



## TESTIMONY

1 message

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Multnomah County Department of Community Services [Address] [City, State, ZIP]

Subject: Opposition to Portland Water Bureau's Request for Conditional/Non-Conforming Exception in Rural Zone MUA20

Dear Members of the Multnomah County Department of Community Services,

I am writing to express my strong opposition to Portland Water Bureau's request for a conditional or non-conforming exception to construct a large "legacy" water treatment facility within the rural boundaries of Multnomah County. Specifically within Plan Area "West of the Sandy River" and Zoned "MUA20" for Multi-Use Agriculture. Granting such an exception would be detrimental to the integrity of the rural area and have far-reaching negative consequences for the environment, our school children, agriculture, and the local community. Therefore, I urge you to reject this request.

For perspective, please note that the proposed facility would be surrounded by woodlands and forests, agriculture and farm land, and rural homes owned by individuals who have spent their life savings to live in this peaceful and tranquil area of Multnomah County. The plant would be located approximately 3000 feet above the sandy river and immediately adjacent to Johnson Creek which is a protected body of water in Multnomah County. In addition to the Elk, Deer, Bald Eagles, Herons, Red Tail Hawks, Kestrels, Kites, Multiple Owl Species, Jays, Hummingbirds, and Coyotes that are known to live on

and adjacent to the proposed site, endangered species such as the Western Pond Turtle (*Actinemys marmorata*) and the Northern Red-Legged Frog (*Rana aurora*) have been seen in these local waters and must be protected from this type of large industrial construction. Of course the Sandy River is home to Chinook, Coho, Steelhead and the Western Painted Turtle – all which also should be protected. I suggest that a study be conducted regarding each of these species on how this specific water treatment facility could negatively impact their current environment.

According to the information provided on the Multnomah County website, the County's primary goal is to protect the health, safety, and livability of its residents by ensuring compliance with land use, transportation, and erosion control codes. The County also aims to preserve and protect wildlife, streams, scenic views, forest lands, and farm and nursery production within its boundaries.

As highlighted in the zoning regulations for MUA20, the purpose of this district is to conserve agricultural lands, encourage non-agricultural uses compatible with the natural resource base, and ensure that any conditional uses align with the character of the area and applicable County policies. It is evident that a large water treatment facility does not meet these criteria and would not be compatible with the rural setting designated for this zone.

Additionally, I don't believe the Portland Water Bureau (PWB) has Multnomah County's or our community's best interest in mind. It is my belief that the Management team at PWB only cares about creating a legacy project where their names will be enshrined for all to see. If this wasn't the case, they would be looking for more efficient and cost effective ways to solve the required removal of Cryptosporidium from their water supply – just like thousands of other water bureaus currently use.

According to the CDC, Cryptosporidium is the leading cause of waterborne disease. From the CDC website, *“While this parasite can be spread in several different ways, water (drinking water and recreational water) is the most common way to spread the parasite. Cryptosporidium is a leading cause of waterborne disease among humans in the United States”*. If Cryptosporidium is the leading cause of waterborne disease, and Cryptosporidium is the only parasite the Federal Government is requiring the PWB to address, and only a few water districts currently have similar water treatment facilities to the one proposed by PWD, how are the thousands of other water districts across this country eliminating Cryptosporidium from their drinking water without billion dollar water treatment facilities? I'll tell you, they do it with alternative methods that are more efficient and cost effective. I believe a review of alternative options needs to be conducted before any decisions can be made on this issue.

Additionally, it is my understanding that due to the proposed rate hikes that this project will require, the PWB is losing approximately 30% of their customer base – further increasing the cost to the remaining customers. It does not make sense for a business to increase production capacity and facility expenses at a time they are losing customers. They should be stabilizing costs and meeting the minimum federal requirements in an effort to reduce costs, keep rates in check, and to retain more customers.

Allow me to outline some additional reasons why I strongly oppose the construction of the water treatment facility in this rural area:

1. **Preservation of Rural Character:** The MUA20 zoning is specifically designed to protect the rural character of the area, promoting multiple use agriculture. Allowing the construction of a large water treatment facility contradicts the purpose of this zoning regulation and undermines the values and intentions set forth in the County's land use plan. It is crucial to preserve the rural ambiance, scenic beauty, and agricultural activities that define this area.
2. **Environmental Impact:** Constructing a water treatment facility within a rural zone can have severe environmental consequences. The infrastructure required for such a facility, including pipelines, access roads, and power lines, could fragment and disrupt the natural landscape, leading to habitat destruction and the displacement of local wildlife. Additionally, the potential pollution or waste generated by the facility could pose risks to nearby rivers, streams, and groundwater, threatening the delicate balance of the local ecosystem.
3. **School Children's Safety:** The projected four years of construction for the water treatment facility would result in approximately 1,000 additional vehicle trips in the area daily, with 300 of them being heavy truck trips carrying dangerous chemicals, heavy materials, and construction equipment near schools, busses and residents traveling to take their children to school. This increased truck traffic poses a significant safety risk to school children in the area. Congestion, road damage, and potential accidents could compromise the safety of our children. Moreover, the emission of hazardous pollutants from these trucks can contribute to air pollution, negatively impacting the respiratory health of the children and their overall well-being.
4. **Agricultural Interference:** Zone MUA20 plays a vital role in supporting agricultural activities and preserving valuable farmland. Granting an exception for a 100 acre water treatment facility could result in the loss of agricultural land, hampering farming operations and potentially displacing farmers. It is crucial to prioritize the preservation of agricultural resources, as they contribute to the local food supply, the regional economy, and the overall sustainability of the county.

5. **Water Resource Management:** While the need for water treatment is acknowledged, placing such a facility within Zone MUA20 may not be the most efficient solution. It could require extensive infrastructure and the transportation of water from distant sources, leading to energy inefficiencies and increased costs. I believe there are other options the PWB has considered, but they received too much opposition to continue. One of these may actually be a better choice if a plant like this is actually the best option. Considering alternative locations closer to urban centers, where the demand is higher, may actually prove to be more practical and cost-effective in terms of water distribution and conservation.

6. **Community Well-being:** The construction and operation of a large water treatment facility in a rural area could have significant negative impacts on the local community. Increased noise, traffic, and potential health concerns associated with industrial activities may deteriorate the quality of life for residents who chose to live in this rural setting. Additionally, the social fabric and sense of community that currently exists may be disrupted, potentially leading to conflicts over land use and property values.

7. **Lack of Safe Roads:** During the proposed four years of construction, the PWB has provided a traffic study documenting that they will increase current traffic in the area by 700 commercial vehicle and 300 heavy truck trips per day. This study further documented their proposed road closures, and the alternate routes that their 1000 vehicle trips per day will utilize. What this study fails to document is how these proposed road closures and alternate routes will impact the current residents, employees, and emergency services such as ambulance, fire and police in the area. The study fails to mention current traffic patterns, current volume or number of cars utilizing these roads, and there is no mention of delays, safety concerns or issues that their construction and road closure may cause. But what is worse, is that they do not address how they will monitor and insure that their 300 heavy truck trips and 700 commercial vehicle trips will utilize their proposed alternate routes and/or ensure these vehicles will not utilize residential streets such as Carpenter Lane between Altman and Cottrell Rd. I recommend a new traffic study be conducted that specifically documents all traffic, including current residential cars, school busses, fire and other emergency services, and employees that use the local roads. Then add the 1000 additional daily trips to the metrics to provide an accurate forecast of how their proposed road closures and additional trips will impact the residents and workers in the area. But there needs to be some way to monitor and penalize any vehicle associated with the PWB project for utilizing routes not specifically recommended or documented in their plans. And for the safety of our children and those that walk the area, the PWB needs to assure Multnomah County and the local residents that no one working on this project will utilize roads other than those approved on their report.

8. **Wildlife Impact:** The rural areas of East Multnomah County are rich in biodiversity and serve as crucial habitats for various wildlife species – especially Elk, Deer, Geese and Hummingbirds near the proposed plant. Constructing a large water treatment plant in this delicate ecosystem would undoubtedly disrupt their natural habitats. Noise pollution, land clearance, and alterations to local water and vegetation sources can cause significant harm to wildlife populations. The disruption of their natural habitats can lead to imbalances in the ecosystem, affecting the food chain and the overall health of the environment. Species dependent on the affected habitats may be forced to relocate, which can disrupt migration patterns and breeding cycles. In turn, this may lead to a decline in the overall biodiversity and ecological integrity of the region. I believe a full study needs to be conducted before any construction should begin.

In light of these reasons, I implore the Multnomah County Department of Community Services to reject Portland Water Bureau's request for a conditional or non-conforming exception for the construction of a water treatment facility within Zone MUA20. It is vital to prioritize the long-term preservation of the rural character, environmental health, agricultural viability, and community well-being in Multnomah County.

Thank you for considering my concerns. I trust that you will carefully weigh the implications of this decision and make a choice that aligns with the best interests of the county and its residents.

Sincerely,

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