

May 18, 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,

Thank you for the opportunity to comment further on the Portland Water Bureau's (PWB) proposed Filtration Facility and Pipelines project during this remand process.

As a lifelong resident and landowner in the area that is known as the West of the Sandy River Rural Reserve, I am very familiar with the importance of water system resilience. The property where I work and live depends on the area's natural water system. I continue to have serious concerns that the scale and footprint of this project are simply too large to avoid significant adverse impacts on natural resources, particularly in the rural and ecologically sensitive landscape where it is sited.

LUBA's remand rightly questioned whether the County made adequate findings under Multnomah County Code 39.7515(B)—which requires that development “will not have significant adverse impacts on identified natural resources and functional values.” After reviewing the applicant's additional submittals, I do not believe this standard has been met.

Project Scale and Unavoidable Impacts:

This is not a minor installation or passive infrastructure. It is a high-intensity industrial facility—affecting hundreds of acres throughout the West of the Sandy River rural reserve, involving extensive grading, tree clearing, fencing, pipeline corridors, and deep well dewatering. The scale alone makes it highly unlikely that impacts to groundwater, wildlife, and waterways can be fully avoided or logically and adequately mitigated. Yet the applicant provides a limited site-specific analysis and minimal evidence of how such broad disturbance will be mitigated.

Groundwater Alteration: There is no clear analysis of how perched groundwater flows, springs, or dependent vegetation will be affected. If groundwater shifts or subsurface flows are altered, entire micro-ecosystems could be lost.

Wildlife Disruption: Large-scale fencing, night lighting, and habitat removal will fragment wildlife corridors.

Stormwater Discharge: Direct discharge into Johnson Creek raises risks of erosion, sedimentation, and habitat degradation. Yet no detailed hydrological modeling or mitigation strategies have been presented.

The burden of proof lies with the applicant to show that adverse impacts are either avoided or *meaningfully* mitigated. In my view, the current record does not support such a finding based on the unprecedented scale of this project for the area.

I urge the Hearings Officer to deny the conditional use permit based on it's harmful impacts to the areas natural resources.

Respectfully,
Jennifer Hart
Black Gold Springs LLC.
38200 SE Lusted Rd.
Boring, OR 97009
503-467-8733



LUP Hearings <lup-hearings@multco.us>

Remand-PWB Filtration Facility and Pipelines- Case File: T3-2022-16220

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

Mon, May 19, 2025 at 10:31 AM

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Multnomah County -

Please add this to the record.

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

Jennifer Hart -PWB Remand 7 -PDF.pdf
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