



Cottrell Community Planning Organization
Pleasant Home Community Association
PO Box 1411
Boring OR 97009

10/8/2026

RE: Opposition to T3-2026-0012

City of Sandy Drinking Water Pump Station
35320 SE Carpenter Lane

Dear Hearings Officer:

We respectfully request that the Hearings Officer deny T3-2026-0012 because the applicant has not adequately demonstrated that the proposed Sandy Pump Station satisfies the applicable criteria in MCC 39.7515, including subsection (A), which addresses consistency with the character of the area, and subsection (B), which requires that the use will not adversely affect natural resources.

The proposed facility raises concerns under both criteria. It would introduce a pump station serving the City of Sandy—approximately 5 to 10 miles away and in a different county—into a rural residential area where a nearby home is reportedly about 50 feet from the property line at the proposed site. The applicant has not adequately explained why the facility must be located at this particular spot, why the previously approved Pleasant Home Water District (PHWD) pump-station footprint cannot be used, or why the station cannot be placed farther from residences within the filtration facility's existing fenced area. These unanswered questions are relevant to whether the proposed location and its operational effects are consistent with the area's character and whether reasonable siting alternatives have been considered.

Our concern is not simply the presence of a pump station on the property. The proposed Sandy Pump Station represents a material change from the development and landscape configuration previously approved by Multnomah County under T3-2022-16220. The proposed facility is substantially different from the previously approved Pleasant Home Pump Station (PHPS), and it would occupy an area that was shown as planted in the previously approved landscape plan.

The County's own Staff Report recognizes that the proposed Sandy Pump Station requires changes to the previously approved landscape plan, including relocation of plantings that would otherwise have occurred at the proposed pump-station site.

The issue before the Hearings Officer is therefore not simply whether the Sandy Pump Station is an allowable community service use. The issue is whether this particular development, with its different footprint, configuration, infrastructure and resulting landscape changes, will adversely affect natural resources.



We believe the current record does not provide sufficient evidence to make that finding.

I. The Proposed Sandy Pump Station Is Not Simply a One-for-One Replacement of the Pleasant Home Pump Station

The applicant characterizes the Sandy Pump Station as an alternative to the previously approved Pleasant Home Pump Station and fire pump station.

However, the two configurations are materially different.

The previously approved landscape plan treated the PHPS and fire pump station areas as developed areas, while the location proposed for the Sandy Pump Station was depicted as planted. The current application therefore changes not only the type and configuration of the pump infrastructure, but also the location and arrangement of approved landscaping and habitat.

The County's Staff Report expressly acknowledges that construction of the Sandy Pump Station would alter the landscape plan approved under T3-2022-16220 and that the prior approval must be modified to accommodate those changes.

A detailed comparison is provided in Appendix A

II. The Change to the Approved Landscape Plan Is Relevant to MCC 39.7515(B)

MCC 39.7515(B) requires that the proposed use: "Will not adversely affect natural resources."

The fact that the proposed pump station is outside the SEC overlays does not by itself establish compliance with this criterion.

The County's prior Bull Run approval specifically considered wildlife habitat as a natural resource and relied upon the approved landscape and habitat plan, including the location, size, diversity and function of habitat improvements.

The County's prior record therefore establishes an important baseline: the landscape configuration was not merely aesthetic landscaping. It was part of the natural-resource mitigation framework supporting the prior approval. The current application changes that framework.

III. The County Should Compare the Proposed Development Against the Previously Approved Configuration

The appropriate comparison is not simply:

"Are there more trees in the revised plan?"



The appropriate comparison is: "Does the revised development preserve the natural-resource functions that were provided by the previously approved configuration?"

That requires consideration of:

- building and site footprint;
- location of the facility;
- amount and location of impervious surface;
- location and quantity of native plantings;
- habitat structure and diversity;
- habitat connectivity;
- vegetated buffers;
- screening and buffering;
- noise and operational effects; and
- long-term maintenance requirements.

Appendix A summarizes the material differences.

IV. Additional Plantings Do Not Automatically Establish Equivalent Habitat

The current Staff Report states that construction of the Sandy Pump Station would displace 7 trees and 27 shrubs that would otherwise have been planted at the proposed pump-station location. The applicant proposes replacement plantings elsewhere, including additional trees and shrubs. We do not dispute that additional plantings are proposed. However, tree and shrub counts alone do not establish that natural-resource function has been preserved.

The prior Bull Run approval considered more than planting quantities. The County's natural-resource analysis considered habitat quantity and quality, the location and size of habitat areas, the volume, size and diversity of plantings, habitat connectivity, and other habitat enhancements.

Consequently, relocating plantings from the area occupied by the Sandy Pump Station cannot simply be deemed equivalent because the applicant proposes a greater number of trees and shrubs elsewhere.

The applicant should demonstrate that the revised configuration maintains equivalent or greater:

1. habitat function;
2. habitat connectivity;
3. vegetation structure and diversity;
4. wildlife movement opportunities;



5. buffering and screening function; and
6. long-term ecological value.

The current record does not adequately establish that equivalency.

V. The Future Modification of the Landscape Plan Should Not Substitute for the Required Finding Now

The Staff Report recommends that PWB modify the prior approval and landscape plan before a Certificate of Occupancy is issued. That does not resolve the underlying approval issue. The Hearings Officer must determine whether the application satisfies the applicable approval criteria as part of this land-use decision.

The County should not approve a new development on the assumption that a future landscape modification will eventually establish compliance.

Before approving the Sandy Pump Station, the record should establish:

- precisely what approved habitat and landscaping will be displaced;
- precisely where replacement habitat will be located;
- how the replacement habitat compares functionally to what is being displaced;
- how habitat connectivity will be maintained;
- how the revised configuration affects the natural-resource findings underlying T3-2022-16220; and
- how the long-term maintenance and monitoring obligations will apply to the revised configuration.

Without that information, the County cannot reasonably conclude that the proposed change will not adversely affect natural resources.

VI. The Sandy Pump Station Should Be Evaluated as the Development Actually Proposed

We recognize that the Sandy Pump Station would replace the previously approved PHPS and separate fire pump station rather than simply being constructed in addition to them.



That distinction is important, and we do not contend that the proposed facility necessarily creates a greater overall impervious footprint than construction of both previously approved facilities. However, that does not resolve the natural-resource issue. The Sandy Pump Station has a different building footprint, different configuration, different location and different surrounding landscape treatment than the previously approved PHPS configuration.

The County must therefore evaluate the environmental and natural-resource consequences of the actual proposal, rather than treating the proposal as functionally identical to the previously approved facilities.

VII. The Application Does Not Adequately Explain Why Other Siting Alternatives Were Rejected

The applicant explains that the Bull Run Filtration Facility will make Sandy's existing connection to the Bull Run supply no longer viable as a source of potable water and that a new connection is needed to meet applicable *Cryptosporidium* treatment requirements. That explanation may describe why Sandy needs a new connection to the treated water supply. It does not, by itself, explain why the pump station must be built in the location and configuration proposed in this application.

The application materials available to the community do not adequately explain:

- why the existing water-supply connection is no longer viable in technical terms, including whether the limitation is related to water quality, pressure, treatment, or another design constraint;
- why the Sandy Pump Station cannot use the same general footprint as the previously approved Pleasant Home Water District (PHWD) pump station;
- why the new pump station cannot be located inside the filtration facility's existing fenced area, farther from nearby residences;
- what other feasible locations or connection configurations were evaluated; and
- why those alternatives were rejected, including whether they were infeasible for engineering, safety, operational, environmental, or cost reasons.

We recognize that the applicant proposes the Sandy Pump Station as an alternative to the previously approved PHWD and fire pump stations, rather than in addition to them. However, replacing two previously approved facilities with one new facility does not establish that the new location is the least impactful or otherwise appropriate location. The proposed Sandy Pump Station is approximately 140 feet east of the approved PHWD pump-station location and occupies an area shown as planted in the previously approved landscape plan.



The location matters because the proposed station is intended to serve the City of Sandy, not the nearby rural community surrounding the Bull Run site. Sandy is approximately 5 to 10 miles away and is in a different county. We do not suggest that serving a community outside Multnomah County automatically disqualifies a public utility use. Rather, the fact that the facility serves a distant community makes it especially important for the County to carefully evaluate the local impacts imposed on nearby residents and whether those impacts can reasonably be avoided through a different siting choice.

A residence is reportedly approximately 50 feet from the property line along the proposed station location. Given that proximity, the applicant should explain why the facility cannot be placed farther from homes, including inside the existing fenced facility grounds if technically feasible. The record should include a meaningful alternatives comparison addressing distance to residences, noise, visual effects, landscape and habitat impacts, access, safety, and engineering feasibility.

Without that information, the County lacks an adequate basis to conclude that the proposed siting is consistent with the character of the area under MCC 39.7515(A). The absence of a documented alternatives analysis also leaves unresolved whether the specific impacts of this location—including potential persistent operational noise and displacement of approved plantings—are avoidable.

We ask the Hearings Officer to require the applicant to identify the alternatives considered and provide a reasoned explanation, supported by the record, for rejecting other feasible footprints and locations. If the application record does not establish why the proposed location is necessary and compatible with the area, the County should deny the application rather than assume that the selected location is justified.

VIII. The Applicant Has Not Established That the Revised Landscape Provides Equivalent Natural-Resource Function

The current Staff Report characterizes the revised planting plan as providing a "modest net benefit to habitat."

That conclusion should not substitute for a site-specific demonstration of equivalency.

The County's prior natural-resource determination was based on a comprehensive landscape and habitat framework. The proposed Sandy Pump Station changes that framework.

If the applicant believes the revised plan provides equal or greater habitat function, the applicant should demonstrate that conclusion using the same type of evidence that supported the prior natural-resource determination.

In particular, the County should require a direct comparison between:



- A. the habitat and landscape configuration approved under T3-2022-16220; and
- B. the habitat and landscape configuration that would remain after construction of the Sandy Pump Station.

The comparison should address both quantity and function.

IX. Continuous Operational Noise May Be Inconsistent with the Character of the Area

MCC 39.7515(A) requires the proposed community service use to be consistent with the character of the area. That analysis should account for the sound the facility will produce during ordinary operation, not only its appearance or the number of vehicle trips it generates.

The proposed Sandy Pump Station is expected to operate as a utility facility, and the County's proposed condition would limit normal operational noise to 50 dBA at any property line. However, a decibel limit alone does not fully describe how sound will be experienced by nearby residents. A persistent, tonal or low-frequency humming sound may be more noticeable and intrusive than intermittent sounds at a similar measured level, particularly during quiet evening and nighttime periods when background noise is low.

The surrounding area has a rural residential character. A continuous mechanical hum audible at nearby homes would introduce a persistent industrial or utility sound into that setting and may be inconsistent with the area's character under MCC 39.7515(A). The County should not assume that the proposed 50 dBA limit resolves this concern without examining the actual sound characteristics and the assumptions used in the applicant's acoustical analysis.

We ask the Hearings Officer to review Appendix F, the acoustical analysis, and require the applicant to clarify whether the analysis evaluates tonal or low-frequency noise, the expected duration and frequency of pump operation, nighttime operating conditions, and sound levels at the nearest residences—not only at the parent parcel's property line. The County should also explain how the proposed noise condition will be monitored and enforced if nearby residents experience a persistent hum after the station begins operating.

If the applicant has not demonstrated that the facility's expected operational sound will be consistent with the character of the area, the County should deny the application. At minimum, any approval should include an enforceable requirement to investigate and promptly correct verified tonal or persistent noise that is inconsistent with the approved acoustical analysis.

X. Conclusion and Requested Decision

The proposed Sandy Pump Station is materially different from the previously approved PHWD pump station and requires changes to a landscape and habitat configuration that formed part of the



County's prior natural-resource determination. The applicant has not adequately demonstrated that those changes will preserve the natural-resource functions relied upon in T3-2022-16220.

The application also does not adequately explain why the existing supply connection is no longer viable in technical terms, why the previously approved PHWD footprint cannot be used, or why the station cannot be located farther from nearby residences within the existing fenced facility grounds. The potential for persistent operational humming and the close proximity of nearby homes raise additional concerns under MCC 39.7515(A), which addresses consistency with the character of the area.

Because the record does not adequately establish compliance with MCC 39.7515(A) and (B), we respectfully request that the Hearings Officer deny T3-2026-0012.

If the applicant wishes to pursue the Sandy Pump Station, it should first provide a revised landscape and habitat plan, supported by appropriate technical analysis, demonstrating that the proposed change will not adversely affect natural resources and that the habitat functions relied upon in the prior approval will be maintained or improved



Appendix A. Summary of Key Differences

Issue	Previously Approved PHWD/Fire Pump Stations	Proposed Sandy Pump Station	Why It Matters
Location	PHWD station at its approved location.	Approximately 140 feet east, in an area designated for planting.	Changes the approved landscape and habitat configuration.
Building and site	Two separate pump facilities.	One 2,520-sq.-ft. building with 7,655 sq. ft. of impervious area, including grasscrete.	The new configuration must be evaluated on its actual site impacts.
Landscaping	Native plantings were planned where the Sandy station is proposed.	Displaces 7 trees and 27 shrubs; replacement plantings are proposed elsewhere, including 36 additional trees and 36 shrubs.	More plants elsewhere do not automatically preserve habitat function or connectivity.
Alternative locations	PHWD station was approved at a different location.	Applicant has not adequately explained why it cannot use the prior footprint or locate the station inside the existing facility fence.	A comparison of feasible locations is needed, particularly given nearby residences.
Noise and rural character	Prior facility subject to its approved plans and conditions.	Proposed operational limit of 50 dBA at the property line; community is concerned about persistent humming.	Continuous mechanical noise may conflict with rural residential character under MCC 39.7515(A).
Nearby residents and service area	PHWD facility associated with the local water district.	Serves Sandy, approximately 5–10 miles away in a different county; a residence is reportedly about 50 feet from the property line at the proposed site.	The County should carefully weigh local impacts and whether they can be reduced through alternative siting.
Natural-resource compliance	Prior approval relied on an approved landscape and habitat plan.	Requires changes to that plan and relocation of plantings.	The applicant must demonstrate compliance with MCC 39.7515(B), not simply rely on the prior approval.



Lisa Estrin <lisa.m.estrin@multco.us>

Written Testimony for T3-2026-0012

1 message

Cottrell CPO <cottrellcpo@gmail.com>

Thu, Oct 8, 2026 at 10:19 PM

To: LUP Hearings <lup-hearings@multco.us>

Cc: pleasanthca@gmail.com, Alexandra Howard <alexandra.howard@multco.us>, Lisa Estrin <lisa.m.estrin@multco.us>

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LUP Hearings,

Please see the attached written testimony for T3-2026-0012.

Thank you,
Cottrell CPO
Pleasant Home Community Association



CCPO-1082026-T3-2026-0012.pdf

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