



April 14, 2025  
Multnomah County Hearings Officer  
Multnomah County Community Services, Land Use Planning  
1600 SE 190 Avenue  
Portland, OR 97233

**Re: Case # T3-2022-16220 – Proposed Portland Water Bureau Filtration Plant Project**

The East Multnomah Soil and Water Conservation District (EMSWCD) is a non-regulatory government agency representing the residents of Multnomah County east of the Willamette River to the far end of the county. The mission of EMSWCD is to help people care for land and water. We appreciate the opportunity to provide comments to the Hearings Officer as part of the County's remand proceedings required by LUBA. While EMSWCD supports the provision of clean, safe drinking water for all Portland Water Bureau (PWB) customers, we are concerned that the current proposed location for the water filtration plant will incur negative and irreversible impacts on the agricultural natural resources of East Multnomah County.

**MCC 39,7515(B) criterion**

**Farmland importance and decline**

A core focus of EMSWCD is the protection of high-value natural resource agricultural lands that serve as the cornerstone of our rural area. These lands are the fabric of our rural economy, provide domestic food security, and habitat for fish and wildlife. They are also under threat from rapid fragmentation and conversion. According to the 2022 USDA Agricultural Census, farmland acreage in Multnomah County has declined by nearly 43,000 acres - 87% - since 1969. As farmland acreage has declined with the proliferation of non-farm uses in historically agricultural zones, the average farm size has also declined, from 114 acres in 1969 to 41 acres in 2022. Average farm sales have also declined by some \$40,000 during the period 1969 – 2022, reflecting a shrinking agricultural industry increasingly under pressure from non-farm uses.

To halt the loss of agricultural land, EMSWCD launched a working farmland protection program in 2013 to "strategically and permanently protect high value agricultural lands in order to maintain a viable agricultural economy and improve watershed health and function." EMSWCD's program works in partnership with private landowners to create 'Forever Farms' by purchasing working farmland easements to ensure that land continues in active agricultural use. By preventing conversion to non-farm

uses, EMSWCD is helping ensure a future for the agricultural natural resource economy of East Multnomah County.

Over the past ten years EMSWCD has protected nearly 250 acres of high-value agricultural land. The location of the proposed PWB facility is on some of the most fertile and nutrient-rich soil in the State and comprises one of the largest farm properties in East Multnomah County. According to the United States Department of Agriculture, over 95% of the proposed site contains Class 2 soils, which Oregon Department of Agriculture describes as “some of the best agricultural soils in the United States.”<sup>1</sup> The proposed site has prime agricultural soils, favorable topography, legal water rights, and is sizeable enough to support commercial farming operations; this is reflected in the District’s farmland prioritization (2016) which identifies the property as the 3<sup>rd</sup> best farm within the District’s service area. Removing this land from our County’s limited agricultural base has the potential to drive up prices and increase barriers for land access that are already high. Farmland in Multnomah County is already the 41<sup>st</sup> most expensive in the US and has increased 542% since 1992<sup>2</sup>. The size and scale of a 95-acre conversion project, along with its associated infrastructure, top-soil removal and 4 miles of new pipelines, will have a negative ripple effect across the agricultural community, economy, and waterways that weave through our remaining natural resource agricultural lands. Other communities across the country that have lost a significant agricultural land base have experienced non-farmer use conflicts and lost support industries like feed stores and equipment dealers<sup>3</sup>.

### **Conclusion**

The Community Service Approval criteria MCC 39.7515(B) referenced in the Remand from LUBA requires that the projects NOT adversely affect natural resources. The proposal by the City of Portland to site an urban water treatment facility within a Rural Reserve in East Multnomah County adversely impacts agricultural natural resources. Furthermore, it is not consistent with the character of the area. As a Soil and Water Conservation District, we play a critical role in protecting natural spaces that contribute to the quality of life for both urban and rural residents. We respectfully ask that you re-launch an alternatives analysis that provides a robust review of all potential sites for this facility. EMSWCD urges Multnomah County to preserve our unique and threatened agricultural natural resources by ensuring that this site remains dedicated to agricultural use.

Respectfully submitted,



Kelley Beamer, Executive Director  
East Multnomah Soil & Water Conservation District

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<sup>1</sup> Oregon Department of Agriculture 2023 comment letter to Mult. Co Hearing officer

<sup>2</sup> USDA Census of Agriculture (2022)

<sup>3</sup> [https://www.farmlandinfo.org/wp-content/uploads/sites/2/2019/09/Is\\_There\\_a\\_Critical\\_Mass\\_of\\_Ag\\_Land\\_Needed\\_1.pdf](https://www.farmlandinfo.org/wp-content/uploads/sites/2/2019/09/Is_There_a_Critical_Mass_of_Ag_Land_Needed_1.pdf)



LUP Hearings &lt;lup-hearings@multco.us&gt;

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## EMSWCD Testimony

1 message

**Kelley Beamer** <Kelley@emswcd.org>

Mon, Apr 14, 2025 at 11:51 AM

To: "LUP-Hearings@multco.us" &lt;LUP-Hearings@multco.us&gt;

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Hello, on behalf of East Multnomah Soil and Water Conservation District (EMSWCD), I would like to submit the attached written testimony for Case No. T3-2022-16220.

**Kelley Beamer**

(she/her)

*Executive Director***East Multnomah Soil and Water Conservation District**[5211 N. Williams Ave., Portland, OR 97217](#)

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[emswcd.org](http://emswcd.org)*We help people care for land and water***EMSWCD.Comments.PWB.Remand.4.14.25.pdf**

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