

May 3, 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

Dear Hearings Officer,

Perched groundwater is a natural resource in and around the facility site that comes under criteria specified in MCC 39.7515(B). Perched Groundwater was mentioned at the Remand Hearing. You asked a question regarding water being pumped into Johnson Creek. PWB's Attorney, Zoe Powers spoke on the perched groundwater that is being pumped into Johnson Creek. This and its affect is concerning to the ecosystem in the area and to those landowners who have groundwater rights.

Perched groundwater occurs above an impermeable layer, such as clay or hard rock. When the water accumulates in this zone, it creates pressure in the saturated area. When the perched groundwater reaches a point where the pressure is sufficient, or if the impermeable layer is breached or sloped, the water flows out to the surface. This outflow is typically where a spring may form. Springs formed from perched groundwater contribute to local ecosystems by providing a reliable source of water, supporting plant and animal life in the vicinity.

Large construction projects and operational industrial plants can have significant impacts on perched groundwater.

Key impacts:

- alteration of water flows: Construction can change the natural flow groundwater, leading to the drying up of springs and altering their discharge rates. This affects the ecosystems that depend on these water sources.

- groundwater depletion: Dewatering processes can lower the water table, reducing the availability of groundwater for nearby springs and habitats. It can also lead to a decline in water quality and quantity to the area.

- contamination risks: The trucking of diesel, chemicals, and sediments will introduce pollutants into the groundwater. These contaminants can seep

into the aquifer and affect the quality of water in springs and surrounding ecosystems. During operations of the filtration plant stormwater will be dumped into Johnson Creek.

-habitat disruption: The physical presence of operation at the plant (equipment, operation activities, staff, trucking, vehicle, humans, and sound) will disrupt local habitats, affecting wildlife that relies on the perch and springs. This will lead too displacement or reduction in species populations.

-erosion and sedimentation: The pumping of groundwater and operational stormwater into Johnson Creek is causing increase erosion, leading to sedimentation in Johnson Creek. This degrades water quality and is affecting aquatic life dependent on clear water.

-temperature changes: Altering land surface, asphalt, many buildings with roofs, and stormwater will lead to change in temperature regimes in Johnson Creek. Warmer water will negatively impact aquatic ecosystems.

-long term changes: A large industrial plant this size will alter groundwater system and local ecosystems for years and even decades.

With and estimated 1 million gallons a day of a combination of perched groundwater, groundwater, and aquifer water flowing from the site into Johnson Creek, depleting these natural resources and resulting in some of the “key impacts”listed adverse affects to natural resources are occurring at the site.

Renee France, PWB Attorney spoke on wildlife and the enhanced habitat for wildlife in 48 acres of the property. This filtration plant is going to be fenced. The fence is not going to be five feet, but much higher. I have worked in the area since 1991 and currently live on 63 acre. I personally know how a fence can alter wildlife. As for 20 acres of my property is fenced with a 7 foot cyclone, with 12 inches of barbwire, equaling an 8 feet high of fence. It is nice to feel secure, however, it cuts the wildlife off from my property. Periodically I will get a deer in my fence line, as for I have uneven ground in areas and they can slide under the fence, or if a gate is left open. Currently, I do not have to worry about leaving a gate open as for the deer are not around. I live 1/2 mile from the project.

Unlike my fence having uneven areas where the animals can come through or dig under, I would imagine that the Filtration Plant fence will be much more substantial than my fencing. It will be harder to dig under and will be maintained. This being the case how will there be wildlife other then birds, snakes and little small critters using the land that now id fenced off to them for a migration path, food , and bedding down. This has had an adverse affect on the

wildlife natural resources of the area and does not meet criteria of MCC 39.7515(B).

This conditional use permit should not be approved because it does not meeting criteria set forth in MCC 39.7515(B).

Sincerely,
Jennifer Hart
38200 SE Lusted Rd
Boring, OR. 97009
Sandyjen23@gmail.com



LUP Hearings <lup-hearings@multco.us>

PWB Remand Case File: T3-2022-16220

2 messages

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

Sun, May 4, 2025 at 5:55 PM

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

Please add this to the record.

Thank you,
Jennifer Hart
38200 SE Lusted Rd
Boring, OR. 97009
Sandyjen23@gmail.com



Perched Groundwater.pdf
27K

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

Mon, May 5, 2025 at 10:45 AM

Hello,

We have received your comment and added it to the record in the case. Thank you.

Best regards,
Land Use Planning

Multnomah County
Department of Community Services - Land Use Planning Division
1600 SE 190th Ave., Portland OR 97233
T: 503-988-3043
E: lup-hearings@multco.us
<https://multco.us/landuse>

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Thank you,
Jennifer Hart
38200 SE Lusted Rd
Boring, OR. 97009

5/5/25, 11:19 AM

Multnomah County Mail - PWB Remand Case File: T3-2022-16220

Sandyjen23@gmail.com