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To: [Greg Faust](#); [Public Comment](#); [Information](#)
Cc: [Asa Leckie - Skamania County](#); [Rob Farris - Skamania County](#); [Brian Nichols - Skamania County](#)
Subject: Agriculture Income Test - Columbia Gorge Scenic Area
Date: Monday, August 18, 2025 10:31:16 PM

LETTER OF CONCERN

RE: Columbia River Gorge Commission Agricultural Income Test - Regional Economic Exclusion

EXECUTIVE SUMMARY

I am writing to express concern regarding the Columbia River Gorge Commission's Agricultural Income Test, which requires \$94,527 in gross annual income (2024) for agricultural dwellings. This regulation creates insurmountable barriers for most residents in our region while systematically preventing economic mobility and agricultural innovation. Current economic data demonstrates that this policy excludes 60-75% of regional households from agricultural opportunities, creating economic discrimination that violates constitutional principles while undermining the very agricultural preservation goals it purports to serve.

REGIONAL ECONOMIC IMPACT DATA

The Income Test Excludes the Majority of Regional Residents

Wasco County, Oregon:

- Median household income: \$63,602 (2023)
- **Income test creates \$30,925 gap (49% below requirement)**
- Poverty rate: 12.9% of population, with 17.7% of children in poverty
- **Estimated 75-80% of households excluded from agricultural opportunities**

Klickitat County, Washington:

- Median household income: \$70,400 (2023)
- **Income test creates \$24,127 gap (25% below requirement)**
- Poverty rate: 14.7% of population
- **Estimated 60-70% of households excluded from agricultural opportunities**

Skamania County, Washington:

- Median household income: \$90,085 (2023)
- **Income test creates \$4,442 gap (5% below requirement)**
- **Estimated 45-55% of households excluded from agricultural opportunities**

Who Is Being Excluded?

The \$94,527 requirement systematically excludes:

Working Poor and Lower-Middle Class:

- Seasonal agricultural workers (\$25,000-\$40,000 annually)
- Tourism and service industry employees (\$30,000-\$45,000)
- Teachers and public employees with stable but moderate incomes

- Healthcare workers in rural facilities
- Single-parent households managing childcare costs

Middle-Class Families:

- Government employees at county and state levels (\$50,000-\$75,000)
- Small business owners in tourism and service sectors
- Skilled trades workers in construction and maintenance
- Dual-income households with combined moderate earnings

Nearly Universal Exclusion:

- 100% of residents living in poverty
- 100% of beginning farmers without established operations
- 100% of young adults from local families seeking agricultural careers
- 100% of veterans wanting to apply agricultural training locally

LOST ECONOMIC OPPORTUNITIES

Agricultural Enterprises Prevented by Income Test

Small-Scale Agricultural Ventures (\$15,000-\$50,000 annual potential):

- Market gardening operations serving local restaurants
- Specialty crop production (berries, herbs, flowers, organic produce)
- Agritourism enterprises leveraging scenic location
- Value-added processing (farm kitchens, craft beverages, artisan products)

Agricultural Service Businesses (\$25,000-\$75,000 annual potential):

- Custom farming services and equipment rental
- Agricultural consulting for organic transition
- Farm management services for absentee landowners
- Agricultural education programs for schools and community groups

Cooperative Agricultural Ventures (\$40,000-\$80,000 per participant):

- Community Supported Agriculture (CSA) operations
- Agricultural cooperatives sharing resources and markets
- Community commercial kitchens for value-added processing

Economic Multiplier Effects Lost

Each prevented agricultural enterprise eliminates:

- 2-4 direct jobs in agricultural production
- 3-6 indirect jobs in supporting services
- \$50,000-\$200,000 annually in local economic circulation
- Property tax revenue from productive agricultural use
- Tourism revenue from agritourism experiences

CONSTITUTIONAL AND CIVIL RIGHTS CONCERNS

Equal Protection Violations

The income test creates wealth-based discrimination that violates constitutional equal protection guarantees:

- **Systematic exclusion** of working families from economic opportunities
- **Arbitrary income barriers** unrelated to legitimate regulatory purposes
- **Perpetuation of economic stratification** between wealthy landowners and service workers
- **Denial of economic mobility** pathways traditionally provided by agriculture

Due Process Violations

The regulation fails constitutional due process requirements:

- **No rational relationship** between \$94,527 income and agricultural preservation
- **Arbitrary inflation indexing** without economic impact analysis
- **Failure to consider** regional economic conditions and market realities
- **Prevention of legitimate business formation** through excessive restrictions

Civil Rights Implications

The income test creates disparate impact on protected classes:

- **Women farmers** operating smaller, diversified operations
- **Beginning farmers** under age 35 lacking established income streams
- **Disabled residents** on fixed incomes categorically excluded
- **Minority agricultural entrepreneurs** facing additional barriers to land access

COMMUNITY AND REGIONAL HARM

Workforce Development Crisis

Youth Out-Migration Evidence:

- Regional median ages (Klickitat: 47.5, Skamania: 48.6) indicate aging population
- Young adults from agricultural families cannot start local farming operations
- College graduates cannot return to region for agricultural careers
- Military veterans cannot apply agricultural training in home communities

Agricultural Sector Stagnation

Current Negative Trends:

- Limited farm succession as next generation cannot meet requirements
- Agricultural land speculation rather than productive use
- Loss of agricultural knowledge and traditional farming practices
- Reduced agricultural innovation and sustainable practice adoption

Community Economic Health Deterioration

Economic Diversity Reduction:

- Tourism dependency without agricultural entrepreneurship options
- Limited business formation and local ownership opportunities
- Service sector employment trap preventing economic mobility
- Wealth concentration as only high-income residents access agricultural land

FEDERAL AND STATE POLICY CONFLICTS

Federal Program Conflicts

The income test undermines:

- USDA Beginning Farmer and Rancher Development Programs
- Rural Business Development grants supporting agricultural enterprises
- Economic development initiatives targeting rural poverty reduction
- Agricultural workforce development programs requiring farm residence

State Policy Conflicts

Oregon:

- Rural economic development strategies promoting agricultural diversification
- Anti-poverty initiatives supporting economic mobility pathways
- Workforce development goals for agricultural sector growth

Washington:

- Rural economic development programs supporting agricultural entrepreneurship
- Poverty reduction initiatives requiring economic opportunity access
- Community development goals for inclusive economic growth

REQUESTED ACTIONS

Immediate Actions Requested

1. **Emergency suspension** of the income test pending economic impact analysis
2. **Public hearings** in each affected county on the regulation's economic impact
3. **Comprehensive review** of alternatives supporting regional economic inclusion
4. **Economic impact assessment** analyzing effects on working families and regional development

Long-Term Reform Recommendations

County-Specific Income Standards:

- Wasco County: \$50,000 (80% of median household income)
- Klickitat County: \$55,000 (80% of median household income)
- Skamania County: \$70,000 (80% of median household income)

Economic Development Incentives:

- 5-year income test exemption for beginning farmers
- Graduated income requirements for new agricultural ventures
- Business plan review option instead of income history requirements
- Cooperative enterprise allowances for shared agricultural ventures

Community Benefit Standards:

- Reduced requirements for operations providing local employment
- Educational program integration with agricultural training
- Social enterprise allowances for operations serving disadvantaged populations

THE CHOICE BEFORE US

The Columbia River Gorge Commission and county commissioners face a fundamental choice:

Continue the current path of economic exclusion that:

- Excludes 60-75% of regional residents from agricultural opportunities

- Creates agricultural gentrification accessible only to the wealthy
- Accelerates rural economic decline and youth out-migration
- Violates constitutional principles of equal protection and due process

OR

Embrace inclusive agricultural policies that:

- Support working families in building agricultural enterprises
- Provide genuine economic mobility pathways for regional residents
- Revitalize rural agriculture through innovation and community investment
- Preserve agricultural character through productive use rather than speculation

CONCLUSION

True agricultural preservation requires economically accessible opportunities for regional residents, not artificial barriers that exclude working families while hollowing out rural communities.

I urge considering the impact of these concerns and look forward to working collaboratively on solutions that support both agricultural preservation and regional economic vitality.

The data is clear: **the current income test creates systematic economic discrimination while undermining the agricultural preservation and community vitality goals we all share.**

Respectfully submitted,

Thank you

Greg Faust