



LUP Comments <lup-comments@multco.us>

Case File T2-2025-0067 Public Comments

1 message

Carpenter Lane Farm <carpenterlanefarm@gmail.com>
To: LUP-comments@multco.us

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Re: **Case File T2-2025-0067** – Application for a Significant Water Resources (SEC-wr) Permit for the proposed “Cottrell Pond Restoration” at 8344 SE Cottrell Road

I submit this comment in strong opposition to approval of the above-referenced permit application. The proposal to remove an existing in-line pond and dam within Johnson Creek represents a significant change in scope that was **not included in Portland Water Bureau's originally approved project**, and it is being advanced only in response to impacts created by that project.

Mitigation proposed downstream does not absolve Portland Water Bureau (PWB) of the damage it is causing upstream. Cottrell Pond currently provides flood storage, sediment capture, and ecological function within a system that is already impaired. Its removal would worsen hydrologic instability and water quality impacts in Johnson Creek rather than restore them.

Recent rain events demonstrate that the underlying motivation for this permit is to prevent pond overtopping and potential flooding of Cottrell Road due to the **large volumes of water now being discharged into Johnson Creek** as a result of PWB's construction activities. This directly contradicts representations made in PWB's originally approved—and currently contested—permits, in which PWB stated it would discharge **no water** into Johnson Creek and would not create additional groundwater beyond pre-construction conditions.

Those representations are impossible to reconcile with reality. PWB has created over 40 acres—and likely closer to 80 acres—of impervious surface through lined ponds, compacted gravel roads, parking areas, staging yards, trailers, and offices. Increased runoff and altered hydrology are inevitable consequences of this level of disturbance.

The County should not approve a permit that attempts to retroactively justify environmental harm created by unrealistic assumptions or permit violations. At a minimum, approval should be withheld and all related work paused until independent oversight is established and all pending appeals are resolved.

Thank you for accepting these comments.

Ron & Mary Roberts
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