 work program.

As you may know, Senate Bill 960 was adopted by the 2011 legislature to address an important issue affecting many farms in Multnomah County and the State of Oregon. Agricultural tourism events have become increasingly critical to the promotion and economic viability of farming operations throughout Oregon. While many farms have been conducting these events for years, they have recently become more controversial given their regulatory uncertainty. This led to a number of complicated enforcement actions and legal challenges. Senate Bill 960 was a bipartisan effort intended to formally legalize these events and provide counties clearer regulatory authority.

Skyline Gardens, LLC believes that the Planning Commission should prioritize implementation of Senate Bill 960 for three primary reasons. First, the legislature clearly intended for counties to prioritize this issue. Senate Bill 960 was passed pursuant to an emergency clause that made it effective on its passage.

Second, it would greatly benefit Skyline Gardens, LLC and similarly situated farms in Multnomah County that want to pursue approvals for agricultural tourism events for 2012. Like to other farms in the County Skyline Gardens, LLC is currently processing a farm stand permit application to allow for promotional events such as farm tours and farm to table dinners, but the farm stand permit process is somewhat restrictive and cumbersome. Senate Bill 960 provides a clearer and more effective means for regulating these types of events. Since these types of

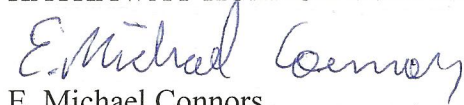
promotional events typically start in the Spring, the Planning Commission should make Senate Bill 960 a priority so that it can be adopted in time to allow farms to obtain the necessary land use approval for these events in the Spring of 2012. In order to meet that timeframe, it is important that Senate Bill 960 be prioritized.

Third, the County benefits from adopting local regulations implementing Senate Bill 960 to ensure that local standards can be applied. We advised the County that we believe Senate Bill 960 applies directly to the County and does not require that an applicant wait for local implementation in order to obtain approval for agricultural tourism event. If an applicant were to pursue approval of agricultural tourism events directly under Senate Bill 960, the County would not be able to apply any local standards because Senate Bill 960 has not been formally implemented into the Multnomah County Code. It would be better for both the County and the applicant if there were clearly defined local standards in the Multnomah County Code for these types of events.

We appreciate your consideration of our request and hope that you will agree to prioritize implementation of Senate Bill 960 as part of the 2012 work program.

Very truly yours,

HATHAWAY KOBACK CONNORS LLP

A handwritten signature in blue ink that reads "E. Michael Connors". The signature is written in a cursive, flowing style.

E. Michael Connors

EMC/df