

April 12, 2025

T3-2022-16220 Comments
Multnomah County Hearings Officer
1600 SE 1990th Ave
Portland, OR 97233
LUP-Comments@multco.us

Re: Portland Water Bureau Filtration Facility and
Pipelines County Case File T3-2002-16220 — REMAND

Multnomah County Hearings Officer,

This testimony is my submittal to Multnomah County for the record of my opposition to allowing Portland Water Bureau (PWB) to build a water filtration plant in East Multnomah County and my comments for Case T2-2002-16220 addressing impacts on natural resources. Many of the reasons this rural community exists is because of these exact natural resources that this hearing will address. The preexisting Character of the Area included wildlife habitat, streams, wetlands, forests and highly prized agricultural lands, all which were addressed at the last County hearing by multiple people and all which will be changed forever with the presence of this massive filtration plant.

I am pleased that LUBA remanded at least the “Natural Resources” portion of the case because the affect the Portland Water Bureau Filtration Plant has and will continue to have on the area will tremendously affects the ecosystems, biodiversity and natural resources.

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.”

PWB is pumping water out of the plant site to prevent their overflow ponds from overflowing and that is what they plan on continuing to do even after the plant is completed. That water flows directly into Johnson Creek at the headwaters after traversing agricultural land containing “contaminated soil.” Beaver Creek is a stones throw away and the Scenic Sandy River is just beyond that. I can personally walk from my house to all three bodies of water. All three are vital functioning natural systems providing life to fish and other wildlife, water for human existence, agriculture and livestock and all three are in danger of being contaminated by the water filtration plant. Johnson Creek is a “Significant Environmental Concern” (SEC) labeled body of water that is the life source for protected species of fish and also provides life source to other wildlife in it’s riparian corridor. The filtration plant will always need to pump water out of the facility in order to prevent their overflow ponds from actually overflowing. This

procedure will not end when construction ends and the endangered salmon and other wildlife dependent on Johnson Creek will continue to be affected. Besides the contaminated water, dirt and erosion sediment is also being deposited altering the shape and flow of the creek forever. When construction is completed and the plant is up and running there will be chemicals on site that could end up in that same overflow water. Degradation of this vital environment is disastrous and is one of the reasons that this site should never have been considered for a water filtration plant and definitely not allowed by land use.

Another natural resource system that is altered by their need to pump water is the naturally occurring springs in the area that are now drying up. We have always had several springs flowing on our property. One would consistently surface near our paved driveway and run downhill next to the pavement freezing over in winter. This winter there was no spring and no frozen water on the ground and there won't be again in the future because of their pumping.

I've observed the disappearance of our usual wildlife including elk, owls, eagles, geese and many many migrating birds. Herds of elk used to run through our property and out into the fields next door, the same fields that have become their giant construction site. The elk will never be returning to a site that will be covered by concrete, asphalt and buildings. That field is gone forever along with all the creatures that called that land home if even for a temporary stay. Huge flocks of migrating geese used to fly over my house headed for and landing in those same fields next door and that hasn't happened this year and won't ever again with the constant noise and lights from a functioning filtration plant. The owl's hoot that used to lull me to sleep at night is gone and I really miss it.

The approximately 360 trees already removed can not be mitigated by planting new trees which will not reach the size and maturity of those lost in anyone's lifetime and therefore will not provide the same safe harbor or homes for birds or other creatures. Trees of their age provided significant air exchange of carbon dioxide and oxygen that is vital for life at all levels and protection from sound and light exposure which affect all walks of life - birds, humans and any other creatures that populate rural landscapes. Research has shown that artificial lights illuminating the night sky cause birds to become confused and unable to navigate causing exhaustion and death from their searching for the familiar resting places. Rural landscapes and open spaces are necessary for migration and industrial size plants disrupt and diminish this functioning natural system. Large industrial size facilities belong within urban areas where like structures and systems are congregated together and open spaces and natural, unpolluted areas need to be left undeveloped so the necessity of biodiversity for life can continue.

Agriculture seems like a man made functioning system but the soils that support the growth of plants is a phenomenon of itself. Large plots consisting of prized soil need to remain as such so if needed at any point in the future for necessary food production, they would be available. Covering the land with concrete etc or simply disturbing the

natural soils, for pipeline installation will damage and alter the quality of the soil and remove their potential for food in the future.

Statewide goals “require cities and counties to plan for the management and protection of natural resources including, maintaining air, land and water quality and protecting riparian corridors, wetland and wildlife habitat. These goals were intended for protection and continuance of our natural world and will function as intended if places are provided for human congregation (cities) while also providing for nature (open undisturbed landscapes).

There is a reason that about ten years ago our area of East Multnomah County was established as a “Rural Reserve” set aside for fifty years to be unaltered and protected from urban expansion to provide open spaces. Yet here we are today facing a mega industrial size plant in the middle of prime agricultural land that has provided life to so many creatures being destroyed and eliminated forever.

Multnomah County’s Comprehensive Plan encompasses the Statewide Goal 5 to provided for and protect natural resources and PWB’s filtration project is not compatible with this regulation and should not be allowed by land use. Pumping surface water, lights, noise and loss of open land adversely affects those individual naturally functioning systems and should be prevented.

Thank you,
Suzanne Courter
36610 SE Dodge Park Blvd Boring, Oregon 97009Comments

4/15/25, 9:31 AM

Multnomah County Mail - Fwd: Comments Natural Resources - Mult. Co. Hearing Officer



LUP Hearings <lup-hearings@multco.us>

Fwd: Comments Natural Resources - Mult. Co. Hearing Officer

1 message

LUP Submittals <lup-submittals@multco.us>
To: LUP Hearings <lup-hearings@multco.us>

Tue, Apr 15, 2025 at 9:30 AM

Thank you,

Planner on Duty
Multnomah County Land Use Planning

Note: An application is not received and accepted for submission until all required application fees have been paid.
[MCC 39.1125 and MCC 39.1130 / MCC 38.0580]

Multnomah County
Department of Community Services - Land Use Planning Division
T: 503-988-3043 | E: land.use.planning@multco.us
<https://multco.us/landuse>

----- Forwarded message -----

From: **Suzanne** <suzcc@me.com>
Date: Tue, Apr 15, 2025 at 9:28 AM
Subject: Comments Natural Resources - Mult. Co. Hearing Officer
To: LUP Submittals <lup-submittals@multco.us>