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April 15, 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

Oregon Farm Bureau (OFB) is the state's largest and most inclusive agriculture organization, proudly representing over 6500 family farms and ranches that produce more than 220 agricultural commodities. From hops and hazelnuts to cattle, cranberries, and timber with operations spanning from just a few acres to thousands, our members utilize all farming methods including organic, conventional, regenerative, biotech, and even no-tech.

For reference, Oregon's agriculture industry is a cornerstone of the state's economy, generating approximately \$6.77 billion in agricultural cash receipts in 2022, with crops contributing \$4.65 billion and livestock adding \$2.12 billion, according to the U.S. Department of Agriculture¹. More specifically and to the point, agriculture is still very much an important and viable economic driver for Multnomah County. The last census of agriculture reported that the agricultural production value in the county is valued at nearly \$75 million per year, ranking the county 23 among the state's 36 counties². Nearly all the farms operated in the county are small and family operated with the average farm size being 48 acres and the average value of products sold per farm coming in at \$95,143³.

Oregon Farm Bureau joins Multnomah County Farm Bureau and members of the local agricultural community in opposition to the siting of the Portland Water Bureau's Bull Run Water Filtration Plant on SE Carpenter Lane in rural east Multnomah County.

For generations, family farms in east Multnomah County have responsibly managed and stewarded the region's agricultural lands. Despite a documented, ongoing reduction in farm acreage, the area still supports a committed and viable agricultural community working to maintain the productivity and ecological integrity of the county's remaining farmland.

¹ https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1,_Chapter_1_State_Level/Oregon/st41_1_002_002.pdf

² https://www.nass.usda.gov/Publications/AgCensus/2017/Online_Resources/County_Profiles/Oregon/cp41051.pdf?utm_source=chatgpt.com

³ https://www.city-data.com/county/Multnomah_County-OR.html?utm_source=chatgpt.com

The proposed construction of the Bull Run Water Filtration Plant would result in the conversion of approximately 100 acres of high-quality, contiguous farmland to industrial use. This represents a significant loss of productive agricultural land in a county where such land is increasingly scarce. Once land is removed from agricultural use for development of this scale, the conversion is permanent, with long-term implications for local and regional food production, natural resources, and wildlife.

The consequences extend beyond the immediate loss of farmland. Continued erosion of the natural and agricultural land base undermines the broader agricultural economy, including essential infrastructure such as equipment suppliers, seed and fertilizer dealers, container providers, and other supporting services. These impacts ripple throughout the regional agricultural network, weakening the viability of farming in Multnomah County and surrounding areas and further deteriorating the natural resource land base of the county.

In addition to the loss of farmland, the project has led to significant disruption to the rural landscape. Construction-related impacts include increased traffic, extensive soil disturbance, including exporting the soil out of the county, tree removal, altered water drainage patterns, and effects on wildlife habitat. These outcomes are in obvious conflict with the goals and requirements outlined in Multnomah County Code 39.7515(B), which requires that community service uses not adversely affect natural resources.

From a policy standpoint, Oregon Farm Bureau believes that agricultural lands, particularly those with high quality soil and active production, should not serve as the default location for infrastructure projects that could be sited elsewhere. While we understand the necessity of critical infrastructure such as water treatment, such facilities should be located in areas already designated or suited for industrial development, particularly when viable alternatives do exist.

We encourage both the City of Portland and Multnomah County to reevaluate the siting of this facility. Given the significance of the land in question and the potential for long-term impacts on the county's natural resource base, we urge an immediate cease in construction activities and a reconsideration of other options that would preserve this land for continued agricultural use.

Oregon Farm Bureau is committed to supporting the continued viability of Oregon's agricultural communities and resources. We appreciate the opportunity to provide input on this important matter and hope you will give full consideration to the implications of continuing with the project in this location.

Respectfully,

A handwritten signature in cursive script that reads "Angela Bailey".

Angela Bailey
President
Oregon Farm Bureau Federation



LUP Hearings <lup-hearings@multco.us>

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

1 message

Angela Bailey <angi@oregonfb.org>

Tue, Apr 15, 2025 at 1:48 PM

To: "LUP-Hearings@multco.us" <LUP-Hearings@multco.us>

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

On behalf of Oregon Farm Bureau, I respectfully submit the attached written testimony for Case # T3-2022-16220.

Warmly,

~A

**Angi Bailey***President* | Oregon Farm Bureau

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Oregon Farm Bureau Comments - Case # T3-2022-16220 – Proposed Portland Water Bureau Filtration Plant Project.pdf

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