



June 30, 2023

RE: Case File #T3-2022-16220 PWB Land Use Application for Filtration Plant & Pipelines

To the Hearings Officer and other respected members of Multnomah County Land Use Planning Board:

My name is Ryan Marjama. I'm a life-long resident and nursery stock farmer in the rural community of East Multnomah County. I've spent my whole life as part of the local nursery industry, and I now run our family nursery with my dad and brothers. I grew up on our nursery property in the Orient/Cottrell/Sandy rural farm communities, and my wife and I are raising our family right here as well. On behalf of myself, my family, and our valued employees at Don Marjama Nursery, Inc, I would like to express our strongest and most sincere opposition to the water filtration plant and pipeline project for which Portland Water Bureau is currently applying for a conditional use permit. Please consider this statement our response in opposition to their overall application as well as our rejection of their farm, traffic, and construction impact reports.

**About the Nursery:** Don Marjama Nursery Co., Inc. was started in 1977 by my parents, Don & Le'Ann Marjama on 1.5 acres in their back yard. Over the years and with the help me and my brothers, Tim and Brad, and countless faithful employees, we now farm about 300 acres of field and container-grown stock. What once use to be only 3 items grown now consists of multiple varieties of Conifers, Maples, Dogwoods and misc. Ornamental trees and shrubs. We continue to strive in producing a product that is consistent and above average in quality.

Our nursery is headquartered at 11333 SE Bluff Road, but our roughly 300 acres of farm production are spread across 6 different locations in the local area. Some of these locations we can reach from our adjacent properties and some we access by using local rural roads. We employ on average 40-50 employees year-round, who typically work 8-hour days, 5-6 days a week. Many of our employees have been with us for over a decade, some almost two. Some people think of nurseries as seasonal, part-time or temp work, but many nurseries, like ourselves, have numerous long-term employees who are regular members of the local community. Our employees raise their families here, our kids go to the same schools, we attend the same churches and wave when we see each other on the road. That's just how our rural community is – we're all neighbors, even if we don't live next door.

What Portland Water Bureau wants to introduce to our rural community is so out of place and so out of character for our area, that I don't think many of us realized it would ever even get this far. We had faith in the land use and zoning laws that protect our very important agricultural lands, especially those out here in the West of the Sandy River area which is a designated rural reserve. We, the local ag industry, dedicate our lives to farming and agriculture in this area because *there are* protections in place to ensure that the farming legacies that we are building will continue to be available to our future generations. I think we as local farmers, who are quite aware of our zoning and land use rules, were very surprised to learn that PWB not only selected this piece of important agricultural land as the 'best place' to put their industrial filtration plant, but also that they seem to keep saying whatever they want to make it seem like it's a done deal. In their reports they say they've spoken with and listened to farmers and community members, but yet those same reports conclude that their filtration and pipeline project fits in just fine with the character of the area, which any resident will tell you just isn't true. PWB even goes so far as to claim that their worst-case scenario is better for the community than a local nursery. Their 'facility' will be 95 acres of paved roads and parking lots, two-story brick and mortar buildings, a communications tower, perimeter security fencing, 24-hour lighting, round-the-clock employees and a minimum of 5 tanker trucks daily bringing dangerous chemicals

down our country roads. And that's their *planned* facility – no telling what their 'worst case' version might be. A nursery, on the other hand, is simply fields planted with trees, where wildlife casually hang out or pass through, where tractors make their rounds and leave before sundown. A nursery rarely has paved roads or security fencing, never has round the clock operations, and about the only two-story buildings you'll find on a nursery are the original farmhouses and barns still lived in and used to this day.

PWB compares their filtration facility footprint to that of nearby nurseries. We can't know what they counted in their calculations because they simply state that the numbers are 'estimated building coverage' totals, with no mention of the buildings measured from the images they used. We have to believe they counted anything with a roof. They also point to greenhouses to imply that their facility will be less obtrusive than a nursery. However, greenhouses do not take up acres and acres as PWB reports. They are non-permanent ag structures that could actually be plowed over if a tractor ran into them. They don't have any brick or mortar structure or foundations; they are single-story height or less, and they don't have 24-hour lighting so they don't affect the views of any nearby residences during the day *or* night. Farms are *not* an unexpected sight in the country. No one who lives here would be surprised to see a greenhouse, a barn, a tractor, or a shed. They would *not*, however, expect to see an industrial plant lit up 24 hours a day, on paved-over fields, with round-the-clock shift changes and deliveries, security personnel and paved parking lots and gated entries.

Agriculture is an important part of Oregon's heritage as well as its future. And local nurseries like ours are an important part of both. The wholesale ornamental nursery stock industry is a huge export business for Oregon. Most if not all of our products are exported to other states. Don Marjama Nursery specializes in field and container-grown trees and plants. We grow hundreds of varieties of nursery stock, flowering and shade trees. Most of what we sell is exported to states that lack either the climate or the rich soil and farmland needed to grow ornamental nursery stock. Oregon is one of the top three nursery production states in the nation, and we *lead* the nation in several ornamental plant categories. The nursery industry is an important economic force in the State of Oregon, made possible by the rich soil of our farmland *and* the farmers willing to dedicate their lives to farming. Our fields right here in East Multnomah County have some of the most productive soils in the world, and that farmland should be protected. In fact, nursery stock and greenhouse products have ranked as Oregon's number one agricultural commodity in sales for 8 of the last 10 years, according to Oregon Association of Nurseries.

The local nursery industry not only brings in revenue to the State, but creates both seasonal and permanent *local* jobs. A high percentage of nursery workers are from local yet marginalized populations, not always English-speaking, and often need long-term, year-round employment as well as seasonal job opportunities. Local nurseries offer both. Nursery workers live in the same rural area as the farms, 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, in fact, they usually carpool when coming to work or get dropped off by a family member. They are familiar with the pedestrian and bicycle traffic, hidden driveways, bus stops, and school drop off and pick up routines, and they often carpool to work together.

Nurseries help keep more land than just their own in farm production as well. By leasing land from area residents, we not only can expand our own farmable acreage, but it provides a valuable income for landowners in the community. Most importantly, it keeps the land in farm production, as was intended by the overall comprehensive plans for the area set by local and state officials. Nurseries develop long-term, working relationships with the owners of the lands they lease. We are committed to being good stewards of the land that we farm, we respect that often their families live on that land, and we care about the environment because we live here too. However, land for lease is hard to come by, expensive, and creates additional challenges of moving equipment, employees and trees between locations that are typically not next to each other. For these reasons, it's important to maintain any and all leased land as long as possible because it is difficult to replace, and costly to move trees once they're planted. The massive filtration and pipeline project has failed to take the importance of farming mobility into account. Road construction, pipeline construction, main site construction and all the closures, delays and detours

that will result from this 'plan' will essentially paralyze nurseries that need to move crews, equipment and trees from their main location to off-site locations. When these off-site locations are leased rather than owned, the only logical move for the farmer is to let go of leased lands that become too difficult and costly to reach and maintain. Even with lands owned by the nursery it's a huge financial impact to not be able to reach their fields. But, as stated above, the loss of lease lands hurts the land owner too, and is a financial loss for all parties involved.

### **Normal well-established operations at Don Marjama Nursery**

**Employees:** A typical day at our nursery and most others starts with employees arriving to our main location on Bluff Road. Although we employ on average 40-50 employees, we always have significantly fewer cars in the parking area than employees on the clock because many of them carpool together or are dropped off by a family member. Nursery employees work, on average, 8-9 hours a day Monday through Friday with occasional Saturdays. Our nursery is closed on Sundays as is common practice in the area. 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. At no time does our nursery operate 24-hours a day.

Our employees report to the main farm location, or headquarters, on Bluff Road at the start of the work day to receive their work assignments for the day. Equipment and crews are transported to any of our 6 nearby locations routes that involve the local roads. Employees transport tractors, equipment, trees, supplies, and more to these off-site locations using farm vehicles with trailers as well as driving the tractors themselves. The tractors used for regular field work are small, compact tractors designed to fit between rows of trees in a field. Farm equipment is kept only at 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. We have well-established routes to move employees and equipment from headquarters to off-site locations; these routes take into consideration how fast regular traffic moves on the road, and how heavy the traffic is to ensure the safety of my employees who will be moving slower than regular traffic. Our routes also consider school bus routes, bus stops, and pick up/drop off routines, as well as the safest roads to operate on should we encounter poor weather conditions. For all these reasons, it's imperative I have multiple, open route options to ensure safety of my employees and efficient mobility of my equipment. At any time and without notice, routes may need to change due to any number of factors, and unrestricted mobility is an important key characteristic of well-established farm practices.

Employees travel back to the main farm headquarters 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 takes place multiple times a day and throughout the entire year as necessary. For example, myself and our nursery foremen go between sites multiple times a day to check in with crews, repair equipment, deliver supplies, or for a number of other reasons.

**Tractor work:** PWB compares their filtration plant operations to our nursery tractor operations. However, there is a huge discrepancy between the two. First, tractors are operated by employees during their normal work day and never scheduled on Sundays. By nature, tractor work is not done after dark and is only done in short increments of time. Employees shut down the tractors during lunch and other breaks, so tractors are generally operating in the fields for less than 4 hours at a time. 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, only minutes, while they are turning at the end of the rows. Only in small fields might a tractor be in audible range throughout the whole field, and these small fields do not take much time to complete the work needed. Tractors are not working 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. We certainly do not operate tractors or any farm equipment 24 hours a day. For these reasons, accepted farming practices involving tractors and farm equipment should not be an acceptable comparison to, or representation of, normal operations at PWB's filtration plant.

**Manual work:** Manual work is a large part of accepted farming practices. Manual work involves essential tasks such as digging, planting, pruning, trimming, tying & staking, budding, irrigation and water management, and field maintenance. Employees perform these tasks on foot in fields, generally walking up and down the rows of trees, performing tasks by hand or with small hand-held tools. This type of work in the fields is quiet work – there are typically and intentionally no tractors doing row work in the fields where employees are working on foot. There’s little if any dust stirred up by these tasks, and it is quiet enough employees can hear each other across the fields.

**Mobility of farming operations:** Driving and transporting equipment on the rural roads in our area is a slow process because the roads are full of potholes and often have heavy pedestrian, school bus, bicycle or equestrian traffic on them, so we drive very slow and respectful of these conditions. Facing delays and detours or interference from increased traffic could create unsafe situations on these roads because the reduced speeds at which we safely drive will cause drivers unfamiliar with our roads to want to pass unsafely. 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 us 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.

**Irrigation:** Irrigation & water management involves 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.

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 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 on the same aquifer, local area farmers including Don Marjama Nursery could see a decline in water availability. This will result in having to dig deeper or drill a new well altogether, an extremely costly endeavor of anywhere from \$100,000 to \$300,000 or more for a new well. Damage from construction vibrations at the adjacent site during the 4 to 5-year period of construction is also a big concern. Sustained vibrations from drilling into and under the ground near a well can cause extensive damage, especially with horizontal drilling, and require repairs that can easily cost \$60,000 or more. A well belonging to a property adjacent to the PWB plant site was already damaged in test drilling and had to be replaced. If any of our wells are damaged during irrigation season, the impact would be disastrous and result in dead trees and cancelled orders.

**Nursery shipping logistics:** Don Marjama Nursery loads customer orders on common carrier, over the road trucks during normal hours of operation and on normal workdays, in a designated loading area at the main headquarters. Our loading activities have never caused any interference with pedestrian or vehicle traffic on Bluff Road. Trucks for customer orders are often arranged through a broker who works to get the customer’s 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 truck drivers for these shipments are common carrier over-the-road commercial truck drivers. They are typically following the order of a load sheet or designated route from which they cannot deviate. Sometimes our trucks are also loading at other area nurseries into the same trailer, and it needs to be loaded in a specific order according to the customer or broker. Trucks can’t deviate from their stops and go to another nursery out of order due to road delays and closures. If we’re the only wholesaler on that truck, they definitely can’t just come a day later or earlier according to our local road issues. There is an end customer to satisfy and deliver that load to, and unless inclement weather makes it unsafe to do so, schedules must be strictly followed. If there are regular delays or closures on the roads leading to and from my nursery, we will lose customers and orders which would be devastating and negatively affect our bottom line. 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 will avoid purchasing product from nurseries with shipping issues, even if not the fault of the nursery itself. Shipping delays and order fulfillment issues will result in negatively impacting the reputation of our nursery.

as well, which could put a nursery out of business. According to their application, construction impacts of the PWB filtration plants are expected to last a minimum of 4 years but could take even longer, which will have an obvious and sustained, long-term and potentially permanent negative impact on our nursery.

**Additional farm operations:** General maintenance and repair of farm equipment & buildings is performed routinely and as needed. It's important that myself and our employees have reliable access to nearby towns to pick up things needed for urgent repairs and prevent a disruption to normal operations.

Regular pickup and delivery of farm supplies is another component of normal farm operations at Don Marjama Nursery. We often make multiple trips daily to check on crews at offsite locations and/or pick up parts or other supplies from various suppliers in town (most commonly to Gresham, Troutdale, Sandy, Clackamas, Oregon City, Wilsonville, etc).

Outside deliveries to the nursery include: Supplies needed for typical nursery operations from various suppliers; sand, 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 on an as needed, often next-day basis. These supplies, as mentioned above, are delivered to the main farm location on Bluff Road by pickups on a weekly basis on average, but more or fewer trips may be necessary as operational needs determine.

**Examples of construction-related concerns and impacts are detailed below:**

**Construction congestion on roads:** The construction of the filtration plant & pipelines on and around nursery property in our area will be completely prohibitive to the continuation of well-established farming practices. Construction and operation of the PWB plant will severely impact numerous farm operations, and it is inevitable that our nursery will feel the effects of the massive construction planned for in our area. My own ability to drive from my home to my nursery will be impacted, which means my ability to respond to an emergency or urgent need at the nursery will be impacted. The planned construction on these roads and others also means that there will be times when not only will employees *not* be able to reach the farm and report to work, but customer trucks, farm equipment, and farm trucks hauling equipment on large trailers could be unable to get to 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 will seek work at a different nursery where the commute is easier, resulting in loss of work force which will negatively impact productivity. Impacted productivity is ultimately reflected in the number of orders completed. A customer order can easily be worth \$100,000 or more, and is impossible to predict and to arrange alternative operations to fill an order if there are delays and labor availability issues due to area road closures, delays and detours. The months when the most construction will be done on the surrounding roads are the same months that are typically the busiest in the nursery industry, because both are highly dependent on dry weather conditions. The impact from reduced workforce efficiency and productivity, and even as little as *one order* not completed or not completed on time can result in a financial loss of up to \$100,000 or more. Losing any order leaves us with unsold trees we've already paid employees to dig and prepare for shipping. These losses will be compounded the longer the construction at the main site and on area roads is sustained.

Interference with common carrier over the road semi-trucks easily accessing our farm is a major concern. Is it extremely disruptive to reschedule these trucks, if it's even at all possible, due to detours and road closures. It is also dangerous for semi-trucks to navigate alternative routes when main roads are closed because these truck drivers are not from this area and are not familiar with our community's network of rural roads. Many of our rural roads cannot accommodate the size and turn radius of a semi-truck. It is not safe for other vehicle and pedestrian traffic to have semi-trucks attempting to navigate unfamiliar detour routes on our rural roads, with numerous hidden driveways, multiple school bus stops, no lane striping, and no shoulders, and no safe areas to turn around.

Many of our roads out here do not have adequate width or shoulders for semi-trucks to share the road with bicycles, pedestrians, equestrians, slow-moving farm equipment, and other non-vehicle traffic that is a normal part of life in this rural area. Re-routing semi-trucks and heavy-duty construction traffic onto side roads and detours routes will create risk to other drivers and area residents. If our nursery loses orders because of the massive network of road construction surrounding our location – even just one order – it will negatively impact our bottom line.

But at the end of the day, the most devastating impact caused by the City of Portland allowing PWB to pursue applying to build the water filtration plant is the loss of almost 100 acres of prime agricultural land – land that has never been used for anything but farming. The soil here is unmatched and reported by the USDA to be some of the best in the world. For this much prime agricultural land to be taken out of farm production is devastating to Oregon’s agricultural economy, and its character. The wholesale nursery business is one of Oregon’s strongest but *last* remaining agricultural industries. It brings revenue into the state, provides jobs for important groups of marginalized citizens, and protects Oregon’s rich heritage as an agricultural center. But it’s an industry that needs protection itself.

I hope this statement gives our Multnomah County Land Use decision makers, and especially the Hearings Officer, a clearer, more accurate picture of the *real* cost of Portland’s filtration project. A facility and project of this size and scale, even one considered a ‘community service use,’ was never intended to be built on designated important agricultural lands to which state and local leaders have given specific protections. It’s time to enforce those protections and stand up for Oregon agriculture. The loss of this prime farm land to an industrial complex is one more step toward the eradication of the Oregon farmer. Soon, especially in Multnomah County, farmland – and farmers – will become extinct.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ryan Marjama', with a stylized flourish at the end.

Ryan Marjama  
Owner/Operator  
Don Marjama Nursery, Inc  
ryan@donmarjamanursery.com



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**RE: Case File #T3-2022-16220 written testimony**

1 message

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

Fri, Jun 30, 2023 at 12:30 PM



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

Please add this written testimony from Don Marjama Nursery Co., Inc to the record in the case of Portland Water Bureau's Land Use application hearing, Case File #T3-2022-16220.

Thank you.



**Marjama Nursery Impact Statement 0630.pdf**

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