



TO: Department of Community Services
Land use Planning Division
LUP-comments@multco.us

Subject: Case File T3-2022-16220 Comments (Portland Water Bureau Water Filtration Facility & Pipelines)

In the Portland Water Bureau's [PWB] August 31, 2018 Filtration Plant Key Decisions and Process Report, construction truck trips were estimated to be over 100,000, see page 75 of 1077, and is described as "Local Impacts - Neighbors Impacted." It is unclear to the reader what is being hauled in these truck trips and whether the trips include some or all of the following that will need to be hauled: concrete, excavation materials, structural backfill, native backfill, pipeline pipes, gravel, asphalt, and structural building materials and hardware.

PWB has stated there will be "Local Impacts" due to truck traffic, yet there was no Construction Traffic Impact Analysis [CTIA] in the PWB's application, only a "Post-Construction" traffic impact analysis, see PWB Application C.1 Bull Run Filtration Project Traffic Impact Analysis.

MCC 39.7520[A][6] sets forth the approval criteria for this application and refers back to MCC39.7515 approval criteria [A] thru [H]. When giving the approval criteria a cursory look, even without a CTIA from PWB, it is evident that the number of truck trips will effect the area, animals, create hazardous conditions, and effect farmers.

The fact that the PWB has not submitted a CTIA is a singular, significant concern that compromises the communality's ability to evaluate impacts.

In conclusion, Construction traffic is germane to the land use review because it is a fundamental element of the proposed use. It seems that it would be impossible to evaluate the impact of the proposed use in terms of neighborhood character, farming practices, natural resource impacts, public service demand and hazardous conditions without knowing the nature and extent of the construction activities.

Thank you for this opportunity to comment and we will supplement with additional testimony in advance of the hearing.

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