

RE: Case File No. T3-2022-16220 (Portland Water Bureau)

Amalia Bruley

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Criteria Addressed: MCC 39.7515 (C) Will not force significant changes in or costs to accepted farming practices; and (A) Is consistent with the character of the area.

General rebuttal to Applicant's conclusion that the proposed project satisfies these criteria

Dear Hearings Officer Rappleyea,

My name is Amalia Bruley, and I am the shipping coordinator at a Nursery off of Lusted Road that will be directly affected by the Bull Run Project. I am writing in response to Mr. Pengruber's rebuttals to local nursery farmers in Exhibit I.80, as well as a memorandum labeled Exhibit I.84. Both of these documents erroneously summarize that PWB's filtration plant and pipeline project will not cause changes nor cause increase in costs to accepted farming practices, approval criteria MCC 39.7515 (C). I agree with and refer to all statements made by all local nursery farmers, ODA, OAN and OFB - who are the real farm experts -that PWB's project will absolutely have significant impacts to our accepted farming practices and thus fails to meet the approval criteria. As a resident and a local ag-industry professional, the rebuttals in Exhibits I.80 and I.84, and A.230 as well as proposed traffic demand plans, have also caused me great concern for how this project will impact my community, my commute, and my profession.

Firstly, I wish to address my concerns as a resident of Multnomah County, focusing on the financial implications this project could impose on the community. Given the current economic landscape, where residents are already grappling with rising costs, an additional financial burden like increased water costs raises significant concerns. The initial cost projections for this project were estimated at \$350 to \$500 million in 2017, yet the latest reports indicate a staggering \$1.8 billion, as per a KGW 8 article. Notably, larger cities such as Seattle and San Francisco effectively utilize Ultraviolet lights for water treatment, a potentially more cost-efficient solution. Given these circumstances, I question the absolute necessity of this water treatment facility as reported by PWB in their Land Use Application documents and at the June 30th hearing.

I am apprehensive that the proposed benefits may not justify the financial burden on our community, particularly considering the existing housing crisis. This burden risks exacerbating the struggles of vulnerable residents. Despite mentions of robust financial assistance, it's unlikely to suffice. Many borderline households are already grappling with rising costs in various aspects of life, and imposing an additional financial strain on a basic necessity like water appears to be imprudent. I wonder if alternative, more cost-effective methods were adequately explored to achieve the same goals without negatively impacting the community.

Transitioning to my concerns about the impact on my daily life and profession, I anticipate significant disruptions in my daily commute due to this project. While assurances are made about minimal delays and allowances for local and farm traffic, the practical implementation

raises questions. The assessment of local traffic isn't entirely clear, and any system used to discern this could inevitably lead to delays. The project's predicted effects seem to have been inaccurately evaluated, paralleling the miscalculations in the overall project costs.

PWB consultants have allegedly evaluated and shown that - on paper- there will be no impacts on our local roads from construction. The reality is that construction-related delays and detours on multiple area roads at the same time is absolutely not part of the character of this area. As a lifelong resident of the area, I can attest that any disruption to our small, narrow, one and two lane rural roads most certainly causes delays and frustration. The only delays that easily come to mind have been weather-related (downed trees & power lines, hazardous road conditions from ice and snow), or traffic related (accidents). These are expected in this area, and much different than planned mass construction for an unnecessary utility project. Waiting for a flagger or pilot vehicle at single lane closures is not common to this area. Outside the urban growth boundary, we do not experience development and road improvements. I can't even remember when the last paving or road improvement project caused me a delay on my way to work, which is a significant reason why I choose to live and work in this rural community. The character of this area would be destroyed by a project requiring construction of this scale and magnitude, despite what the final, end result might 'look like'. Changing the character of the area is a violation of approval criteria MCC 39.7515 (A), and for this reason the application should be denied.

In terms of commuting, the most viable route available to me would be Oxbow Drive, which historically isn't the most reliable road. Incidents like car accidents and fallen trees often lead to road closures, and this unpredictability can substantially impact my daily commute. The alternative, going around Lusted Road, would significantly extend my current 26-minute commute to 46 minutes or even more, considering weather conditions. This limitation to one acceptable route is concerning, particularly given the unpredictability of Oregon's weather.

Furthermore, this project threatens to disrupt the tranquility of my regular commute. One of the benefits of commuting to a rural area is the absence of traffic congestion, allowing for a peaceful drive. With construction vehicles added to the mix, it's logical to anticipate a rise in traffic accidents. More vehicles on the road typically lead to an increase in accidents, resulting in unforeseen delays that would exceed the area's norm.

My most pressing concern, however, revolves around my work and its negative implications due to the project. As a shipping coordinator in the agricultural industry for the last 4 years, this construction threatens to severely hinder the logistics of shipping. The industry norm entails paying per mile, making detours a costly affair. I work closely with Gary Bert from Integrity Logistics, a seasoned broker with over 30 years of experience. His insights highlight that special instructions for detours could cost around \$200 per load or even more for complex routes. This is a considerable increase from the standard costs. Gary Bert aptly noted, "Drivers living on the East coast; they don't know the area. They rely on GPS; it'll be a nightmare."

More complex routes, especially those involving pickups from multiple nurseries, are already challenging to arrange. Detours would compound these complexities, making it infeasible to secure trucks or significantly escalating costs. These detours would affect the loading sequence of trucks and disrupt our meticulous loading and unloading order. Our nursery stock is time-sensitive, and delays can compromise its quality.

The potential cumulative impact is a serious concern and could lead to delayed loading and extended shipping seasons, echoing the challenges faced during the Covid-19 pandemic. Amidst the pandemic, we encountered instances where owner-operated carriers declined transporting our nursery loads due to more accessible delivery options available nearby. In parallel, larger carriers substantially increased their rates, occasionally inflating costs by as much as \$3,000 per load. The proposed detours will inevitably necessitate greater reliance on these higher-cost carriers.

It's essential to emphasize that even a minor delay preventing a truck from reaching our nursery could result in the driver canceling the load. Given that they are not compensated by the hour and do not wait, cancellations pose a significant risk. Snowy conditions, rendering it unsafe for drivers to access our nursery, have also led to cancellations.

Moreover, if Oxbow becomes our sole viable road and experiences an extended obstruction, we face the real possibility of losing the truck. This situation would effectively curtail the number of trucks able to access our premises, thereby impacting our operations, and extending our shipping season.

Extending the shipping seasons due to detours and disruptions raises the risk of claims significantly. This is particularly true for us, as the window for planting bare-root nursery stock is inherently limited. The inability to ensure punctual delivery of products while maintaining their quality would not only imperil our own business but also put local nurseries' businesses and reputations in jeopardy.

In conclusion, I urge a thorough reconsideration of the Bull Run Project's impact on our community, daily commutes, and local businesses. The detriments seem to outweigh the benefits, especially considering the financial burden on an already struggling community and the disruption of daily life and commerce. I appreciate your time and attention to these pressing concerns.

Sincerely,

Amalia Bruley



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1 message

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To: "lup-comments@multco.us" <lup-comments@multco.us>

Wed, Sep 6, 2023 at 11:53 AM



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