Cottrell CPO

Pleasant Home
Community Association

Cottrell Community Planning Organization
Pleasant Home Community Association
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October 30, 2026

City of Sandy Pump Station – T3-2026-0012

To: Multnomah County Hearings Officer
From: Cottrell Community Planning Organization
Re: City of Sandy Pump Station, 35320 SE Carpenter Lane

The Cottrell Community Planning Organization (CPO) submits this testimony regarding the proposed City of Sandy pump station on SE Carpenter Lane. The CPO is concerned that the proposal will impose permanent impacts on nearby rural residents while serving a water system outside the rural community in which the facility is being located.

The CPO recognizes the importance of reliable public water infrastructure. However, the County must determine whether this particular facility, at this location and as proposed, satisfies the applicable conditional use criteria. We believe the application raises significant concerns under Multnomah County Code (MCC) 39.7515(A) and (G).

1. Compatibility with Rural Character — MCC 39.7515(A)

The West of Sandy River Rural Area Plan describes a community vision centered on quiet open spaces, productive farms and forests, country roads, healthy streams, and preservation of the rural way of life. The proposed pump station introduces additional permanent utility infrastructure into this setting, with direct effects on nearby Carpenter Lane residents.

The facility will add a substantial building and impervious surface, remove existing trees and shrubs, and introduce mechanical equipment with the potential for ongoing noise. These are not simply temporary construction impacts. They are permanent changes to the character and experience of the surrounding area.

The fact that the property already contains the Bull Run filtration facility does not establish that additional utility development is automatically compatible with the rural area. Each proposal must independently satisfy the applicable approval criteria, including compatibility with the surrounding area and the cumulative effects of related development.

2. The Original Bull Run Approval Does Not Provide Blanket Authorization for Additional Development — MCC 39.7515(A) and (G)

The County's prior approval of the Bull Run filtration facility should not be interpreted as blanket approval for any subsequent modification, expansion, or related utility infrastructure proposed on the property. The Sandy pump station is a separate land-use proposal that introduces additional facilities and impacts not necessarily evaluated as part of the original approval.

The County should evaluate this proposal in the context of the entire Bull Run development, including the combined and cumulative effects of the filtration facility and the proposed pump station. It should also determine whether adding this facility represents a material change to the previously approved project that requires review or modification of the original land-use approval.

The original approval cannot reasonably be relied upon as a substitute for evaluating the impacts of infrastructure that was not included in that decision. The County must ensure that the current proposal complies with applicable land-use requirements and does not undermine the findings or conditions supporting the original approval.

3. Noise and Ongoing Residential Impacts — MCC 39.7515(A)

The proposed pump station will operate near existing rural residences. Although the application references a 50 dBA noise limit at property lines, meeting a general decibel threshold does not necessarily establish that the facility will be compatible with the rural residential setting.

The County should consider the potential for continuous mechanical noise, tonal or low-frequency hum, nighttime operation, and the cumulative noise from the pump station and existing filtration facility. The CPO requests that any approval include:

- Enforceable operational noise limits that account for tonal and low-frequency noise;
- Evaluation under realistic full-load operating conditions, including nighttime operation;
- Post-construction noise verification at the nearest affected residences; and
- Required corrective measures if the facility exceeds approved limits or creates unreasonable noise impacts.

4. Visual Impacts, Vegetation, and Rural Character — MCC 39.7515(A) and (G)

The proposal will remove existing trees and shrubs and introduce additional building and paved areas. Replacement plantings elsewhere on the property do not necessarily replace the screening, visual character, or residential buffering provided by vegetation removed near neighboring homes.

The County should require retention of existing vegetation wherever feasible, effective screening along the residential-facing portions of the facility, replacement plantings where screening is lost, and appropriately shielded lighting that does not unnecessarily illuminate neighboring properties.

These measures should be designed to protect the experience of adjacent residents, not simply satisfy a general landscaping requirement.

5. Site Selection and Alternatives — MCC 39.7515(A) and (G)

The proposed facility serves the City of Sandy, which is outside the rural Multnomah County community where the pump station will be located. Carpenter Lane residents will bear the direct and permanent effects of infrastructure serving an outside community.

The CPO is not asserting that the County Code categorically prohibits a utility facility from serving an area outside the rural community. However, the purpose and service area of the facility are relevant when evaluating whether its location and impacts are appropriate and compatible with the surrounding rural area.

The applicant should explain why this location is necessary and whether alternative locations, configurations, setbacks, or equipment arrangements could reduce impacts to Carpenter Lane residents. The existence of the previously approved filtration facility on this property does not, by itself, establish that this is the appropriate location for every related utility facility.

6. Requested Conditions and Findings — MCC 39.7510

If the County considers approval, the CPO requests specific, enforceable conditions addressing:

- Operational noise, including tonal and low-frequency noise, with post-construction verification and corrective measures;
- Retention and replacement of vegetation to maintain effective screening for nearby residences;
- Shielded, downward-directed lighting;
- Construction, maintenance, and service traffic impacts on Carpenter Lane; and
- Ongoing responsibility by the City of Sandy to maintain compliance with all approval conditions.

Conditions should directly address impacts to neighboring residents and remain enforceable for

The Cottrell CPO is concerned that the proposed pump station will impose permanent noise, visual, and land-use impacts on rural Carpenter Lane residents while serving the City of Sandy. The County's prior approval of the Bull Run filtration facility does not eliminate its obligation to independently evaluate this proposal or its relationship to the previously approved project.

The CPO requests that the Hearings Officer find that the applicant has not adequately demonstrated compliance with MCC 39.7515(A) and (G), and deny the application unless those criteria can be satisfied. At a minimum, the County should require a complete evaluation of the combined project impacts, determine whether the proposed pump station requires review as a

modification to the original Bull Run approval, and impose meaningful, enforceable conditions that protect neighboring residents and the rural character of the area.

Cottrell Community Planning Organization and Pleasant Home Community Association