

# **Bull Run Filtration Projects Land Use Applications**

**Information and Materials Requested  
Application T3-2022-16220**

# Contents

---

Introduction .....	2
Information and Materials Requested.....	2
A. Lot of Record Verifications .....	2
B. Community Service Conditional Use – Water Filtration Facility.....	3
C. Community Service Conditional Uses – Intertie Location & Pipeline .....	4
D. Community Service Conditional Use – Communications Tower.....	6
E. Geologic Hazard Permits.....	7
F. Design Review – Water Filtration Facility .....	7
G. Design Review – Communication Tower.....	7
H. Design Review – Finished Water Pipelines & Intertie .....	8
I. Significant Environmental Concern.....	8
J. Miscellaneous .....	9
Supplemental Information from Applicant.....	11
K.1 Cathodic Protection Rectifiers (CPRs).....	11
K.2 Pipeline Corridor Length .....	11
K.3 Cottrell Road and Carpenter Lane .....	11
K.4 Applicant’s Response .....	11
Completeness Response Summary.....	12

# Attachments

---

The following completeness attachments provide requested materials and supporting information.

**A. Lot of Record Verifications**

- 1. Legal Lot Deed (1S4E23C-00800 Unit) .....Attachment A.1a
- 2. Legal Lot Map (1S4E23C-00800 Unit) .....Attachment A.1b
- 3. Contract 1971 (1S4E22D-00100).....Attachment A.2a
- 4. Contract Assignment 1975 (1S4E22D-00100) .....Attachment A.2b

**B. Community Service Conditional Use Water Filtration Facility**

- 1. Acoustic Baseline Measurement .....Attachment B.1

**C. Community Service Conditional Use Intertie Location & Pipeline**

- 1. Pre-Construction Ambient Sound Level Measurement .....Attachment C.1

**D. Community Service Conditional Use Communications Tower**

- 1. Antennae Data Sheets.....Attachment D.1
- 2. Tower Drawing with Antennae .....Attachment D.2
- 3. Tower Antennae Locations .....Attachment D.3

**E. Geologic Hazard Permits**

- 1. Geologic Hazards Permits Narrative .....Attachment E.1
- 2. Responses to County Comments on Geologic Hazards Permits .....Attachment E.2

**F. Design Review Water Filtration Facility**

- 1. Landscape Drawing Sheets (LU-302, LU-409-410) .....Attachment F.1

**G. Design Review Communications Tower**

- 1. Ancillary Building Drawing Sheets (LU-A-01-02) .....Attachment G.2
- 2. Tower Area Drawing Sheet (LU-402) .....Attachment G.3

**H. Design Review Finished Pipelines & Intertie**

- 1. Appurtenances and Grading Drawing Sheets (LU-208, -504) .....Attachment H.1
- 2. Intertie Yard Setbacks (Replaces Section 2, Figure 9) .....Attachment H.2a
- 3. Intertie Site Plan Drawing Sheet (LU-500) .....Attachment H.2b
- 4. Intertie Landscape Drawing Sheet (LU-501) .....Attachment H.2c
- 5. Intertie Model View Lusted Road .....Attachment H.2d
- 6. Intertie Model View Lusted Road .....Attachment H.2e
- 7. Intertie Model View Lusted Road .....Attachment H.2f
- 8. Intertie Model View Farm Road .....Attachment H.2g

**Bull Run Filtration Projects Land Use Applications  
T3-2022-16220**

**I. Significant Environmental Concern**

- 1. Pipeline SEC Drawing Sheets (LU-600-603) .....Attachment I.1
- 2. Multnomah Connection Proposed Ground Disturbance .....Attachment I.2

**J. Miscellaneous**

- 1. Stormwater Drainage Control Certificates ..... Attachment J.2
- 2. Lot Consolidation..... Attachment J.3
- 3. Existing Retaining Wall ..... Attachment J.6
- 4. Pipeline Drawing Sheets (Site, Architectural, Civil) .....Attachment J.7

**K. Supplemental Information**

- 1. Cathodic Protection Rectifiers Narrative .....Attachment K.1a
- 2. Agricultural Review of Cathodic Protection Rectifiers .....Attachment K.1b
- 3. Off-site Improvements Drawing Sheets (LU-201-205) .....Attachment K.3a
- 4. Off-site Grading and Paving Drawing Sheets (C-301-306) .....Attachment K.3b
- 5. Off-site Roadway Plan and Profile Drawing Sheets (C-400-406) .....Attachment K.3c
- 6. Applicant’s Response to Completeness Letter .....Attachment K.4

## Introduction

This narrative is submitted in response to the letter from Lisa Estrin, Senior Planner, dated November 10, 2022, and titled “RE: Application for Portland Water Bureau Water Filtration Facility, Pipelines and Related Actions (Case #T3-2022-16220)” (the “**Completeness Request**”). As requested, the applicant signed and returned the “Applicant’s Response” on November 15, 2022, indicating that the Water Bureau would provide the additional information identified in the Multnomah County letter within 180 days. The Applicant’s Response is also provided in Completeness Attachment K.4.

Each question from the Completeness Request is provided below in *italic font*, followed by the applicant’s response. The questions from the Completeness Request have been given sequential lettering (A, B, C, etc.) in order to better organize the responsive materials.

Defined terms used in this narrative are provided in the overall application Introduction or defined herein.

## Information and Materials Requested

Included with the information below are a number of references to two types of supporting documents.

- References to the “**Application Appendix**” are to the previously provided appendices submitted with the initial application package.
- References to a “**Completeness Attachment**” are to new documents included with this package in response to the Completeness Request. In general, the Completeness Attachments are numbered based on the question from the Completeness Request to which they relate (rather than being numbered sequentially).

### A. Lot of Record Verifications

1. *The narrative for tax lot 1S4E23C-00800 seems to indicate that this tax lot contains a single unit of land. The title report describes 4 units of land.*

a. *Please clarify if you believe there is a deed that consolidates the four units of land described in the title plant records report contained in Ex K.3.c into a single unit of land and provide a copy of said deed.*

**Response:** Tax lot 1S4E23C-00800 includes four units of land described in four individual deeds recorded in November and December of 1923. The Water Bureau has no record of the deeds being consolidated.

b. *If the four units of land have not been consolidated via deed, please clarify if the application is seeking a Lot of Record Verification for each of these units of land or if not each one, which one?*

**Response:** The Water Bureau is only seeking lot of record verification for one specific legal lot (one of the four units of TL 800), the unit where work is proposed. That legal lot is described in Book 950 Page 126 (Completeness Attachment A.1.a). This unit/deed is shown on attached Map 950 126 (Completeness Attachment A.1.b). This is the deed that was referenced in the land use application and all the analysis of TL 800 in the land use application was intended to be related to this unit/deed. In particular, the statement “Tax lot 800 has a 629-foot front lot line and has access on Lusted Road” could have been more precisely stated to be clear that the front lot line referenced is that of this unit/deed where work is proposed. The front lot line is shown on Completeness Attachment A.1.b.

2. *Please provide a copy of the Contract dated June 22, 1971 for the property 1S4E22D-00100 (R994220820) for the Lot of Record Verification.*

**Response:** A copy of the recorded Contract dated June 22, 1971, for the property 1S4E22D-00100 (R994220820) is provided in Completeness Attachment A.2.a. The recorded contract assignment to the City of Portland dated November 17, 1975, is also provided (Completeness Attachment A.2.b).

## **B. Community Service Conditional Use – Water Filtration Facility**

1. *Please complete a 24-hr base line noise study to establish the actual noise level within the immediate area of the Filtration Site (1S4E22D-00400 & 1S4E22D-00100). This will help to establish the character of the area.*

**Response:** A 24-hr baseline noise study for the Filtration site is provided in Completeness Attachment B.1.

2. *Uses that are accessory to a Community Use are themselves a community service use [MCC 39.7520(A)(19). The application will need to be amended to address the Pleasant Home Water Pump (PHWP) and the Public Tours as Accessory uses to the Water Filtration Facility CS. These accessory community service uses will need to meet the approval criteria in MCC 39.7515(A) through (H).*

- a. *The information provided in Appendix E.1 regarding Public Tours describes similar practices conducted at various water treatment plants in Oregon. As part of the accessory use community service application, materials need to address the actual tours to take place at the Portland Water Bureau Water Filtration Facility on Carpenter Lane. Information on the bus size that the facility operates, average numbers of individuals, maximum numbers of individuals, typical number of tours a month, maximum number of tours a month will need to be provided. The description will be used by the Hearings Officer to evaluate and limit or condition this use as provided by MCC 39.7505.*

**Response:** The Water Bureau withdraws any portion of the application materials related to public tours. The Water Bureau may in the future apply for an accessory use for public tours (and, in any such application in the future, would include the requested information cited in Completeness Request 2.a).

- b. *It appears the PHWP is an accessory use as it is not within the fenced area of the Water Filtration Facility.*

**Response:** The Pleasant Home Water District (PHWD) pump station is one of several pump stations located on the filtration facility site and is within a fenced area of the site as shown in Figure 28, Site Security Diagram (Application Narrative, Section 1.B) and Application Appendix A.1a, Sheet No. LU-302. The pump station is part of the distribution system of the water utility, the primary use of the site. There are other pump stations on the site as well, which are equally part of the distribution system of the water utility (see for example the pump station at Sheet Keynotes 24 and 25, Application Appendix A.1a, Sheet No. LU-302). For these reasons, the Water Bureau does not view the PHWD pump station as an

accessory use, that is, as a use that is “customarily subordinate and incidental to a primary use on a lot” (MCC 39.2000).

If it were an accessory use, the Community Service findings in the application fully incorporate the PHWD pump station and demonstrate compliance with the approval criteria. The pump station is clearly identified in the list of filtration facility buildings on page 2 of Application Narrative Section 1.A and is shown on the corresponding Figure 1. All of the subsequent analysis of approval criteria MCC 39.7515(A) through (H) apply to the PHWD pump station and the other elements of the filtration facility. Figure 3 in Section 1.A shows the pump station with generous yard setbacks and dense landscape buffering. The pump station does not have any greater impacts on surrounding land uses from light, sound, traffic, and other potential externalities than other elements of the filtration facility addressed in the narrative. Like the other elements of the filtration facility, it is commonly found in the area and is consistent with the character of the area. Like the rest of the filtration facility, the PHWD pump station will not adversely affect natural resources, will not force a significant change in nor significantly increase the cost of accepted farm or forest practices in the surrounding lands, will not require public services other than those existing or programmed for the area, will be located outside big game winter range habitat areas, will not create hazardous conditions, and will satisfy the applicable policies of the Comprehensive Plan and other applicable approval criteria of the MCC.

### **C. Community Service Conditional Uses – Intertie Location & Pipeline**

1. *Please explain how the term “Core Analysis Area” relates to the approval criteria MCC 39.7515(A) - Is consistent with the character of the area.*

**Response:** Section 2.A of the application provides background for the concept of the “Core Analysis Area” and its relationship with the “consistent with the character of the area” approval criterion:

*“For purposes of determining whether a proposal is consistent with the character of the area, the MCC requires identification of the area, a description of the character of the area, and a discussion of the character of the use—including potential visual, noise, odor, and traffic impacts—and how that character fits with the area. The area and character of the project study area is mapped and described in the **Introduction** and **Section 1.A**. The **Section 2 Overview** and this Section 2.A describe impact-specific (core) analysis areas for the pipelines and the intertie, related to potential impacts from pipelines, appurtenances, and the intertie on surrounding farm, forest, and rural residential land uses in each core analysis area, **and by extension in the study area more broadly.**” (Section 2.A, Page 5, emphasis in last sentence added)*

The “study area” is the proposed “area” for the approval criterion in MCC 39.7515(A) (“consistent with the character of the area”). The last sentence of the quote above should have more clearly referenced a concept in the application narrative Section 1.A, page 25, and Section 1 Overview, page 5, that describes how conclusions in the core analysis areas apply “by extension in the study area more broadly”:

*“Note that the land use characteristics within core analysis areas are typical of those found in the larger consolidated study area. ... Because of these similarities, as well as others described in this application package, such as in topography, climate, soils, and other characteristics, the core analysis areas and the consolidated study area are essentially identical in terms of the potential for susceptibility to impacts from the filtration facility **or pipelines**, such as potential based on*

*the mixture of farm types and sizes and scope of activities. Because of these shared characteristics and similarities, and because potential impacts (both related to externalities and sensitivities of the proposed use) are more likely to occur on lands close to the filtration facility than on more distant lands, the detailed analysis and conclusions of no impact for the more focused core analysis areas also apply to areas of the study area further away from the filtration facility.” (Section 1 Overview, page 5, emphasis added)*

*“As explained in the **Section 1 Overview** and relevant studies in the appendices, the core analysis areas are representative of and similar to the larger study area in terms of appearance, operational characteristics, and susceptibility to potential impacts from the filtration facility. For this reason, the core analysis areas (where smaller than the study area) allowed the project team to ensure that there would be no adverse impacts in the parts of the study area further away from the potential source of impacts.” (Section 1.A, page 25)*

The core (impact-specific) analysis areas for the pipelines and intertie are described in more detail in the Section 2 Overview. Two core analysis areas are proposed depending on the proposed facility type:

- Pipeline Core Analysis Area: Potential impacts from pipelines and appurtenances on surrounding farm, forest, and rural residential land uses.
- Intertie Core Analysis Area: Potential impacts from the intertie on surrounding farm and rural residential land uses.

Section 2.A explains that, “Since no impacts were found in the core analysis areas and the land use pattern within the core analysis areas is homogenous with the land use patterns in the larger study area, the detailed analysis of the more focused core analysis also applies to the areas of the larger study area further away from the pipelines and intertie.” Section 2.A, page 6. Thus, each core analysis area is directly related to the approval criterion in MCC 39.7515(A) and its call for an analysis of the character of the use—including potential visual, noise, odor, and traffic impacts—and how that character fits with the character of the study area more broadly.

2. *Please explain the decision to use one-quarter mile as the core analysis area based solely on visibility of the Intertie electrical building*

**Response:** As described in the application narrative Sections 2 and 2.A, the intertie generates sound, requires outdoor security lighting, and has potential visual impacts on surrounding farm and rural residential land uses. The core (impact-specific) analysis area for the intertie was defined to ensure that all such potential impacts on nearby land uses could be effectively mitigated. However, even unmitigated, sound and lighting impacts would extend only a short distance from the intertie site, while visual impacts would have the potential to reach further, up to a quarter mile away. Thus, the area proposed for the core analysis area for the intertie does take into account other categories of potential impacts, and is not based solely on the potential unmitigated visibility of the intertie, but all other categories of potential impact are wholly within that area. This concept was referenced in Section 2.A, which provides:

*“The proposed intertie structure (without mitigation) potentially could have visual, auditory, and light impacts. For example, although the intertie structure is designed to mimic farm structures in the study area, as documented in **Section 1.A**, those structures often are visible from public roads and often have noise and glare impacts on nearby residential properties. To ensure that all*

*potential impacts on nearby land uses are effectively mitigated, the core analysis area for the intertie is a quarter mile from the easement boundary, the area in which an unmitigated structure could potentially be visually significant.” (Section 2.A, Page 7)*

Thus, the core analysis area for the intertie addresses all potential impacts from an unmitigated intertie. The intertie core analysis area reaches out a quarter mile to ensure all impacts are analyzed, including potential visual impacts, which, by being the largest, end up defining the area.

3. *Please complete a 24-hr base line noise study to establish the actual noise level within the immediate area of the Intertie Site (1S4E21A-00900) (1S4E22D-00400 & 1S4E22D-00100). This will help to establish the character of the area.*

**Response:** A 24-hr baseline noise study for the Finished Water Intertie site is provided in Completeness Attachment C.3.

## **D. Community Service Conditional Use – Communications Tower**

1. *Please clarify the number and type of antennas that will be placed on the radio transmission tower as required by MCC 39.7560(C)(2).*

**Response:** Antenna information used in tower design is provided in the Antenna Mounting Table on the Tower Design Drawing (Application Appendix M.2). This includes the number and type of antennas. That figure has been updated to address related comments in D.2, below, and is provided in Completeness Attachment D.2. Antenna data sheets are provided in Completeness Attachment D.1. For ease of reference, there are sixteen (16) total antennas proposed under this application and the types of antennas are ten (10) Yagis, five (5) whips, and one (1) microwave dish.

- a. *Address whether the tower would be able to handle additional antennas or would be able to accept a co-location for a cell tower.*

**Response:** The proposed tower design and design calculations were conducted for the specific type and number of antennas listed on page 1 of Application Appendix M.4. While the Water Bureau does not anticipate the need for additional antenna, if such antenna were required in the future, new design calculations would need to be performed for additional antennas.

The Water Bureau will not accept cellular communications equipment for use on this tower for design and security reasons. The Water Bureau would accept a condition of approval prohibiting cell facilities on the tower if the County feels it is necessary.

2. *Please edit the Tower Design Drawing to show the location of the antennas and microwave dishes as they are part of the design. [MCC 39.7560(C)(1)]*

**Response:** The Tower Design Drawing (Application Appendix M.2) has been updated to include antenna locations (see Completeness Attachment D.2). Specific antenna locations with model, name, and elevation are illustrated in Completeness Attachment D.3.

## E. Geologic Hazard Permits

Responses related to the Geologic Hazard permits questions are provided in Completeness Attachment E.1, and supported by the Technical Memorandum in Completeness Attachment E.2.

## F. Design Review – Water Filtration Facility

1. *Please label the detention ponds on the on the Proposed Conditions Site Plan (LU-302). [MCC 39.8025(B)(13)]*

**Response:** Detention pond labels have been added to Sheet LU-302. The revised drawing is provided in Completeness Attachment F.1.

2. *Provide tree, shrub, and groundcover species and sizes. Neither Sheet LU-306 (“Landscape Plan”) nor LU-401 Facility Enlargement 2 includes species and sizes, only locations (LU-404 only shows stormwater plantings). [MCC 39.8025 (B)(14)]*

**Response:** The Water Bureau has prepared two new sheets providing the requested information:

- Sheet LU-409, Plant Species and Sizes (Completeness Attachment F.1)
- Sheet LU-410, Planting Details (Completeness Attachment F.1)

These sheets cover all species and sizes not previously shown on the stormwater planting sheet (Application Appendix A.1a, Sheet No. LU-404).

## G. Design Review – Communication Tower

1. *Provide design elevations for the communication tower that shows the lattice tower along with its antennas and microwave dishes. [MCC 39.8025(B)(3)]*

**Response:** The Tower Design Drawing (Application Appendix M.2) has been updated to show its antennas and microwave dishes (Completeness Attachment D.2). An additional elevation of the lattice tower provides a detail view of specific antenna and dish locations with elevations on the tower (Completeness Attachment D.3). Note that the proposed tower height is 180 feet as described in the application. There is one typo in the application narrative in Section 1: Filtration Facility Site Overview, Table 2, that lists the height as 175. That typo is hereby corrected.

2. *Provide a floor plan and building design elevations for the communication tower accessory building. In the A.1.b Architectural Plans, Site Plan Sheet LU-GEN-A-012 shows and labels the communications tower accessory building, but the floor plan and building design elevations are missing. [MCC 39.8025(B)(3), (4), and (5)]*

**Response:** A floor plan and building design elevations for the communication tower accessory building are provided in Completeness Attachment G.2. As noted on Completeness Attachment G.2, the building exterior will match the color and materials of other buildings on the site. For example, the color tone used on the exterior will match or be consistent with the blue tone that is indicated on other buildings on the site.

3. *Provide tree, shrub, and groundcover species and sizes. Neither Sheet LU-306 (“Landscape Plan”) nor LU-401 Facility Enlargement 2 includes species and planting sizes, only locations (LU-404 only shows stormwater plantings). [MCC 39.8025 (B)(14)]*

**Response:** Application Appendix A.1.a, Sheet LU-402, Tower Area Enlargement, has been updated to identify species and sizes of the trees, shrubs and groundcover. (See Completeness Attachment G.3). A note has been added to clarify that dead trees within the tree grove may be removed under arborist direction.

## H. Design Review – Finished Water Pipelines & Intertie

1. *Please clarify the locations of the proposed ground-disturbance, grading, filling and site contouring changes are for the air valves, drains, and accessways and at the intertie electrical building site. According to page 12, “all finished grades will be restored,” suggesting that grading will occur. [MCC 8025(B)(15)]*

**Response:** The grading plan for the intertie site (Sheet LU-504) has been updated in Completeness Attachment H.1, which replaces the Sheet LU-504 previously provided in Application Appendix A.2.c. The plan shows all planned contouring, fill and grading at the site. As the contours indicate, ground disturbance will occur across the intertie site.

The pipeline appurtenances (air valves, drains, and accessways) are described in the application narrative (Sections 2, 2.A, and 2.B). Current details of the appurtenances are provided on Sheet LU-208 in Completeness Attachment H.1. These details show cross-sections of each appurtenance type, including full below-ground to above-ground features. A trench will be excavated, pipelines and appurtenances installed, then the excavated material will be replaced in the trench around these features, and site contours/grades restored to existing conditions.

2. *How tall is the security fencing at the Intertie site?*

**Response:** The Water Bureau has decided to increase the planned fence height from 6 feet to 7 feet. Plans have been adjusted to meet setbacks under MCC 39.4325(C)(1). The nearest property line (north) is now 11 feet from the fence. This is illustrated in Completeness Attachment H.2.a, which replaces “Figure 9. Yard Dimensions at Intertie Site” in the Application Narrative, Section 2 Overview (which had indicated a 6-foot-tall fence). Updates to Sheets LU-500 and LU-501 (previously provided in Application Appendix A.2.a) are provided in Completeness Attachments H.2.b and H.2.c., respectively. Updated site visualizations are provided in Completeness Attachments H.2.d through H.2.g, which replace Application Appendix A.2.a, Sheet LU-502 and application narrative Section 2.B, page ii image and Figures 9-12.

## I. Significant Environmental Concern

1. *On Page 5 of Appendix A.3, there are two symbols for the SEC-h overlay zone, please modify the plan to use only one. For each Raw Water Pipeline property with SEC-h overlay on it.*

**Response:** Application Appendix A.3, Sheet LU-601 (the drawing on Page 5) has been clarified to show a consistent dashed line for the SEC-h overlay. This sheet is included in the full updated SEC plan set provided in Completeness Attachment I.1, which replaces Application Appendix A.3.

**Bull Run Filtration Projects Land Use Applications  
T3-2022-16220**

2. *Will any ground disturbance occur on tax lot 1S4E23C-00800, 1S4E23C-01200 or 1S4E23C-01300 to connect the Raw Water pipeline to the existing pipeline? If so, clearly show where the development will occur.*

**Response:** No ground disturbance will occur on tax lots 1S4E23C-01200 or 1S4E23C-01300. On tax lot 1S4E23C-00800, excavation and removal of three trees will be required to connect the Raw Water pipeline to the existing pipeline. All improvements on tax lot 1S4E23C-00800 will be underground, with no structures at or above the ground surface. The proposed disturbance area and pipeline improvements are shown in Completeness Attachment I.2. The alteration to the existing pipeline has no ground coverage (all improvements are below ground), and therefore meets SEC-h overlay exception MCC 39.5515(A)(8)(b).

3. *Please provide a scaled site plan that clearly shows the location of all property lines for each tax lot involved in either the Raw Water Pipeline or other pipelines that involve the SEC-h overlays, right of way lines, boundaries of the SEC-h and then where any vegetation is to be removed, ground disturbance, landform changes or any other new development will occur.*

**Response:** The requested plan information has been incorporated into an updated set of SEC drawings, in Completeness Attachment I.1. These plans are scaled and clearly show the location of property lines for each tax lot where pipeline work is planned in SEC-h overlays. The plans have been updated with notes and labels to show vegetation removal, ground disturbance, landform changes, and extent of new development within the SEC-h overlay.

## **J. Miscellaneous**

1. *Please provide documentation from Clackamas County as to what permits are necessary for the improvement of the Emergency Access Route to Bluff Road. Have these permits been applied for? [MCC 39.7505 & MCC 39.8025]*

**Response:** The Water Bureau confirmed with Clackamas County that the emergency access road will need a Type II review for a utility facility in the EFU District. The Water Bureau submitted the Type II application to Clackamas County on January 20, 2023.

2. *Stormwater Drainage Control Certificate: Please have the Engineer sign the Stormwater Drainage Control Certificates [H.3] and provide the date of the corresponding calculations or reports. [MCC 39.6235]*

**Response:** The three Stormwater Drainage Control Certificates signed and dated by the engineer are provided in Completeness Attachment J.2, which replaces Application Appendix H.4.

3. *The Water Filtration Site consists of two units of land (1S4E22D-00400 & 1S4E22D-00100). A Lot Consolidation application will be needed to consolidate it into a single parcel. A Lot Consolidation application using MCC 39.9300 is a Type I application. A property owner may also choose to consolidate units of land as part of a land division application. If choosing to do a land division application, please discuss with the case planner before making the application.*

**Response:** A Lot Consolidation application with supporting maps and attachments is provided in Completeness Attachment J.3.

**Bull Run Filtration Projects Land Use Applications  
T3-2022-16220**

4. *In Narrative 1.A for the Filtration Facility Conditional Use Application, on Page 34, first paragraph, it appears Appendix D.3 should actually be Appendix E.3. On the same page under A.3.1.5 Noise and Vibration Impact Conclusion, it references an Appendix A.4 Exterior Noise Analysis. Please submit Appendix A.4.*

**Response:** Thank you for your close review. You are correct that these references contained typographical errors. In Narrative Section 1.A, Page 34, first paragraph, the reference to “Appendix D.3” should be a reference to Application Appendix E.3, consistent with the references on the prior page. Similarly, the reference on the same page under A.3.1.5 Noise and Vibration Impact Conclusion to “Appendix A.4 Exterior Noise Analysis” should have been a reference to Application Appendix E.3, which is the Exterior Noise Analysis, and the reference to “Appendix A.4 Air Quality, Dust, Noise, and Vibration Memo” should have been a reference to Application Appendix E.4, Potential Local Impacts of Facility Operation: Air Quality, Dust, Noise, and Vibration.

5. *Please explain what type of ground disturbance/activity is occurring in the SEC-wr that it needs to be reseeded along the roadways? [MCC 39.5510 / MCC 39.5515]*

**Response:** All proposed ground disturbance in the SEC-wr zone is for the placement of pipelines within the existing right-of-way (MCC 39.5515(A)(24)). At Cottrell Road, there will be temporary trench excavation and a launch pit within the existing right-of-way to install the underground small pipe (LRDM). To the west of Cottrell on Dodge Park Blvd., pipeline construction will require temporary traffic diversion within the existing right-of-way with that area to be reseeded following construction. Along Oxbow and the east side of Altman, there will be a temporary excavation within the existing right-of-way for pipe construction activity (new pipe and a connection to an existing pipe). In all of these locations, the original grades will be restored and the area reseeded at the end of construction.

6. *In Appendix A.2.a Site Plans, Page 15, please provide information about what repairs will be needed to the retaining wall. Is the retaining wall owned by the private property owner or the County? Approximately how old is the retaining wall? How tall is the retaining wall? Is a building permit going to be necessary? Please provide a photograph or two of the retaining wall. [MCC 39.4355 Uses, MCC 39.4375(C)]*

**Response:** The retaining wall noted on Application Appendix A.2.a, Site Plans, Sheet LU-200 (page 15 of the PDF) is a replacement of an existing landscape wall. The existing landscape wall is up to 3 feet in height and built with landscape timbers. The wall is on private property and the owners have asked that a portion of it be replaced. The age of the wall is unknown but it has deteriorated beyond repair (see photos provided in Completeness Attachment J.6). The landscape wall will be replaced with a similar wall that is 12-ft long and 3-ft tall made of ultrablock (concrete blocks). No building permits will be needed.

7. *The property lines, right-of-way lines, contour information on the plans is very difficult to read as they are often printed so lightly or obscured. Information that is required by the various code sections must be able to be read. Please review the various plans and make sure that the information being presented can be easily read. [MCC 39.5085, MCC 39.5520]*

**Response:** A new set of pipeline drawings are provided in Completeness Attachment J.7. These drawings replace all of Application Appendix A.2 (A.2.a, A.2.b, and A.2.c) and have been revised with heavier line weights and clearer presentation, including property lines, right-of-way lines, and contours. The updated plans are clear on Water Bureau prints and the Water Bureau will be happy to provide printed sets if needed. All drawing updates found in other applicable Completeness Attachments are incorporated in this set.

## Supplemental Information from Applicant

In addition to the information provided in response to the Completeness Request, the applicant wishes to provide the following updates and changes to the application. For organizational ease, this supplemental information is organized as Section K (continuing the sequence of lettering given to the questions above from the Completeness Request), and with “Completeness Attachments” also using the “K” letter where provided.

### K.1 Cathodic Protection Rectifiers (CPRs)

The Water Bureau and project design team have confirmed the need to provide cathodic protection to RW and FW pipelines. These cathodic protection rectifiers (“CPRs”) are pipeline appurtenances that were not explicitly shown or discussed in the original pipeline applications (Application Narrative Section 2 through 2.D) and are therefore proposed to be added as described in Completeness Attachment K.1.a.

### K.2 Pipeline Corridor Length

The application refers to approximately 4 miles of pipeline corridor, which includes the total length of pipeline corridor, covering larger pipelines as well as the smaller Lusted Road Distribution Main. The Water Bureau wants to clarify that the pipeline corridor is approximately 3.6 miles, including 12,217 lineal feet in ROW and 6,972 lineal feet outside of ROW.

### K.3 Cottrell Road and Carpenter Lane

In response to community feedback, the Water Bureau is providing in Completeness Attachments K.3.a-c an updated and more detailed design package for the right of way improvements at Cottrell Road and Carpenter Lane. Completeness Attachment K.3.a replaces in its entirety Application Appendix A.1.c. Completeness Attachments K.3.b and K.3.c provide additional detail on the proposed design of Cottrell Road and Carpenter Lane – please note that this additional detail in K.3.b and K.3.c is not related to the approval criteria for the various land use applications pending in front of Multnomah County or intended to be approved as part of those land use applications, but rather is intended to respond to community concerns about details and allow a more thorough review of those details by Multnomah County Transportation.

### K.4 Applicant’s Response

As noted above, the applicant signed and returned the “Applicant’s Response” on November 15, 2022, indicating that the Water Bureau would provide the additional information identified in the Multnomah County letter within 180 days. The Applicant’s Response is also provided in Completeness Attachment K.4.

## Completeness Response Summary

The Water Bureau has responded to each of the County’s completeness requests and believes that this submittal, with attachments and revised plans, addresses all of the comments received. Table 1 provides a summary of all appendices and narrative figures in the original application (each called an Application Appendix) that are replaced by updated documents contained in the Completeness Attachments that accompany this response letter. To address the request for increased line weight on pipeline plans, a full set of updated pipeline and SEC plans (covering Appendix A.2 and A.3) is also included.

**Table 1. Bull Run Filtration Application Updates**

Application Appendix #	Description/Change	Replaced by Completeness Attachment #
A.1.a / Sheet LU-302	Detention pond labels added	F.1
A.1.a / Sheet LU-402	Plant species and sizes added	G.3
A.1.c	Carpenter Lane improvements	K.3.c
A.2.a / Sheet LU-502	Intertie site visualizations with adjusted fence location	H.2.d through H.2.f
A.2.a / Sheet LU-500-501	Adjusted fence location	H.2.b and H.2.c
A.2.c / Sheet LU-504	Updated intertie grading plan	H.1
A.2 Pipeline Drawing Set	Increased line weight for property/ROW lines and contours	J.7
A.3 SEC Drawing Set	Clarification of property/ROW lines, contours, SEC-h line symbols; added notes and labels	I.1
H.4	Signed Stormwater Drainage Control Certificates	J.2
M.2	Antenna locations and detail added to tower drawing	D.2
Application Narrative Section # / Figure #	Description/Change	Replaced by Completeness Attachment #
Section 2, Figure 9	Intertie Yard Setback update	H.2a
Section 2.B / Figures 9-12, and Page ii image	Intertie site visualizations with adjusted fence location	H.2.d through H.2.g

Thank you for your review of this land use application. With this submittal, the Water Bureau believes that County Planning Department has the information needed to deem the application complete and proceed with the Type III review process. Please feel free to call if you have any questions.