

Charles Waugh  
38203 SE Lusted RD  
Boring, OR 97009  
[cw@charleswaugh.com](mailto:cw@charleswaugh.com)

Re: Case\_T3-2022-16220

**Rebuttal:**

The following videos were shared with Land Use Planning and submitted into the record. Please accept the following explanatory text as context.

All of these videos speak to either criteria MCC 39.7515(A) is consistent with Character of the Area or MCC 39.7515 (F) will not create hazardous conditions and show that these criteria are not met.

- [V1.0\\_Large\\_Trucks\\_Are\\_Dangerous\\_in\\_Rural\\_Areas--Case\\_T3-2022-16220.mp4](#)
  - Rebutts *Exhibit A.227 Bull Run Filtration Construction Traffic Impact Analysis*
  - Shows the **intersection at SE Cottrell and SE Bluff** with two trucks turning WB onto Bluff from SB Cottrell.
  - Three hazards are exposed in one short sequence:
    - Passenger cars are impatient and pass inappropriately.
    - The large trucks obstruct vision of cars at intersections.
    - Large trucks need to swing into the oncoming lanes either before or after turns.
  
- [V2.0\\_Carpenter\\_Lane\\_is\\_a\\_Rural\\_Residential\\_LANE\\_T3-2022-16220.mp4](#)
  - Rebutts *Exhibit A.227 Bull Run Filtration Construction Traffic Impact Analysis*
  - Shows the hazards and dangers of adding an industrial development into a rural residential area.
  - Children on bikes, dogs, mothers with strollers, and large trucks do NOT belong together.
  
- [V3.0\\_Large\\_Trucks\\_And\\_Farm\\_Traffic\\_On\\_Bluff\\_Rd--Case\\_T3-2022-16220.mp4](#)
  - Rebutts *Exhibit A.227 Bull Run Filtration Construction Traffic Impact Analysis*

- Shows the impact of even **one truck on Bluff Rd.** with the existing rural nature of the area exemplified by a single tractor with disc harrow in tow.
  - Both vehicles must partially leave the roadway to be able to pass each other.
  - Bluff is a major arterial in this area and is the main proposed route for ALL construction traffic.
- [V4.0\\_Large\\_Trucks\\_And\\_Farm\\_Traffic\\_On\\_Cottrell\\_Rd\\_SB\\_at\\_Bluff--Case\\_T3-2022-16220.mp4](#)
    - Rebutts *Exhibit A.227 Bull Run Filtration Construction Traffic Impact Analysis*
    - Shows the impact of even **one truck on Cottrell Rd.** with the existing rural nature of the area exemplified by a single tractor with disc harrow in tow.
      - Truck has to back up into a private driveway to allow the tractor and harrow to pass.
      - Private cars also have to use the private driveway to allow the truck and harrow to pass.
      - Much time is spent in this interaction. With a truck every 1-1/2 minutes coming down this road, the delays would be dramatic and would further frustrate other drivers and thereby create more hazards.
    - NOTE: Cottrell Rd. is the **main** proposed route for **ALL** construction traffic.
- [V5.0\\_COTA\\_Carpenter\\_Lane\\_6\\_Sep20233\\_~8am.mp4](#)
    - Rebutts *I.74 and Exhibit A.4, 1.A Filtration Facility Conditional Use Application Narrative*
    - This video was shot the morning of 6 September 2023 around 8 AM.
    - Shows the rural nature of the area.
    - Shows a local resident who is out for a morning walk and run
    - Shows that Bluff Rd traffic is heard quite plainly even at a distance 3900 feet.
    - The construction traffic and build-out will be all but deafening by comparison. And the ongoing operation of the plant will be significantly louder.
- [V6.0\\_Cottrell\\_Rd\\_with\\_Truck\\_then\\_onto\\_Carpenter\\_Lane.mp4](#)
    - Rebutts *Exhibit A.227 Bull Run Filtration Construction Traffic Impact Analysis and Exhibit A.4, 1.A Filtration Facility Conditional Use Application Narrative*

- Video shows a drive on the morning of 6 Sept 2023.
- Shows a delivery truck parked in the traffic lane on Cottrell Rd.
- Shows a dog walker walking his dog in the quiet morning.
- Shows the trouble with morning sun on the rural roads while driving.

-----

The following is supporting verbiage to the above videos for clarification and emphasis.

The construction of the proposed PWB Filtration Plant must be considered as part of the approval process. This has been noted by Carrie Richter and certainly makes sense. Otherwise it is like telling one's pregnant wife that the burden of pregnancy and labor of delivery is unimportant compared to proudly presenting one's son and heir to the watching world.

The construction is slated to last 4 years minimum, though one can easily squint one's eyes and make guess that it will be longer . . . as most government projects go (even ones with a budget of ~\$2billion.)

The construction traffic alone would be a monstrous intrusion in this area. Truck traffic is estimated at (even with 'mitigation' efforts) to be ~300 trips per day. (ref: Exhibit A.227 Bull Run Filtration Construction Traffic Impact Analysis, pg. 8)

PWB is proposing upgrading Carpenter Lane for this traffic, yet leaving all other roads unchanged. The videos referenced below show but a miniscule part of the impact of such traffic. Rural farm traffic is a common occurrence in this area and *cannot* be mitigated, it is the historical, existing, zoned use of this area. It is truly the life-blood of this area. The construction traffic will irreparably interrupt, disorder, delay, cause dangers, and economic impact to the farm traffic.

#### CARPENTER LANE PROPOSED 'UPGRADES'

The 'new and improved' Carpenter Lane is proposed to be an asphalt road, 32' wide, with curbs and driveway openings.

That would certainly NOT be commensurate with the character of the area. The farmers and homeowners out here have built their businesses and homes over the last century-plus on roads much humbler than that. That road would stand out like a sore thumb (the thumb that some uncaring soul had whacked with a hammer).

There is not a single road for many miles in any direction that is 32 feet wide, paved, with curbs, yet that is what the PWB proposes to make Carpenter Lane. I can understand why - they want to run 300 trucks of up to 72,000 pounds each up and down that road daily. And they want to do that for 5 years (that's just shy of 400,000 truck trips total). Yes, that would require a substantial road.

Further, that road would have curbs. Yes: CURBS! There are no curbs within *many miles* of this area. And, those curbs would be in a residential area where children have ridden their bikes for decades and would continue to do so for decades to come. So now, they'll have to ride on the asphalt, sharing space with trucks that outweigh them almost 2000 times. That's not a fair fight, nor is it safe - *by no means is it safe*.

See video [V2.0\\_Carpenter\\_Lane\\_is\\_a\\_Rural\\_Residential\\_LANE\\_T3-2022-16220.mp4](#) which shows the dangers of mixing children, bikes, dogs, strollers, and 70,000lb+ trucks. Keep in mind this video shows ONE TRUCK, not 300 over the course of *a single day every day* over the course of 5 years.

In addition, once off of that stretch of not-in-the-character-of-the-area road, those ~400,000 truck trips would be driving on the roads that are already in poor condition. Very few of the roads have defined edges, centerlines, fog lines, turn lanes, or large radius swept corners to accommodate large trucks.

Yes, currently the odd large truck in the area navigates through this area, but that may be *one per day or less*, not 300 trips per day for 5 years. See video [V1.0\\_Large\\_Trucks\\_Are\\_Dangerous\\_in\\_Rural\\_Areas--Case\\_T3-2022-16220.mp4](#) (referenced below) for examples of but a very few of the dangers.

Keep in mind that these trucks would carry not just the dirt that would be hauled OUT (~1.2million cubic yards! - enough dirt to build a solid wall *9 feet wide X 30 feet tall X 25 miles long* - the same distance from this project to Portland City Hall). These trucks would also carry IN heavy equipment for all of the excavating, plus roughly 7 miles of 12' diameter pipe, all of the 1000's of yards of concrete (at ~4000 pound per yd), all of the gravel, the building materials, the asphalt, sand, chemicals, electrical wiring, fixtures and boxes, roughly a hundred light poles (!), the fencing, the pumps and valves, and lastly, the sign out front of the proposed filtration plant itself.

To demonstrate the dangers and the out-of-character nature of the proposed development and its construction, please see the following videos that have been

entered into the record. Make sure your sound is ON (though some have silent sections and some are altogether silent):

**To call a \$billion-plus facility fitting with the Character of the Area is wrong.**

Simply by pointing to the shape and color of a building and native plantings does not mean that is fitting with the character of the area. Here are but some of the egregious violations that even a cursory glance at their proposed plans shows:

- Light poles and lights (ref.: A.1a)
  - Roughly 100 light poles on the PWB proposed plans (Ref: A.1a, pgs. 28-39)
  - That's more than the entire Cottrell area has *in aggregate*.
  - Even Scenic fruit, which is a concentrated fruit processing facility (in the agriculture industry), that has been in business for just shy of 100 years, has only 6 light poles total.
  - Sester farms has 8 light poles total spread over >400 acres.
  
- Lighted sign at the entrance
  - No one in the area has a lighted sign, except, again, Scenic Fruit, whose sign is mounted directly on their main building and located under a peak-of-gable mounted parking-lot illuminating light which lights the sign as only party of its duties.
  - Not one sign in the area is 8' wide on a concrete foundation that is 16' long and 4.5' tall, lighted with lights on 8' poles. (Ref: A.1a, pg. 17 and pg 29)
  
- 32 foot wide paved road, with curbs
  - No one in the area has this sort of road.
  - This presents hazards to the rural residential neighborhood.
  - See video:  
[V1.0\\_Large\\_Trucks\\_Are\\_Dangerous\\_in\\_Rural\\_Areas--Case\\_T3-2022-16220.mp4](#)
  - This is entirely out of keeping with the Character of the Area and is completely self-serving to manage the construction traffic for the 5 years of construction.
  
- Paved interior roads
  - No one in the area has these.
  - PWB proposed plant has almost 2 miles of them total, with light poles continuously along their length. (Ref: A.1a, pgs. 28-39)

- Two abandoned houses on Carpenter Lane
  - Shown in this video:  
[V5.0\\_COTA\\_Carpenter\\_Lane\\_6\\_Sep20233\\_~8am.mp4](#)
  - There are no other abandoned houses in this area..
  - PWB purchased these houses and have left them to sit uninhabited.
  - This was done far in advance of receiving any land use approval from Multnomah County.
  - It is sadly ironic that the only abandoned houses in the entire area are owned by the City of Portland.
  
- The rural nature of the area is evident in this video:  
[V5.0\\_COTA\\_Carpenter\\_Lane\\_6\\_Sep20233\\_~8am.mp4](#)
  - The traffic on Bluff Rd., ~3900 feet away, can be plainly heard in the video. Construction traffic and other noises will be significantly louder and more consistent.
  - The quiet, rural nature of the area is evident. This will be destroyed during construction and disrupted during the ongoing operation of the plant.



---

## Rebuttal with Videos Referenced and Explanatory Text - Re: Case\_T3-2022-16220

1 message

---

**Charles G. Waugh** <cw@charleswaugh.com>

Wed, Sep 6, 2023 at 11:42 AM

To: "LUP-Comments@multco.us" <LUP-Comments@multco.us>



**External Sender** - Be Suspicious of Attachments, Links, and Requests for Payment or Login Information.

Please accept the attached for Case\_T3-2022-16220

Warmest regards,

Charles Waugh

[38203 SE Lusted RD](#)

[Boring, OR 97009](#)

503-358-1513

[www.charleswaugh.com](http://www.charleswaugh.com)



**Rebuttal with Videos Referenced and Explanatory Text.pdf**

93K



Scott Robison <scott.robison@multco.us>

## Folder shared with you: "Videos from Charles Waugh Re: Case\_T3-2022-16220"

2 messages

charles waugh (via Google Drive) <drive-shares-dm-noreply@google.com>

Wed, Sep 6, 2023 at 11:20 AM

Reply-To: charles waugh <charles.cfap@gmail.com>

To: scott.robison@multco.us

### charles waugh shared a folder



charles waugh (charles.cfap@gmail.com) has invited you to **contribute** to the following shared folder:



charles waugh is outside your organization.

Open

If you don't want to receive files from this person, [block the sender](#) from Drive

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA  
You have received this email because charles.cfap@gmail.com shared a file or folder located in Google Drive with you.



Scott Robison <scott.robison@multco.us>  
To: charles waugh <charles.cfap@gmail.com>

Wed, Sep 6, 2023 at 11:23 AM

I'm confirming receipt of the videos. Laura Belson already shared these exact same files a few minutes earlier.

[Quoted text hidden]

--

**Scott Robison**

Administrative Analyst I Land Use

Department of Community Services I Multnomah County

Phone: 503-988-0187 | [scott.robison@multco.us](mailto:scott.robison@multco.us)



Scott Robison <scott.robison@multco.us>

## Folder shared with you: "Videos from Charles Waugh Re: Case\_T3-2022-16220"

4 messages

Laura Belson (via Google Drive) <drive-shares-dm-noreply@google.com>

Wed, Sep 6, 2023 at 11:18 AM

Reply-To: Laura Belson <lauratov@gmail.com>

To: scott.robison@multco.us

### Laura Belson shared a folder



Laura Belson (lauratov@gmail.com) has invited you to **contribute** to the following shared folder:

 Videos from Charles Waugh Re: Case\_T3-2022-16220



Laura Belson is outside your organization.

Open

If you don't want to receive files from this person, [block the sender](#) from Drive

Google LLC, [1600 Amphitheatre Parkway, Mountain View, CA 94043, USA](#)

You have received this email because lauratov@gmail.com shared a file or folder located in Google Drive with you.



Scott Robison <scott.robison@multco.us>

Wed, Sep 6, 2023 at 11:23 AM

To: Laura Belson <lauratov@gmail.com>

I'm confirming receipt of the videos. Charles Waugh just shared them again a few minutes later, they are the exact same.

[Quoted text hidden]

--

**Scott Robison**

Administrative Analyst I Land Use

Department of Community Services | Multnomah County

Phone: 503-988-0187 | [scott.robison@multco.us](mailto:scott.robison@multco.us)

**Laura Belson** <lauratov@gmail.com>  
To: Scott Robison <scott.robison@multco.us>

Wed, Sep 6, 2023 at 11:34 AM



**External Sender** - Be Suspicious of Attachments, Links, and Requests for Payment or Login Information.

Thanks! Did you receive all 6? We will follow up with some written testimony that goes along with them. Please file for File T3-2022-16220.

Thanks!!

[Quoted text hidden]

**Scott Robison** <scott.robison@multco.us>  
To: Laura Belson <lauratov@gmail.com>

Wed, Sep 6, 2023 at 11:36 AM

Yes, here is what was received, and then Waugh shared them again.

Shared with me > Videos from Charles Waugh

Type People Modified (Send feedback to Google)

Name	Owner	Last m...	↓	File size
V5.0_COTA_Carpenter_Lane_6_Sep20233_~8am.mp4	charles waugh	10:09AM		306 MB
V6.0_Cottrell_Rd_with_Truck_then_onto_Carpenter_Lane.m...	charles waugh	9:56AM		99.9 MB
V1.0_Large_Trucks_Are_Dangerous_in_Rural_Areas--Case_...	charles waugh	Sep 5, 2023		1.97 GB
V2.0_Carpenter_Lane_is_a_Rural_Residential_LANE_T3-202...	charles waugh	Sep 5, 2023		155.3 MB
V4.0_Large_Trucks_And_Farm_Traffic_On_Cottrell_Rd_SB_a...	charles waugh	Sep 3, 2023		3.03 GB
V3.0_Large_Trucks_And_Farm_Traffic_On_Bluff_Rd--Case_...	charles waugh	Sep 3, 2023		132.5 MB

[Quoted text hidden]