



July 28, 2023

RE: T3-2022-16220 Comments

To the esteemed Multnomah County Hearings Officer:

This letter is addressing MCC 39.7515 Conditional Use Approval Criteria C (1) and (2) and pertains to the Globalwise Compatibility of Proposed PWB Filtration & Pipelines Construction with Farm Traffic report (GCP), found in Exhibit H.3.

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, and every individual resident, as well as any other opposition on record to the construction of this project in the heart of our farming community.

This Globalwise Report is extremely concerning to our business and the entire local agricultural industry. To say there is going to be minimal impact to normal local farming operations, travel and practices is absurd. The construction of this plant at the proposed location will cause an undue burden to local farming businesses and residents, increase operating costs, and disrupt normal operations for local farmers and ag-related businesses including ours. There are several inconsistencies in the report and vague responses to the concerns brought forth by local farmers, and I share the sentiment as do many in our area when I say that we do not feel this report accurately represents our rural community and local farming industry.

First, I am curious as to when the referenced 'Construction Traffic Impacts Analysis' (*Ref. GCP Attachment 6, Comment 4*) was performed. Was this study done between 2020 and 2022? Did the analysis consider that traffic was greatly reduced during those years of the COVID pandemic as more people worked from home instead of commuting to a workplace, schools utilized remote learning, and many local businesses had reduced hours or were temporarily closed?

Tree Source (TSB), referred to as "Operator U" in the report, is located at 9825 SE 362nd Ave in Boring, OR. We are a nursery stock logistics operation that deals with on-site live products as well as coordination of multiple nurseries connected through our logistical network.

The Globalwise report assumes TSB is a farming operation with no farm traffic and thus no need for Alternate routes. (*Ref. GCP pg. 36*). Although we only minimally use the surrounding public roads for movement of our farm equipment, it is absolutely imperative that our business has unencumbered, year-round access to all roads in the surrounding road network to maintain operations related to outbound shipping, in-bound deliveries, customer traffic and commuting employees. These concerns are outlined below.

TSB utilizes three 26' box trucks to procure material throughout the Willamette Valley on a daily basis. The main routes our local trucks take include Bluff Road to head north and west, and Hwy 212 to head south. We depend on these routes to bring back material in time to be 'cross-docked' and reloaded on

limited to paying overtime to our drivers (avg. \$72.00/hr) and to our loading crew (avg. \$114.72/hr), detention rates to our trucking brokers (avg. \$200/hr), possible overnight fees ranging from \$500-\$1000, and missed delivery times to our customers and causing TSB to reimburse landscape crews for waiting on trucks at an average of \$45.00/hr. On top of this, there is no way to quantify the negative effect on our brand and future lost sales due to upset customers.

The report does recognize there is *not* an alternative Outbound Shipping Route for 53' semis. As is common practice in the nursery industry, we use common-carrier, over the road semi-trucks for shipping live product from our location to customers. This point is one of my main concerns. There is only one safe and acceptable route to and from our loading area on 362nd Ave (see attached map). Our outbound trucks travel to and from I-84 in Troutdale, OR. The third-party source, www.truckdrivingdirections.com, confirms this same route we ask our outbound trucks to take. Any delays to our shipping schedule will also cause an undue financial burden as mentioned in the previous paragraph. As a logistics company, our main goal is to meet our customers' demand with live, quality trees at the exact time their crews are onsite to receive the trees. As mentioned before, delays to expected delivery times cause financial burden in the form of detention fees, overnight fees, lost time wages, credits due to death loss of material, and unknowable loss of future sales.

Under the figure 'Summary for Farms Traveling on Bluff Road' (Ref. GCP pg. 36), 'No' is marked under 'Alternate Outbound Shipping Route' for Operator U (TSB). However, directly above in BOLD "Alternative Outbound Shipping Traffic Route" it states "The secondary outbound shipping route is SE 362nd Ave north to Bluff Road then east on Bluff Road. Travel on Bluff Road is the only alternate outbound shipping route." Not only is this statement a contradiction and inconsistent, this suggested route disregards the safety of the semi driver as well as all drivers traveling at this intersection. Globalwise's statement suggests semi-truck traffic take a route that involves turning *east* instead of west onto Bluff Road which is an extreme 45-degree angle turn and causes semis to cross over and take up both directional lanes to make the turn. Under normal conditions, without added construction traffic loads and drivers in a hurry to get around construction, this is an extremely dangerous maneuver. With the addition of delayed and re-routed traffic, and especially if PWB is granted construction access through their proposed 'Emergency Access Road' on Bluff Road directly across from our farm, this becomes an even greater danger to commuters and semi drivers. This report fails to acknowledge the added time for their suggested alternate routes. In this case, if outbound shipments must use Bluff Rd east – the opposite direction of Troutdale, in addition to being an unsafe alternative, this routing adds over 35 minutes in each direction. That is time that the operator will charge TSB for, and that extra hour could have a serious ripple effect on overall logistics. The only acceptable and *safe* route is Bluff Road *west* towards Troutdale.

Also, on page 36 of the GCP in the figure 'Summary for Farms Traveling on Bluff Road', it states Operator U's "Farm Traffic Lowest Use Seasons" as July-January, and that during these months there is no alternate farm traffic route needed. This is completely incorrect and misrepresents our farm operations. Shipping customer orders, local deliveries, employees and our three box trucks utilize Bluff Road multiple times a day, every month of the year, definitely including summer and fall months. Typically, our lowest shipping months are December, January and February, but only in the fact that there a slightly fewer outbound shipments those months, and that number is never zero. However, normal farm operations and "Farms Traveling on Bluff Road" involves *much more* than just outbound shipments to customers. Globalwise fails to consider all the logistical needs of a normal farming operation, and that our 'farm traffic routes' are more than just travel between fields and headquarters as defined in appendix A, page 9. Outbound shipments are crucial, but they don't happen without the entire operation running smoothly, from employees commuting to & from work to vendors, service providers, and regional

logistics to organize those customer orders. Not accounting for the whole picture misrepresents not only TSB's farming operations; it misrepresents the scope and scale of the impact to every farmer affected by this proposed project.

Travel on Bluff Road, in both directions to and from our farm, is crucial to maintaining not just normal farming operations, but to staying in business entirely. Limiting and/or redirecting traffic on Bluff Road, while adding hundreds of dump trucks and other construction vehicles to our rural road network daily, will significantly interfere with and restrict access to and from our farm for customers, employees, and deliveries, and in many cases, will completely inhibit outbound shipments, with significant financial consequences and cost burdens to TSB, as described earlier.

The information provided above only accounts for our farm's outbound shipping and general operating logistics. Another significant impact of the inevitable interference from construction will be to our vendors and service providers. We have farm supplies consistently delivered to our farm as well as regularly scheduled service providers every week throughout the year. If a vendor refuses to continue deliveries or service due to unusual traffic delays in the area, it will cause TSB the additional financial and time burden of sending our own employees and vehicles as far as Salem, Oregon to pick up needed supplies for our operation. When service providers are unable to reach our location as regularly scheduled, they may not be able to reschedule and may discontinue the service altogether if construction prevents them from adhering to their operating schedule. This situation could have dire impacts on our operation and even the health and safety of our employees. For example, service vendors include companies like the one that performs our weekly portable restroom cleaning and sanitation service. Any disruption in this service puts the health and safety of our workers at risk.

Speaking of health risks, I did not see any significant mention of the impact of the additional noise, dust, diesel fumes or road destruction that will be caused by the construction traffic and re-routed commuter traffic. First, when dust coats the surface of trees and plant leaves, it blocks the little pores, depriving them of the sunlight they need to create the food to make the plant grow. It's akin to a human not eating, and the plants will become frail and susceptible to disease. Our property, and our employees working on the property, are only 20' from Bluff Road. Where is the study that shows the health effects of long-term exposure to construction levels of dust, noise and exhaust fumes from the increased traffic and construction trucks on the roads past our open fields and employees?

All the concerns above, and others I have chosen not to mention here because they affect the residents more than our business, are not adequately addressed in this report. Also, the report only refers to the immediate area around the proposed building site. At a minimum, the report should include the impact on the communities and public roads leading to and from this area and the most populated areas to include Portland, Gresham, Troutdale, and Sandy. After reading the report, I found myself asking 'are these construction vehicles just going to suddenly appear on Dodge Park and Carpenter Lane?' They must originate from somewhere. They must be going somewhere. 98% of TSB employees commute in from other communities over 5 miles away. I would assume we are not the only company or farm in the area where employees commute from outside the area analyzed. Why does the report ignore these outlying affected areas?

Together with Tree Source and all our employees, I wholeheartedly oppose this mega-project and filtration site at the proposed location. The undue financial burdens and safety and health risks to local farming operations, farmers, and their employees far outweigh the 'community service use' it supposes to provide. PWB states in their 'Response to Comment 1' in *the memorandum to the comments of Shelly*

*L Ekstrom, LLC dated March 14, 2023, "As stated in the Water Bureau's land use application, this facility will serve the area's residents, which includes residential customers of the Pleasant Home Water District," and, "As the property owner, the Water Bureau is applying for community service use to fulfill its mission of supply its customers with high quality water from its current major source of water supply, the Bull Run System." How can this be **when the community they are referring to is directly opposed?** My suggestion to PWB is to utilize appropriately zoned industrial land that will not permanently and negatively disrupt and forever change an entire region's economic footprint and way of life.*

Sincerely,

Kurt Clemence

Kurt Clemence

General Manager

TreeSource-Boring OR



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