

Memorandum

To: Aaron Ray, Planning Director
From: Dylan Giliberto
Date: December 5th, 2025
Subject: Healthy Food Policy Code Update Recommendations

Introduction

This memo will propose a number of changes to the Cottage Grove city code in line with recommendations from the Healthy Food Policy Project's [Zoning for Urban Agriculture](#) guide. This 2024 guide offers a number of ways that a city can modify its development code to increase access to urban agriculture and healthful food. Clarifying agricultural definitions, more explicit mentions of agriculture, and other modifications to allow for these commercial operations in non-commercial zones are just some of the ways the report suggests updating the code.

Project Scope

This project proposes updates to both the city code and to the [Cottage Grove Comprehensive Land Use Plan](#). With guidance from the [Zoning for Urban Agriculture](#) guide and the [Cottage Grove 2037 Vision and Action Plan](#), these proposals will aim to remove barriers and further encourage Cottage Grove community members to pursue urban agriculture, specifically in R-1 and R-2 zones. Some of the proposed changes in this memo may support or increase access to urban agriculture in other city zones, but the main focus will be specifically in low and medium density residential areas of Cottage Grove.

The city may wish to take further action to support urban agriculture with new legislation, however this issue will not be addressed as a part of this project. Instead, the focus will remain on updating the development code and the comprehensive plan.

Background

Many of these policy changes are in-line with what the City of Cottage Grove has already committed to, either through its comprehensive plan or through its [Cottage Grove 2037 Vision and Action Plan](#). Together, these two documents should guide the updates the city staff proposes as they are an indication of the community and city councils vision. Additionally, a lack of support in the comprehensive plan should not be the end of a code update proposal if support can be found in another document, such

as the 2037 vision. While these visions are not binding, they are adopted more frequently than comprehensive plans are, and can absolutely be used as a guide for updating both the city code and comprehensive plan.

First, the comprehensive plan does not specifically address the topic of urban agriculture or equity. It does, however, indicate that the 2037 vision should “inform and provide support” for economic development.

The 2037 vision does provide direct support for these code updates. The vision outlines a number of strategies for accomplishing various goals. Strategy 17 states that the city should “forge a stronger connection between local agricultural producers, products and consumers with an emphasis on supporting organic practices and products.” This strategy is part of the larger goal of “Preserving and Promoting Environmental Assets.” Some of the specific ideas mentioned include a larger, permanent farmers market, school-based food production, and “community supported agriculture.” This makes it clear that the city has already intended to expand support for increasing food production, and that a comprehensive plan update may be in order alongside the code updates.

Takeaways from HFPP

The Healthy Food Policy Project offers many suggestions on how a development code can be modified to support urban agriculture. Below is refined list of key suggestions that may be most impactful in the City of Cottage Grove:

1. Specify which zones permit urban agriculture and what specific activities are allowed
2. Allow on-site sales
3. Allow accessory structures to support production
4. Promote equity/access in the zoning code

Using these suggestions as a guide, this memo will propose a number of changes to the comprehensive plan and development code.

Proposed Comprehensive Plan Amendments

In order to bring the 1980 comprehensive plan up to date with more recent city visions, and to provide support for the development code amendments, the following changes are proposed.

1. Add a “Specific Element” on equity

Unlike most newer comprehensive plans often found in other Oregon cities, the City of Cottage Grove's 1980 comprehensive plan does not address the issue of equity. If the city wishes to operate in a way that creates equitable outcomes for its residents, then the comprehensive plan must address this topic so that a guideline exists for future work.

Additionally, equity is a central reason to implement code changes to support urban agriculture. In its [Equity in Zoning Policy Guide](#), the American Planners Association lists "the availability of affordable, healthy, and culturally appropriate food" as a core aspect to addressing public health in zoning.

This amendment is intended to address the lack of support or direction provided by the comprehensive plan in regards to equity. Furthermore, support is lacking in the 2037 Vision, indicating that this would be a new but very important policy direction for the City of Cottage Grove. This change would provide support and guidance to not only the following code proposal, but to any future city projects that aim to create more equitable outcomes for Cottage Grove residents or undo histories of harm, oppression, and exclusion.

2. Add a "Specific Element" on Urban Agriculture

While support for urban agriculture can be found in some aspects of the existing comprehensive plan, the 2037 vision document, and existing development code, the City of Cottage Grove could send a clear message to the community that it intends to increase access to urban agriculture by updating the comprehensive plan.

This section, backed by the previous proposal on equity, would provide extra room for city staff to act according to the *Zoning for Urban Agriculture* guide and to greatly ease the process of establishing an urban agriculture use in residential areas.

Proposed Code Amendments

The following proposed changes or additions to the city development code are intended to either clarify rules which impact urban agriculture in R-1 and R-2 zones, to add rules that remove barriers to urban agriculture, or remove/modify rules that impose barriers to urban agriculture. Each proposed modification stems from suggestions in the aforementioned [Zoning for Urban Agriculture](#) guide, but is adapted to fit within the Cottage Grove development code. While there are a number of ways in which the existing code already caters to urban agriculture, there is certainly room to make the code more legible and accommodating to this use.

1. Cottage Industry Permits

14.49.200.A Cottage Industry Permits

The purpose of this Section is to encourage those who are engaged in small commercial ventures that do not conform to the Special Standards for Certain Uses in Section 14.22.200, G. Home Occupation. The standards referenced above allow home occupations as outright permitted uses that do not require Type III Cottage Industry Permit Review.

Section 14.49.200.C outlines a Cottage Industry Permit exemption process for uses that can be described as urban agriculture. This is to encourage urban gardening, farming, and food production in Cottage Grove.

14.49.200.C

A proposed cottage industry on an R-1 or R-2 zoned property with the sole purpose of planting, growing, and harvesting food crops, or raising livestock permitted in section 14.22.200.L, is not subject to approval of a cottage industry permit. These cottage industries may be operated for either personal or commercial purposes. Any additional structures for the purpose of the cottage industry will still be subject to relevant development code. Additionally, this exemption does not cover operations involving the preparation or serving of prepared or hot foods.

14.22.110 Residential Districts – Allowed Land Uses

Commercial Categories	Residential Restricted (R)	Low Density Residential (R-1)	Medium Density Residential (R-2)	Mobile Home Park (MHP)	High Density Residential (R-3)	Residential Commercial (RC)
Cottage Industry, per Section 14.22.200 and 14.49.200	CU+S	CU+S	CU+S	CU+S	CU+S	CU+S
<u>Urban Agriculture Cottage Industry, per Section 14.49.200.C</u>	<u>CU+S</u>	P	P	<u>CU+S</u>	<u>CU+S</u>	<u>CU+S</u>

Findings

The Cottage Industry section of the development code (14.49.200) already allows for and encourages some appropriate industrial uses in residential zones. Generally, urban agriculture will be a lower-impact use compared to many other industrial uses, meaning that exempting these uses from the permit process should not raise major concerns. The cottage industry idea is an innovative and unique aspect to the Cottage Grove development code that already has support in the comprehensive plan, and these changes should not require any additional support. Regardless, the proposed amendments to the comprehensive plan and the city's 2037 vision provide support for relaxing requirements around urban agriculture, and this modification should make it significantly easier for Cottage Grove residents to produce agricultural products at their home.

2. Temporary Use Permits for Farm Stands

14.49.100 Temporary Use Permits

Temporary uses are characterized by their short term or seasonal nature and by the fact that permanent improvements are not made to the site. Temporary uses include, but are not limited to: construction trailers, leasing offices, temporary carnivals and fairs, parking lot sales, retail warehouse sales, seasonal sales such as Christmas tree sales ~~and vegetable stands~~, medical hardships, ~~and food carts~~, and farm stands. Five types of temporary uses require permit approval, and one requires no permit (See A, B, C, D, ~~and E~~, and F):

14.49.100.F Farm Stands

Temporary farm stands may be permitted in R-1 and R-2 zones for the purpose of selling urban agriculture products. No temporary use permit is required to operate a farm stand, provided all of the following criteria are satisfied:

1. The property is zoned either R-1 or R-2;
2. The farm stand will not be an enclosed structure, or provide raised flooring;
3. Commercial operations take place only between 8am and 8pm;
4. The farm stand will not require any water or sewer connections;
5. The farm stand will not sell prepared foods, hot foods, or anything other than agricultural products;
6. All products sold at the farm stand will have been produced on the property that the stand is located at;

7. The use will pose no impediment or hazard to pedestrians in the area of the use;
8. The use does not create adverse off-site impacts including vehicle traffic, noise, odors, vibrations, glare or lights that affect an adjoining use in a manner which other uses allowed outright in the district do not affect the adjoining use;

Findings

Ample support for this modification to allow temporary farm stands can be found in both the comprehensive plan and the 2037 vision document. First, the comprehensive plan states that it is the city’s goal to “encourage opportunities to broaden our economic base,” and allowing low-impact commercial uses in residential zones is an excellent way to achieve this goal. Next, strategy 13 in the 2037 Vision states that the city should “support existing, and recruit a complementary range of, small, medium and large businesses representing a range of sectors to ensure local economic stability.” Allowing aspiring and existing small business owners to locate their point of sale operation on a property they already own eliminates a tremendous barrier to running an urban agriculture business.

Additionally, this change is supported by existing development code. The previous code amendment proposal dealt with Cottage Industries (14.49.200), and 14.49.200.A states that “...benefits to the business owner and to the general public include a reduced number of commute-to-work trips, day-time ‘eyes on the street’ at the residence, and a neighborhood-scale version of mixed residential and commercial uses.”

The proposed limitations on farm stands (outlined above in 14.49.100.F.1 - 8) should mitigate most concerns around operating small-scale commercial operations in a residential area and should maintain a small-scale structure and sale volume appropriate to the R-1 and R-2 zones.

3. Residential Land Use for Farm Stands

14.22.110 Residential Districts – Allowed Land Uses

Other Categories	Residential Restricted (R)	Low Density Residential (R-1)	Medium Density Residential (R-2)	Mobile Home Park (MHP)	High Density Residential (R-3)	Residential Commercial (RC)

-- Temporary Residential Trailers	S	S	S	S	S	S
-- Temporary Fireworks Sales	N	N	N	N	N	CU
-- Christmas Tree Lots	N	N	N	N	N	CU
-- Similar uses	N	N	N	N	N	CU
-- Temporary Food Vendors (not enclosed in building)	N	N	N	N	P	P
-- <u>Temporary Farm Stands</u>	<u>N</u>	<u>S</u>	<u>S</u>	<u>N</u>	<u>N</u>	<u>N</u>

Findings

The findings from the previous proposed code change are applicable to this proposed amendment as well. The comprehensive plan, 2037 vision, and existing city code all provide support for this code update.

4. Development Standards for Urban Agriculture Structures

14.22.120 Residential Districts – Development Standards

Standard	Residential Restricted (R)	Low Density Residential (R-1)	Medium Density Residential (R-2)	High Density Residential (R-3)	Residential Commercial (RC)
<p>Minimum Setbacks (feet): (See also Sections 14.22.130, setback yards; 14.22.140, infill standards; 14.22.170, R/R-1 height step-down; 14.31.200, clear vision, and 14.32.500, Fences and Walls.)</p> <p>Front/Street Setback</p>					

<u>Greenhouses, agricultural storage sheds, compost bins, farm stands</u>	<u>N/A</u>	<u>2 ft</u>	<u>2 ft</u>	<u>N/A</u>	<u>N/A</u>
<u>Other Structures</u> except garage/carport entries	10 ft	10 ft	5 ft	5 ft	5 ft
Side Setback, except alleys (total of 2 sides)					
<u>Greenhouses, agricultural storage sheds, compost bins, farm stands</u>	<u>N/A</u>	<u>2 ft per side</u>	<u>2 ft per side</u>	<u>N/A</u>	<u>N/A</u>
Rear Setbacks, except alley					
<u>Greenhouses, agricultural storage sheds, compost bins, farm stands</u>	<u>N/A</u>	<u>2 ft</u>	<u>2 ft</u>	<u>N/A</u>	<u>N/A</u>
Alley Setbacks					
<u>Greenhouses, agricultural storage sheds, compost bins, farm stands</u>	<u>N/A</u>	<u>2 ft</u>	<u>2 ft</u>	<u>N/A</u>	<u>N/A</u>

Findings

While support may be found in the comprehensive plan, 2037 vision document, or existing code in the same way that previous findings have, this code amendment would be best supported by the second proposed comprehensive plan update on urban agriculture. This amendment would show that the Cottage Grove City Council supports urban agriculture, and does not see these uses as a nuisance. This proposed development code update would dramatically increase the flexibility that residents in R-1 and R-2 zoned areas have to construct structures necessary for their urban agriculture uses.

5. Max. Building Coverage Provisions

14.22.120 Residential Districts – Development Standards

Standard	Residential Restricted (R)	Low Density Residential (R-1)	Medium Density Residential (R-2)	High Density Residential (R-3)	Residential Commercial (RC)
Max. Building Coverage	50%	50%	60%	N/A	60%
<u>Max. Building Coverage for Urban Agriculture Structures (in addition to overall max. Building coverage)</u>	<u>N/A</u>	<u>10%</u>	<u>10%</u>	<u>N/A</u>	<u>N/A</u>

14.22.160.A Lot Coverage Calculation

The maximum allowable lot coverage shall be as provided in Table 14.22.120. Lot coverage is calculated as the percentage of a lot or parcel covered by buildings or structures (as defined by the foundation plan area) and other structures with surfaces greater than 30 inches above the finished grade. It does not include paved surface-level developments such as driveways, parking pads, and patios. See subsection B, Impervious Surfaces. Additionally, urban agriculture related structures such as greenhouses, storage sheds, compost bins, and farm stands are excluded from the total maximum allowable lot coverage. Instead, these structures are granted a separate, additional maximum lot coverage percentage, outlined in Table 14.22.120. This means that these structures may be constructed even when the general max. building coverage has already been reached.

Findings

This proposed development code amendment, similarly to the previous one, does not have adequate support from existing city documents. Instead, this proposal would be best backed by the second proposed comprehensive plan update.

Engagement Overview

These proposed updates are unlikely to cause significant negative impact, but they still do bring changes to what can or cannot be done in R-1 and R-2 zones. It is important that a community engagement campaign is carried out as a part of this project to ensure that no major oversights have been made in possible impacts, to learn from

the community what other ways the city can improve access to urban agriculture, and to inform the community of the new ways they may be able to use their properties in the future.

In addition to typical open houses and surveys, which should be conducted, there are many ways in which Cottage Grove can be creative with this outreach process. As an example, a demonstration could be carried out showing all of the different ways that this project may impact a given residential property. Local hardware or agricultural suppliers would likely be willing to lend the city a greenhouse, garden shed, compost bin, and/or garden beds in order to set up this example urban farm. Residents could be invited to tour the demonstration, consider potential impacts, ask questions, and provide feedback.

In line with the existing language on community engagement in the comprehensive plan, and the proposed additions on equity, the city should make every effort to reach all members and groups within the Cottage Grove community. As a major driver of this project is the desire to reduce inequities and increase access to healthful food and economic opportunities, it is imperative that every member of the community has a fair chance to participate.

Adoption Process

Ideally, the proposed amendments will be workshopped by the Cottage Grove community, city staff, and by the city council before the time comes to formally propose the amendments.

Once the amendments are ready for official consideration, a type IV process will need to take place, in which the city council will consider and either approve or deny the proposed amendments, per 14.47.200 Legislative Amendments.

The work of this project should not end upon approval of the proposed changes. The city should continue to inform, educate, and encourage the community to take advantage of the changes.

Conclusion

If enacted, these changes have the possibility to spur a process that would reshape the way many Cottage Grove community members eat, shop, and work. It could lay excellent groundwork for this evolution, and could even set an example for nearby municipalities that have not yet taken the same step.

This memorandum is just a first step towards increasing the prevalence of urban agriculture in Cottage Grove. The proposed comprehensive plan amendments will send the message that the city is committed to equity, and more specifically, intends to increase access to healthful food and small-scale economic opportunity. The proposed

development code changes will begin to put some of this vision into action. Continued support, review, and updates will be essential to sustain any momentum in this movement.

Finally, urban agriculture is just one of countless ways that Cottage Grove can promote equity and public health within the community. Further similar projects should be undertaken, and additional changes can and should be made to city documentation and legislation to further these goals in other areas