

To: Alan Rappleyea, Hearing Officer  
Lisa Estrin, Senior Planner  
Multnomah County Land Use and Planning Division  
From: Terry Ciecko

Date: August 3, 2023

Subject: T-3-2022-16220- Supplemental Testimony In Opposition

My comments address “character of the area”. To better understand how and why the PWB Mega filtration plant is not an acceptable fit for a rural farming community, imagine a project proposal by rural area farmers to construct a 95 acre working farm in the center of downtown Portland on prime real estate. It’s simply a turning of the tables using many of the PWB’s own words and tactics for approval of their project. My hope is to highlight how inappropriate and devastating the PWB’s proposed filtration plant will be for farmers, business’s and local residents if approved in rural East Multnomah County.

So here goes:

The proposal by the rural farmers is to construct a working farm in the core downtown Portland area. It would be modeled after the Edgefield poor farm in the 1930’s when individuals were housed and taught a variety of farming and other life changing skills. In return, the previously houseless individuals would be cared for and given a roof over their heads. No expenses will be spared in designing a state of the art farm home. It promises to tick off all the possible boxes in order to ensure a top drawer facility for the residents.

Farmers see this project as “essential” in order to care for the homeless population while at the same time maintaining stability in the local downtown economy.

The zoning issues will be resolved by MultCo Land Use. Zoning will be “adjusted” in order to accommodate farmland in downtown Portland. Codes will be changed without proper notification to residents of Portland regardless of the fact that it is required by Multco’s Comprehensive Plan. The wheels will be greased for an easy transition. It should be noted that only a small percentage of downtown Portlanders will benefit from the farm. But the end results of cleaning up the downtown area outweigh that fact and will be largely ignored.

#### The Highlights:

- The farmers expect to get land use approval regardless of hurdles. They are so confident that they have already spent over \$120 million of tax payer dollars designing and prepping for the farm and are calling it a DONE DEAL.
- The project would be built on 95 acres of prime real estate in downtown Portland. It should be noted that a mere 15 miles outside of the Portland city limits there is a previously approved property identified as “a very suitable site” for the farm. However, the farmers fear too much public pushback from those residents and also feel that the stricter environmental requirements for that site would increase cost and also cause the project to take much longer to complete. The downtown site will have no such requirements for environmental assessment.
- Initially 2 million cubic yards of topsoil will be required to be hauled onto the site.

- Construction is estimated to last approximately 5 years and require 308,000 heavy truckloads of materials in and out of the city center. In addition to the heavy trucks, 700,000 construction work force vehicles are predicted to be traveling in and out of the city during that timeframe.
- Construction noise and dust will not be a problem. There is a mitigation plan for that.
- Safety issues regarding pedestrians, bicyclists, busy intersections, bus routes and emergency services have been analyzed and no problems are anticipated as promised by the the farmer's consultants. Farmers will work closely with these groups to ensure that things run smoothly.
- Multiple roads in and out of downtown will be closed for extended periods but every effort will be made to notify all concerned to "limit the inconvenience" the construction will create.
- Heavy truck traffic needed for construction will not enter or leave downtown during the 20 minute period before and 20 minutes after rush hour traffic. How this will be enforced is unclear.
- Air pollution from construction will not be a problem and fumes from diesel trucks will be no worse than what is already occurring.
- New farm buildings will be constructed on the site to be used livestock, chemical and farm equipment storage. These buildings will be designed to resemble the other buildings in the downtown area. They will be very attractive.

- Roads in and out of downtown will be seriously degraded but they will be repaired to the same or better condition after construction is over.
- High powered consultants will be paid to mitigate any problems that residents and business owners may encounter regarding the project.
- The farm will be well maintained and monitored. No soil run off onto city streets, flooding or chemical spray drift is expected to occur.
- Hazardous materials will be delivered regularly and “fingers crossed” there won’t be any accidents but that’s really outside of the farmer’s control.
- Waste products from the livestock will be hauled away several hundred times per year so as to manage odors.

It is important to note again that the PWB Mega Filtration Plant would have never been allowed until Multnomah County Land Use Division changed the county code in 2019 (see Ord. 1270) to make way for this industrial site. This happened after the PWB identified 95 acres as their preferred site. Rather than conduct a “thorough public process” prior to amending the code as required by the county’s own policy 3.16-1 that is outlined in the comprehensive plan, the county decided to forgo involving stakeholders instead referred to the change as “house keeping”. All this despite the fact that PWB already had identified a suitable site. In 2018 a memorandum put out by the PWB identified Powell Butte as a suitable site due to its elevation, location within the urban growth boundary, greater opportunities for public education and community recreation facilities. PWB already owned the property. Additionally, Powell Butte is the primary distribution site for the entire system.

From the start, the PWB has acted as if this is a “DONE DEAL” and have promoted that message. They have spent well over one hundred million dollars of rate payer money on this project prior having land use approval.

Fire District 10, Gresham Barlow School District, Oregon Trail Academy, First Student School Bus Service’s, the farming community and local business’s are overwhelmingly opposed to the construction of this project. Their testimony provides compelling evidence related to hazardous conditions, impacts to public services, farming practices, and natural resources. These impacts cannot be resolved through “conditions of approval”. The PWB proposed project does not meet the criteria required for a Conditional Use. Industrial development should not be in a rural community any more than a working farm should be located in downtown Portland.

Thank you!!





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## PWB Proposal T3-2022-16220- Testimony in Opposition

1 message

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**Terry** <tciecko51@gmail.com>  
To: LUP-Comments@multco.us

Mon, Aug 7, 2023 at 11:11 AM

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Please see attached testimony in opposition for inclusion in the record for Application T3-2022-16220.  
Thanks.



**Terry C character of the area.pdf**

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