

April 11, 2025

Multnomah County Hearings Officer
1600 SE 190th Ave
Portland, OR 97233
LUP-Hearings@multco.us

Re: Portland Water Bureau Filtration Facility and
Pipelines County Case File T3-2022-16220 -Remand

Multnomah County Hearings Officer,

I submit this statement in strong opposition to the proposed PWB Water Filtration Industrial Facility located in East Multnomah County. This Industrial -scale development poses a significant threat to the ecological integrity and adversely affects the long-term sustainability of surrounding natural resources. It conflicts with several provisions of the Multnomah County Code, including MCC 39.7515(B), and undermines the objectives in Chapter 5 of the Multnomah County Comprehensive Plan regarding natural resources and environmental protection.

The proposal conflicts with MCC 39.7515(B),

Under Multnomah County Code 39.7515(B), conditional use may only be approved if:

“The proposed use will not have significant adverse effects on the natural, scenic, and historic resources of the area.”

The applicant’s proposal includes construction of a fenced water filtration plant, accompanied by access roads, impervious surfaces and ongoing industrial operations on some 94 acres of Oregon designated prime farmland. The proposed location lies within a Rural Reserve, a sensitive riparian corridor, and wildlife habitat areas, as documented by County resource inventories.

The fencing and industrial activity would fragment habitat, disturb wildlife corridors, and alter hydrological patterns thus promoting environmental and natural resource degradation. These impacts are not minimal or incidental- they are significant adverse effects, and therefore the proposal does not satisfy MCC 39.7515(B).

The Proposal Undermines Goals and Policies in Chapter 5 of the Multnomah County Comprehensive Plan. Chapter 5 of the Comprehensive Plan emphasizes the protection of natural resources, particularly under the following goals, policies, and strategies:

Goal: "To Protect and restore rivers, streams, wetlands, wildlife habitat and other natural resources; maintain and enhance air, water, and land quality; conserve scenic areas and open spaces; and maintain natural resources' contribution to the rural character of the County."

Policy 5.12-4. "Controlling storm water volume from developed areas in a manner that does not contribute to increased flow streams and does not result in hydro-modification impacts, such as channel straightening, widening, deepening, and clearing of in stream habitat features...."

Policy 5.14-1. "The run-off from the site shall not adversely affect water quality in adjacent streams, ponds, or lakes, or alter the drainage on adjoining lands, or cause damage to adjacent property or wildlife habitat."

The daily pumping of around a million gallons of groundwater, overflow pond water and storm water thru a Flow Spreader into Johnson Creek adversely affects and alters the ecosystem of the Creek. This is happening in the Southwest corner of the Plant. Discharging water defies MCC 39.7515(B) and the Comprehensive Plan Chapter 5. This area is inventoried as Significant Environmental Concern- Water Resource. **See Attached Approved Plans (Storm Water Management Plan Filtration Facility and Erosion Control Construction Plan) that shows Johnson Creek will be used for dumping Stormwater when the Filtration Plant is in operation. This violates MCC 39.7515(B) and the Multnomah Comprehensive Plan. In the Remand Submissions N.14 includes videos of the discharge going in Johnson Creek.

The proposed industrial facility is inherently inconsistent with the goal, policies, and strategies. It introduces potential pollution sources, increases stormwater runoff and degrades natural habitats- all of which contradict the County's mandate to prevent resource degradation and maintain ecosystem functions.

Strategy 5.33-2: "In significant wildlife habitat areas, encourage fencing which allows wildlife to pass through."

Allowing a large-scale fenced industrial facility in the area sends a troubling signal that natural resource protection is subordinate to industrial development. This would set a precedent that conflicts with the County's long-term planning goals and environmental commitments.

Protecting and conserve natural resources to maintain ecosystem functions and enhance community livability is in the Comprehensive Plan Chapter 5.

Further, the Plan states that the degradation of air, water, land, and biological resources should be prevented through land use decisions, to assure and promote the maintenance and improvement riparian areas, wetlands, and wildlife habitat areas to ensure long-term ecological health is mentioned. The operation of the filtration plant will result in the degradation of these natural resources and this adverse affect on natural resources cannot be mitigated. The code (MCC 39.7515 (B)) states, conditional use may only be approved if: "The proposed use will not have significant adverse effects on the natural, scenic, and historic resources of the area."

The proposed water filtration facility may serve as a utilitarian function, but its location and scale are inappropriate in an ecologically sensitive area. The project fails to meet the approval criteria of MCC 39.7515(B) and directly contravenes the environmental goals outlined in Chapter 5 of the Comprehensive Plan.

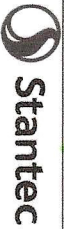
Since the use of this facility on the site would adversely affect and degrade natural resources, I respectfully urge the Hearings Officer to deny the application and direct PWB to consider alternative sites.

Thank you for your consideration.

Respectfully submitted,

Jennifer Hart
38200 SE Lusted Rd.
Boring, OR 97009
sandyjen23@gmail.com
503-467-8733

S. W
corner



David W. Peters, Engineering Manager, PE No 16632



Civil

S&P Project No
 W022229
 114 Section
 3765 / 3766
 Sheet No
 00-LU-307
 X of X
















GRID 02

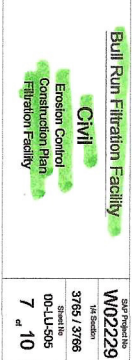
SE Bluff Rd.

1. Refer to Filtration Facility Stormwater Report (Appendix H.1) for stormwater calculations and sizing.
2. See 00-LU-304 (Grading Plan) for ground disturbance limits.
3. See 00-LU-306 (Landscape Plan) for propose vegetation.

1. Drainage Ditch per detail C-169/GEN-C-223
2. Storm Piped
3. **Drainage Pond**
4. Underdrain Storm Pipe
5. Water Quality Steel per detail C-169/GEN-C-223
6. Stormwater Planter per detail C-162/GEN-C-270
7. Flow Control Maintenance Hole
8. Stormwater Basin per detail C-161/GEN-C-202
9. Outfall Flow Spreader per detail C-171/GEN-C-223
10. Septic Tank

Plan Approved

Major Center		Cherries Red
SEC Zone		Storm Plaster
SEC Zone		Sawn Deck
SEC Zone		
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1. No unsupported finish slopes on site.
2. Limit of Disturbance is 1ft from Geohazard line, property line, or SEC-WR line. Temporary Silt Fence is placed at Limit of Disturbance.

1. *Installed Temporary Sill Fences*, See Detail 2 on Sheet 00-LU-509.
2. *Install Two Protection Fences*, See Detail 1 on Sheet 00-LU-509.
3. *Install Stabilized/Gravel/Concrete Entrances*, See Detail 1 on Sheet 00-LU-509.
4. *Install Window Wires*, See Detail 2 on Sheet 00-LU-509.
5. *Protect Existing Fence*, Place Temporary Sill Fence Minimum 1ft from existing fence.
6. *Install Concrete Fiber Sock*, See Detail 2 on Sheet 00-LU-510.
7. *Install Storm Walls*, See Detail 2 on Sheet 00-LU-510.
8. *Install Inlet Protection*, See Detail 6 on Sheet 00-LU-509.

- [illegible]



LUP Hearings <lup-hearings@multco.us>

Remand - T3-2022-16220

1 message

Jennifer Hart <sandyjen23@gmail.com>
To: LUP-Hearings@multco.us

Tue, Apr 15, 2025 at 8:26 AM

External Sender - Be Suspicious of Attachments, Links, and Requests for Payment or Login Information.

Multnomah County,

Can you please add this to the Remand Record T3-2022-16220.

Thanks,

Jennifer Hart
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Boring, OR 97009
Sandyjen23@gmail.com



Jennifer Hart Testimony JC Discharge.pdf
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