



Comment from: PWB Treatment Plant - 143229

1 message

Webform via Multnomah County <webmaster@multco.us>

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Reply-To: Webform <webmaster@multco.us>

To: LUP-Comments@multco.us

Submitted on Friday, June 30, 2023 - 11:27am

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Testimony:

Hearings Officer:

My name is Larry Bailey, and I am the president of the Multnomah County Farm Bureau. Farm Bureau is the largest general farm advocacy organization, both in Oregon and nation-wide. Multnomah County Farm Bureau has over 6,000 members, and our mission is to help local farmers be successful. I am submitting this testimony on behalf of our farming members. To that end, I direct my comments to Portland Water Bureau's (PWB's) proposed water treatment facility and the project's negative impacts on accepted farm practices on the surrounding lands (Exhibit A4, pages 69-71).

Many local farmers also have testified about the negative impacts of this project. I encourage you to listen carefully to their words. PWB would have you believe that farmers' concerns are unfounded and even commissioned a report to support this assertion (Exhibit A.33), which is referenced throughout and incorporated into PWB's permit application. That report, which appears to have been created not to ensure protection of agriculture in East Multnomah County but instead to provide PWB with a defensible position against our concerns, clearly articulates reasons why farmers' concerns are nonsensical and should be ignored. In fact, that report goes so far as to blanketly argue that no phase of the proposed project will have any impact on any accepted farming practice in East Multnomah County. The report quite dishonestly argues that this is the case because "the filtration facility and its operation will generate no perceptible changes or externalities outside the boundary of the facility" and that "there are no sensitivities of the proposed filtration facility which could potentially cause significant changes in or significantly increase the cost of accepted farming practices in the Surrounding Lands" (Exhibit A.33, page 112).

We fundamentally disagree, and I want to specifically describe for you how Portland Water Bureau's proposed water treatment facility will have detrimental impacts on local farmers and will quantitatively impact the ability of our members to pursue accepted farming practices in East Multnomah County. In fact, PWB separately has admitted that just the pipeline aspect of the proposed project "will affect agricultural lands and ongoing agricultural operations" in the area (Exhibit A.35, page 2).

Any assertion to the contrary is disingenuous at best. We submit that this documented admission, in and of itself, is disqualifying of the requirement that the proposed facility cause no significant change in, or increased cost of, accepted farming practices. However, we would like to go on to consider a few examples of the impacts that the proposed project will have on the farming community.

During the construction phase, which we understand is projected to last four years (Exhibit A.230, page 2), it is impossible to argue that local farms will not experience significant transportation disruptions. Stated differently, the proposed facility will have significant, observable, and detrimental impacts "outside the boundary of the facility." In fact, PWB's construction traffic study estimates an average truck volume of nearly 900 trips per day and a peak truck volume, which is projected to last over a year, of nearly 1500 trips per day (Exhibit A.230, page 8). Spread over the assumed 11-hour work day, this amounts to one truck every 30 seconds. During this timeframe, farm equipment, which often travels at 5-10 miles per hour, will be competing with this fast-moving construction traffic for space on our local roads, nearly all of which lack shoulders (Exhibit A.230, page 3).

In addition, the construction phase will close several of our main thoroughfares for extended periods of time. During these closures, local farmers will not only have to contend with the above-discussed construction traffic but also with the congestion associated with the re-routing of local traffic to avoid the closures. The combination of increased traffic and increased drive distances will cause a concrete and measurable decrease in farm profitability.

For example, the closure of Dodge Park Blvd for pipeline construction, together with the high concentration of traffic at the intersection of Carpenter and Cottrell Roads, will double the length of a one-mile trip from the corner of Dodge

Park and Cottrell to the corner of Dodge Park and Altman Roads (assumes re-routing to Lusted Road, and a similar analysis may be performed for the closure of Lusted Road). While this may seem inconsequential for vehicles traveling at 55 miles per hour, it is a nearly 30-minute round-trip delay for a farm vehicle traveling at 5 miles per hour and will only be worsened by the additional congestion. This results in a significant decrease in overall productivity for farms that must travel these redirected routes.

For farmers, time is of the essence. Many farming activities are directly tied to local weather patterns. For example, spraying can only be done when there is little to no wind, often for only a few hours in a given day and a small number of days each week. The presence, absence, or likelihood of rainfall also must be considered, further limiting the time window for application of certain pesticides. Many other accepted farming practices, such as planting and harvesting, have similar limited time windows. Loss of productive time during these limited time windows is especially detrimental to accepted farming practices.

The proposed water treatment facility also will have more long-term impacts on accepted farming practices. PWB's consultants may argue that the impacts of disrupting native soils in order to bury a large pipeline on agricultural lands can be effectively mitigated, and that the soil can be returned to its original productivity. However, the farmers, who have real-life experience with such activities, tell a very different story. I urge you to carefully consider their testimony to this effect.

The report commissioned by PWB (Exhibit A.33) would have you believe that there will be no interrelation between activities performed at the proposed water treatment facility and nearby farms. We strongly disagree and submit that the proposed facility does have sensitivities that have the potential to "cause significant change in or significantly increase the costs of accepted farming practices in the Surrounding Lands." For example, while the report goes to great lengths in arguing that the facility will not generate dust that will be detrimental to farming activities, it completely ignores the potential impacts that dust from farming activities will have on the "open water areas" of the proposed facility. Any farmer can attest to the fact that mowing, tilling, disking, plowing, and the like, all generate dust. Any farmer can also attest to the fact that this dust travels long distances. While the presence of buffer areas around the proposed water treatment facility might be argued to mitigate risk from pesticide drift, these buffers cannot, and will not, stop dust generated from farming activities from entering these open water areas.

Finally, it is impossible to ignore the impact that this accelerated removal of farmland will have on the overall farming community of East Multnomah County. Farms do not operate in a vacuum. They rely on a supply and distribution infrastructure that is stronger, and more readily available, when there is a critical mass of farms in the area. Our community already has experienced the loss of several local farm suppliers over the past few years, including tractor, chemical, and irrigation component suppliers. These losses cause farmers to wait longer, and travel farther, for necessary supplies, decreasing their productivity and increasing the carbon footprint of their farms. The site of the proposed water treatment facility amounts to approximately 2% of the highest-value, irrigated farmland in Multnomah County overall, and a much higher fraction of the irrigated farmland in East Multnomah County. Conversion of this land to industrial use strains an already strained farming infrastructure in East Multnomah County, and this impact cannot be ignored, mitigated, or recovered.

For the above reasons, and many more, we urge you to deny Portland Water Bureau's Conditional Use Permit Application for the proposed water treatment facility.

Sincerely,

Larry Bailey
President, Multnomah County Farm Bureau
Owner, Verna Jean Nursery