RE: **Multnomah County Case File No. T3-2022-16220 (PWB Filtration Plant)**

Date: August 4, 2023

From: Brent Leathers, 35050 SE Carpenter Lane, Gresham

To: Lisa Estrin, Senior Planner

RE: Construction Truck Traffic Logistics

Hi Lisa,

Please add this document to the Hearings Officer's file for review in this matter. At the end of this narrative are aerial photographs and street-views of Carpenter Lane.

At the Hearing, I testified briefly about the complications related to the construction truck traffic. I own and operate a fleet of fuel tanker trucks ("Leathers Fuels"). My tanker truck/trailer combinations are 70' to 75' long, and weigh over 105,000 pounds when fully loaded. This is similar to the typical dump truck with "pup" (trailer) in terms of length, weight, and turning radius, although the long tongue between truck and trailer for dump trucks means that the combination requires a larger turning radius than the vehicles my company operates.

The PWB application provides scant specificity regarding the route(s) construction trucks will travel. It is clear that the expected truck count is 350+ trucks per day, and that mass quantities of rock and concrete will be hauled to the site, and similar quantities of dirt hauled away from the site. It appears that the 350+ trucks per day will equate to 700+ trips per day, as these trucks will come to the site, and later leave the site. If we assume a 9-hour workday, that equates to 1.3 trucks per minute.

That calculation does not include the various other trucks/cars for vendors providing supplies, contractor employees, PWB staff trips, residential and farm traffic, etc.

What is clear is that <u>all of those trucks must use the intersection at Carpenter Lane and Cottrell Road</u> (on the first aerial view picture below, the intersection between the two arrow points). Trucks leaving the proposed construction site (westbound on Carpenter) will have to utilize the entire width of Carpenter at its intersection with Cottrell Road, in order to stage a turn onto Cottrell Road.

Because the applicant does not clarify the details*, we do not know if these trucks will turn southbound or northbound. Logistically, the best ultimate destination is Dodge Park Boulevard, as it has a substantially wider right-of-way (95' on the MultCo "SAIL" Assessor map) than either of the alternatives (Lusted Road and Bluff Road are typical rural roads with narrow lane width and mostly no shoulder width; less than 60' right-of-way). Dodge Park Boulevard is also a mere block north of Carpenter Lane. Because the logistics favor the use of Dodge Park, I have presumed the Carpenter-to-Cottrell-to-Dodge Park for purposes of illustration (the yellow lines on the first picture, below). It is my opinion that any other route (e.g., utilizing Lusted Road or Bluff Road) to be logistically less favorable, and more hazardous. **

The trucks exiting Carpenter Lane must make a sharp, 90-degree turn onto Cottrell (to proceed north to Dodge Park Boulevard, or south to Bluff Road). As the truck/trailers swing out onto Cottrell, those trucks will by necessity consume the entire road width of Carpenter and then Cottrell, and their trailers will not return to the proper lane for considerable distance. If Dodge Park Boulevard is the destination, those trailers will partially block the southbound lane of Cottrell, eliminating the possibility for a returning truck to pass by. This short

section of Cottrell is particularly steep, a 5 to 6% grade (by comparison, Hwy. 26 west of Government Camp is 3% grade).

Continuing the path of a truck exiting the PWB site, the example truck/trailer will stop at the intersection of Cottrell and Dodge Park. This particular position is subgrade, meaning that the natural topography is some 10' above the road surface. The truck driver cannot see up and down Dodge Park until the cab is nearly protruding into the Dodge Park eastbound lane.

The driver of this truck must now wait patiently until Dodge Park is essentially clear of vehicles. The 90-degree turn onto Dodge Park will be, by necessity, a slow movement, especially for a loaded truck. The trailer is sitting on a steep hill, and 90-degree turns take effort and concentration. It will take some time for the vehicle to accelerate and clear the intersection.

As I visualized these movements, then considered the returning trucks, I realized that returning trucks will have to stop on Dodge Park Boulevard and wait for the entire path previously described, to clear. Two truck/trailers cannot pass each other throughout the path described to this point (the yellow-highlighted section on the first aerial picture, below).

For these reasons, I concluded that the safest, and most logistically-sound 'transportation plan' will necessitate that returning trucks approach from the western portion of Carpenter Lane (i.e., between Altman Road and Cottrell Road)***. That path will allow trucks coming to the project site to stop and wait at the Carpenter/Cottrell intersection, facing eastbound, where they can see the exiting trucks clearly. A driver in this position can then wait for the opportunity to proceed across Cottrell, when no out-bound truck is in the way.

The end result is that the entirety of Carpenter Lane will become a heavy 'truck route' for up to 5 years, with the consequences that number of witnesses have identified, including impacts on the availability of fire and emergency services, and the destruction of the rural and agricultural character of this area.

Please note that these intricate truck movements can be performed by average and above truck drivers, although consistent attention to detail is imperative. Will the various trucking contractors have good drivers, who consistently practice/perform safe maneuvers? Is it likely that there will be drivers that are merely "human", and experience lapses of attention, or get in a hurry, and create even worse hazardous situations? My experience is that if you operate trucks, eventually you have terrible accidents, sometimes even though your own driver is not at fault.

<u>Beyond the disruption, noise, dust, and traffic snarls, the extreme conditions posed by the road alignments/conditions, and the intensity of this truck traffic, will inevitably result in injuries and deaths</u>.

<u>Notes</u>: (* I would ask that the Multnomah County Transportation Department perform an in-depth analysis of impacts to each intersection, and that such analysis go beyond simple LOS review. The turning movements by large trucks at many of these intersections will result in traffic complications and delays well beyond typical rural traffic. I recognize that the proposed routing of construction traffic was not before them when they conducted their review.)

(** PWB intends to install major pipelines in Dodge Park Boulevard between Cottrell and Altman Road. The pipeline installations are expected to take in excess of one year, which will force the use of less safe alternative routes.)

(*** This path places similar turning-movement burdens at the intersections of Dodge Park Boulevard/Altman Road, and then again at the very tight 90-degree turn from Altman to Carpenter.)

Finally, the PWB has indicated it would make roadway improvements to mitigate hazards and difficulties in the movements I've just described. I do believe they can reduce some of the difficulty of the movements by widening Carpenter Lane, and removing the natural berm and trees at the intersection of Cottrell/Dodge Park. However, even with Carpenter Lane at full width, trucks turning from Carpenter onto Cottrell will block any other vehicle from using that same path, until it is completely onto Dodge Park Blvd. Long truck/trailer combinations simply require very large turning radiuses that exceed the 55' right-of-way available for use. Those truck/trailer combinations must swing ultra-wide in order to get the back axles of the trailer, which 'scuff' through a tight, 90-degree turn, to clear the inside corner.

Removal of the berm at Cottrell/Dodge Park will greatly increase sight distances for both egress and ingress on Dodge Park and Cottrell. But the turning radiuses required for 70' truck/trailer combinations negate the possibility for trucks to pass each other in the yellow-highlighted road sections.

Finally, the PWB could alleviate the turning radius problem by eliminating trailers, and only running solo dump trucks. Unfortunately, that will double the quantity of the truck trips.

In any case, the burden is upon the PWB to commit to a transportation plan, complete with mitigative measures, for Multnomah County experts to analyze and comment upon.

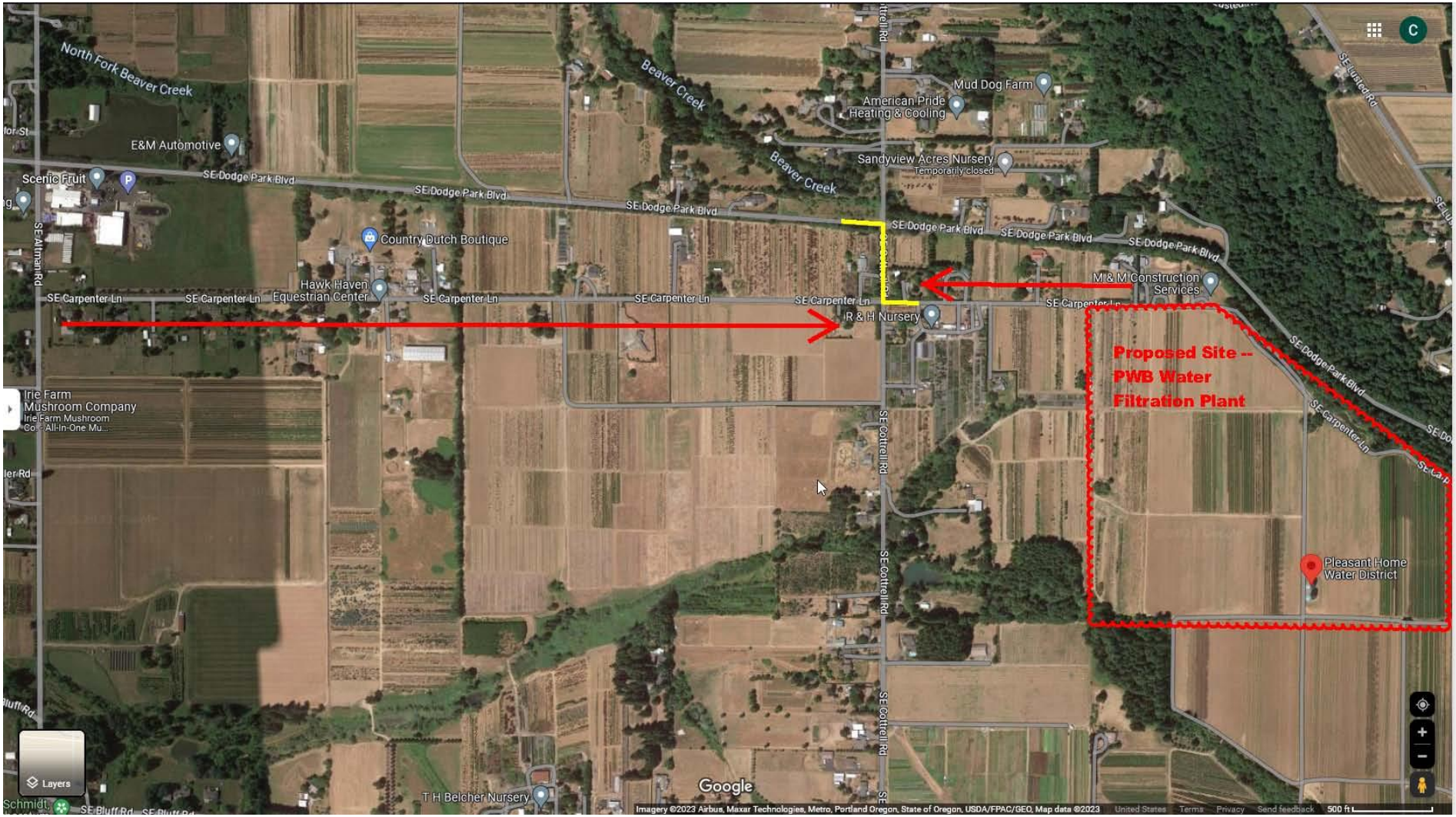
Generally speaking, we local residents believe that the Portland Water Bureau is attempting to focus our attention on the completed facility and later operations (which have serious impacts as well, although less dramatic ones). In using that approach, the PWB attempts to ignore several years of continuous traffic impacts and safety issues.

This narrative has only considered the first "leg" or portion of the transportation logistics. This portion provides an illustration of the complexities and safety hazards. But I have not addressed impacts that will occur all along any other prescribed routes, including those roadways adjacent to existing schools, where parents routinely line up twice a day to pick up/drop off their children. There are many intersections and paths that will suffer from the effects of more than one truck per minute. The Portland Water Bureau should delineate dedicated routes for full review on this record, and address the impacts along the entire length of those prescribed routes.

In my opinion as a heavy truck operator, regardless of how the truck traffic on and around Carpenter Lane is handled and in spite or even because of proposed "improvements," conditions for other regular users, including personal vehicles, school buses, farm equipment, bicyclists, horseback riders, and pedestrians, will remain totally unsafe -- indeed, highly dangerous -- throughout the years of construction.
Thank you for considering my thoughts on these matters. Respectfully submitted,

Brent Leathers

Brent Leathers
35050 SE Carpenter Lane
Gresham, OR 97080


North Fork Beaver Creek
Beaver Creek
Beaver Creek
E&M Automotive
Scenic Fruit
SE Dodge Park Blvd
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SE Dodge Park Blvd
SE Allman Rd
Country Dutch Boutique
Hawk Haven Equestrian Center
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SE Carpenter Ln
Mud Dog Farm
American Pride Heating & Cooling
Sandyview Acres Nursery
Temporarily closed
M & M Construction Services
R & H Nursery
Proposed Site -- PWB Water Filtration Plant
Irie Farm Mushroom Company
Irie Farm Mushroom
All-In-One Mu...
SE Cottrell Rd
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SE Cottrell Rd
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SE Dodge Park Blvd
SE Carpenter Ln
Pleasant Home Water District
T H Belcher Nursery
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Imagery ©2023 Airbus, Maxar Technologies, Metro, Portland Oregon, State of Oregon, USDA/FPAC/GEO, Map data ©2023
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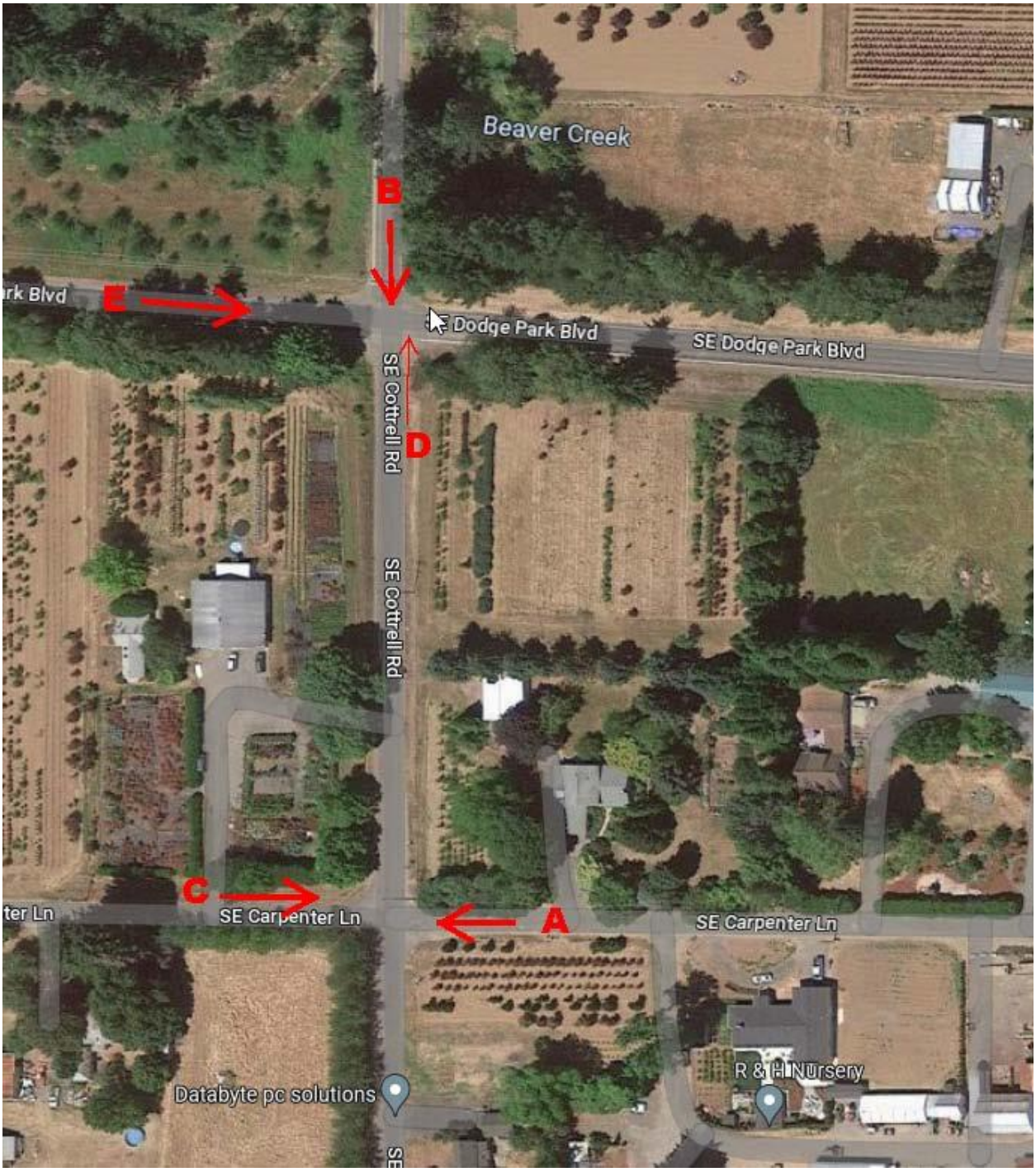

The above map is to identify the location and direction of the Google “Streetview” pictures that follow.


Gresham, oregon
34747 SE Carpenter Ln
Gresham, Oregon
Google Street View
Mar 2022
See more dates
Streetview "A", looking West on Carpenter Lane at intersection with Cottrell Road.
(Note pickup off asphalt to allow another auto to pass, and grand old pine trees on right. Are the pine trees sacrificed for proposed right-of-way widening?)
Google
Image capture: Mar 2022 © 2023 Google United States Terms Privacy Report a problem


Gresham, oregon
7450 SE Cottrell Rd
Gresham, Oregon
Google Street View
Jun 2023
See more dates
STOP
Streetview Picture "B"
Looking South on Cottrell across Dodge Park Blvd.
(Note subgrade elevation and steep decline to Dodge Park Blvd.)
Google
Image capture: Jun 2023 © 2023 Google United States Terms Privacy Report a problem


Gresham, oregon
34668 SE Carpenter Ln
Gresham, Oregon
Google Street View
Jun 2023
See more dates
Streetview Picture "C", looking East on Carpenter Lane, across Cottrell Road.
(The propose filtration plant entrance is represented by the yellow box at the far East end of Carpenter Lane.)
Google
Image capture: Jun 2023 © 2023 Google United States Terms Privacy Report a problem


Gresham, oregon
7625 SE Cottrell Rd
Boring, Oregon
Google Street View
Jun 2023
See more dates
STOP
SE Cottrell Rd
Streetview Picture "D", Carpenter Lane looking North, approaching Dodge Park Blvd.
(Note subgrade condition of road surface; truck drivers' eye-level approx. same as green "SE Dodge Park" sign. No view of Dodge Park traffic until beyond "Stop" sign.)
Google
Image capture: Jun 2023 © 2023 Google United States Terms Privacy Report a problem

Streetview Picture "E" -- Dodge Park Blvd. at Cottrell Road, looking SW. Arrows depict trucks coming to and leaving the project site.

Multnomah County

LUP Comments <lup-comments@multco.us>

Case File No. T3-2022-16220 (PWB Filtration Plant) - Brent Leathers

1 message

Brent Leathers <brent@leathersfuels.net> Mon, Aug 7, 2023 at 11:39 AM
To: LUP-Comments@multco.us, LUP-Hearings@multco.us
Cc: "Jeffrey L. Kleinman" <KleinmanJL@aol.com>

Good morning,

Please add the attached letter to the commentary opposed to the PWB Filtration Plant.

Thank you!

Brent

Brent Leathers, Advisor

Leathers Enterprises, Inc.

503-661-1244, x106

"If liberty means anything at all, it means the right to tell people what they do not want to hear." -- George Orwell

Supplement Testimony, Truck Routes, 230807.pdf
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