

Friends of French Prairie

Friends of French Prairie
is an Oregon non-profit corporation

PO Box 403 | Donald, Oregon 97020 | www.friendsoffrenchprairie.org



February 6, 2020

Karla Valness
Oregon Department of Agriculture

Re: Comments regarding Resolution 310

Greetings;

I write on behalf of Friends of French Prairie, a land use advocacy organization in the north Willamette Valley, focusing on French Prairie: Oregon's historic and agricultural heartland. This letter concerns the siting of agri-tourism, *entertainment activities and associated activities on agricultural lands*.

We have been involved in a ten-year long opposition to the expansion of the Aurora State Airport which has dutifully ignored the impacts of this undertaking on local agriculture, in spite of the requirement to do so by the Statewide Planning Goals. This has made us particularly aware of such negative impacts of non-farm developments on agriculture, and we recently worked with a member who is the largest fresh vegetable grower in the north Willamette Valley and farms on both sides of the airport to assess the potential financial impact. See Attached white paper.

The above is certainly not agri-tourism, but our area of concern is French Prairie, the north end of the Willamette Valley, just south of metro Portland. Being just outside Metro's UGB means constant pressure for development and non-farm activity. The Aurora Airport expansion is an example, which has also only minimally addressed the consequences of urban-level uses, such as traffic, water and sewer impacts, noise and quality of life impacts, etc.

Friends of French Prairie supports the Oregon State Board of Agriculture's Resolution, particularly the definition of "strictly defined circumstances" for uses related to entertainment and tourism, and the emphasis placed on determinations "directly related to commercial farm use or processing activities occurring on the subject farm or ranch operation."

We concur that agri-tourism should be subordinate to farm use, and that compatibility evaluations should be vigorous and thorough to protect our farmlands from non-farm activities. Such activities should occur in rural towns where the infrastructure is in place to handle traffic and people, and possess the necessary public services to manage the related impacts.

Sincerely

A handwritten signature in blue ink that reads "Benjamin D Williams". The signature is written in a cursive style and is positioned above a light grey rectangular stamp.

Benjamin D Williams

Friends of French Prairie

AURORA FARMS

October 9, 2019

IMPACT OF CLOSURE OR REROUTING OF KIEL ROAD ON AURORA FARMS

Aurora Farms is a fresh market vegetable farm located in French Prairie, and farming approximately 200 acres of EFU farmland. Approximately 100 acres is on the west side of the Aurora Airport, west of Lower Boones Ferry Road, and another approximately 100 acres is located on the east side of the Airport, directly east of Airport Road.



Historically, Kiel Road has provided east to west access from one side of the Aurora Airport to the other, allowing avoidance of the two major arterials, Arndt Road (to north) and Ehlen Road (to south). This access road has become increasingly important as overall traffic has increased

on both arterials, and made moving farm machinery a hazard to equipment operators and vehicle drivers.

Aurora Farms is a major part of the local agricultural economy, with approximately \$2 million in annual revenue, and employing approximately 25 farm workers plus management in the summer, and six to eight farm workers plus management in the winter. With an average farm worker wage (fully burdened) of \$16.50, it is a major part of the local economy. All washing, packing, cooling and cold storage plus shipping docks are on the west side,.

Farming operations of both sides of the airport rotate fresh vegetables year-round in small plots, thus requiring ingress and egress year-round for soil preparation and harvesting. To farm this much land, Aurora Farms owns 14 tractors, 5 of which carry specialized implements (plows, chisels, harrows, etc.) that must move from plot to plot on a weekly or bi-weekly schedule and thus side to side of the Aurora Airport. Besides moving slower than traffic on any local roads, many of these implements are wider than a single lane of traffic. Some implements have already been forced to be duplicated (i.e. permanently located on one side of the airport or another) due to traffic and associated potential vehicular accident risks.

Equipment and Employee Travel Times

- Current tractor time to move from east side to west side, or back is approximately 15 minutes during non-peak hours.
- Current truck and bus time to move from east side to west side, or back is approximately 8 minutes during non-peak hours.

Harvesting crews make an average to two side-to-side trips per day, each generating two vehicle trips. With 5 one-ton trucks for harvesting, that results in 20 vehicular trips per day.

Management make an average of 5 side-to-side trips per day resulting in 10 vehicular trips per day.

Farm Supervisors make an average of 3 side-to-side trips per day, resulting in 6 vehicular trips per day.

Irrigation crews make an average of 3 side-to-side trips per day, resulting in 6 vehicular trips per day.

Employee movement occurs by a small school bus (carrying 9-10 workers) and a large cargo van (carrying 7-8 people) and both make an average of 2 side-to-side trips per day, resulting in 8 vehicular trips per day.

Rerouting of Kiel Road south to join Ehlen Road would make Kiel Road unusable for local farming purposes because of the increase in traffic and congestion that would occur at the intersection of Kiel and Ehlen Roads, in addition to the congestion already existing at Hwy 551 and Ehlen Road. Farm equipment usage on Ehlen Road would significantly increase safety risks for employees and for vehicle operators. Rerouting of Kiel Road would require Aurora Farms to

reroute its tractor and truck operations north on Boones Ferry Road, through the signaled Hwy 551 and Arndt Road intersection, then east to Airport Road, through that signaled intersection, and then south on Airport Road.

Estimated increases in travel times are:

- Tractors: 36 side-to-side moves per year generating 72 vehicular trips x 4.5 tractors =324 vehicular trips @ an additional 15 minutes of travel time = 4,860 minutes per year
- Trucks, bus and van: 17 side-to-side trips per day generating 34 vehicular trips 260 days per year = 9,100 vehicular trips @ an additional 8 minutes travel time = 72,800 minutes per year.
- Management truck trips: 5 side-to-side trips per day generating 10 vehicular trips per day 260 days per year = 2,600 vehicular trips @ an additional 8 minutes travel time = 20,800 minutes per year.

Total additional travel time incurred by relocation of Kiel Road = 98,460 minutes or 1,641 hours per year. At the average farm worker hourly wage of \$16.50 (not counting extra labor cost for Supervisor or Manager), **this results in over \$27,000 in additional annual expense.** Additional to the added expense incurred for the time spent detailed above, is the opportunity cost of having work crews that could be generating income not able to do so.

Because of the location of the packing, washing and cooling facilities on the west side, only tractor and implement trips can only be mitigated by duplicating equipment on both sides, an untenable capital cost increase. Replicating the washing, packing, cooling and cold storage facilities on the east side is such a large capital expense that it likewise would be cost prohibitive.

It should also be noted that there are five other farming ventures around the Aurora Airport that use Kiel Road to avoid the arterials with all the traffic congestion.

Both Aurora Farms farm locations are comprised of farmland with Class I and Class II soils, principally Amity silt loam and Willamette silt loam. Nonetheless, this is a tough business in the best of times. The proposed expansion of the Aurora State Airport may render it untenable.

It would be one thing if the threat were posed by a private developer. However, for the threat to come from the State of Oregon itself, the laws of which are intended to protect and promote agriculture outside the Urban Growth Boundary, is uniquely shameful and deeply disturbing.

Raymond (Mike) Iverson
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