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## MEMORANDUM

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

**Date:** 5/5/2025

**From:** Cottrell Community Planning Organization, Pleasant Home Community Association

**RE:** Response to N.64: *Pre-Construction Condition Supplemental Information*, prepared by Portland Water Bureau, April 15, 2025

### SUMMARY

In Exhibit N.64, PWB offers photos of pre-construction conditions of the Bull Run Filtration site. The photos included in N.64 grossly misrepresent the conditions of the Portland Water Bureau's (PWB) 96 acres that were actively farmed by the farming lessee, Surface Nursery. This nursery stock farm was carefully cultivated and managed by Surface Nursery prior to 2019. The nursery stock provided resources for wildlife, such as birds and pollinators.

#### *Specific Misrepresentations in N.64:*

- Selective photos depicting property with bare dirt or covered in weeds
- Omission of timeline of PWB tree removal plans for Surface Nursery. Farming operations were significantly altered after upcoming tree removal notice in 2019; limited tree cultivation between 2019-2021.
- All photos from 2019 through present-day are not accurate representations of farming at the proposed filtration site.

#### *Facts to Provide Context for Photos Presented in N.64:*

- In 2019, PWB indicated to Surface Nursery that they will have to plan on removing all nursery stock. PWB grants Surface Nursery the needed two years to accommodate recently planted stock.
- Since PWB's notice given in 2019, Surface Nursery does not continue normal operations of planting of nursery stock at the proposed filtration site. Unplanted land is left bare and becomes fallow and weeds grow over agriculture soils.
- In December 2021, the PWB directed Surface Nursery (lessee) to remove all remaining nursery stock.
- After removal of nursery stock in 2021, PWB did not make an effort to establish any cover crop to prevent erosion or mobilization of soil of the bare, fallow 96 acres.

*Abbreviated title (optional)*

- Under normal nursery operations, when soils are not being used for nursery production, Surface Nursery planted bare soil with cover crop such as barley and rye to ensure productive soils for future plantings and control run-off and erosion.
- Point FF11 (“R&H Nursery Stormwater”) in Exhibit N.64 is the natural drainage from the filtration site. The culvert helps facilitate drainage through this ephemeral stream, a tributary of Johnson Creek.

*Accurate Pre-Construction Conditions, Prior to 2019 Notice to Remove Nursery Stock*



Filtration Site from SE Carpenter Lane looking south, August 2007.



Filtration Site from SE Carpenter Lane looking south, August 2011. In distance, adjacent to Johnson Creek, shows cover crop on land not cultivating nursery stock.



Distant pre-construction view of site with surrounding nursery land in foreground. Photo taken from 35534 SE Bluff Road looking north, July 2019. No bare land shown on proposed Filtration Site.



Distant pre-construction view of site with surrounding nursery land in foreground. Photo from 36098 SE Bluff Road looking north, July 2019. No bare land shown on proposed Filtration Site.



Close-up example of cultivated trees with standard cover-crop planting between rows on Surface Nursery property directly adjacent to the southeast corner of the proposed Filtration Site, October 2020.





Close-up example of cultivated trees with standard cover-crop planting between rows on Surface Nursery property directly adjacent to proposed Filtration Site facing south toward SE Bluff Road, March 2021.



*Abbreviated title (optional)*

Newly planted nursery stock with freshly tilled soil on Surface Nursery property directly adjacent to proposed Filtration Site facing northwest, June 2021.

*Aerial Views of Filtration Site 2002-2023*

The following photos (source: GoogleEarth, accessed April 30, 2025) capture aerial views of the filtration site from 20+ years prior to PWB directive to remove nursery stock in 2021. Last image from 2023 shows post nursery stock cultivation. Photos over time depict crop rotations, cover crops on non-farmed lands, and time periods of minimal bare soil exposure.



August 2002



*Abbreviated title (optional)*



August 2005

*Abbreviated title (optional)*



July 2010

*Abbreviated title (optional)*



August 2011



*Abbreviated title (optional)*



July 2013

*Abbreviated title (optional)*



July 2017

*Abbreviated title (optional)*



July 2019





April 2023 – Fallow ground following PWB directive to remove nursery stock



March 2025, Current condition.



*Abbreviated title (optional)*

*Aerial Views of Raw Water Portal, pre-construction*



July 2022 – view from SE Lusted Rd looking west.





July 2024 – view from SE Lusted Rd looking west.

*Abbreviated title (optional)*

*Aerial Views of Raw Water Portal, current*



May 2025 – view from SE Lusted Rd looking west.





May 2025 – Portal site with cassion.





LUP Hearings <lup-hearings@multco.us>

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## #T3-2022-16220: Response to N.64

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**Cottrell CPO** <cottrellcpo@gmail.com>  
To: LUP Hearings <LUP-hearings@multco.us>

Mon, May 5, 2025 at 10:52 AM



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

LUP,

With regards to the remand of T3-2022-16220, attached is our response to N.64 - Pre-Construction Conditions.

Please acknowledge receipt of this email.

Thank you,  
Cottrell CPO



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**CPO Response to N.64 - Pre-Construction Conditions.pdf**  
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