



**R & H Nursery, Inc.**  
*Gresham Oregon*

34826 SE Carpenter Lane  
Gresham, OR 97080

Phone: 503-663-2806

Toll Free: 1-877-663-2806

E-mail: [pat@r-hnursery.com](mailto:pat@r-hnursery.com)

June 26, 2023

To the respected members of the Multnomah County Land Use Planning Board:

My name is Patrick Holt, I am a fourth generation farmer in the east Multnomah county area, specifically I border the entire west boundary of the proposed Portland Water Bureau's filtration plant site from Carpenter Lane to the border of Clackamas County. I have grown up on and worked on this proposed site since the 1960's. I have farmed the entirety of this site from 1983 to 1994 for my former employer Moller's Nursery, Inc.

In 1990 I started R & H Nursery, Inc. and in 1996 I personally started to farm the west 18 acres of the proposed site of the industrial filtration plant.

I have been an advocate for farmers, farm land, soil, and water quality most of my life. I was the chair of Senate Bill 1010 Sandy River Water Quality Plan. I have been Chapter President, Committee Chair and Committee member for the Oregon Association of Nurseries for over 40 years. I am a long standing member of the Oregon Farm Bureau. Please consider this statement my response of opposition to the overall land use application as well as my opposition to the farm, traffic, and construction impact reports. I was interviewed at length for these reports, and none of my concerns were addressed.

Before I get into some of the specifics of the impacts this industrial plant will have on my nursery and the surrounding rural area I would like to address what I feel will be the most dramatic affect for Oregon if this land use application is approved, this is the loss of almost 100 acres of prime, valuable, and highly productive farm land. The State of Oregon is losing productive farm land at an alarming rate, and I feel if you rule in favor of the industrial filtration plant on historical farm land it could forever change the scope of urban sprawl onto rural farm land.

The proposed industrial site has been strictly farmland for more than 100 years, it has raised cattle, grown food crops, and grown nursery stock. It was never intended to be an industrial site.

This property was condemned by the City of Portland over 45 years ago with land use rules that were far more lax than today's standards. The original water treatment plant was not started then and shouldn't be started now.

#### **About the Nursery;**

R & H Nursery is a wholesale ornamental nursery exporting balled and burlaped and container trees to 30 plus states across the country. We bring out of state money into the local economy, and create both seasonal and permanent local jobs. R & H Nursery currently employs 10-15 employees year-round, while other area nurseries employ many more. Most of our employees live in east Multnomah County and their

children go to the local schools, and their families drive on the same local, rural roads that are typical of this area. They are not driving in from out of the area. They are familiar with the pedestrian and bicycle traffic, bus stops, and school drop off and pick up routines, and they often carpool to work together.

The land where R & H Nursery is located has been owned and farmed by the same family for 73 years. My cousin, Ron Roberts, and I founded R & H Nursery in 1992. Ron farmed raspberries and other fruit crops prior to joining me in the nursery industry, and also had well over 40 years of farming experience. I have continued to own and operate R & H Nursery in its original location after Ron retired a few years ago. R & H Nursery also regularly leases land from residents in the area, as is common in the nursery industry. This provides income for those landowners and most importantly keeps the land in farm production, as was intended by the overall plan for the area set by local and state officials.

We grow over 200 varieties of landscape size ornamental trees and shrubs. As a wholesale nursery, I deal only with wholesale customers, I do not sell directly to the public. R & H Nursery exports trees to other states. Western Oregon has both a climate conducive to growing nursery stock as well as rich soil in its farmland, making it ideal for ornamental nursery stock growers such as myself. Most of the states we export to lack either the climate or the rich soil and farmland needed to grow ornamental nursery stock. Oregon is one of the top nursery production states in the nation, and nursery stock is the number one agriculture commodity in the State of Oregon.

### **Normal farm operations at R & H Nursery**

#### **Employees:**

R & H Nursery has on average 10-15 employees year-round. Employees work, on average, 8 hours a day, 5-6 days a week, year-round. Most if not all nursery work, especially field work, is done during daylight hours, so the work schedule might change throughout the year to accommodate the available hours of daylight.

My employees report to the main farm location, or headquarters, on Carpenter Lane at the start of the work day to receive their work assignments for the day. If their work will be off-site, employees transport tractors, equipment, trees, supplies, and more to these off-site locations using a variety of vehicles. Farm equipment is typically kept at the headquarters, so any work to be done at locations separate from the main farm require transporting the necessary equipment. This is for security reasons as well as logistics, as the headquarters is the only location equipped to maintain and service the farm equipment, as well as where all supplies are stored to prepare for various job tasks. To move employees and equipment from headquarters to off-site locations, I have to consider how fast regular traffic moves on roads I need to use, and how heavy the traffic is to ensure the safety of my employees. I also consider school bus routes, stops, and pick up/drop off routines that take place on roads I need to move equipment on. Weather conditions also play a role in deciding the best route. For all these reasons, it's imperative I have multiple options to ensure safety of my employees and efficient mobility of my equipment. For locations on Carpenter Lane & Cottrell Rd, and those within the main farm, employees drive tractors, pickups, and other farm equipment directly to and from the fields. To reach some of these areas, it is often necessary to drive the tractors or equipment on the roads, including the east end of Carpenter Lane.

Regardless of where they are working, my employees return to the main farm headquarters area for their lunch break, then go back to their work location after lunch. They return to the main farm at the conclusion of the day and leave in their personal vehicles at that time. Travel between the main farm and

off-site work locations can take place multiple times a day and throughout the entire year as necessary. I go between sites multiple times to check in with crews, repair equipment, deliver supplies, or for a number of other reasons.

Normal farm operations at R & H Nursery include but are not limited to field work, greenhouse work, maintenance & repair on farm equipment & buildings, and filling & shipping customer wholesale orders. These activities take place at all field sites operated by the nursery. If trees need to be moved they are loaded on trucks and trailers and hauled. Tractors and other slow moving farm equipment are driven on the roads between nearby locations such as fields on Carpenter Lane & Cottrell Rd. Equipment and employee mobility is hugely important in the nursery business to maintain efficiency, productivity, and profitability.

### **Tractor work in the fields;**

Tractors and other farm equipment are used as part of my normal farming operation at R & H Nursery. When tractor work is being performed, there are typically 1-6 tractors operating in the fields throughout R & H Nursery's farming operation. Most tractors used for field work are small and compact as they need to fit in between the narrow rows of trees. My employees drive these tractors to and from the fields adjacent to the main farm location using the East end of Carpenter Lane. These tractors typically go 2-8mph.

Tractors are operated by employees during their normal 8-hour work day. By nature, tractor work is not done after dark and is only done in short increments of time, such as from start to lunch time, and after lunch to quitting time. Employees shut down the tractors during lunch and other breaks. Tractors move across the fields through the rows, turn around at the end of the row, and travel back in the opposite direction. When tractors are within audible range of residences, it is for a brief amount of time, while they are turning at the end of the rows. Only in very small fields a tractor may be in audible range throughout the field, and these small fields do not take much time to complete the work needed. The low 'hum' that these small tractors produce is a very normal noise that is part of the rural landscape, and is minimally audible to nearby residents or pedestrians. Any noise from tractor work is also only present a few hours at a time on select days, during daylight hours. Tractors are not present in every field every day; once the task involving a tractor is completed, a tractor may not return to that field for days or even weeks.

### **Mobility of Farming Operations:**

Transporting employees, farm equipment and trees between field locations of my nursery is a regular activity. Moving tractor and equipment to fields not adjacent to the farm site involves hauling them using farm vehicles. Trips per day between the main farm location and leased fields off site range from 1 round trip to 6 round trips or more. Detours from ongoing road construction or interference from increased and re-routed traffic could create unsafe situations on these roads because of the reduced speeds at which we safely drive. It is not possible to plan and predict every time equipment may need to be transported on local roads, and any delays in doing so costs me money in the way of having to pay overtime, having to hire more employees to get the workload completed because other employees are delayed on the roads, and ultimately lost revenue if orders are unable to be filled on time according to customer needs.

Field work is also a large part of normal farm operations and accepted farm practices at R & H Nursery. Field work involves but is not limited to field planning, preparation and maintenance, tractor work, hand

digging/planting/pruning, irrigation and water management, and applying fertilizer and weed & pest control measures.

Hand pruning and trimming is done by employees walking up and down the rows of trees, trimming and pruning as needed with hand held shears. Employees get to the fields by pickup, tractor, or another farm vehicle, and go to the main farm lunch room for their lunch break.

### **Irrigation;**

Irrigation & water management is another part of accepted farm practices. It involves tasks such as moving pipes by hand and also with tractors within the fields, performing maintenance or replacing irrigation pipes, looking for breaks, checking and adjusting flows and coverage, and all well maintenance and repair. R & H Nursery's well is adjacent to the main site of the proposed filtration plant, and is on the Deep Troutdale Aquifer as is common of many area nurseries and farms. A big concern regarding the new filtration plant is that some of PWB's wholesale customers, such as City of Gresham, City of Rockwood, and Tualatin Valley stated in local news articles that they will not be renewing their contracts due to the rate increases and have opted to drill their own wells. When large-scale wells such as those for a municipality are drilled, local area farmers including R & H Nursery may see a sharp decline in water availability. This may result in having to drill a new well, an extremely costly endeavor of anywhere from \$100,000 to \$300,000 if obtaining a permit for a new well is possible. Damage from construction vibrations at the adjacent site during the 4+ years of construction is also a big concern. Sustained vibrations from drilling into and under the ground near a well are known to cause damage, and require costly repairs that could top \$60,000. I believe that test drilling on their site has already damaged a neighbor's well on an adjacent property and had to be replaced. If construction causes my well to be damaged or put out of commission during irrigation season it will have a devastating impact on my business. Any disruption to my irrigation program will result in a huge financial loss to my nursery.

### **Order assembly;**

Another part of normal nursery operations at R & H Nursery is preparing orders for shipments. This includes digging trees in fields, hauling those trees to holding yards, and organizing trees in those area for upcoming loading. Employees typically use tractors and farm vehicles to access fields on Carpenter Lane and Cottrell Rd to collect the trees that have been dug for upcoming orders and move them to the holding yard or loading areas at the main farm site. For off-site locations employees transport tractors and other equipment to the site with a farm vehicles. Trees are dug and moved to the holding/loading areas at the main farm site throughout the year. For any of these trips to be delayed or detoured on roads is a costly disruption, causing extended work hours and overtime rates to be paid to employees in order to maintain the normal operational schedule and avoid a disruption of order fulfilment.

### **Nursery shipping logistics:**

R & H Nursery loads common carrier over the road semi-trucks to ship customer orders. Trucks are loaded during normal hours of operation and on normal workdays in a designated loading area at the main headquarters. For over 30 years, R & H Nursery's loading activities have not caused any interference with

pedestrian or vehicle traffic on Carpenter Lane. The local school bus also uses the loading area at R & H to turn around and pick up school children on Carpenter Lane.

Typically, once an order is scheduled to be shipped, a truck broker schedules the load and lets the nursery know when the truck will be there and when it will need to be finished loading and leaving to get to the next place on time. The trucks are often arranged through a broker who works to get the customers total order onto a truck and delivered to the customer. Customers are not local and the trucks are delivering to out-of-state locations. The drivers are long-haul commercial truck drivers. They are not from the local area and are simply following the order of a load sheet from which they cannot deviate. Trucks often have multiple nurseries that will be loading into the same trailer, and the trailer needs to be loaded in a specific order. Trucks can't deviate from their stops and go to another nursery out of order due to road delays and closures. If there are known delays or closures on the roads leading to and from my nursery, I face the potential of losing customers and orders. Customers may be warned to not purchase nursery stock from me because of road closures, detours and delays that prevent trucks from getting to each stop on time causing major issues in the loading chain. Loss of customer orders would be devastating. Orders can be anywhere from \$5k to over \$100k. When a truck is delayed getting to or from a nursery there are multiple consequences, ranging from a reduction in invoice or sale, damaged trees, lost income and unhappy customers. Ultimately brokers and customers may avoid purchasing product from nurseries with shipping issues, even if not the fault of the nursery itself. The wholesale nursery market is very specialized, and nurseries share information amongst each other. Shipping delays and order fulfillment issues may result in negatively impacting the reputation of the nursery. According to their application, construction impacts of the PWB filtration plant are expected to last a minimum of 4 years, which will have an obvious and sustained, permanent negative impact on my nursery.

#### **Additional Farm Operations:**

General maintenance and repair of farm equipment & buildings is performed routinely and as needed. It's important that we have reliable access to nearby towns to pick up things needed for urgent repairs and prevent a disruption to normal operations. Equipment, tractor, and vehicle repair is performed in a dedicated area on the main farm site and requires parts to be picked up and/or delivered from businesses in town on a regular basis year-round to complete necessary repairs and maintenance to prevent unnecessary disruption to normal operations.

Regular pickup and delivery of farm supplies is another component of normal farm operations at R & H Nursery. Typically I make multiple trips daily to check on crews at off-site locations or pick up parts or other supplies from various suppliers in town (most commonly to Gresham, Troutdale, Sandy, Clackamas, Oregon City, etc.).

Outside deliveries to the nursery include: Supplies needed for typical nursery operations from various suppliers; mulch, potting soil, burlap, baskets, pots, wire, tape, fertilizer, shears, shovels, gloves, etc. Parts and supplies needed for regular maintenance and repair are also ordered and delivered to the farm. Frequency can be as much as weekly or more during certain times.

The portable restrooms at the main farm are serviced weekly year round. Servicing the portable restrooms is done on a schedule set by the service provider. Disruption of this schedule, such as road closures on roads surrounding R & H Nursery may result in the provider cancelling the contract.

Although there are some periods of the year where certain activities are busier than others, a nursery is a fluid, dynamic business that depends on numerous factors that necessitate complete readiness but also flexibility. For example, weather and market conditions are major factors that can cause orders to be delayed or moved up, requiring a shift in priorities and work assignments to accommodate those immediate schedule changes, sometimes with little to no advance notice. R & H Nursery must remain unencumbered by limitations that could hinder its ability to respond to these changes and others. For example, there are times when weather in other parts of the country has affected my shipping plans, and caused an order to be moved up. I had to suddenly get the customer's trees to the loading area right away, which involved moving crews and equipment to different locations and re-assigning work tasks throughout the farm. I also need to be able to quickly act on a land lease opportunity that would benefit my operation, and need to be able to access that land and not be hindered by 4+ years of road construction in the area. The estimated construction period presents a huge encumbrance to my ability to carry out normal farm operations for R & H Nursery, and especially will interfere with the ability to quickly adapt and redirect workforces. A repeated, sustained disruptive situation such as the construction of PWB's plant, pipeline, and infrastructure will have devastating and permanent consequences to my farm business, and as such the construction period should be equally considered as part of the overall impact of the land use application submitted by PWB.

**These additional concerns are detailed below.**

**Construction congestion;**

Construction and operation of the PWB plant will severely impact R & H Nursery's normal farm operations and accepted farming practices. PWB plans to widen the East end of Carpenter Lane to be used as the primary access for the plant. Currently, Carpenter Lane is a local, rural road with no shoulder and no lane striping. The East end of Carpenter Lane is and has always been a dead-end, rural road with private farm and residential access only. Upgrading the use class of this portion of Carpenter Lane solely for PWB's access to their industrial site will be a hugely disruptive project to residents and farming operations. It is possible that there will be times that R & H Nursery will be completely inaccessible due to the massive road renovation and construction on the East end of Carpenter Lane, and at the intersections of Carpenter & Cottrell Rd and Cottrell Rd & Dodge Park Blvd, all of which are necessary access points for R & H Nursery. The planned construction on these roads and others also mean that there may be times when employees will not be able to reach the farm and report to work, and semi-trucks, farm equipment, and farm trucks hauling equipment will be unable to enter or exit the farm. The inability of employees to access the farm and the restricted mobility of farm operations will have devastating financial impacts ultimately resulting in trees not being able to be managed properly and customer orders not being prepared, loaded and shipped. When employees are unable to get to work, production is halted. When employee commute times are extended due to delays, detours and closures on their usual routes to and from work, they may seek work at a different nursery where the commute is less stressful, resulting in loss of work force which will negatively impact productivity. The months when the most construction may be done on the surrounding area are the same months that are typically the busiest in the nursery industry. The impact from reduced workforce efficiency and productivity will directly impact R & H Nursery's bottom line.

During the construction of PWB's plant, the estimated number of daily dump truck trips it will take to move the massive amount of soil PWB plans to have excavated and moved off the site on Carpenter Lane will be prohibitive to the normal farming operation at R & H Nursery. Interference with semi-trucks

entering and exiting the loading area is a major concern. These over the road trucks are unable to be re-scheduled to accommodate traffic delays, detours and road closures. They have a set pick-up order to adhere to so they can make the proper deliveries. It is also dangerous for semi-trucks to navigate alternative routes when main roads are closed.

### **Health concerns;**

Dust and noise from the construction site will have a significant impact on nursery operations and accepted farm practices. My employees will be exposed to noise and dust levels much higher than normal and expected in nursery work. It is in a nursery's best interest to generate as little dust as possible, for employee's health as well as the health of the trees and plants. We achieve this by spacing out tractor work in fields, avoiding field work on foot when a tractor is doing row work nearby, and by avoiding tractor work in windy conditions so as not to lose additional top soil. Normal farm operations and accepted farm practices include regular work in the fields on foot performing hand pruning and trimming, working on or moving irrigation, planting, digging, and more. During these activities, the fields are quiet and free of equipment stirring up dust. In addition to the main construction site adjacent to R & H's fields, Carpenter Lane will be seeing hundreds of dump trucks per day hauling loads of dirt and debris from the site. R & H Nursery employees regularly work in the container yards and loading areas adjacent to Carpenter Lane, and will be subject to levels of dust and particulate in the air stirred up by the constant traffic and dump trucks coming on and off the construction site and driving directly next to these work areas.

Noise generated from the construction activities at the main site and from these hundreds of trucks on Carpenter Lane far exceeds noise levels found in normal farm operations and accepted farm practices at R & H Nursery. In order to protect the hearing health of our employees, I may need to purchase industrial-quality hearing protection for my employees, beyond the scope of what is expected with accepted farming practices.

This impact on respiratory health is very serious. My employees may be subject to unusually high levels of dust and particulates from the construction site that borders R & H Nursery's fields, as well as construction traffic and dump trucks that will be continuously driving up and down Carpenter Lane that borders the loading area, fields, and holding yards of the main farm site, which are all frequent work locations for my employees. N95-type dust masks commonly used for nursery work are sufficient for normal operations and accepted farm practices, however, they may not be sufficient to protect the health of my employees when subjected to this construction dust and reduced air quality.

### **Plant growth concerns;**

In addition to impacting the health of my employees and my overall labor force in general, the dust, diesel fumes and airborne particulate may affect my trees. The massive amount of dirt & top soil to be excavated and hauled off-site will generate quantities of dust that far exceed what is part of normal farming practices. The majority of the industrial plant will be built on the western edge of the construction site that borders my fields; diesel fumes and dust drift is inevitable and cannot be adequately mitigated with water. Excessive amounts of dust and diesel fumes generated from hundreds of dump truck trips per day plus traffic from work crews, PWB employees, contractors, construction vehicles, etc., will fall onto and coat my trees and plants. Plants that are coated in dust have a reduction in photosynthesis that results

in growth problems. Dust covering plants also affects respiration and transpiration which increases leaf temperature which allows the penetration of phytotoxic gaseous pollutants. This leads to the tree or plant having visible damage and generally there is decreased productivity. The only mitigation for this impact is cost prohibitive.

**Security concerns;**

The construction and the presence of a massive, industrial complex such as PWB's water filtration plant will have a huge permanent impact on my nursery business. Increased visibility from construction traffic and then ongoing employee traffic, deliveries, and public tours during normal operations presents massive security concerns. R & H is not a retail nursery nor open to the public. There is minimal office staff at R&H Nursery, and unless it is lunch time, employees are out in the fields and not at the main farm area. Increased visibility from daily staff and visitors driving by, delivery drivers, contractors, and facility tours, presents a valid security concern and liability risk from people wandering into the farms property, the loading areas, holding yards and container yards.

**In closing;**

I hope this statement gives you a clearer, more accurate picture of the real cost of Portland's filtration project to farmers such as myself. A development of this kind, even one considered a 'community service use' was never intended to be built on designated important agricultural land to which state and local leaders have given specific protections. It's time to enforce those protections and stand up for Oregon agriculture.

Sincerely,

A handwritten signature in black ink that reads "Patrick Holt". The signature is written in a cursive, flowing style with a large initial "P".

Patrick Holt  
President  
R & H Nursery, Inc.