Carol Chesarek
Land Use Chair
Forest Park Neighborhood Assoc.
13300 NW Germantown Road
Portland, OR 97231

September 11, 2026

Multnomah County Land Use Planning
1600 SE 190th Avenue
Portland, OR. 97231

Submitted by e-mail:
lup-hearings@multco.us

Re: Multnomah County Notice of Violation CCPR1-2025-0003
12424 NW Springville Road

>> Please enter this letter into the record for the hearing on September 11, 2026.

Dear Hearings Officer,

Thank you for the opportunity to provide these comments.

The property at 12424 NW Springville Road is within Forest Park Neighborhood Association. Our neighborhood is recognized by both the Multnomah County and the City of Portland. The natural resources in our neighborhood, which include Forest Park and the high value habitats on privately owned land around the park, are recognized by Multnomah County, City of Portland, Metro, and Oregon Department of Fish and Wildlife as important to the region and the state. That's why portions of this property are protected with SEC-s overlays, and the entire property is protected with an SEC-h overlay for wildlife habitat because of their value to the county, but also to comply with State Land Use Goal 5.

Metro holds a conservation easement on a large area at the east end of the property at 12424 NW Springville Road, purchased with taxpayer funds through one of their Parks and Natural Spaces bonds. This is a priority area for protection because of its proximity and wildlife connectivity to Forest Park and to the Abbey Creek/upper Rock Creek riparian areas.

Our neighborhood works to protect the natural resources in the area, but we've also invested a lot of time and effort protecting our limited but valuable farmlands because we value our local farmers. We worked very hard to persuade Multnomah County to protect the lands along Springville Road with a Rural Reserve for Natural Landscape Features that protects the area from urban expansion for about another 40 years. Residents and property owners along

Springville Road overwhelmingly supported that Rural Reserve designation to protect both natural resources and farmlands from development
Multnomah County staff bends over backwards to avoid code-compliance actions. They make every effort to work with property owners to resolve issues. If a property owner wants to avoid a code enforcement action, staff will invest time and resources to help you. The county will forgive almost any violation if a property owner makes a good faith effort to resolve it.

The respondent has applied for and received many permits from the county for ground disturbance, grading, and fill. Many of those permits were applied for after code violations were reported to the county. The property owner is very familiar with the county codes and the permitting process.

I have been involved with our land use committee for 20 years, and I don't remember ever seeing a code violation hearing for a property in our neighborhood.

County staff have done a long, painstaking, and time-consuming investigation. The respondent has removed Stop Work Order signs and refused to allow the county access to the property in a timely way to inspect the work they've done. The property owner has had a long time to work with the county to resolve the issues in this complaint.

Oregon has state land use goals to protect our valuable agricultural lands and industry – Goal 3, and also to protect the natural resources that support wildlife and human life like clean air and water – Goal 5. Both are important. Goal 3 does not cancel out Goal 5. County codes implement and support both goals.

It is important that county codes are enforced, when necessary, so other property owners don't get the impression that everyone can simply ignore code when it isn't convenient. We have these codes for good reasons, for the benefit of the entire community. Code violations of this scale impose a burden on the community, including all the neighbors who do follow the rules.

Forest Park Neighborhood supports the letter submitted by Susan Andrews on behalf of residents and property owners on NW Springville Road. I have heard many of these issues directly from signers of the letter and have witnessed many issues myself. The county's code enforcement system has failed to protect those neighbors and their interests.

We found the county staff report to be carefully researched, thorough, quantified, well documented and well considered, and measured in its findings. We support the county's findings and recommendations, and we ask you to please affirm the LUP Director's determination of violations and to support their recommended remedies.

Thank you for your consideration.

Carol Chesarek
Land Use Chair, Forest Park Neighborhood Association