

To: Liz Fancher, Hearings Officer – T3-2022-16220 - Remand

Email To: LUP-Hearings@multco.us

Date: 5/4/2025

From: Paul Willis

Carpenter Ln., Gresham, OR 97080

RE: Land Use Portland Water Bureau Water Treatment Plant - Case # T3-2022-16220

Oppose Permit Approval Based on PWB not Meeting MCC 39.7515(B)

Dar HO,

Beings located in East Multnomah County, in its Rural Reserve, the area is truly rural without the sounds and lights of the city, but with the sounds of the country and farming, minimal lighting, small country markets, feed stores and the local Pleasant Home Saloon. The biggest "business" footprint is the Gresham-Barlow School Districts Sam Barlow High School, some 3 miles away, on 43 acres.

The Rural Reserve is so designated to "... protect valuable farmland," with soil that is considered to be a natural resource. [<https://www.multco.us/landuse/urban-and-rural-reserves>]. A natural resource that is being destroyed and removed, and thus adversely affected by the siting and operation of PWB's water filtration plant. This adverse impact does not meet the requirements of MCC 39.7515(B).

"Rural reserves are lands that are high value working farms.... These areas are to be protected from urbanization for 50 years after their designation."
[<https://www.oregonmetro.gov/urban-and-rural-reserves>] We have about 40 years left on our designation. The Plant site's soil, according to the USDA Web Soil Survey, is valuable and considered a natural resource, farmable Class II soil and even the State of Oregon refers to the site soil as "prime valuable farmland." There is no question the 94 acre PWB site is valuable farmland to be farmed and not to become an industrial site. No one appears to be protecting the valuable farmland resource as the Rural Reserve mandate and MCC 39.7515(B) requires.

PWB is quick to point out that there is commercial operation in the immediate area and how because of these the Plant fits right in. The PWB states, "...the size [building sf] and employee numbers of the filtration facility are consistent with the character of the area.." [Land Use Application File T3-2022-16220 [Application], Exhibit A.4, 1.A, pg. 9, 10. [<https://www.multco.us/landuse/document-library-pwb-treatment-plant>]] This is not a valid comparison. The farm related buildings referenced are associated with keeping farmlands in production, whereas PWB is talking 94 areas of prime farmland out of production by removing the native prime soil. And the key here is to recognize the scale of PWB's 94 acre \$2B mega-industrial complex and its affect on natural resources. How can a complex of this magnitude, with all the related activities, not have an adverse affect on its surroundings.

Non-Construction/plant noise is addressed in Exhibit A.49, E3. E.3, pg. 11, states that emergency generators for the operating plant will have a 75 dBA enclosure around them, implying the sound without the enclosure is much more. So, at night the generator sound could be over the allowed 50 dBA, a Code limit. These generators needed to be regularly run to test reliability and readiness. This "unusual" area "farmland" noise will be disruptive to fish, fowl and wildlife. Watershed fish and wildlife will potentially be affected by the uncontrolled noise levels. In wildlife, including birds, noise can have a detrimental effect, " "...noise can increase the risk of death by altering predator or prey detection and avoidance, interfere with reproduction and navigation, and contribute to permanent hearing loss." Additionally, fish get use to sounds like the wind and various vibrations. Unfamiliar sound and vibration levels will affect them too.

Plant operation air quality and odors are of concern. Ozone generation is part of the PWB's water filtration process. It was recently removed but said to be installed in the future. Ozone has an odor that some may find objectionable and is described as follows: Metallic; like a burning wire; like chlorine; a "clean" smell; sweet and pungent. Breathing ozone can result in various health effects, including, induction of respiratory symptoms; decrements in lung function and inflammation of airways; and with respiratory symptoms, such as coughing, throat irritation, pain burning or discomfort in chest when taking a deep breath and chest tightness, wheezing or shortness of breath. Exposure concentration and time duration will determine ozone's effects. Wildlife have a keen sense of smell and will avoid the area with the presence of ozone. References follow:

1. EPA, Ground-level Ozone Pollution, Setting and Reviewing Standards to Control Ozone Pollution.^[SEP] <https://www.epa.gov/ground-level-ozone-pollution/setting-and-reviewing-standards-control-ozone-pollution>.
2. M°Lekule Blog, What Does Ozone Smell Like?, by Christina VanVuren, October 30, 2017.^[SEP] <https://molekule.science/what-does-ozone-smell-like/>
3. EPA, Ozone Pollution and Your Patients' Health, Health Effects of Ozone in the General Population.^[SEP] <https://www.epa.gov/ozone-pollution-and-your-patients-health/health-effects-ozone-general-population>

Your consideration of the above is very much appreciated and I trust you will come to the same conclusion I did.... PWB's permit application does not meet the criteria of MCC 39.7515(B).

Thank You

Paul Willis



LUP Hearings <lup-hearings@multco.us>

Case # T3-2022-16220 - Remand testimony for Hearing Officer 050525

Paul Willis <willisteam@msn.com>
To: LUP Hearings <lup-hearings@multco.us>

Mon, May 5, 2025 at 10:05 AM



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Please find attached the subject remand testimony for the Hearing Officer. Case T3-2022-16220 Remand.

Thanks you

Paul Willis



Remand 050425 Testimony.docx
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