



Multnomah County Hearings Officer  
Multnomah County Community Services, Land Use Planning  
1600 SE 190 Avenue  
Portland, OR 97233

**Re: case # T3-2022-16220 - Proposed Portland Water Bureau Filtration Plant Project**

The East Multnomah Soil and Water Conservation District (EMSWCD) is a nonregulatory government agency representing residents of Multnomah County east of the Willamette River to the far end of the county. The mission of EMSWCD is to help people care for soil and water.

EMSWCD understands that Portland Water Bureau (PWB) is obligated by US Environmental Protection Agency regulations and the terms of a compliance order entered into between the PWB and Oregon Health Authority to have a system operational no later than 2027 that is capable of removing *Cryptosporidium* and other potential contaminants.

While EMSWCD supports the provision of clean, safe drinking water for all PWB customers, we are concerned about the proposed location of the water filtration facility. The proposed location for the facility is on land designated as a Rural Reserve. Consistent with its Rural Reserve designation, this location represents some of the very best farmland remaining in EMSWCD's service area. It has prime agricultural soils, favorable topography, legal water rights, and is sizeable enough to support commercial farming operations. Siting this facility on Rural Reserve-designated land not only equates to farmland loss, but it also sets a negative precedent of constructing facilities intended to serve a primarily urban population on land that is protected for agriculture.

EMSWCD consistently hears from our farming community about the loss of farmland and the challenges of accessing farmland. The 2017 USDA Census of Agriculture identified a continued trend of fewer acres in active agricultural production in Multnomah County, with a 15% decline between 2012 – 2017 alone. By selecting a location on land within a Rural Reserve for its facility, the PWB is competing with local farms and placing its thumb on the scales against the future of agriculture in Multnomah County.

EMSWCD recognizes the challenging position the PWB is in but requests that the PWB select a new location for its facility in an area that is more compatible for its purpose.

Respectfully submitted,

The Board of Directors  
East Multnomah Soil & Water Conservation District