



9311 SE Butte Avenue
Vancouver, WA 98664-3623

Telephone: (360) 696-3888
Mobile: (360) 904-3015
Facsimile: (360) 696-3888

marketing and economic services

To: Tim Brooks, Winterbrook Planning
From: Bruce Prenguber, Globalwise Inc.
Date: February 6, 2025
Subject: Design Modification of Bull Run Filtration Facility Project for Sandy Pump Station

As part of the Portland Water Bureau's Bull Run Water Treatment Project (BRWTP), I conducted an extensive analysis to evaluate farm impacts on Multnomah County MUA-20 lands of the proposed water treatment facility. Multnomah County Case # T3-2022-16220 was approved by the County Hearings Officer in November 2023. The County Hearings Officer concluded that the project met the applicable approval criteria and satisfied the farm impacts test.¹

This memorandum reviews the potential farm impacts of proposed minor changes needed to modify the original plan for the Pleasant Home Water District Pump Station to accommodate a pump station (referred to here as the Sandy Pump Station) and related water supply line to provide municipal water to the City of Sandy. My analysis considers the potential for significant change in accepted farm practices and significant increase in the cost of farm practices in the Surrounding Lands.

The Land Use Board of Appeals (LUBA) of the State of Oregon decision found that Multnomah County is not required to consider construction impacts of the Bull Run Project under the state statutory farm impacts test. (See LUBA No. 2023-086, page 130). None-the-less, my analyses have reviewed BRWTP construction activity as well as BRWTP operations to determine if there are significant changes in accepted farm practices or significant increases in the cost of accepted farm practices.

In the previous Multnomah County case, I conducted the following analysis:

- Compatibility of Proposed Portland Water Bureau Filtration Facility and Pipeline Operations With Surrounding Agriculture ("Agricultural Compatibility Study"), dated September 2022 to Multnomah County. This study is a farm property-by-farm property

¹ This decision was affirmed by LUBA on January 22, 2025 (Case #2023-086).

evaluation of the Surrounding Multnomah County and Clackamas County agricultural lands² for potential farm use impacts due to operation of the filtration site, the water supply pipelines, and pipeline appurtenances. This evaluation considered 14 potential sources of externality impacts on farming in the Surrounding Lands as well as two sensitivities for accepted farm practices from operation of the filtration facility. The application addressed the farm use impacts test and the Multnomah County Hearings Officer concluded that the project satisfied the applicable approval criteria. See Exhibit A.33, pages 123 – 163 for the discussion of farm impacts on a farm property-by-farm property basis.

- Bull Run Filtration Facility and Pipelines Project - Response to Public Comments Related to Farm Use Impacts in Multnomah County, (open record period one), Memorandum dated August 5, 2023, to Multnomah County Hearings Officer. This analysis reviewed and responded to all public comments by farmers related to potential impacts from construction and operation of the filtration facility and pipelines. Each comment related to the farm impacts test for individual and cumulative effects from project construction and operation. Most farmers' comments focused on alleged farm impacts from the construction of the filtration facility and pipelines. Impacts from operations were not discussed as a significant concern. As previously stated, LUBA's decision specifically excluded consideration of construction impacts. None-the-less, my report addressed each specific farmer impact comment for farm impact for both construction and operations and explained why the Water Bureau meets the requirements of the farm impact test. See Case T3- 2022-16220 Exhibit I-80 pages 7-8; pages 22-23; pages 33-34, pages 45-48, and page 68 for a discussion of potential filtration facility construction noise impacts on farm use.
- Bull Run Filtration Facility and Pipelines Project - Response to Public Comments Related to Cumulative Farm Use Impacts in Multnomah County, Memorandum, dated September 6, 2023, to Multnomah County Hearings Officer. Previous analyses referenced above address the potential impacts of project externalities and sensitivities for individual farms from both construction and operation of the Filtration Facility and the pipelines. Some of those farm use impacts analyses are cumulative (additive). This memorandum gives more detailed farm-by-farm analysis and in particular addresses cumulative impacts on accepted farm practices in the Surrounding Lands. See Case T3- 2022-16220, Exhibit J.88, pages 1-25.

I have also prepared other reports that address the farm impacts test which do not pertain to impacts from filtration facility site plans for the revised City of Sandy Pump Station.

I have reviewed the engineering plans by Stantec for the City of Sandy Pump Station located within the filtration facility site. The planned changes include replacing a smaller pump station with a slightly larger pump station and shifting the pump station 150 feet- to the east, away from the R&H Nursery property. Other changes include adding a small amount of impervious area for the driveway at the pump station, modification in the location of landscape plantings to provide additional screening for the modified pumpstation, and an increase in the diameter of the buried pipeline from eight inches to 16 inches to serve Sandy's municipal water needs.

² Agricultural lands as used here include any land with zoning that allows agricultural use, including EFU and MUA-20 zoned lands.

Among all externalities I have analyzed for construction of the filtration facility, only noise has potential to change in any perceptible amount with the planned City of Sandy Pump Station. An updated noise analysis has been conducted by Stantec with re-design of the pump station. This evaluation considered the noise codes of both Multnomah and Clackamas counties and applied the more restrictive standard when the codes differ. The analysis determined that under the condition of continuous operation of mechanical equipment the county codes for noise exterior to buildings will be met with no additional mitigation required. See Bull Run Filtration Facility Exterior Noise Analysis, Technical Memorandum by Stantec, dated December 17, 2024, page 13.

Several reasons were stated in my reports about construction noise at the filtration facility does not result in a significant change in accepted farm practices nor significantly increase the cost of accepted farm practices. See Exhibit I.80 pages 7-8. Noise from facility operations is lower than construction-related noise. Under the farm impacts test, the limited amount of noise from operating the Sandy Pump Station will have no effect on surrounding farms.

With regard to the agricultural compatibility of the proposed changes, my findings are as follows:

1. None of the minor changes within the filtration facility site as proposed to supply water to the City of Sandy affect the conditions imposed in the previous Multnomah County Decision or cause a significant change in accepted farm practices or cause a significant increase in the cost of accepted farm practices. Noise level from operating the new pump station will remain within the noise limits allowed by the noise codes of both Multnomah and Clackamas counties and will meet the farm impacts test, as I have analyzed previously. Furthermore, the new pump station is no closer to the perimeter of the filtration facility site than the previously planned pump station. There is no potential for an increase in the noise externality to impact farm use in the Surrounding Lands.
2. Operation of the City of Sandy Pump Station and the water flow in the increased diameter underground pipeline will not impact any of the other externalities in my Agricultural Compatibility Study or in other reports and analysis.

For all of the above reasons, the approval of the modifications in design as described above will not force a significant change in, nor significantly increase the cost of, accepted farm practices in the Surrounding Lands.