



Gary Shepherd, Senior Attorney

## Exhibit A.31

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October 18, 2024

**Via electronic mail and**  
**Multnomah County Land Use Planning Portal:**

Marisol Cervantes  
Multnomah County Land Use Planning  
[Marisol.Cervantes@multco.us](mailto:Marisol.Cervantes@multco.us)  
[land.use.planning@multco.us](mailto:land.use.planning@multco.us)

RE: Case #T3-2024-0001  
Updated Plan Set – Record Submission

Dear Marisol,

Please include this letter and attachments in the record of these proceedings. Since submitting the original application and evidence support, Metro has been working with its team of scientists, arborists, engineers, and planners to update the project plan set. Several on-site and off-site meetings and discussions, as well as engineering efforts have further refined the plan set. This includes incorporating more directional drilling, rather than open trench pipe installation in certain project locations than previously presented.

Specifically, through the old growth forest section of the project, characterized by curved road sections and large trees and extending to the east, the project team determined that directional drilling is the best construction technique that would protect the tree resources by minimizing anticipated root exposure. Directional drilling results in water lines installed away from and well below tree root systems. This change is reflected on Sheets C7 through C9, as well as sheets C13, C21, C22, and C24.

Throughout the entire project, best management practices, including continued arborist consultation, will prevent impacts to the adjacent resources. All construction techniques are appropriate for the project and locations proposed. Attached is the Revised Plan Set for your review and use in this application process.

Also attached is the project arborist's Tree Protection Plan, including recommended conditions of approval to support our tree protection efforts. The plan details the arborist's involvement, review, and project, design, and protection recommendations.

Thank you for your assistance and effort in processing this application. If any questions or concerns remain, Metro will endeavor to promptly provide responsive information.

Sincerely,

A handwritten signature in black ink, appearing to read 'G Shepherd', written in a cursive style.

Gary Shepherd  
Senior Attorney  
Office of Metro Attorney

**Attachments:**

- 1) Revised Oxbow Park Welcome Center Water System Plan Set**
- 2) Revised Oxbow Park Water Distribution System Replacement**
- 3) Harrity Tree Specialists, Inc. Tree Protection Plan**