

June 28, 2023

**To:** Alan Rappleyea

**From:** Ian Courter

**Subject:** Opposition to Portland Water Bureau's Conditional Use Application for a Filtration Plant at Carpenter Lane

Dear Mr. Rappleyea,

My name is Ian Courter. I live at 36610 SE Dodge Park Blvd, just east of the proposed filtration project site. My wife Lauren and I have four children ages 13-16. Our property is a 10-acre, EFU-zoned blueberry farm. We purchased the property 10 years ago to adopt a rural life, away from the city, with access to good schools for our children. We also wanted to try our hand at farming and raising livestock. We love our property in the Cottrell area for the same reasons I suspect everyone else in our community values their property—productive soil, natural beauty, views of Mount Hood, clear night sky, sounds of the nearby Sandy River, wind in the trees, songbirds, owls, and pollinating insects, the smell of cedar, pine, and wild mint, as well as regular sightings of wildlife including, hawks, eagles, bobcats, cougars, bears, deer, and elk.

When we purchased our property, we could never have imagined a development proposal like Portland Water Bureau's filtration plant at Carpenter Lane. How could we have anticipated such a massive industrial installation within an existing rural community, outside the urban growth boundary, in a highly valued agricultural zone? Multnomah County's West of Sandy River Transportation and Land Use Plan includes a vision statement crafted by a citizen task force to guide development in our area and it reads as follows:

*As residents and landowners in the area between the cities of Gresham and Troutdale and the Sandy River, our vision is that we will continue to enjoy our rural lifestyle. We value all of the features that make this a rural place including the quiet open spaces, vistas of productive farm and forest lands and of Mt. Hood, country roads, healthy air, soils and streams, and a night sky where we can clearly see the stars.*

*We envision that the Orient and Pleasant Home rural centers will continue to prosper within defined areas in order to provide for the needs of residents and visitors. We want our roads to continue to serve as the transportation network for the area, while remaining usable for people enjoying the country and accessing*

*the Sandy River, with opportunities for exercise by walking, running, bicycling and horseback riding.*

*In order to maintain this vision, we recognize that the planned density of residential development must not increase, that the agricultural economy of the area must remain strong, and that development of new non-agricultural businesses should serve the needs of the local area. This plan is intended to help us in our stewardship of the environment, our lifestyle, and our community over the next 20 years.*

The West of Sandy River Plan goes on to list numerous specific policies influenced by this vision statement. For example, Policy 22 on page 60 states:

*New commercial and industrial uses within the Orient Rural Community will be small-scale and low impact in nature as defined by the State Unincorporated Communities Rule. These uses will not adversely impact agriculture or forestry uses and will reinforce the rural nature of the Orient Rural Community and the Pleasant Home Rural Service Center.*

Given the land use policies established for the area, you can imagine our surprise when the Portland Water Bureau announced their preliminary proposal in 2017.

Portland Water Bureau is seeking "Conditional Use" approval for a "Utility Facility." The County's West of Sandy River Plan explains that "*Conditional uses...may be permitted...provided that any such conditional use would not be detrimental to the adjoining properties or to the purpose and intent of the Comprehensive Plan.*" I contend that construction and operation of Portland Water Bureau's proposed filtration plant at Carpenter Lane is not consistent with the policies and intent of the West of Sandy River Plan, the filtration plant's primary purpose is not to serve the needs of our local community, and, if allowed to proceed, the plant's construction and operation would be detrimental to our adjoining property, specifically with respect to our use and enjoyment of our land. The facility's noises would permanently conceal the natural sounds that we currently enjoy; dust and other airborne debris created during the aggressive seven-year construction period would necessitate washing of our berries, which is not currently needed; and heavy industrial traffic on our country roads would create a serious hazard for existing residents and farm workers. Once construction is complete, many of the same problems would persist. Moreover, my family would not be able to live and farm near tanks filled with toxic chemicals and trucks frequently offloading hazardous materials.

I've been following Portland Water Bureau's effort to promote their filtration plant at Carpenter Lane for the last six years. Initially, Portland Water Bureau expressed a need to treat the water for cryptosporidium to comply with federal drinking water regulations. Then, in early 2018, emphasis was placed on the need for the facility to address sediment pulses following wildfires. This came shortly after the Eagle Creek fire that burned a significant portion of the Columbia River Gorge. In 2021, a new rationale emerged—economic recovery for minority owned businesses after the pandemic<sup>1</sup>. Portland Water Bureau and Portland City Council synchronized their rationale for the filtration plant project with contemporary events, highlighting the weak basis for the original motivation to build this project at Carpenter Lane. If construction of the filtration plant was critical and could not be delayed, Portland Water Bureau would have chosen a site that was zoned for this type of industry.

Although the project rationale has changed numerous times, one thing has remained consistent. Portland Water Bureau argues that the filtration plant at Carpenter Lane is “federally required.” I believe Portland Water Bureau is using this caricature to mislead the public to promote a larger, more expensive facility in an area that is not zoned for non-agricultural industry. Claiming the project is federally required has been effective at motivating Portland City Council to appropriate huge sums of money, and it's the same strategy Portland Water Bureau will likely continue to use to control public opinion and plead for conditional use approval. The fact is that Portland Water Bureau has several cryptosporidium treatment options and various possible building sites, but they chose a filtration plant at Carpenter Lane. The project they chose happens to be the most expensive treatment option; at the most impactful site. To be clear, Portland Water Bureau can choose a different site for their filtration plant, and they can choose a different treatment option, such as an ultraviolet treatment facility. The federal government is not requiring a filtration plant at Carpenter Lane, and rejection of Portland Water Bureau's conditional use application will not impair their ability to satisfy federal drinking water standards.

Finally, I would like to explain why the Portland Water Bureau is intent on building their filtration plant at Carpenter Lane, within the existing communities of Cottrell and Pleasant Home. I believe they selected this site because they were attracted to the natural, peaceful, rural character of the area. They saw the potential for an idealized facility with unobstructed views of Mount Hood (Figure 1), surrounded by natural spaces and agriculture, located outside populous areas, and within a convenient distance of Portland. My assertion is supported by Portland Water Bureau's site selection analysis, woefully inadequate environmental and

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<sup>1</sup> Review of the project funding allocation breakdown reveals that greater than 95% of the funding will be contracted to multinational engineering corporations and their subsidiaries.

socioeconomic analyses, eagerness to obtain approval despite self-imposed timelines, repeated changes in project rationale, and continual disregard for our community's opposition. The Water Bureau is more concerned about pushing this filtration plant through at this location than they are about implementing a responsible, necessary water treatment project.

I urge you to reject Portland Water Bureau's conditional use application for a filtration plant at Carpenter Lane.

Sincerely,



Figure 1. View of Mount Hood from proposed filtration plant site at Carpenter Lane. Picture taken on June 27, 2023.