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April 16, 2025

To: Hearings Officer

Re: City of Portland's proposed Water Treatment Plant (Case File T3-2022-16220)

My name is Rod Park. My farm is located at 9797 SE Revenue Road Boring, OR 97009. I am a 3rd generation farmer in the eastern portion of the Metro region. I am currently growing nursery plants in Clackamas County, south and west of the proposed water treatment plant.

I have seen and experienced the good, the bad and the ugly of our land use system. The good is the protection of farm and forest lands while at the same time promoting vibrant communities within the urban growth boundary. The bad is the land that sometimes needs to be converted from rural uses to urban ones or capacity underutilized within the UGB. The ugly is to see how some pervert our land use system to their advantage.

Park's Nursery produces high quality, mature nursery plants. These are exported to Washington, Idaho, Michigan, Colorado, New Jersey, Washington D.C., Georgia, Canada and many more. We, and the nursery industry, are part of the traded sector, a net importer of dollars into Oregon's economy.

I currently have five employees. We are small but we have an influence due to the quality of the products we export. My employees work eight hours a day, five to six days a week. We sometimes work longer hours as weather conditions or shipping necessitates.

While I am not directly impacted by the pipeline running through my property nor am I adjacent to the proposed facility, so most of my concerns are around the traffic impacts on my farming operations, others, and the support facilities for us all.

The September 2022 Compatibility of Proposed Portland Water Bureau Filtration Facility & Pipeline Operations with Surrounding Agriculture report is flawed because it concludes little impact from traffic on farmlands and farm operations from traffic impacts. It was primarily for the Portland Water Bureau Bull Run the operational impacts of the water treatment plant.

The study did not address construction traffic for the approximately five years of construction. The removal of one million plus yards of soil, the trucking in of unknown amounts of gravel, concrete and other building supplies, etc. is not addressed. The routing nor the number of trips this will generate during the construction of the proposed facility is not addressed.

The scope of the study reflected by the map (Exhibit A.31 pg.2) does not geographically represent the farm community of this area for either the construction or operations of the proposed facility. By not having a larger representative scope, the traffic impacts to the farmlands in the community are not evaluated as required. Traffic to the proposed site does not just appear at the edge of the map referenced,

then just disappears when leaving. The study should have been expanded to reflect the real traffic patterns for the traffic generated from construction and operations as presented in earlier testimony.

“Secondary traffic” farm impacts from those seeking routes to avoid construction vehicles and later the operational vehicles, needs to be addressed as well. Traffic will seek alternative routes, potentially through lands being farmed, interfering with farm operation and/or farm equipment movements.

Some negative impacts.

- Trucks, tractors, and other farm equipment movements from location to location.
- Employees in both their ability to get to and from work along with other movements as needed between farm locations.
- The delay in deliveries of supplies such as fertilizers, sawdust, bark dust, harvesting supplies, etc. due to road closures and traffic congestion.
- Land impacts from the use of herbicides, pesticides, liming and fertilizing of fields due to increased interaction with traffic and the need for additional buffer setbacks to avoid potential conflicts.
- The movement of plant materials from various locations for lining out and transplanting along with transporting harvested material to the dock facilities.

The Oregon nursery industry is very far from our markets as most of our products are shipped east of the Mississippi River. Transportation costs are of prime concern to our clients. We try to overcome this obstacle by cooperative shipping of our plant materials. A semi-truck is often loaded by multiple nurseries for delivery to either one client or to multiple clients. As such a semi-truck may need to cross the region multiple times and if delayed, creates increased shipping and labor costs. There is the very real danger we will lose clients and markets if they can obtain the similar plants from other parts of the country closer to the market. Fortunately, Oregon’s superior plant products has so far been able to maintain our clients and markets.

I mentioned earlier there is an ugly part of our land use system. Those that would pervert uses to their advantage be it for cost reduction or political expediency. Rural lands, be it farms or forests, have less dollar value than those lands within the urban growth boundary precisely because they cannot have urban development. The Portland Water Treatment Facility comes with no political consequences to Portland’s elected leaders as not one of the rural citizens of Multnomah or Clackamas County can vote for or against them. Nor can we start a referendum in Portland as we do not have standing.

Placing an urban facility to support urban uses in a rural area, especially one specifically designated as a rural reserve by the Multnomah County Commission, goes against the principle which created the rural reserve.

The City of Portland has not demonstrated no alternatives are available.

Urban facilities should be located within urban growth boundaries as they serve an urban, not a rural community.

Sincerely,



Rod Park