



LUP Hearings <lup-hearings@multco.us>

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## Written testimony: (Case File T3-2022-16220)

1 message

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**rod parks nursery.com** <rod@parksnursery.com>  
To: "LUP-Hearings@multco.us" <LUP-Hearings@multco.us>

Thu, Jun 29, 2023 at 1:39 PM



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Dear Sirs,

Please find attached my testimony regarding the Portland Water Treatment Plant. (Case File T3-2022-16220)

Thank you.

### **Rod Park**



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P.O. Box 1686

Boring, OR 97009

p. (503)663-3715

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**Rod Park - Park's Nursery PDX Water Treatment Plant Testimony.pdf**

751K



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June 29<sup>th</sup>, 2023

To: Hearings Officer for Multnomah County.

Re: City of Portland's proposed Water Treatment Plant (Case File T3-2022-16220)

My name is Rod Park. My farm is located at 9797 SE Revenue Road Boring, OR 97009. I am a 3<sup>rd</sup> generation farmer in the eastern portion of the Metro region. I am currently growing nursery plants in Clackamas County, south and west of the proposed water treatment plant.

I will prefix my remarks with some of my background. I am a past president of the Oregon Association of Nurseries, a former Chair of the Oregon Board of Agriculture and I served 12 years as a Metro Councilor, representing the 250,000 citizens in the eastern portion of the region. As a Metro Councilor I also chaired the region's transportation committee, JPACT. Those experiences have informed and colored my opinions of Oregon and its unique protection of farmland, the building of vibrant communities and how transportation is interwoven into the rural and urban landscape.

Our farm was established in east Multnomah County in 1952. The land was annexed to Gresham after the first urban growth boundary was established in late 1978. My family farmed for many years at this location, surrounded by other farms until urbanization of those farms made relocating to a rural location in Clackamas County a better option. I have seen and experienced the good, the bad and the ugly of our land use system. The good is the protection of farm and forest lands while at the same time promoting vibrant communities within the urban growth boundary. The bad is the land that sometimes needs to be converted from rural uses to urban ones or capacity underutilized within the UGB. The ugly is to see how some pervert our land use system to their advantage.

Park's Nursery produces high quality, mature nursery plants. These are exported to Washington, Idaho, Michigan, Colorado, New Jersey, Washington D.C., Georgia, Canada and many more. We, and the nursery industry, are part of the traded sector, a net importer of dollars into Oregon's economy. With my recent move and "right sizing" of my operation from two to one location, I currently have five employees. We are small but we have an influence due to the quality of the products we export. My employees work eight hours a day, five to six days a week. We sometimes work longer hours as weather conditions or shipping necessitates.

I have several concerns regarding the proposed water treatment plant. I am not directly impacted by the pipeline running through my property nor am I adjacent to the proposed facility, so most of my concerns are around the traffic impacts on my farming operations, others, and the support facilities for us all.

The September 2022 Compatibility of Proposed Portland Water Bureau Filtration Facility & Pipeline Operations with Surrounding Agriculture report is flawed because it concludes little impact from traffic on farmlands and farm operations from traffic impacts. This report appears to depend upon the analysis

by Global Transportation Engineering dated September 2<sup>nd</sup>, 2022, Portland Water Bureau Bull Run Filtration Project Analysis.

The Global Transportation Engineering Memorandum dated September 2, 2022, regarding the Portland Water Bureau Bull Run Filtration Project Analysis, is for the operational impacts of the water treatment plant only.

The Global Transportation Engineering study does not address construction traffic for the approximately five years of construction. The removal of one million plus yards of soil, the trucking in of unknown amounts of gravel, concrete and other building supplies, etc. is not addressed. The routing nor the number of trips this will generate during the construction of the proposed facility is not addressed.

The scope of the study reflected by the map (Exhibit A.31 pg.2) does not geographically represent the farm community of this area for either the construction or operations of the proposed facility. By not having a larger representative scope, the traffic impacts to the farmlands in the community are not evaluated as required. (Farm Impact Test) The traffic to the proposed site does not just appear at the edge of the map referenced, then just disappears when leaving. The western boundary should be at least to the eastern edge of the Metro UGB. The northern boundary should be I-84. The eastern boundary to the Sandy River to the City of Sandy. The southern boundary should be across Hwy 26 to Kelso Road to Boring/Damascus. These boundaries are representative of the farmlands and farming community which should be studied for the traffic generated from construction and operations.

Not including Clackamas County in the study does not provide a full disclosure of traffic impacts and consequences. As I stated earlier, traffic does not stop at map lines, nor does it stop at county lines, nor at the UGB.

The applicant's traffic routing and studies also assume Clackamas County will grant access to SE Bluff Road, south of the water plant. If Clackamas County does not grant access, how will traffic be routed and what will be that impact? The access at SE Bluff Road needs to be addressed as part of this application as it is a critical assumption.

"Secondary traffic" farm impacts from those seeking routes to avoid construction vehicles and later the operational vehicles, needs to be addressed as well. Traffic will seek alternative routes, potentially through farmlands.

I do know from experience; traffic does negatively impact farming operations such as:

- Trucks, tractors, and other farm equipment movements from location to location.
- Employees in both their ability to get to and from work along with other movements as needed between farm locations.
- The delay in deliveries of supplies such as fertilizers, sawdust, bark dust, harvesting supplies, etc. due to road closures and traffic congestion.
- Land impacts from the use of herbicides, pesticides, liming and fertilizing of fields due to increased interaction with traffic and the need for additional buffer setbacks to avoid potential conflicts.
- The movement of plant materials from various locations for lining out and transplanting along with transporting harvested material to the dock facilities.

The Oregon nursery industry is very far from our markets as most of our products are shipped east of the Mississippi River. Transportation costs are of prime concern to our clients. We try to overcome this obstacle by cooperative shipping of our plant materials. A semi-truck is often loaded by multiple

nurseries for delivery to either one client or to multiple clients. As such a semi-truck may need to cross the region multiple times and if delayed, creates increased shipping and labor costs. There is the very real danger we will lose clients and markets if they can obtain the similar plants from other parts of the country closer to the market. Fortunately, Oregon's superior plant products has so far been able to maintain our clients and markets.

I mentioned earlier there is an ugly part of our land use system. Those that would pervert uses to their advantage be it for cost reduction or political expediency. Rural lands, be it farms or forests, have less dollar value than those lands within the urban growth boundary precisely because they cannot have urban development. The Portland Water Treatment Plant comes with no political consequences to Portland's elected leaders as not one of the rural citizens of Multnomah or Clackamas County can vote for or against them. Nor can we start a referendum in Portland as we do not have standing.

Placing an urban facility to support urban uses in a rural area, especially one specifically designated as a rural reserve by the Multnomah County Commission, is a perversion of the principles of Oregon's land use laws. The only exception is if no alternative sites are available. The City of Portland has not demonstrated that need as no alternatives analysis as outlined by the state was not conducted to my knowledge.

Urban facilities should be located within urban growth boundaries as they serve an urban, not a rural community. This is one of the guiding principles of Oregon land use goals.

Sincerely,



Rod Park

