

SUPPLEMENTARY TESTIMONY IN OPPOSITION TO PORTLAND WATER BUREAU APPLICATION  
FOR CONDITIONAL USE PERMIT TO BUILD FILTRATION FACILITY

Case File: T3-2022-16220

- 1. Name:** Holly H. Martin
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This testimony supplements and does not duplicate previously submitted testimony. I have lived at the above address on Lusted Road for 30 years. I have been involved with the opposition to the PWB filtration from its inception and make the statements below based upon my personal knowledge gained in the course of living in the area for 30 years and knowledge gained in the course of dealing with PWB and the opposition. I have also reviewed the Multnomah County zoning maps to confirm that the property owned by Portland Water Bureau upon which it seeks a permit to construct a water filtration plant is within the West of Sandy River Rural Planning Area.

Focus: Compliance with 39.7515 (I): *In the West of Sandy River Rural Planning Area, the use is limited in type and scale to primarily serve the needs of the rural area.*

Noteably, this criterion is not even addressed in the staff report issued June 22, 2023, which covers Section 39.7515(A)-(H) seriatum. Therefore, I can only conclude PWB made no showing on this point.

The stated purpose of this filtration facility to serve the needs of the Portland Metro area for years to come. The proposed facility is not *limited in type and scale to primarily serve the needs of the rural area*. As a matter of fact, many people in the local area will not be served by this filtration facility. They are on wells, both in Multnomah and Clackamas Counties. Many of the original people opposing this facility before PWB changed the pipeline routing were concerned about damage to their wells when PWB put in its pipeline.

Only historic properties in this rural area have access to PWB water. Others must drill wells or buy from other water districts. As an individual example, our farm is right across from the PWB Hudson Intertie and is the site of the original and future start of a pipeline route from the intertie to the proposed filtration facility. It is an old property and has PWB water service. However, when we applied for water for the new house we are building on the same property (corner of Hudson and Lusted) we were told by PWB they would not supply water to the new house, nor would they allow us to split the pre-existing line.

Full disclosure, our farm is in Clackamas County, across the county line. However, the proposed PWB facility is built very close to the county line and its impacts are felt

across that line. It is the nature of rural areas and communities that they are not defined by county lines but by the people, the landscape, and common lifestyles and values.

The proposed PWB facility simply doesn't meet the requirements of Section 39.7515(I) and those requirements are mandatory.

Focus: Compliance with 39.7515 (C): *The use will not (1) force a significant change in accepted farm...practices...; nor (2) Significantly increase the cost of accepted farm...practices....*

The study submitted by PWB to demonstrate compliance with these requirements is inadequate in that the focus area is too small and it focuses on large farms/nurseries and does not sufficiently address the impact on small farms.

It specifically does not include our small family farm, which is down Lusted hill from the facility. Details on our operations are included in my earlier testimony. The project will create a traffic choke point for us, as Lusted is our main route west. The years of construction disruption should be considered, not just the finished operations of the plant, as smaller farming operations with narrower margins may not survive the increased difficulties of attracting customers, getting employees to work on time and getting product to market through the disruptions, which are projected to last years. Wildlife currently closer to the plant site may well be pushed east by the noise, dust and traffic and loss of habitat, resulting in heavier use of our lands with increased damage to crops.



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## Fw: Supplementary Testimony for Case File T3-2022-16220 PWB Filtration Plant ATTACHMENT

1 message

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**Holly Martin** <martinlegal@cs.com>

Tue, Aug 1, 2023 at 1:57 PM

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

Cc: Ian and Lauren Courter <courteril@gmail.com>, Mike Martin <pdxdirect@cs.com>, Justin Martin <justin.l.martin4@gmail.com>



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Holly Martin

----- Forwarded Message -----

**From:** Holly Martin <martinlegal@cs.com>

**To:** LUP-comments@multco.us <lup-comments@multco.us>

**Cc:** Ian and Lauren Courter <courteril@gmail.com>

**Sent:** Tuesday, August 1, 2023 at 01:51:09 PM PDT

**Subject:** Re: Supplementary Testimony for Case File T3-2022-16220 PWB Filtration Plant

My additional testimony for this case is attached, and I request that it be considered and made part of the record.

Thank you.

Holly Martin



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