



April 14, 2025

Via Email

Liz Francher, Multnomah County Hearings Officer
Multnomah County Community Services, Land Use Planning
1600 SE 190th Avenue
Portland OR 97233-5910

Subject: T3-2022-16220 – Remand, Response to S36; Soils and Ag Land as a Natural Resource

Dear Ms. Francher:

1000 Friends of Oregon is a nonprofit, membership organization that works with Oregonians to support livable urban and rural communities, protect family farms, forests and natural areas, and provide transportation and housing choices. In the matter related to proposal by the City of Portland Water Bureau to develop and operate a drinking water filtration facility, communications tower and related transmission pipelines on lands zoned for agricultural use (Case File T3-2022-16220) we offer the following comments for your consideration in response to S36; Soils and Ag Land as a Natural Resource.

As we pointed out in previous comments, the county code requires that when approving a Community Service use, the approval authority shall find that the proposal meets the following approval criteria ****

(B) Will not adversely affect natural resources[.]”

Multnomah County defines “natural resources” as:

...functioning natural systems, such as wetlands or streams, wildlife habitat, material in the environment used or capable of being used for some purpose, minerals, fuels, **agricultural resources**, and forests¹ (emphasis supplied).

¹ Multnomah County Staff Report on Remand, page 8

We again assert that the proposed development would adversely impact agricultural natural resources, both within the boundaries of the subject tract and the surrounding area.

Agriculture is land and soil dependent. The quality of the soil is a key element in the nature and viability of an area's agricultural capabilities. Globalwise, the consultant for the City of Portland Water Bureau, argues that farmland is not a functioning natural system.

Is soil a natural resource? The consensus of scientific opinion is yes. Here's a few references. There are many more.

1. "(The) soils are natural three-dimensional bodies occupying a characteristic part of the landscape." Soil Science Division Staff - USDA/NRCS. 2017. Soil survey manual, Chapter 1. C. Ditzler, K. Scheffe, and H.C. Monger (eds.). USDA Handbook 18. Government Printing Office, Washington, D.C. <https://www.nrcs.usda.gov/resources/guides-and-instructions/soil-survey-manual>
2. "Soil is not an inert growing medium - it is a living and life-giving natural resource. It is teeming with billions of bacteria, fungi, and other microbes that are the foundation of an elegant symbiotic ecosystem." USDA-NRCS. Soil health. Available online at: <https://www.nrcs.usda.gov/conservation-basics/natural-resource-concerns/soils/soil-health> Accessed 9 May 2025.
3. " Soil is an essential, non-renewable resource for agriculture, providing the basis for the production of food, fibre, and other resources for a circular bio-economy." European Commission. Available online at: https://agriculture.ec.europa.eu/cap-my-country/sustainability/environmental-sustainability/natural-resources/soil_en Accessed 9 May 2025.
4. "The objective of this review is to describe processes, causes, and factors of soil degradation by erosion and desertification; describe the importance of climate change on these processes; and outline principles and practices of sustainable management of soil and other natural resources. Lal, R. Climate Change and Soil Degradation Mitigation by Sustainable Management of Soils and Other Natural Resources. *Agric Res* 1, 199–212 (2012). <https://doi.org/10.1007/s40003-012-0031-9>

There has also been discussion provided related to trucking soils from the subject property to other farms. This begs the question, is the agricultural use of the topsoil preserved by trucking it to a different farm? No. First, soil is not just topsoil. The subsoil is also an important part of the natural system that is soil. Recent research points to the subsoil as an important location for long-term carbon sequestration. Second, if two neighboring farms are growing 140 bushels of wheat per acre and one

farm trucks its topsoil to the other farm, the receiving farm will not be able to grow 280 bushels of wheat per acre. Moving topsoil in large quantities to other sites can have serious negative consequences, including the energy use and greenhouse gas emissions from the trucking, alteration of natural hydrologic processes, including runoff and infiltration, movement of weeds or pathogens, etc.

Thank you for the opportunity to provide these comments for your consideration. Please enter our comments into the record of this case.

Respectfully,



James W. Johnson
Working Lands Policy Director²

² Jim Johnson is a recognized expert on agriculture and agricultural land use issues. His career has included nearly 28-years as the Land Use and Water Planning Coordinator at the Oregon Department of Agriculture, Farm and Forest Coordinator at the Oregon Department of Land Conservation and Development, Farm and Forest Lands Planner at the Columbia River Gorge Commission and several years as a county planner.