

August 7th, 2023

RE: T3-2022-16220 Comments, Applicant's Pre-hearing Statement Exhibit H.3

To the Esteemed Hearing Officer Alan Rappleyea, and Respected Members of the Multnomah County Land Use Planning Board,

This letter is addressing MCC 39.7515 Conditional Use Approval Criteria C (1) and (2), Significant changes in and costs to accepted farm practices; and Approval Criteria F, Creation of Hazardous Conditions. Please consider this written submission as part of our response to the applicant's pre-hearing statement submitted on June 29th, recorded as Exhibit H.3, which includes a Globalwise report titled "Compatibility of Proposed PWB Filtration Facility & Pipelines Construction with Farm Traffic, referred to in this letter as simply 'the report.'

We would also like to state that we stand with and echo all opposition against the PWB filtration and pipeline project. This includes the resolutions of opposition from Gresham-Barlow and Oregon Trail school districts, Fire District #10, Cottrell CPO and PHCA, 1000 Friends of Oregon, submission from Oregon Association of Nurseries, Oregon Farm Bureau, Oregon Department of Agriculture, and every individual farm operator and resident on record against this project. We stand with all testimony in opposition of PWB's proposed project, and reinforce our own opposition on the grounds of egregious, irreversible and significant changes and costs to our accepted farm practices and to the entire ag industry of our regional economy. We firmly believe that the construction impacts of a project of this magnitude in a rural area such as are disproportionate to any perceived community benefit.

We emphasize the importance of a comprehensive understanding of the nature of farming in this area to ensure the proper evaluation of the project's implications to not only Carlson Farms, but all ag-related businesses that are the foundation of this rural community.

In the report regarding construction impacts to farm traffic, Carlson Farms is referred to as "Operator G," although no appendix was found that provided a record of such information. We have identified this information based on the given headquarters location. It is important to note that I was never interviewed by a Globalwise employee or agent, and in addition to the errors and omissions regarding my own nursery's 'thorough analysis,' the accuracy of all information in the report, and the conclusions drawn based upon it, should be questioned.

We would like to first address the most obvious significant changes and costs to our accepted farming practices from the extensive, widely disruptive construction plan, and the hazardous conditions it will create for our rural farm community.

Regarding the discussion of our farm in the referenced report, we must point out that it fails to consider that our nursery is somewhat unique in that we deal mainly with specimen size ornamental nursery stock. The majority of our trees range in age from 20 - 40 years old. Specimen nursery stock is more expensive, larger in size, and more fragile to handle. They are susceptible to dust generated by pipeline construction activities, and dust mites are a major concern as they come with dust and can damage and even kill a specimen size tree, ruining decades of growth and investment. Also, fewer specimen plants can be shipped on a truck, so although we are a 'small' nursery, we often have as much or more outbound shipping traffic than a larger nursery. Our standard practice is to sell and ship on demand by customer order. Our trees are sold and shipped on an individual basis. We regularly have customers who call for same-day appointments to see our trees and consider whether they will fit their needs. Traffic

varies by the week, and is not constrained by seasons. A customer may be shopping for a tree they need the next day or the next month, so there is no seasonal variance to our farm traffic that uses Dodge Park Blvd. This means we do not plan outbound shipping in advance or by any season, but rather as a customer comes to the farm to find the tree they want, digging and shipping is arranged at that time for as soon as possible. Weather, truck, and crew availability are the biggest factors involved when finalizing a sale. This is our accepted farm practice.

The only access to Carlson Farms is Dodge Park Blvd, which will be significantly impacted by the construction plan. It is very misleading to state that we do not generate a significant number of road trips, when in actuality this study has no idea. For example, this year in our empty fields, we have begun planting row crops which will require more daily, year-round field work and increase farm traffic and truck trips. Field and tree maintenance activities will be performed on a regular, often daily basis by farm employees who will need unencumbered access to the farm, as is an accepted farming practice. It is reasonable to be concerned that the magnitude of this project's seven-year construction plan will make it difficult for me to find and keep employees who are willing to deal with road closures, delays and detours on a daily basis for seven years. Deliveries, service providers, and vendors are also part of an operating farm's 'farm traffic,' yet none of these things is discussed in the report. This fact, that the report fails to acknowledge what truly constitutes farm traffic and disregards these operationally necessary activities, is further proof that the report makes irresponsible and uniformed claims about the impacts of PWB's construction plans on the livelihoods of farmers.

When PWB begins its road improvements followed by pipeline construction on Dodge Park Blvd, and the intersections with Cottrell Rd and Altman Rd, it will force a massive significant change to our accepted farm practice in that we won't be able to accommodate on demand customer visits, or on demand digging and shipping. This practice will be prevented because there will be times, as stated in the construction plan, that access to our farm will be significantly inhibited. Customers are not going to want to sit in road construction to come view our products, they will choose another nursery that is not located inside of a massive construction site. Getting crews to the nursery to dig the trees will be difficult for the same reasons, as will getting a semi-truck or large container truck to the farm to ship the tree. During wet periods or inclement weather while the road is torn up, it's reasonable to expect our home and farm access driveways will be close to impassable for any farm-related trucks or equipment, and possibly even passenger vehicles.

We also have a neighboring farm that leases a one-acre section of our property that is in production. They bring their own tractors, workers and equipment in on a regular, year-round basis to maintain their crop, which have a 3-year growth cycles. This is an accepted farm practice, both leasing fields to/from other farmers and land owners, as well as daily, year-round field work. The construction on Dodge Park Blvd will both encumber and at times restrict the access to this field, which is significant change from normal, accepted practice of being able to freely access and maintain our fields and product. Ultimately, it is reasonable to assume that this farmer may end his lease with me due to the encumbrance of access, costing me a 3-year lease contract.

Not only are these changes forced upon our accepted farming practices a violation of approval criteria MCC 39.7515 (C) (1) and (2) in that they force us to change our sales practices and interfere with on demand digging and shipping, but the road construction itself creates significant hazardous conditions, a violation of MCC 39.7515 (F) approval criteria. Road construction of this magnitude will undoubtedly have a negative impact on drivers, both on local residents trying to drive to work/town and home, but especially on project-related traffic

who are not familiar with our rural roads. Construction vehicle operators, staff employees, service providers, vendors, contractor crews, and others will be flooding this area daily, despite PWB's attempt at trying to convince us they will provide shuttle service in and out of the area. That only accounts for onsite employees – independent contractors, service providers, craft personnel and vendors are highly unlikely to be amenable to coordinating their entire schedule around a shuttle service and force their employees to use it. Hazardous conditions are created when hundreds of additional vehicles and drivers flood into our rural road system every day, as it's not designed to handle that amount of traffic. Road surfaces will quickly deteriorate under the stress of additional traffic, and side roads with no striping or shoulders and numerous residences will become main detour routes, putting those local residents at a significantly higher risk of vehicle and pedestrian-involved accidents.

Hopefully, you can understand how very disruptive and costly this project will be not only for our business but for our neighbor and his business overall. The effects of a construction project in this kind of rural neighborhood may very well put multiple farmers out of business. This rural community and important farm economy is not the appropriate location for a project of this scale and scope.

Sincerely,

Ken Carlson

Ken Carlson
Owner, Carlson Farms



T3-2022-16220 Comments

1 message

Tami Wensenk <tamiwensenk@gmail.com>
To: LUP-Comments@multco.us

Mon, Aug 7, 2023 at 11:35 AM



External Sender - Be Suspicious of Attachments, Links, and Requests for Payment or Login Information.

Please find attached submissions in PDF format for the record in T3-2022-16220 on behalf of local farmers.

Thank you!

3 attachments



Surface Nursery response to H.3 8-4-2023.pdf
268K



Carlson Farms response to H.3.pdf
99K



TreeSource Response to Contruction Farm Traffic Report.pdf
267K