Hannah Elliott

From:Tami MacLeod <tmacleod@lynchmurphy.com>Received by CrookSent:Wednesday, January 17, 2024 2:22 PMCounty PlanningTo:Plan1/17/2024

Cc: Katie McDonald

Subject: Huston File No. 217-23-001215-PLNG

Attachments: 01 17 2024 Ltt Planning Commission-rebuttal.pdf; Ex A Access Map.pdf; Ex B Event

Log.pdf; Ex C detailed logs and photos.pdf; Ex D map.pdf; 01 17 2024 Decl of David Orr

Rebuttal.pdf

Good afternoon -

Please accept the attached as the Orrs' rebuttal submittal.

Respectfully,

TAMI MACLEOD
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LYNCH MURPHY MCLANE LLP ATTORNEYS AT LAW

Tami MacLeod tmacleod@lynchmurphy.com 541-383-5857 office line

January 17, 2024

VIA EMAIL ONLY

Crook County Planning Commission Attn: Katie McDonald, Senior Planner 300 NE 3rd Street Prineville, OR 97754

Subject: Applicant/Property Owner :

Gregory and Karen Huston

File Number

217-23-001215-PLNG

Dear Commissioners and Planning Staff:

Enclosed is the rebuttal submittal on behalf of our clients David and Joanne Orr (Trustees of the David and Joanne Orr Trust), owners of real property located at 8892 NW Campbell Ranch Road, Prineville, Oregon ("Orr Property").

Respectfully submitted,

/s/ Tami MacLeod Tami MacLeod



Tax Lot 14152000-00600-15820 with Full View of Access Road



Orr Property

Existing Buildings and Structures

EVENT LOG

2021

4 OR 5 EVENTS WERE HELD AT CAMPBELL RANCH ROAD DURING 2021. THE WEDDING IN SEPTEMBER OF 2021 WAS SO INVASIVE TO OUR PRIVACY AND ENJOYMENT OF OUR PROPERTY THAT WE CONTACTED THE COUNTY TO UNDERSTAND IF AND WHAT THE PERMIT WAS. WE DID NOT FILE A COMPLAINT BECAUSE WE FELT THE COUNTY WOULD STOP THE EVENTS BECAUSE THERE IS NO PERMIT OR CUP THAT IS RELEVANT TO THEIR USE. ANY USE NOW OR IN THE PAST 20 YEARS HAS NO VALIDITY TO THE CUP BETWEEN PETER KING AND THE CROOKED RIVER DINNER TRAIN. WE WERE TOLD BY THE EVENT PLANNERS IN SEPTEMBER THAT THEY HAD 12 PLUS EVENTS SCHEDULED FOR 2022.

2022

EVENT#1 ON 4/21/22 SPOKE WITH A PERSON DELIVERING TABLES AND CHAIRS FOR THE WILDLAND FIREFIGTHERS FUND RAISER EVENT SCHEDULED FOR 5/7/22. NOTIFIED THE COUNTY IMMEDIATELY. LEGAL REFUSES TO TAKE A POSITION AS TO THE STANDING OF THE 1992 CUP FOR THE UPCOMING EVENTS. WE MET WITH WILL VANVACTOR AND JOHN EISLER ON 4/29. THEY INFORMED US THAT HUSTONS (OWNERS OF THE RANCH)HAVE HIRED AN ATTORNEY AND ADVISED US TO DO LIKEWISE. SET UP FOR THE 5/7

EVENT BEGAN 5/3. NON FARM TRAFFIC BEGAN WITH DELIVERY OF OUTHOUSES, TENTS, PEOPLE TO SET UP, ETC. THE EVENT HAD NON FARM VEHICLES ARRIVING AT 7:00AM AND CONTINUED UNTIL 10:30 PM. SOME STAYED OVERNIGHT. THE NUMBER OF CARS WAS WELL OVER 200 ON THAT DAY ALONE. CATERING TRUCKS (3) BAND VEHICLES AND GUESTS ALL NON FARM USE! THIS EVENT WAS OPEN TO THE GENERAL PUBLIC AND WAS MUCH LARGER THAN THE 2021 EVENT. THE NOISE FROM ALL THESE VEHICLES IS INTERFERING WITH OUR PRIVACY AND ENJOYMENT OF OUR RESIDENCE AND PROPERTY. TAKE DOWN OF THIS EVENT CONTINUED UNTIL 5/11. MORE VEHICLES IN AND OUT. TRAFFIC FOR THIS EVENT BEGAN ON 5/3 AND CONTINUED UNTIL 5/10 OR 5/11. WE ESTIMATE THAT 400 PLUS VEHICILES WERE GOING BY OUR HOUSE FOR THIS EVENT! NO WATER TRUCK WAS PRESENT DURING THAT TIME

EVENT #2 ON 5/12 WE WERE NOTIFIED OF A WEDDING EVENT FOR 5/14. TRAFFIC FOR THIS EVENT BEGAN ON 5/12. COUNTY ASKED THAT WE KEEP A LOG AND TAKE PICTURES. WE SET UP A TRAIL CAMERA TO RECORD THE TRAFFIC IN AND OUT ON 5/13. WE HAD JUST SET THE CAMMERA WHEN A PICKUP PULLING AN RV (A 5TH WHEEL TOY HAULER) TURNED INTO OUR FENCE. THE DRIVER WAS HUNG UP FOR A WHILE THEN PROCEEDED ON TO THE EVENT. THE DAMAGE TO OUR FENCE WAS WITNESSED BY THE CAR FOLLOWING AND BY 4 OF US WATCHING FROM THE HOUSE. THE DRIVER DID NOT CONTACT US. HAD WE NOT BEEN HERE TO WITNESS THIS ACCIDENT WE WOULD NOT HAVE

BEEN AWARE OF HOW THE DAMAGE OCCURED. THIS PLACES A HEAVY BURDEN ON US TO ALWAYS BE AWARE OF THE COMINGS AND GOINGS OF THESE EVENTS. WE ARE NOT GIVEN NOTICE OF WHEN THESE EVENTS ARE SCHEDULED. THAT MEANS WE ARE HERE ALL SEASON LONG. WE THEN TOOK PICTURES OF THE FENCE DAMAGE (POSSIBLE 3 BROKEN POSTS AND RAIL DAMAGE AND NON CLIMB WIRE DAMAGE) WE ASKED FOR THE DRIVER TO RETURN WITH HIS NAME, CONTACT AND INSURANCE INFO BUT HE WAS BUSY. THE GROOM DID SPEAK WITH US AND SAID HE WOULD PAY IN CASH FOR ANY DAMAGES. WE THEN SPOKE WITH BLAIR PARSONS WHO IS HANDLING THE PONDERSOA EVENTS AND HE ADAMANTLY REFUSED TO GIVE US THEIR INFO BECAUSE "THE RANCH HAS NOTHING TO DO WITH IT". WE WERE UNCOMFORTABE WITH GETTING OUR DAMAGE REIMBURSED SO WE CONTACTED THE SHERIFF FOR THE INFO THAT SHOULLD HAVE BEEN PROVIDED AT THE TIME OF THE ACCIDENT. BLATR PARSONS HAS CRITIZED US FOR THAT ACTION. HE BELIEVES THAT WE SHOULD MOVE OUR FENCE BECAUSE IT IS TOO CLOSE TO THE ROAD. IT HAS BEEN IN THAT LOCATION FOR OVER 22 YEARS! PICTURES HAVE BEEN PROVIDED TO SHOW THE NON FARM TRAFFIC IMPACT TO OUR RESIDENCE FROM 5/12 THRU 5/15. THE PICTURES DO NOT HAVE SOUND SO THE IMPACT OF THAT NOISE IS NOT ILLUSTRATED. THE NOISE OF THE TRAFFIC IS HEARD IN OUR HOUSE AND OUR BEDROOM AT NIGHT! HEADLIGHTS ARE AN ISSUE IN THE HOUSE AT NIGHT! BANDS PLAYING AT THE EVENT ARE AN ISSUE ALSO. ONCE AGAIN THERE HAS BEEN NO WATER TRUCK FOR THE ROAD. THE PROPERTY

OWNERS WHO USE THE ROAD HAVE PAID MONEY FOR THE ROAD MAINTENANCE. THIS IS FAR AND ABOVE NORMAL USE OF THE ROAD. SPEED AND ALCOHOL ARE ALSO A MAJOR CONCERN. 11 RVS ENTERED WITH 10 SPENDING 1 OR 2 NIGHTS.

EVENT #3 ON 6/2/22 WE WERE NOTIFIED BY TEXT AT 11:00 PM OF THE 3RD EVENT. TRAFFIC STARTED SET UP AT NOON ON 6/2. FRIDAY TRAFFIC WAS LIGHT COMPARED TO THE PREVIOUS EVENT. TRAFFIC WAS GONE BEFORE DARK. NO ONE SPENT THE NIGHT. SATURDAY TRAFFIC STARTED AROUND 9:30 AM. WE CHECKED THE SIGNING AND TOOK PICTURES OF THE WEDDING EVENT SIGNS. SAME AS THE PREVIOUS EVENT. WE HAVE PICTURES OF 249 VEHICILES GOING BY OUR HOUSE FOR THIS EVENT. MUSIC AND CAR NOISE IS VERY INVASIVE TO OUR ENJOYMENT OF OUR HOME AND PROPERTY. OUR PRIVACY IS GONE BECAUSE EVERYONE LOOKS AT OUR HOUSE AS THEY COME FOR THE WEDDING. AFTER THIS EVENT WE CAN SAY AT LEAST 1000 VEHICLES HAVE COME BY OUR HOUSE IN THE 3 WEEKENDS THAT THESE EVENTS (WEDDINGS) HAVE BEEN HELD.

EVENT #4 ON 6/30/22 WE WERE NOTIFIED BY TEXT AT 1:50 PM OF THE 4TH EVENT. WE WERE NOT TOLD WHAT

TYPE OF EVENT OR THE NUMBERS OF PEOPLE ATTENDING. WE HAD ALREADY SEEN VEHICLES HEADED UP TO THE FOR THIS EVENT WE HAD 2 CAMERAS. ONE AT THE TACK ROOM AND THE OTHER AT OUR ENTRANCE GATE. WITH 2 CAMERAS SET UP WE REALIZED THAT NOT ALL VEHICLES TRIP EACH CAMERA. SO OUR TOTAL VEHICLE COUNT ISN'T ALWAYS ACCURATE. SO VEHICLE COUNT MAY BE UNDER ESTIMATED NOT OVER ESTIMATED. THERE WERE NO RVS BUT WE SAW SOME VEHICLES LEAVE EARLY THE NEXT MORNING. ONCE AGAIN THIS EVENT WAS AN INTRUSION ON OUR PRIVACY AND ENJOYMENT OF OUR PROPERTY. WE HEAR AND SEE EVERYTHING OF THE COMINGS AND GOINGS OF THE EVENT. FOR THIS EVENT THEY DID HAVE A WATER TRUCK WATERING THE ROAD. THERE WERE 2 WATER TRUCKS BUT ONLY 1 WATERED THE ROAD. WE DON'T KNOW IF THEY INTENDED TO HAVE BOTH TRUCKS HERE. THE NUMBER OF VEHICLES WAS 156 FOR THE DAYS OF THIS EVENT.

EVENT #5 ON 7/14/22 @ 5:00 PM WE WERE NOTIFIED OF AN EVENT. ONCE AGAIN THE NOTIFICATION WAS BY TEXT WITH NO COMMUNICATION AS TO TYPE OR SIZE OF EVENT. BECAUSE OF THE INCREASED ACTIVITY WITH MOWING AND VEHICLES (OUTHOUSE PUMPER) WE WERE NOT SURPRISED BUT DISSAPOINTED THAT ANOTHER WEEKEND+ WAS INVADED. WE HAVE ONE CAMERA ON THE TACKROOM TO RECORD THIS EVENT. THE CAMERA IS THE SAME AS USED DURING THE

OTHER EVENTS. BLAIR PARSONS HAS PLACED A CAMERA ON THE POST OF THE GATE DIRECTLY ACROSS FROM OUR THIS CAMERA WILL ALSO RECORD TRAFFIC BUT NOT SHOW VEHICLES TURNING TO HEAD UP TO THE PAVILLION EVENTS. IT TAKES PICTURES OF OUR HOUSE AND YARD. WE BELIEVE THIS IS TO INTIMIDATE US AND SHOW HIS ANGER AT US FOR SHOWING EVENT ACTIVITY. WE HAVE A PICTURE OF HIM DISPLAYING HIS ANGER AT OUR CAMERA. THERE WERE 2 WATER TRUCKS HERE FOR THIS EVENT BUT DID NOT STAY. ONE PASS WITH THE A TRUCK WAS ALL THAT WE SAW ON THE ROAD. THAT DID NOT DO MUCH AS THE HOT WINDY DAY EVOLVED. I HAVE PRINTED THE PICTURES RECORDED BY OUR CAMERA OF THE DAYS BEFORE, DURING, AND AFTER EVENT #5. FROM 7/4/22 THRU 7/17/22 THE NUMBER OF VEHICLES THAT ARE EVENT RELATED TOTAL 317. THIS IS NOT AN ABSOLUTE NUMBER BUT IT IS FAIRLY CLOSE. MOST OF THE NOISE CAME FROM VEHICLES COMING AND GOING. WE ARE UNSURE OF THE NUMBERS OF PEOPLE THAT MAY HAVE SPENT THE NIGHT. WE SAW NO RV'S.

EVENT #6 ON 7/28/22 @ 3:30 PM WE WERE NOTIFIED OF AN EVENT. NO OTHER INFORMATION WAS GIVEN AS TO WHAT THE EVENT WOULD ENTAIL. AGAIN WE SEE OUTHOUSE PUMPER AND OTHER TRAFFIC. FRIDAY TRAFFIC BEGAN EARLY BECAUSE OF THE HIGH TEMPERATURES. SOME VEHICLES WERE SLOW AND CONSIDERATE OTHERS NOT SO

MUCH. MANY VEHICLES HAD VERY LOUD EXHAUST SYSTEMS. AN RV CAME IN EARLY. A UTILITY TRAILER FOLLOWED THE RV. ACTIVITY CONTINUED ALL DURING THE DAY AS THEY SET UP FOR THE EVENT. THE CAMERA WILL SHOW THE NUMBER OF VEHICLES. WHEN MOST LEFT IN THE EVENING THEY WERE VERY LOUD AND VERY FAST ON THE ROAD. ON SATURDAY WE STEPPED OUTSIDE AND SMELLED SMOKE AT 6:00 AM! THERE WERE CAMPERS WHO SPENT THE NIGHT. WE BELIEVE THAT BBO'S WERE BEING STARTED. WE COULD SMELL FOOD BEING COOKED. TRAFFIC FOR THIS EVENT IS LOUD FAST AND HEAVY. NO WATER TRUCK HERE YET. FROM THE USE OF THE WATER TRUCKS AT PRIOR EVENTS, IT HAS BEEN OF LITTLE HELP FOR CONTROLLING THE DUST. THIS EVENT HAD A MUCH LONGER INCREASE IN TRAFFIC BEFORE THE EVENT POSSIBLY DUE TO NO EVENT THE PREVIOUS WEEKEND. TANYA HAD MANY MANY TRIPS GETTING READY FOR EVENT #6. THERE WERE OVERNIGHT CAMPERS BUT I DON'T KNOW HOW MANY. RV'S OF VARIOUS KINDS WERE HERE. THE LARGE VOLUME OF CARS AND TRUCKS MADE THIS AN UNPLEASANT EVENT. MUCH NOISER AND FASTER ON THE ROAD. THE CAMERA HAS RECORDED AROUND 530 VEHICLES THAT MOST LIKELY HAVE BEEN EVENT RELATED FROM 7/18 THRU 7/31.

EVENT #7 ON 8/4/22 WE WERE NOTIFIED OF AN EVENT THIS WEEKEND. NO OTHER INFORMATION GIVEN AS TO WHAT THIS EVENT WOULD BE. TRAFFIC IS RECORDED ON

THE CAMERA CHIP BUT I HAVEN'T TAKEN IT OUT OF THE CAMERA. THE PICTURES WILL SHOW TRAFFIC FROM THE PREVIOUS EVENT THRU THE DAY FOLLOWING THE WEDDING. THERE WAS LOTS OF TRAFFIC FOR SET UP THE DAY BEFORE THE SATURDAY WEDDING. I'LL GET A COUNT TOMORROW. SO FAR, SOME LOUD VEHICLES AND FAST DRIVERS. SATURDAY EVENT WAS LARGE. LOTS OF ACTIVITY WITH COMINGS AND GOINGS. AT ONE POINT I LOOKED AT THE ROAD AND THERE WERE 10 VEHICLES LINED UP TO COME TO THE EVENT. THIS EVENT HAD MANY FOOD AND ALCOHOL TRUCKS. THE BAND WAS LOUD AND IT WAS STILL PLAYING AT 10:45 PM. BY 11:00 PM IT WAS SHUT DOWN. AROUND 10:00 PM THERE WERE 4 VEHICLES COMING IN THE ROAD AND SHOWN HEADLIGHTS INTO OUR BEDROOM. AS THE VEHICLES LEFT THE WEDDING THEY WERE LOUD AND DROVE FAST--TOO FAST FOR THIS ROAD!! AFTER REVIEWING THE CAMERA PHOTOS IT APPEARS THAT EVENT #7 INCREASED THE TRAFFIC AT OUR HOUSE (FROM 8/1-8/7) BY ABOUT 358 VEHICLES!! THIS IS TAKING THE PEACE AND ENJOYMENT FROM OUR HOME. WE HAVE LOST THE QUIET AND OUR PRIVACY.

EVENT #8 NOTIFIED ON FRIDAY 8/26/22 AT 8:00 AM THAT THERE WOULD BE ANOTHER EVENT. THE CAMERA HAS BEEN UP TAKING PICTURES OF THE TIME BETWEEN EVENT #7 AND THE NOTIFICATION OF EVENT #8. THOSE PICTURES ARE PRINTED AND NOTED. WE DECIDED TO

WATER THE ROAD AFTER WE WERE NOTIFIED. OUR HOSES CAN ONLY WATER THE ROAD FOR THAT DISTANCE CLOSE TO THE HOUSE. UNFORTUNATELY BLAIR DROVE UP TO ME WHILE I WAS WATERING AND "POLITELY" ASKED THAT I NOT WATER THE ROAD TO THE NORTH OF OUR POLE BARN. I DID NOT RESPOND. HE ALSO INFORMED ME NOT TO TALK TO OUR NEIGHBOR (RICK MORTON) ABOUT THE WORK THAT HE HAD DONE ON THE DRIVEWAY. THAT WORK WAS PERFORMED WITH A CAT DOZER WITH TRACKS AND BLADE TO ATTEMPT TO RECOVER GRAVEL THAT HAD BEEN PUSHED TO THE SIDE OF THE ROADWAY BY VEHICLES USING THE ROAD. IT ALSO KNOCKED DOWN THE MANY WASH BOARDS THAT HAVE BEEN FORMED BY MANY VEHICLES. THE DOZER WORK PUSHED ASIDE THE GRAVEL AND CREATED BARE DIRT THAT CREATED MUCH MORE DUST FOR VEHICLES TRAVELING THE ROAD. HE DID NOT HAVE A WATER TRUCK TO SETTLE THE DUST. NEIGHBORS SPOKE WITH ME ABOUT HOW MUCH MORE DUST WAS CREATED. AFTER BLAIR HAD HIS WORDS WITH ME, I WAS VERY UPSET THAT HE IS AND WAS ATTEMPTING TO UPSET US AND WE HAVE NO RIGHT TO BE CONCERNED BY WHAT HE DOES. AS THE DAY PROGRESSED HE CONTINUED TO DRIVE ALL AROUND THE HOUSE IN HIS ATV TO DO HIS "WORK" AND OF COURSE MAKING LOTS OF DUST TO DELIBERATELY TO UPSET ME. HE INFORMED ME EARLIER THAT I SHOULD CALL THE COUNTY IF I WAS UPSET. FRIDAY THE EVENT TRAFFIC WAS FOR WEDDING SET UP ETC. THE CAMERA HAS RECORDED THOSE VEHICLES. SATURDAY (WEDDING DAY) THE CAMERA HAS RECORDED THE VEHICLES COMING AND LEAVING. FOR WHATEVER REASON

THERE WAS NO WATER TRUCK PRESENT TO SETTLE DUST FOR THE EVENT. THIS EVENT WAS MORE RESPECTFUL BUT STILL EFFECTS OUR PRIVACY AND ENJOYMENT OF OUR PROPERTY. THE SUNDAY CLEANUP WAS FEWER VEHICLES THAN USUAL AND MORE RESPECTFUL.

EVENT #9 NOTIFIED ON FRIDAY 9/2/22 AT 8:45 AM THAT THERE WOULD BE ANOTHER EVENT: THE CAMERA HAS BEEN RECORDING PICTURES FROM THE PREVIOUS EVENT SO WE WILL COUNT THOSE VEHICLES AS PART OF EVENT #9. THE ACTIVITY HAS NOT BEEN AS HECTIC AS ON PREVIOUS EVENTS. ONCE WE WERE NOTIFIED OF THE WEEKEND EVENT WE WATERED THE ROAD BECAUSE THE HEAT AND THE WORK DONE BY BLAIR HAS MADE OUR DUST PROBLEM SO MUCH WORSE. THE GOOD NEWS IS THAT BLAIR BORROWED OR RENTED A NICE WATER TRUCK AND HE MADE SOME PASSES THE FULL LENGTH OF THE ROADWAY. THE VEHICLES THAT CAME FOR THE SET UP WERE MANY, BUT THEY WERE QUIETIER AND SLOWER DRIVERS THAN OTHER EVENTS. THAT REMAINED TRUE FOR THE EVENT AND THE DAY FOLLOWING. THIS WEDDING WAS OVER AROUND 9:00 PM (MUCH EARLIER THAN OTHER EVENTS). BUT AGAIN IT IS SUCH A LOSS OF OUR PRIVACY. DUE TO THE NUMBER OF WEDDINGS HELD THIS SUMMER, WE HAVE TOTALLY LOST OUR ENJOYMENT OF OUR PROPERTY.

EVENT #10 NOTIFIED ON FRIDAY 9/9/22 AT 8:30 AM THAT THERE WOULD BE AN EVENT THIS WEEKEND. CAMERA HAS BEEN RECORDING PICTURES FROM THE PREVIOUS EVENT TO SHOW ACTIVITY BETWEEN EVENTS. THAT TRAFFIC WAS MOSTLY RANCH EMPLOYEES MOWING LAWN AND DOING WHAT THEY FELT NEEDED DOING. THE DAY BEFORE THE WEDDING FOR SET UP THEY HAD 48 VEHICLES WHICH INCLUDED 3 HARLEY MOTORCYCLES (LOUD). WE DID NOT WATER THE ROAD DO TO OTHER COMMITMENTS. WATER TRUCK WAS HERE FOR PART OF THE DUST PROBLEMS THAT ARE A RESULT OF THE WEDDING TRAFFIC. THIS WEDDING WAS MUCH LIKE THE PREVIOUS WEDDING. SMALLER NUMBERS AND MORE RESPECTFUL IN THETR TRAVEL. THE WEDDING WAS OVER EARLIER AND THE BAND (MUSIC) WAS NOT AS LOUD. HOWEVER WE ARE SO UPSET THAT WE MUST ENDURE THIS ASSAULT TO OUR ENJOYMENT OF OUR PROPERTY. THE COUNTY HAS TAKEN NO ACTION TO STOP THIS!! THEY ARE NOT ENFORCING COUNTY AND STATE CODES. THEY HAVEN'T EVEN INSPECTED THE FACILITY FOR CODE ISSUES. SOMETHING IS WRONG WITH THE COUNTY AND IT'S HANDLING OF OUR COMPLAINT.

EVENT #11 NOTIFIED ON THURSDAY 9/15/22 AT 7:20 PM THAT THERE WOULD BE ANOTHER EVENT THIS WEEKEND. THERE HAS NOT BEEN A LOT OF ACTIVITY LEADING UP TO THIS EVENT. BLAIR DID THE MOWING PREPARING FOR THE

EVENT. THE CAMERA HAS BEEN TAKING PICTURES THE ENTIRE TIME BETWEEN THESE EVENTS AND DURING THE WEEKEND EVENTS. THE DAY BEFORE THE WEDDING THERE WERE 63 VEHICLES. THE SET UP INCLUDED AT LEAST 2 ATVS WHICH WERE USED TO TRANSPORT SET UP GEAR AND PEOPLE. WE WATERED THE ROAD FRIDAY BY GARDEN HOSE TO LESSEN THE DUST FOR THE SET UP. BLAIR USED A WATER TRUCK ON SATURDAY BEFORE GUESTS ARRIVED. THIS WEDDING WAS A LITTLE LARGER THAN THE 2 PREVIOUS EVENTS. WE HAVE NOTICED THAT MANY OF THE VEHICLES WERE OUT OF STATE (WASHINGTON OR RENTAL CARS). THIS WEDDING WRAPPED UP AROUND 10:30--11:00. THE MUSIC AND OR LOUD SPEAKER WAS SOMEWHAT LOUDER THAN THE PREVIOUS 2 EVENTS. THESE EVENTS ARE DAMAGING TO OUR ENJOYMENT OF OUR THIS IS A HUGH CHANGE IN THE 20 YEARS THAT WE HAVE LIVED HERE. THERE MUST BE A REASON THAT THE COUNTY IS ALLOWING THIS TO CONTINUE. IS UNFAIR TO US AND ALL THE PERMIT HOLDERS IN THE COUNTY THAT HAVE ABIDED BY COUNTY AND STATE CODES!! 'S

EVENT #12 NOTIFIED ON FRIDAY 9/23/22 AT 6:50 PM THAT THERE WOULD BE A FAMILY EVENT THIS WEEKEND. THE EVENT WAS A CELEBRATION OF LIFE FOR CHRISTINA HUSTON'S FATHER. IT WAS A BEAUTIFUL DAY FOR THE EVENT. THE EVENT WAS SMALL AND AND VERY QUIET. IT

WAS OVER VERY EARLY. THERE WAS NO WATER TRUCK AND BLAIR AND TANYA HAD LITTLE INVOLVEMENT IN THE EVENT. TRAFFIC WAS MINOR ON THIS EVENT.

EVENT #13 NOTIFIED ON SATURDAY 10/8/22 AT 6:45

AM THAT THERE WOULD BE A FAMILY EVENT THIS WEEKEND.

THERE HAD BEEN SOME ACTIVITY PRIOR TO THE SATURDAY

EVENT. WE HAVE NO IDEA WHAT THIS EVENT WAS OR WHO

IT INVOLVED. WE HAVE SEEN TANYA'S FAMILY COMING

AND GOING. WE HAVE NOT SEEN ANY HUSTON FAMILY

MEMBERS. THE CAMERA HAS RECORDED VEHICLES. BLAIR

AND TANYA HAVE BEEN INVOVED WITH THIS EVENT. THERE

HAS BEEN NO WATER TRUCK TO CONTROL DUST FOR THIS

EVENT. THIS EVENT WAS HELD LATE IN THE AFTERNOON.

NOISE LEVEL WAS BETTER THAN MOST OF THE WEDDING

EVENTS. TRAFFIC WAS LATE LEAVING. WE ARE SO

UNHAPPY WITH ALL OF THESE EVENTS. WE WANT THE FARM

LIFE NOT THE PARTY LIFE!! THERE SHOULD BE SOME

CLARITY ON JUST WHAT A FAMILY EVENT IS.

	2022 EVENT 1	2022 EVENT 2	2022 EVENT 3	2022 EVENT 4	2022 EVENT 5	2022 EVENT 6	2022 EVENT 7	2022 EVENT 8	2022 EVENT 9	2022 EVENT 10	2022 EVENT 11	2022 EVENT 12	2022 EVENT 13
DATE	05/03/2022 - 05/11/2022	05/13/2022 - 05/15/2022	06/03/2022 - 06/05-2022	07/01/2022 - 07/04/2022	07/04/2022 - 07/17/2022	07/18/2022 - 07/31/2022	08/01/2022 - 08/07/2022	08/08/2022 - 08/28/2022	08/28/2022 - 09/04/2022	09/05/2022 - 09/11/2022	09/12/2022 - 09/18/2022	09/19/2022 - 09/25/2022	10/03/2022 - 10/09/2022
EVENT TYPE	Wildland Firefighter Fundraiser	Wedding	Wedding	unknown	unknown	unknown	unknown	Wedding	Wedding	Wedding	Wedding	Celebration of Life	Family Event
NO. OF VEHICLES	400 (estimation)	329	249	156	291	530	358	228	250	194	259	46	133
Breakdow	n										2844		
Two+ days before even	t		11		88	154	35	101	27	11	5	3	4
Day before even	t	105	56	38	59	116	68	33	76	48	63	7	16
Day of even		160	144	98	112	196	216	99	118	101	146	30	85
Day after even		59	38	18	32	64	39	13	29	34	45	6	28
Two+ days after even				2									
CAMPING	some	10 RVs camp 1-2 nights		possible camping		camping and BBQs							
NOTES	a.m. until 10:30 p.m. included	watered; speed of vehicles on	loud music and traffic	privacy concerns due to location of the road to the residence	mowers and outhouse pumper; one pass by water truck		loud traffic; speed of vehicles a concern; many food and alcohol trucks; lots of activity; loud music until 11 p.m. (live band); bright headlights at night	ATV use	more dust due to road activity; heavy set-up traffic	mowing; 3 loud motorcycles	mowing; ATV use (2); loud music until 11 p.m.	family event	no water truck to control the dust on the road; late traffic

COVER PAGE 1 PRE-CAMERA

PICTURES SHOWING ROAD SIGNAGE AND RR PLATFORM

TRAIL CAMERA LOCATION

1ST EVENT: 5/3/22 THRU 5/11/22 400 ESTIMATED VEHICLES (NO PICTURES) EVENT OPEN TO THE PUBLIC SOME OVERNIGHT CAMPING











COVER PAGE 2

EVENT #2
5/13/22 THRU 5/15/22
329 TOTAL VEHICLES (AFTER CAMERA INSTALL @ 2:30 ON 5/13/22)

DAY BEFORE WEDDING: 105 VEHICLES

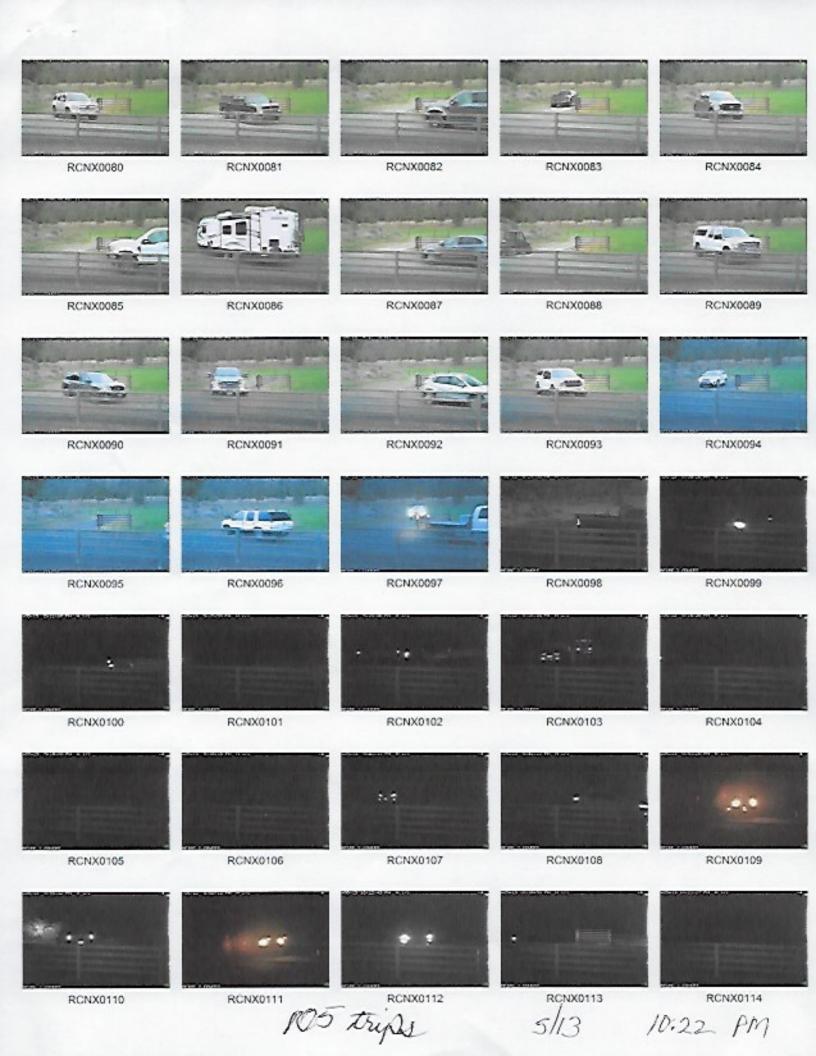
DAY OF WEDDING: 160 VEHICLES

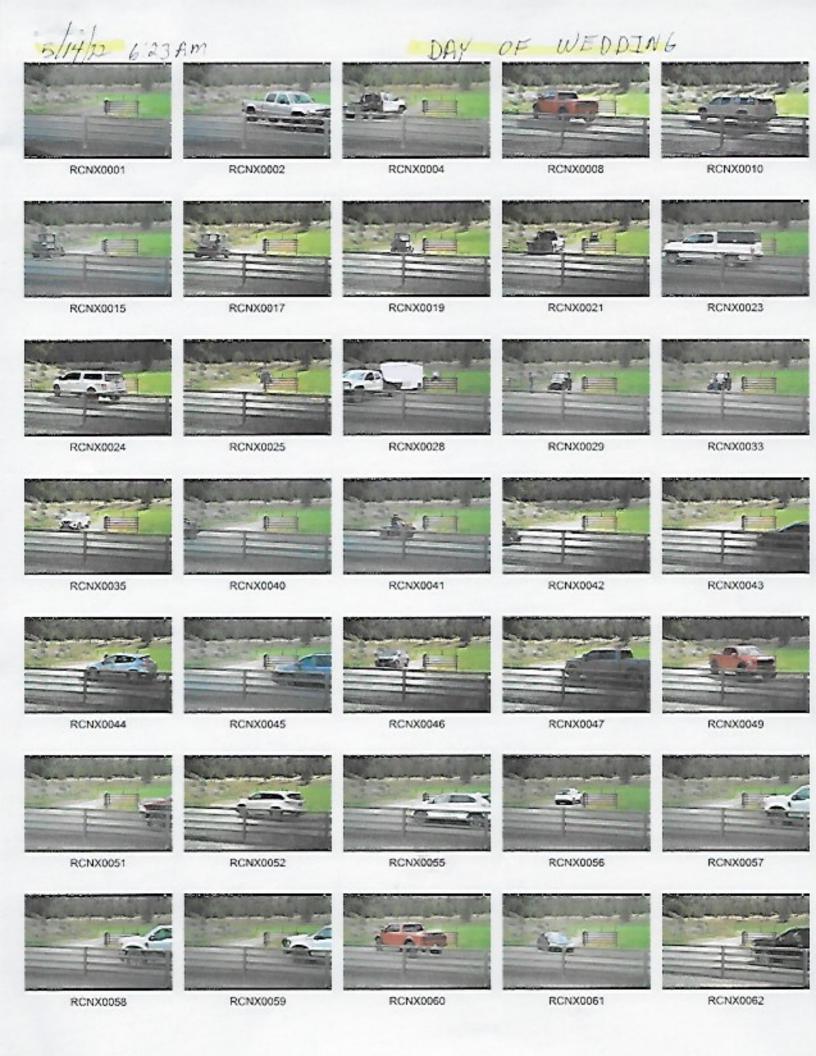
DAY AFTER WEDDING: 59 VEHICLES

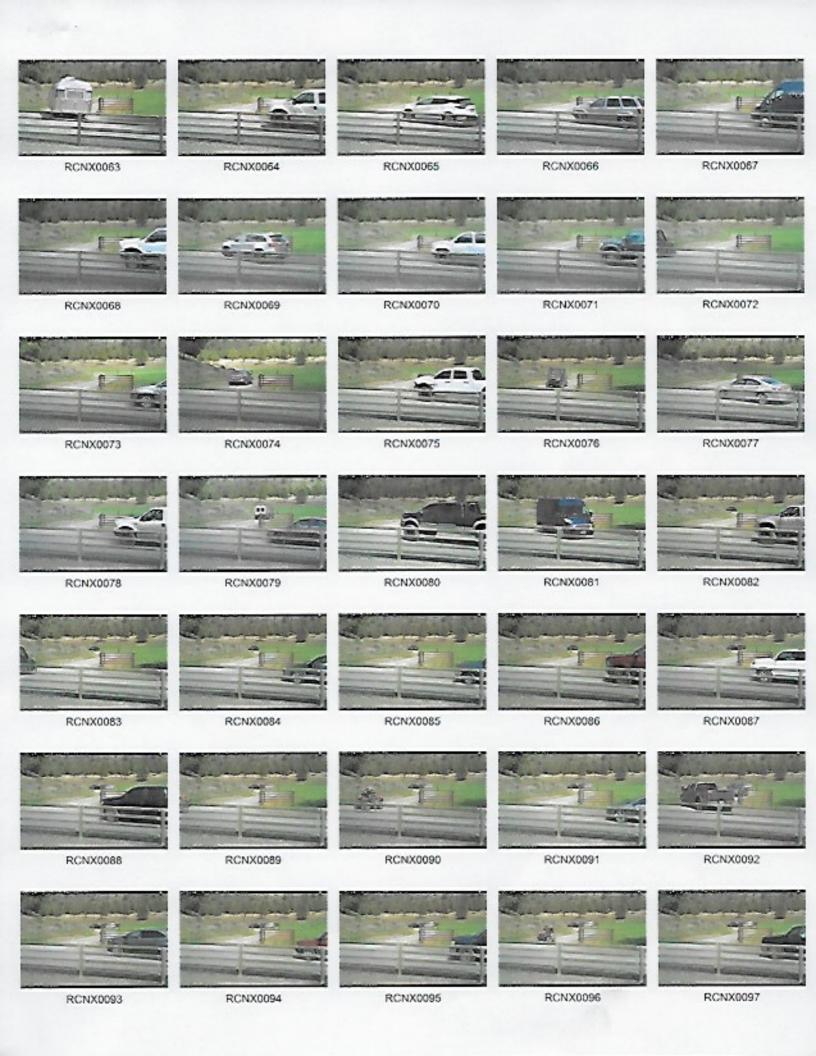
10 RVS CAMP 1 OR 2 NIGHTS

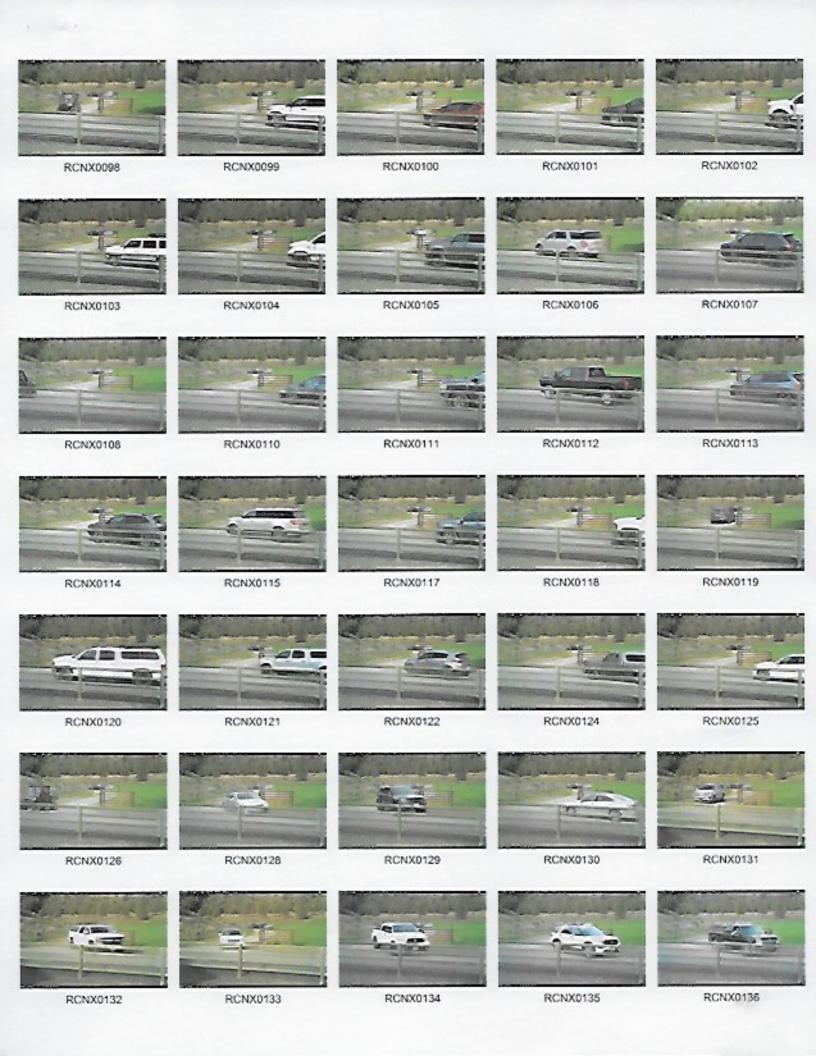
Day Before Wedding Event RCNX0005 RCNX0002 RCNX0003 RCNX0004 RCNX0010 RCNX0006 RCNX0007 RCNX0008 RCNX0009 RCNX0012 RCNX0013 RCNX0014 RCNX0017 RCNX0011 RCNX0024 RCNX0022 RCNX0023 RCNX0019 RCNX0020 RCNX0026 RCNX0027 RCNX0028 RCNX0029 RCNX0025 RCNX0033 RCNX0034 RCNX0035 RCNX0030 RCNX0031 RCNX0040 RCNX0039 RCNX0036 RCNX0037 RCNX0038

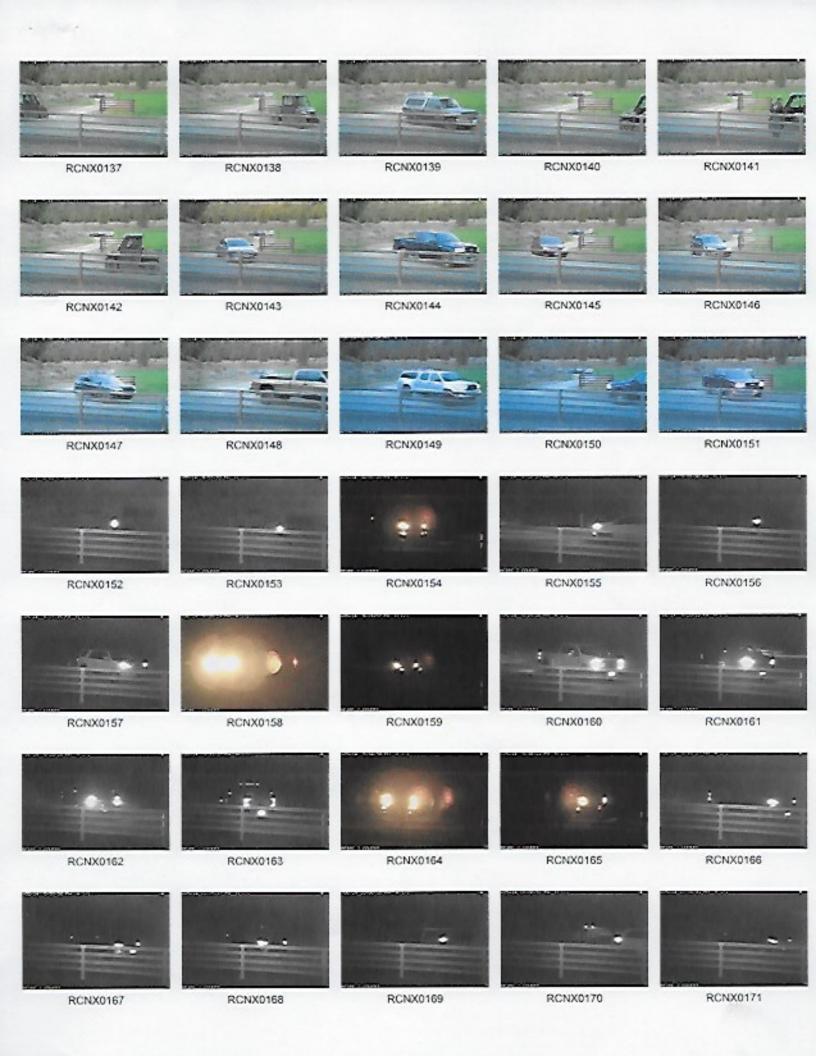














160 Trips



Day after Wedding 8:16 AM RCNX0006 RCNX0007 RCNX0005 RCNX0012 RCNX0009 RCNX0010 RCNX0011 RCNX0015 RCNX0016 RCNX0017 RCNX0014





RCNX0013

RCNX0008

























RCNX0032

















RCNX0036

RCNX0038



RCNX0065

RCNX0066



RCNX0067



RCNX0068

9:39 PM

39 triple

COVER PAGE 3

EVENT #3 6/3/22 THRU 6/5/22 249 TOTAL VEHICLES

2 DAYS BEFORE WEDDING : 11 VEHICLES

DAY BEFORE WEDDING: 56 VEHICLES

DAY OF WEDDING: 144 VEHICLES

DAY AFTER WEDDINF: 38 VEHICLES

COVER PAGE 4

EVENT #4
7/1/22 THRU 7/4/22
156 TOTAL VEHICLES

DAY BEFORE WEDDING: 38 VEHICLES

DAY OF WEDDING: 98 VEHICLES

DAY AFTER WEDDING: 18 VEHICLES

2 DAYS AFTER WEDDING: 2 VEHICLES

COVER PAGE 5

EVENT #5
7/4/22 THRU 7/17/22
291 TOTAL VEHICLES

DAYS BETWEEN WEDDING: 88 VEHICLES
DAY BEFORE WEDDING: 59 VEHICLES

DAY OF WEDDING: 112 VEHICLES

DAY AFTER WEDDING: 32 VEHICLES

COVER PAGE 6

EVENT #6 7/18/22 THRU 7/31/22 530 TOTAL VEHICLES

DAYS BETWEEN WEDDING: 154 VEHICLES
DAY BEFORE WEDDING: 116 VEHICLES

DAY OF WEDDING: 196 VEHICLES

DAY AFTER WEDDING: 64 VEHICLES



COVER PAGE 7

EVENT #7
8/1/22 THRU 8/7/22
358 TOTAL VEHICLES
DAYS BETWEEN WEDDING: 35 VEHICLES
DAY BEFORE WEDDING: 68 VEHICLES
DAY OF WEDDING: 216 VEHICLES
DAY AFTER WEDDING: 39 VEHICLES

COVER PAGE 8

EVENT #8 8/8/22 THRU 8/28/22 228 TOTAL VEHICLES

DAYS BETWEEN WEDDING: 101 VEHICLES

DAY BEFORE WEDDING: 33 VEHICLES

DAY OF WEDDING: 99 VEHICLES

DAY AFTER WEDDING: 13 VEHICLES

COVER PAGE 9

EVENT #9
8/28/22 THRU 9/4/22
250 TOTAL VEHICLES
DAYS BETWEEN WEDDING: 27 VEHICLES
DAY BEFORE WEDDING: 76 VEHICLES
DAY OF WEDDING: 118 VEHICLES

DAY AFTER WEDDING: 29 VEHICLES

COVER PAGE 10

EVENT #10 9/5/22 THRU 9/11/22 194 TOTAL VEHICLES

DAY BETWEEN WEDDING: 11 VEHICLES
DAY BEFORE WEDDING: 48 VEHICLES

DAY OF WEDDING: 101 VEHICLES

DAY AFTER WEDDING: 34 VEHICLES

COVER PAGE 11

EVENT #11
9/12/22 THRU 9/18/22
259 TOTAL VEHICLES
DAY BETWEEN WEDDING: 5 VEHICLES
DAY BEFORE WEDDING: 63 VEHICLES
DAY OF WEDDING: 146 VEHICLES

DAY AFTER WEDDING: 45 VEHICLES

COVER PAGE 12

EVENT #12 9/19/22 THRU 9/25/22 46 TOTAL VEHICLES

DAY BETWEEN EVENT : 3 VEHICLES

DAY BEFORE EVENT: 7 VEHICLES

DAY OF EVENT: 30 VEHICLES

DAY AFTER EVENT: 6 VEHICLES

COVER PAGE 13

EVENT #13 10/3/22 THRU 10/9/22 133 TOTAL VEHICLES

DAY BETWEEN EVENT: 4 VEHICLES
DAY BEFORE EVENT: 16 VEHICLES

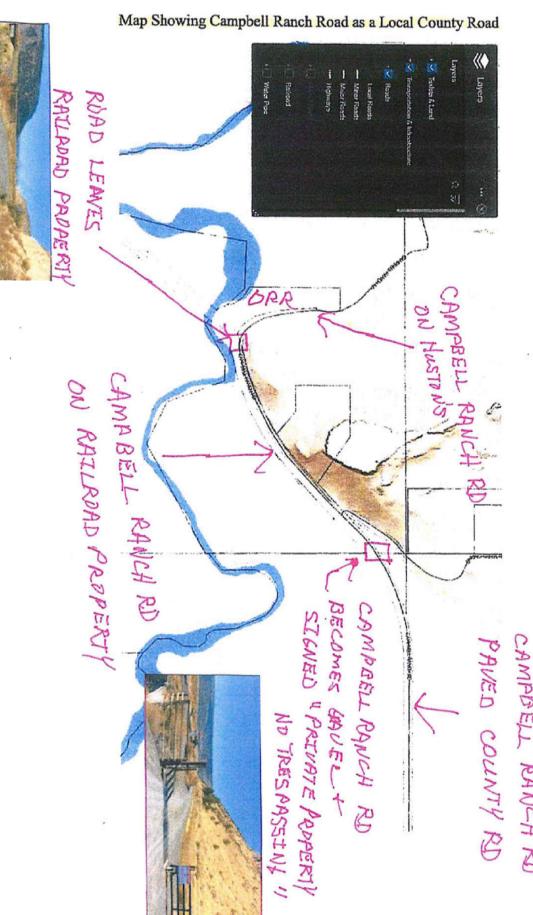
DAY OF EVENT: 85 VEHICLES

DAY AFTER EVENT: 28 VEHICLES

COVER PAGE NORMAL WEEKEND VEHICLE TRAFFIC 5/27/22 THRU 5/29/22 43 VEHICLES







CAMPBELL RANCH RD

Exhibit R

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8	BEFORE THE PLA	NNING COMMISSION
9	FOR CROOK C	OUNTY, OREGON
10	HUSTON, GREGORY A. AND KAREN S.	Record No. 217-23-1215-PLNG
11	Applicants for a Commercial Event Permit in the EFU-2 Zone "Applicant"	DECLARATION OF DAVID ORR (REBUTTAL)
12	the EFO-2 Zone Applicant	(REBUTTAL)
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18	I, David Orr, under penalty of pe	erjury, declare as follows:
19	1. I am one of the Trustees	of the David and Joanne Orr Trust which owns
20	real property located at 8892 NW Campbell Ra	anch Road, Prineville, Oregon, Map ("Orr
21	Property"). My wife and I purchased this property	erty in 2002.
22	2. The Orr Property is show	wn and identified on the attached Exhibit A, which
23	is part of Exhibit D from the Applicants' Narra	tive submitted with their commercial event land
24	use application. As shown on Exhibit A, my ho	ome is directly across from the entrance/exit to the
25	commercial event location. This is also demon	astrated on Exhibit AA in Applicants' 1/10/24
26	submittal (Revised Site Plan).	

Page 1 - DECLARATION OF DAVID ORR (REBUTTAL)

1	3. The Orr Property is almost seven (7) acres and has almost five (5) acres of
2	agricultural water rights. During most of the time that I have owned the property, it has been in
3	farm or ranch use, other than brief periods were I was making improvements to the farm/ranch
4	area. The Orr Property is also in farm deferral for county property taxes.
5	4. Most recently, almost five acres of the Orr Property was in hay, and that
6	hay is still in the ground on the Orr Property. I have sold the hay grown on the Orr Property.
7	5. In the past, the Applicants' ranch manager Blair Parsons harvested the hay
8	on the Orr Property and either used it for their cattle or sold it. Blair Parsons paid for the hay
9	(copies of checks submitted to the Record on 1/10/24). It is my belief that Mr. Parsons no longer
10	harvests my hay due to my opposition of the event business on the Huston property.
11	6. It is my intention to use third-party contractors to harvest and process the
12	hay that is currently on the Orr Property during the 2024 harvest period. Hay was not harvested
13	2002 and 2023 because we were unable to find a third-party contractor after Blair Parsons was
14	no longer interested in harvesting our hay. Since the summer of 2022, when there were thirteen
15	(13) events on the Applicants' property, it has been difficult to schedule contractors to harvest
16	hay, so that it does not conflict with commercial events or traffic.
17	7. I have hay/farm equipment that I use for the farm/ranch uses on the Orr
18	Property. This equipment is different than the home/lawn equipment that I use for the yard and
19	lawn near my home. One of the ways that I protect and secure this farm equipment is with
20	perimeter fencing that limits vehicular access onto my property.
21	8. Applicants (more specifically their ranch manager) have used the Orr
22	Property for farm/ranch purposes.
23	9. Prior to 2021, I am personally aware of only a few events on the
24	Applicants' property. In 2021, I believe there were four-five events on the Applicants' property

but the significant increase came in 2022 when there were thirteen (13) different events – almost

Page 2 - DECLARATION OF DAVID ORR (REBUTTAL)

every weekend during the summer and harvest period.

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1	10. The 2022 events ranged from small gatherings to loud, large groups.
2	Some of the events brought in catered food while others brough in large pieces of cooking
3	equipment to prepare food on site. Music from the wedding events often played well past
4	midnight (one event in 2021 lasted until 3:00 am). Trailers/recreational vehicles were often still
5	on the property the day after an event and it is my belief that guests camped overnight.
6	11. When my wife and I complained to the Crook County Planning
7	Department ("Crook County") after the events in 2021, Crook County encouraged us to put up
8	trail cameras on our property aimed at the entrance/exit of the event center in order to count
9	vehicle trips on event and non-event weekends. Based on our traffic counts from the trail
10	cameras, normal farm activity traffic on non-event weekends were 40-45 vehicle trips for the
11	entire weekend. In contrast, during event weekends, vehicle trips ranged from a low of 130 trips
12	to as high as 530.
13	12. Attached as Exhibit "B" and Exhibit "C" are the "logs" that my wife and I
14	prepared detailing the vehicle trips during events, as well as a description of activities and
15	impacts from the 13 events in 2022. Exhibit B is a summary of the events and traffic, while
16	Exhibit C has more detail, including photographs.
17	13. Access to the entrance/exit of the event center is shown on Exhibit R to
18	Applicants' Narrative. Attached as Exhibit "D" is Applicants' map with the Orrs' hand-written
19	notations. Campbell Ranch Road is a very narrow road, particularly where it turns away from
20	the railroad tracks near the Orr Property. The road cannot accommodate farm traffic and
21	equipment at the same time as the intense event traffic (cars are often stopped and lined up on the
22	road in order to gain access to the event location).
23	14. When cars depart the event center at the end of the evening/event, it is
24	usually dark and late at night. All of the headlights shine directly into the house, specifically my
25	bedroom. Exhibit AA to Applicants' 1/10/24 submittal (Revised Site Plan) shows directly how
26	all of the departing event traffic is aimed directly at my property and home.

1	15. The traffic from the commercial events not only impedes farm use of
2	Campbell Ranch Road, but it is also very invasive and disruptive, in terms of both the noise from
3	the vehicles, the gravel and particularly the dust. During the thirteen events in 2022, I only
4	observed a water truck to dissipate dust for five events, and even then, it was not present or used
5	during the entire event. In fact, for many of the events my wife and I watered the portion of the
6	access road we could reach with our hose and water.
7	16. The event traffic on Campbell Ranch Road is not limited to guests arriving
8	and departing but also includes big trucks bringing in event supplies, utility trailers, RVs and
9	trailers, and large propane tank transportation (for smokers). Greg Huston testified at the hearing
10	on 12/13/23 that Campbell Ranch Road (the private portion that is privately maintained) is 60-
11	feet wide. This is inaccurate. The private portion of Campbell Ranch Road, where it turns away
12	from the railroad tracks, goes along our property and is the access for the commercial event site

17. During the event on May 12, 2022, the fence on the Orr Property was damaged by an event guest towing a 5th wheel toy hauler trailer into the event area. The driver did not stop and did not report the fence damage. Applicants' ranch manager Blair Parsons refused to provide us information about the driver stating "the ranch has nothing to do with it." We had to contact the County Sheriff to get someone to take responsibility and compensate us for the fence damage.

varies in width, between 15 feet and 30 feet. At its narrow points, the road is insufficient to

accommodate commercial event traffic, resident traffic and ranch/farm traffic.

- 18. This fence damage could have made my hay field vulnerable to grazing livestock on neighboring property and exposed my farm equipment to theft/vandalism.
- 19. I am aware the Hustons believe their commercial events do not impact farm or ranch activities on my property or nearby properties, but it does. I read the Hustons' 1/10/24 submittal (specifically Rand Campbell's letter), stating that I should schedule contract harvesters around the schedule of commercial events on the Hustons' property. I believe

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1	requiring me to alter my practices and planning to cater to the commercial event schedule is just	
2	one example of forcing a change in accepted farm practices on my property. Further, if I were to	
3	line up a third-party contractor based on Ponderosa Ranch's event schedule (and I am not even	
4	sure how I would know what the schedule is since Applicants have indicated they want	
5	flexibility in scheduling events each year and might not actually use all 18 event weekends),	
6	what would happen if they change an event or their schedule? Would I then have to re-schedule	
7	or even pay a cancellation fee, increasing the cost of my farm practice? Also, with each event	
8	consisting of at least three days, there is limited time within which for me to schedule farming to	
9	avoid conflict with commercial events and traffic.	
10	20. In addition to having issues scheduling a third-party contractor to harvest	
11	my hay, there are other impacts from the commercial events negatively impacting farm/ranch	
12	activities on my property:	
13	a. Due to the risk of property damage, I have to stay on my property	
14	when there are events at Ponderosa Ranch. Had I not been home	
15	when our fence was damaged, I would not have known how it	
16	happened or that it was an event attendee that had done the	
17	damage. The fence protects my hay from neighboring livestock	
18	coming onto my property and damaging the hay and also provides	
19	protection to my farm equipment from theft or vandalism.	
20	b. During the 2022 event season, a water truck was brought in for	
21	only 5 of the 13 events to water the gravel/dirt road accessing the	
22	event location (and the truck only did one or two passes and was	
23	not there for the whole event). As a result, my wife and I watered	
24	as much of the road as we could with our own water and hose.	
25	This required us to take time that we could have spent doing other	

things, including farm activities on our property, and spend it

Page 5 - DECLARATION OF DAVID ORR (REBUTTAL)

reducing the negative impacts from the commercial events. Mr. 2 Huston's testimony at the 12/31/23 hearing, stating that there is 3 always water trucks at all of the events is simply inaccurate. 4 c. The imposition on our lifestyle, including our farm/ranch activities 5 is not limited to event days. It is also not limited to the three days 6 (set-up, event, break-down) because some of these event activities 7 last longer than just three days. As shown by our logs, Exhibits B 8 and C, these events have lasted more than three days, do not 9 always completely end by 11:00, do not always have attendees off 10 the property by 11:00, and do have people camping overnight. For 11 example, the Wildland Firefighters event on 5/7/2022 saw set up 12 beginning four days before on 5/3/22 with breakdown not 13 complete until four days after on 5/11. As another example, the 14 wedding on 5/14/2022 saw set up starting two days before on 5/12 15 and there were 11 overnight RVs and campers. 16 d. Due to the risk of damage to my property and farm activities (from 17 attendees, from fire, and from traffic), I do not feel I can leave my 18 property when there are commercial events. I also feel I cannot 19 fully engage in farm/ranch activities while caretaking my property 20 during events to make sure nothing is damaged. 21 21. I also believe that the impacts described above, and the multi-day (not 22 three day) events with overnight camping and late-night music and noise does not demonstrate 23 the respect for neighbors discussed in Tanya Parsons's letter submitted 1/10/24. The fence 24 damage, then denial of any responsibility by Ponderosa Ranch, directly rebuts Ms. Parsons's 25 statement that she would never do anything to jeopardize or risk her neighbors.

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1	22. In her letter submitted 1/10/24, Tanya Parsons states that they enforce
2	their rules and contract with commercial event guests, but our logs and trail camera photos
3	(Exhibits B and C) demonstrate otherwise. The photos show arrivals prior to 8:00 am for set-up,
4	more than 200 attendees, events open to the public, kegs of beer being brought to the site in truck
5	beds, and overnight camping. Event attendees to not all leave the site after an event ends at
6	night. One event in 2021 had music playing until 3:00 am.
7	23. Based on my information and belief, it is my understanding that
8	Applicants are not the operators of the Ponderosa Wedding and Event venue but is a business
9	developed and operated by their ranch manager Blair Parsons and/or his wife Tanya. It is
10	unknown to me whether Applicants are receiving the commercial event income from the events
11	or whether that income is going to the Parsons. One reason for this belief is the amount of work
12	Ms. Parsons reports she is doing before, during and after events (per Exhibit Z to Applicants'
13	1/10/23 submittal) and the annual "expenses" reported for events in 2022, on Exhibit U to
14	Applicants' Narrative (\$485 for the year); based on this information it appears she is either doing
15	the work without compensation as the "manager" or receives the event income.
16	I HEREBY DECLARE THAT THE ABOVE STATEMENTS ARE TRUE TO
17	THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS
18	MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY OF
19	PERJURY.
20	DATED this 17 th day of January 2024.
21	/o/ David Own
22	<u>/s/ David Orr</u> David Orr
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Page 7 - DECLARATION OF DAVID ORR (REBUTTAL)