Cottrell CPO

Pleasant Home
Community Association

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

October 30, 2026

To: Dan Kearns, Hearings Officer
From: Cottrell Community Planning Organization
RE: T3-2026-0012 – City of Sandy Pump Station
Challenge to Exhibit A.15 – Fire Service Provider Review

Dear Hearings Officer:

The Cottrell Community Planning Organization (CPO) submits the following objections to Exhibit A.15, the Fire Service Provider Review submitted in support of the proposed City of Sandy pump station at 35320 SE Carpenter Lane.

1. Inadequate Demonstration of Compliance with Rural Public-Service Policies

The *Multnomah County West of Sandy River Transportation and Land Use Plan*, page 45, identifies Framework Plan Policy 38 as governing fire and police protection. The plan calls for development to be served by a fire district, for that district to have an opportunity to review and comment on proposals, and for adequate firefighting water to be available.

Exhibit A.15 documents Gresham Fire's technical review dated September 30, 2025, with a subsequent notation dated November 11, 2025. However, it does not demonstrate whether the proposed development can be accommodated within existing rural fire-protection resources without additional staffing, equipment, infrastructure, or other service commitments.

The CPO questions whether it is appropriate for rural Multnomah County emergency services to assume additional obligations associated with a facility intended to serve the City of Sandy, located in Clackamas County. Although the facility would be located in Multnomah County, its primary operational benefits would accrue outside the host community.

The County should evaluate whether this arrangement is consistent with the rural public-facilities policies and existing service capacity before relying on Exhibit A.15 as evidence of adequate fire protection.

2. Lack of Notification to the Rural Fire Protection District No. 10 Board

On October 30, 2026, the CPO corresponded with representatives of the Rural Fire Protection District No. 10 Board and learned that the Board had not been informed of the proposed City of Sandy pump station or Gresham Fire's review.

This raises substantial questions regarding whether the appropriate governing body was consulted and whether Gresham Fire had the necessary delegated authority to make service commitments on behalf of the District.

Exhibit A.15 indicates that the property is within Gresham Fire's service boundaries or under contract, but does not identify which arrangement applies or provide documentation establishing the authority under which the review was issued.

The CPO requests that the County obtain written clarification from Gresham Fire and the District 10 Board regarding the applicable service agreement, the scope of Gresham Fire's authority, and whether the proposed facility has been reviewed through the District's appropriate governance process.

3. Request for Supplemental Review and Reconsideration of Exhibit A.15

The CPO requests that the Hearings Officer decline to rely on Exhibit A.15 as sufficient evidence of fire-service availability until the applicant provides:

- Documentation establishing Gresham Fire's authority to review and commit fire-protection services for the proposed development.
- Written confirmation that the District 10 Board has been informed and afforded any review or approval required under the applicable service arrangement.
- An assessment of whether the proposed pump station can be served without adversely affecting existing fire-protection resources available to rural Multnomah County residents.
- A supplemental fire-service review addressing these matters and confirming the status of any outstanding conditions.

If the applicant cannot substantiate the authority and service commitments represented in Exhibit A.15, the CPO requests that the Hearings Officer strike the exhibit or, alternatively, assign it no evidentiary weight as proof of adequate fire-protection services.

The CPO further requests that the record remain open, if procedurally permissible, to allow the District 10 Board an opportunity to review and comment on the proposal.

Cottrell Community Planning Organization and Pleasant Home Community Association