

March 10, 2024

Dear Sarah,

The purpose of this letter is to respond to a number of proposals put forward by OR-OSHA on Agricultural Labor Housing (ALH). We believe serious financial consequences will result to small fruit and vegetable farms using ALH in Oregon, while doing little to nothing for worker safety if these ideas are pursued.

High Rolls Ranch is a small, 2<sup>nd</sup> generation family farm starting back in the early 1950's. In our past we have grown apricots, peaches, apples and cherries. Today we farm 175 acres of cherries for the fresh market. We no longer do any direct marketing or u-pick. Everything we grow is consigned to three different packing facilities in Washington.

High Rolls Ranch utilizes three on-farm ALH buildings to house up to 110 people to hand harvest cherries for two months. The buildings then sit vacant for 10 months. Each of these buildings are situated on prime, irrigated agricultural land. Any additional structures, necessary to meet proposed new standards, would take up more income producing acreage. All three buildings were built with central kitchens, central showers and sleeping rooms with bunks in accordance with the Oregon ALH 40 ft<sup>2</sup>/person standard which exists today. Construction cost is and always has been expensive. Borrowing money to pay for construction demands that the farmer use those funds in the most efficient and resourceful manner possible. All three buildings were upgraded with heat and A/C in 2017.

The following exhibits briefly describe each building (A, B and C) and the negative effects that would be caused by implementing proposed rule changes.

Also enclosed are:

- Buildings A, B and C original contractor bids and pictures of construction
- 2001-2023 average net return per lb. for each year showing the very small increase in return to grower over 23 years in contrast to Social Security COLAs over the same period.
- 2016 cost to maintain ALH for High Rolls Ranch (Buildings A, B and C)
- Cost of 2017 HVAC mini splits installed, with current day comparison to replace.

Thank you for your consideration of our concerns,

Dave and Dana Meyer  
High Rolls Ranch  
The Dalles, OR 97058  
[highrollsranch@yahoo.com](mailto:highrollsranch@yahoo.com)  
541-296-5683

(exhibit)

## **Building A**

Built 2005 @ cost of \$273,197.10. Utilizes central kitchen, central shower facility and 10 4-person sleeping units, and two self-contained studio units, all with bunks. Total capacity = 48 people

Sinks - currently in compliance with both bathroom and kitchen

- (9)(f) and (17)(F) would require 7 more bathroom sinks and 2 more cooking sinks

Showers – currently in compliance.

- (9)(b)(e) would require 3 more showers

Toilets – currently in compliance with rented portables.

- IF rented portables are denied under new rules [(12) (e) requiring hot and cold water within 15'] 9 flush toilets and 12 sinks would need to be constructed and expand septic tank and drain field capacity

Cook Burners – currently in compliance

- (17)(B) If new ratio of 1 per 2.5 persons is adopted one more (4 burner) cooktop would be required

Laundry – currently in compliance

- IF wash tubs are denied, construction for 4 washers & dryers would be needed.

NOTE: (7)( h) proposed hot & cold water supply to all units – would need to plumb in 10 additional sinks & drains (which would require cutting into concrete slab in each room.)

Sleeping rooms (14) (k) – currently in compliance @ 40 sq ft/person.

- Going from 40 sq ft/person -> 100 sq ft/person: creates a 75% reduction in bed capacity. All 4-person rooms would become single person units. Three additional buildings of equal size would be needed to create the current capacity.
- If current 40 sq ft/person -> 60 sq ft/person: creates a 50% reduction in bed capacity. An additional building of equal size would be needed to create the current capacity.
- If current 40 sq ft/person -> 50 sq ft/person: creates a 25% reduction in bed capacity. An additional half size building would be needed to create the current capacity.

(exhibit)  
**Building B**

Built 1992 @ cost of \$28,745.00. Utilizes central kitchen and 5 person sleeping units with bunks.  
Total capacity = 30 people

Electrical outlets – currently in compliance

- (6) (j): if new ratio is adopted, we would need one more duplex outlet plumbed into each of the 6 units. This would involve changes to the panel box, and new wire run in conduit on interior walls

Sinks – currently in compliance

- (17) (F) would require one more kitchen sink under new rule if adopted

Cook burners – currently in compliance

- (17) (b): If new ratio of 1 per 2.5 is adopted one more (4-burner) cooktop would be required

NOTE: (7)( h) proposed hot & cold water supply to all units – would need to plumb in 6 additional sinks & drains (which would require cutting into concrete slab in each room.)

Sleeping rooms – currently in compliance

- **Going from 40 sq ft/person -> 100 sq ft/person: creates a 60% reduction in bed capacity. All 5 person rooms would become 2 person rooms. Two- and one-half additional buildings of equal size would be needed to maintain current bed capacity.**
- If current 40 sq ft/person -> 60sq ft/person: creates a 40% reduction in current bed capacity. Would require another half building of equal size to maintain current bed capacity.
- If current 40 sq ft/person -> 50 sq ft/person: creates a 20% reduction in current bed capacity. Would require ¼ - 1/3 additional building of equal size to maintain current bed capacity.

KELLY & O'BRIEN CONSTRUCTION INC.  
6221 KELLY ~~MALDEN~~ CUTOFF RD.  
THE DALLES, OR 97058

# JOB ESTIMATE

BBA# 73148  
GARY KELLY LICENSED • BONDED MICHAEL O'BRIEN  
296-2951 NEW CONSTRUCTION • REMODELING 296-3439

TO DAVE & DANA MEYER  
3755 Skyline Road  
The Dalles, OR 9705

PHONE	DATE
296-5683	11-11-92
JOB NAME/LOCATION	
MEYER/Skyline Road	
The Dalles, OR 97058	

The undersigned proposes to furnish all materials and perform all labor necessary to complete the following:

- Build 30' x 100' Migrant Housing to code.
- 6 - 15' x 15' units with 1-door 2-windows
- 1 - 10' x 15' units with 1-door 1-window
- All specs will be to plans
- All divider walls will have 5/8 fire rock on two sides
- NO PLUMBING
- NO ELECTRICAL
- NO EXCAVATION OR FILL
- NO GUTTERS

TOTAL PRICE: \$28,745.00  
DOWN PAYMENT: \$10,000.00

All of the above work is to be completed in a substantial and workmanlike manner according to standard practices for the sum of ~~Twenty-Eight Thousand Seven Hundred Forty-Five 00/100~~ 28745.00 dollars.

Payments will be made as the work progresses to the value of percent of all work completed. The entire amount of contract will be paid within 10 days after completion.

Any alteration or deviation from the above specifications involving extra cost of material or labor will be executed only upon written orders for same, and will become an extra charge over the sum mentioned in this contract. All agreements must be made in writing.

### ACCEPTANCE

You are hereby authorized to furnish all materials and labor required to complete the work mentioned in the above proposal, for which the undersigned agrees to pay the amount stated in said proposal in accordance with the terms thereof.

Dated \_\_\_\_\_, 19 \_\_\_\_\_ X \_\_\_\_\_  
X \_\_\_\_\_

### High Rolls Ranch Seasonal (Picker) Housing Maintenance for 2016

Property Taxes (3 Buildings)	\$ 4,696.89
Property Damage/Fire Insurance (3 Buildings)	\$ 310.00
Contractor Services/Repairs -electrician (lighting, heating/air, wiring and circuit issues) -plumber (special repairs, pumps, regular changes) -carpentry, concrete, sheetrock, roofing, regular changes)	\$ 1,800.00
Labor for Cleaning and Grounds Maintenance - pre and post harvest -6 people x 12 days x 8 hours)	\$ 8,592.00
Cleaning Supplies (bleach, Spic-n-Span, cleansers, towels, windex, mop heads, laundry soap, batteries, light bulbs, garbage cans and bags, replacement brooms and pans, brushes, bug bombs, misc, etc.)	\$ 1,050.00
Replacement Appliances (2 refridgerators @ \$450 + 1 cooktop @ \$380, 1 washer or dryer/year @ \$400)	\$ 1,680.00
Plumbing (Plumbing fixtures, valves, pipes, toilets and parts, water heaters, water heater elements/thermostats)	\$ 400.00
Harware, lumber, paint, door handles, curtains, replacement screens	\$ 2,400.00
Utilities Electric (Wasco Electric Co-Op) for 2 months	\$ 1,929.00
Dalles City Water for 2 months	\$ 1,032.00
Dales Disposal (garbage pickup twice per week for 2 months)	\$ 1,701.00
Mattresses (10 year life) - replace 10 per year @ \$40	\$ 400.00
Sheets/Covers (5 year life) - replace 20 per year @ \$5	\$ 100.00
Toilet Rental and Sanitation Services (20 units serviced 4 times per week)	\$ 12,966.00
<b>Total Maintenance Cost</b>	<b>\$ 39,056.89</b>

**Individualized Labor Housing Maintenance Costs for 2016**

Cost per Bed		
<i>\$39,056.89 / 108 Beds available</i>	\$	361.64
Cost per Worker		
<i>\$361.64 / 75% efficiency (children, babies, elderly)</i>	\$	482.18

**Things NOT Considered in Labor Housing Maintenance**

Regulation index - similar to inflation index, new costly regulations added or newly enforced every year (e.g. windows cut into doors, heaters, drinking faucets, etc.)

Initial Cost to Construct and interest on borrowed money

1 acre of lost producing ground area

Replaced tables and chairs, picnic tables, bunks, shelving

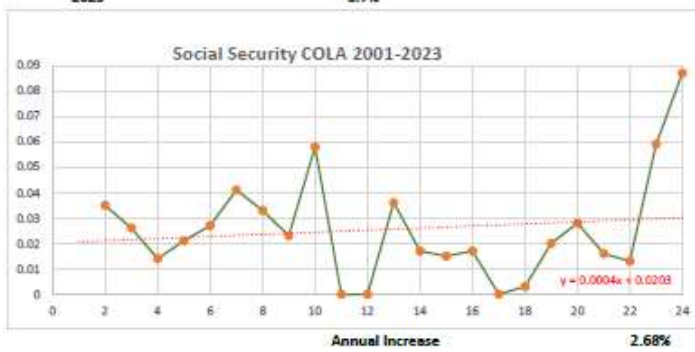
High Rolls Ranch Net Returns - 2001 to 2023

2001	$\frac{\$ 511,318.43}{777,647 \text{ lbs}}$	=	\$ 0.66	per lb	
2002	$\frac{\$ 381,499.14}{670,191 \text{ lbs}}$	=	\$ 0.56	per lb	
2003	$\frac{\$ 788,824.45}{971,536 \text{ lbs}}$	=	\$ 0.81	per lb	
2004	$\frac{\$ 797,572.22}{971,536 \text{ lbs}}$	=	\$ 0.67	per lb	
2005	$\frac{\$ 886,459.57}{1,077,342 \text{ lbs}}$	=	\$ 0.82	per lb	
2006	$\frac{\$ 1,309,577.23}{1,462,693 \text{ lbs}}$	=	\$ 0.90	per lb	
2007	$\frac{\$ 816,361.13}{844,664 \text{ lbs}}$	=	\$ 0.97	per lb	
2008	$\frac{\$ 849,854.48}{540,379}$	=	\$ 1.57	per lb	(only set 1½ ton to the acre)
2009	$\frac{\$ 371,459.72}{753,319 \text{ lbs}}$	=	\$ 0.49	per lb	(market collapse - ~550 ton left unpicked)
2010	$\frac{\$ 1,554,368.41}{1,624,334 \text{ lbs}}$	=	\$ 0.96	per lb	
2011	$\frac{\$ 911,542.90}{980,093 \text{ lbs}}$	=	\$ 0.93	per lb	
2012	$\frac{\$ 1,216,531.98}{1,879,396 \text{ lbs}}$	=	\$ 0.65	per lb	
2013	$\frac{\$ 2,758,480.58}{2,635,317 \text{ lbs}}$	=	\$ 1.05	per lb	
2014	$\frac{\$ 1,645,629.91}{2,440,984 \text{ lbs}}$	=	\$ 0.67	per lb	
2015	$\frac{\$ 1,794,859.37}{1,403,645 \text{ lbs}}$	=	\$ 1.21	per lb	
2016	$\frac{\$ 1,885,774.40}{2,555,522 \text{ lbs}}$	=	\$ 0.74	per lb	
2017	$\frac{\$ 1,160,880.80}{2,023,111 \text{ lbs}}$	=	\$ 0.57	per lb	(market collapse - ~500 ton left unpicked)
2018	$\frac{\$ 946,724.76}{1,018,056 \text{ lbs}}$	=	\$ 0.93	per lb	
2019	$\frac{\$ 1,259,488.70}{1,900,900 \text{ lbs}}$	=	\$ 0.66	per lb	
2020	$\frac{\$ 3,881,501.00}{3,226,355 \text{ lbs}}$	=	\$ 1.20	per lb	
2021	$\frac{\$ 1,953,459.80}{2,487,392 \text{ lbs}}$	=	\$ 0.79	per lb	
2022	$\frac{\$ 2,173,385.40}{1,321,255 \text{ lbs}}$	=	\$ 1.64	per lb	
2023	$\frac{\$ 997,911.00}{2,015,911 \text{ lbs}}$	=	\$ 0.49	per lb	(market collapse - ~500 ton left unpicked)



Social Security COLA

2001	3.5%
2002	2.6%
2003	1.4%
2004	2.1%
2005	2.7%
2006	4.1%
2007	3.3%
2008	2.3%
2009	5.8%
2010	0.0%
2011	0.0%
2012	3.6%
2013	1.7%
2014	1.5%
2015	1.7%
2016	0.0%
2017	0.3%
2018	2.0%
2019	2.8%
2020	1.6%
2021	1.3%
2022	5.9%
2023	8.7%





# DEVCO MECHANICAL

INDUSTRIAL • COMMERCIAL • RESIDENTIAL  
PLUMBING • HEATING • AIR

PO Box 966  
1539 Bargeway Road  
The Dalles, OR 97058  
[devcommechanical.com](http://devcommechanical.com)

Ph : (541) 298-8889  
Fax: (541) 298-8111  
CCB#94244

# PROPOSAL

TO: High Rolls Ranch  
ATTN: Dave Meyer  
EMAIL: [highrollsranch@yahoo.com](mailto:highrollsranch@yahoo.com)  
PHONE: 541-993-2566

JOB NAME: Cabin Mini Split Systems

LOCATION: The Dalles, Oregon 97058

DATE: February 16, 2024

Provide the following:

1) Equipment


- a. 26- Samsung Wind Free 3.0e 9K BTU heat pumps
- b. 26- Samsung Wind Free 3.0e 9K BTU head units
- c. 26- Heat pump pads with risers
- d. 26- Samsung wireless remote controllers

2) Miscellaneous

- a. Permit included
- b. Electrical not included
- c. 10' of paintable vinyl linesect channel for each system included in price
- d. Samsung equipment has a 12 year manufacturers parts warranty

Total: \$107,300.00

Proposal by Alex: [alex@devcommechanical.com](mailto:alex@devcommechanical.com)

WE PROPOSE to furnish the labor and materials necessary to complete the above-described Work. We estimate the cost of the Work will be **\$107,300.00** ("Estimated Price"), which is not a fixed or guaranteed maximum price. Payment due upon substantial completion or within ten (10) days of any progress billing (additional terms on reverse side). Devco may require pre-payment of equipment or materials.  
DEVCO MECHANICAL, INC. ("DEVCO") AUTHORIZED SIGNATURE   
Note: This proposal expires if not accepted within 30 days.

**CUSTOMER'S ACCEPTANCE OF PROPOSAL:** The undersigned Customer(s) authorizes Devco to furnish the above material and to perform the labor required to complete the Work as set forth on the terms and conditions provided herein and on the reverse side. Customer accepts the risk that the actual amount billed for completion of the Work may be more than the Estimated Price. **Important Notice:** Important information pertaining to labor and material warranties and certain Consumer Information is included on the reverse side hereof. Customer acknowledges and agrees that Customer has read and understands the additional terms on the reverse side of this Agreement, all of which are incorporated herein by reference. If Customer is the owner of a residential structure or zero lot line dwelling located in Oregon, Customer acknowledges: (1). Receipt of the Information Notice To Owner about Construction Liens; Consumer Protection Notice and; Notice of Procedure; and (2). Accepts the written warranty on the reverse side hereof.

Signature \_\_\_\_\_ Date \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_

## 2005 SEASONAL PICKER HOUSING

ADDITIONAL COSTS / PURCHASES (NOT INCLUDED IN "HOLE" BII)

## Appliances &amp; Fixtures:

- 12 - Refrigerators - new (from Copper Home Center)
- 2 - Washing machines - new (Ballenger's Appliances)
- 2 - Dryers - new "
- 4 - Stove/Cooktops - " "
- 2 - Range Ovens - " "
- 4 - 80 gal Water Heaters - new (Home Depot)
- 2 - Pressure tanks - new (Ferguson)
- 1 - Booster Pump - new (Ferguson)
- 2 - Fiberglass Shower Units - new "
- 6 - Kitchen Sinks - new " (Kohler - porcelain)
- 7 - Bathroom Sinks - " " "
- 1 - Deep Utility Sink - " " "
- Interior Primer & Paint - (Copper Home Center)

## SITE PREPARATION:

- rock (Munson Paving)
- Vibratory Compactor Rental (Halton)
- Craig Treichel Excavating

## OTHER:

- Curtains & Rods
- Custom Steel Bunk Frames - (Dallas Iron Works)
- 50 - Mattresses (new)
- 2 - toilets (new) - (Ferguson)
- Bathroom mirrors - Home Depot

## DRAINFIELD:

- 360 ft drain pipe
- 800 ft<sup>3</sup> drain rock
- field paper
- 2 - 2500 gal. concrete septic tanks w/risers & lids

PAID 7-13-05  
#966.00  
CHG #1235

### Change Order

HALE CONSTRUCTION NW, INC.

P.O. BOX 64

KLICKITAT, WA 98628

1-509-369-4607

Date: May 25, 2005

Owner: High Rolls Ranch

Contractor: HALE CONSTRUCTION,

Project name: Picker Housing

Change order number: #3

Original contract date: February 2, 2005

**You are directed to make the following changes in this contract:**

Add: 12 Additional Can Lights @ \$70.00 each - \$840.00

Sub-total .....\$840.00

Profit & Overhead 126.00

**Total \$966.00**

The original contract sum was:	\$270,490.00
Net amount of previous change orders:	1741.10
Total original contract amount plus or minus net change orders:	272,231.10
Total amount of this change order:	<b>966.00</b>
The new contract amount including this change order will be:	273,197.10
The contract time will be changed by the following number of days:	( 3 ) Days
The date of completion as of the date of this change order is:	June 10, 2005

**Contractor:**

Hale Construction Northwest, Inc.

Company name  
P. O. Box 64

Address  
Klickitat, WA 98628

City, State, Zip  
May 25, 2005

Date

  
Signature

**Owner:**

Dave & Dana Meyer

Name  
3755 Skyline Road

Address  
The Dalles, OR 97058

City, State, Zip  
May 25, 2005

Date

Signature

Paid \$50,000 5-6-97

C. Michael Riise  
Architect, N.C.A.R.S.  
430 East 3rd Street  
The Dalles, Oregon 97058  
ph.: 541 298 1199  
fax: 541 298 1197

April 17, 1997

INVITATION TO BID

HIGH ROLLS RANCH PICKER HOUSING  
3755 SKYLINE ROAD  
THE DALLES, OREGON

You are invited to bid on a general contract for the work described on the accompanying drawings (two sheets) dated April 17, 1997.

The Owner will receive sealed proposals from invited bidders until 10:00 AM on Monday, April 21, 1997, at the architects office at 430 E. 3rd Street, The Dalles. Contractors are welcome to attend the bid opening which will take place at that time. Bids received after the deadline will not be accepted.

The Owner reserves the right to reject any or all bids and to waive irregularities in bidding.

The contract shall be awarded as soon as possible after the bid opening and the work shall commence upon issuance of the building permit.

The work shall be completed no later than Friday, June 06, 1997.

The undersigned having become thoroughly familiar with the contract documents, local conditions affecting performance and cost of the Work and having fully inspected the Site to be developed, hereby proposes to fully perform the Work within the stated time frame and to furnish all labor and materials as required to complete the Work in accordance with the Contract Documents, for the following sum of money:

Sixty-eight thousand three hundred and thirty Dollars (\$68'310<sup>00</sup>)  
+ 900 electrical

The undersigned understand and agree that this bid shall remain open and shall not be withdrawn for a period of 14 days.

Michael F. Riise  
signature of bidder

4-21-97  
date

Company name, address and telephone number:

1997 CONSTRUCTION PICKER HOUSING

Building	-	68,310. <sup>00</sup>	(Kelly/O'BRIAN)
Plumbing	-	1,965. <sup>26</sup>	(Linda's Plumbing)
Electrical	-	4,296. <sup>42</sup>	(Dick Jenkins)

## OTHER :

- Septic - 200 ft drain pipe
- 400 ft<sup>3</sup> drain rock
- building paper
- 1 - 1500 gal. concrete tank w/ riser & lid.
- interior paint & primer
- insulation & inner panels
- 8 - new refrigerators
- 2 - Stove/Cooktops (new)
- 1 - washing machine (new)
- 1 - dryer (new)
- 1 - booster pumps
- 2 - 80 gal. Water Heaters
- 3 - Bathroom sinks w/ fixtures
- 2 - Kitchen Sinks w/ fixtures
- 1 - Deep Utility Sink w/ fixture
- 1 - Pressure Tank
- 16 - custom steel bunkers - Dallas Iron Works
- 32 - mattresses (new)
- bathroom mirrors