

April 15, 2025
Multnomah County Hearings Officer
Multnomah County Community Services, Land Use Planning
1600 SE 190th Avenue
Portland, OR 99233

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

My name is Larry Bailey, and I am the president of the Multnomah County Farm Bureau. Farm Bureau is the largest general farm advocacy organization, both in Oregon and nation-wide. Multnomah County Farm Bureau's mission is to help local farmers be successful. I am testifying today on behalf of our local farming members.

The farmers of East Multnomah County are intimately connected to our natural resources and understand their importance. In fact, many of us have been protecting those natural resources quite literally for generations. Not only do we understand the significance of our natural resources, we also understand their scarcity.

By statute and code, the State of Oregon and Multnomah County both have chosen to officially prioritize protection of ALL natural resources, and LUBA recently reaffirmed this fact. However, Multnomah County seems to have embarked on a misguided attempt to retroactively limit the scope of those protections, which could not be more simply defined than in MCC 39.7515(B), the focus of our discussions today.

In approving a Community Service use, the approval authority SHALL FIND
that the proposal ... WILL NOT ADVERSELY AFFECT NATURAL RESOURCES.

Period.

Quite frankly, this should be the end of the discussion. A casual drive past the variously impacted sites, which Portland Water Bureau has irresponsibly damaged at its own peril, will make it clear that the relevant criteria will not, and cannot, be met. The body of submissions in opposition to these activities, both before and after construction began, attest to this fact.

In the Staff Report on Remand, Portland Water Bureau admits that a “natural resource” encompasses “agricultural resources and forests” (N.7, page 8, from the 2025 Remand). However, it then attempts to twist that plain language in order to serve the City’s purposes.

We submit that the loss of over 90 acres of existing, productive, irrigated farmland, in and of itself, represents an unacceptable, and clearly adverse, impact on this vital natural resource. The loss becomes even more egregious when you recognize that it is of Class II soils, some of the most productive agricultural soils in the country (Exhibit E.24, page 1, from the 2023 Hearing).

It is equally important to note that in order to protect our agricultural lands, we must, by definition, be willing to stand up for the stewards of those lands, the farmers. Every piece of agricultural land that is lost makes it much more difficult for local farm families to be successful. Every acre of agricultural land that is lost today is lost forever. We cannot make more, and this land will not come back.

The County is at a crossroads. Does it stand on its own principles and protect our vital natural resources, or does it contribute to their destruction?

I, and the members of Multnomah County Farm Bureau, implore you to protect our scarce agricultural resources and deny Portland Water Bureau’s attempt to subvert their existing protections.

Respectfully Submitted,

Larry Bailey, President
Multnomah County Farm Bureau



LUP Hearings <lup-hearings@multco.us>

Multnomah County Farm Bureau Testimony, Case Number T3-2022-16220

1 message

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On behalf of Multnomah County Farm Bureau, I would like to submit the attached testimony for case number T3-2022-16220.

Larry Bailey, President
Multnomah County Farm Bureau



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