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September 4th, 2023

Mr. Alan Rappleyea, Multnomah County Hearings Officer.
Re: City of Portland's proposed Water Treatment Plant (Case File T3-2022-16220)

Response to Global Transportation Engineering.

Exhibit E.16: Rod Park Testimony

E.16 Comment Summary

"The scope of the study reflected by the map (Exhibit A.31 pg.2) does not geographically represent the farm community of this area for either the construction or operations of the proposed facility. By not having a larger representative scope, the traffic impacts to the farmlands in the community are not evaluated as required." This is inadequate for the farm impact test. Traffic doesn't just appear at the edge of the study area. The boundaries should be much larger to be representative of the farming community.

Response to Comment: The fact that the farming community may extend long distances from the Water Bureau projects does not require a study area larger than is defined in the Water Bureau reports or analysis of additional intersections. Both the operations and construction traffic studies evaluated key intersections in the study area and concluded that, with TDM strategies, impacts to intersection and roadway operations due to construction or operations traffic from the project will be minimal even under conservative analysis assumptions (such as all Commuters arriving and departing during the peak hours) that take into consideration roadway closures due to pipeline construction. There are no significant impacts shown by the operations or construction TIA in the study area. Traffic will tend to disburse and have less impact as it moves further away from the filtration facility and pipelines. Given that, the study area as selected and analyzed is fully adequate.

The response of GTE underscores the lack of understanding of the nursery industry's needs and our competitive advantage of collaboration of combining multiple nurseries products in a semi-truck for our customers. The nursery community does, not may, extend beyond the study area as defined by the Water Bureau. The study area was flawed by not recognizing the impacts of construction and potential operations extend well beyond the construction of the water plant and pipelines. Not only are the farmers in the construction areas harmed, but also those in the industry who have built customer bases on those relationships will be harmed as customers seek other sources if they cannot reliability count on their current suppliers. These relationships have developed, in many cases over decades as the nursery industry, though geographically wide, is a small community.

E.16 Comment Summary

Not including Clackamas County in the study does not provide a full disclosure of traffic impacts and

consequences. The applicant's traffic routing and studies also assume Clackamas County will grant access to SE Bluff Road, south of the water plant. If Clackamas County does not grant access, how will traffic be routed and what will be that impact? The access at SE Bluff Road needs to be addressed as part of this application as it is a critical assumption.

Response to Comment: Both the traffic studies for on-going operations and construction traffic include multiple intersections in Clackamas County. It is unclear why this author believes Clackamas County operations have not been considered. Additionally, both the Project TIA and the Construction TIA have been provided to Clackamas County Transportation.

The Construction TIA evaluates a single-site access case (see page 20) and established a limit on total construction trips on SE Carpenter Lane that would serve as effective mitigation to maintain an acceptable Level of Service (LOS) at all study intersections. The Construction TIA single-access evaluation assumed all Truck traffic would travel to and from north of the SE Cottrell Road / SE Carpenter Lane intersection. A subsequent memorandum, submitted concurrently into the record with this response document, was developed to supplement the Construction TIA evaluation by considering a more conservative trip distribution scenario which routes all Truck trips to and from the south of the SE Cottrell Road / SE Carpenter Lane intersection.

Same comments as to a lack of understanding of the scope of the farm community.

E.16 Comment Summary

There will be "secondary traffic farm impacts from those seeking routes to avoid construction vehicles and later the operational vehicles." Traffic will seek alternative routes, potentially through farmlands.

Response to Comment: There is no reason to believe that the public will violate the law and trespass on private farmlands to avoid the minor delays caused by construction. The Construction TIA evaluates several detour routes for pipeline construction that utilize public roads.

Traffic volumes during operations will not impact or cause traffic to reroute. Traffic volumes noted in the Project TIA are conservative, and the TIA shows there are no operational impacts even with this conservative analysis.

GTE interprets this as traffic violating the law and trespassing on private farmlands. This is not correct. As the primary routes become blocked by construction, traffic will detour through farmlands on SECONDARY PUBLIC roads which the farm community uses to move labor, tractors and equipment as well as nursery stock for planting or harvested for sale.

Thank you for your consideration.



Rod Park



rebuttal testimony

1 message

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Please find attached my response to PDX rebuttal of the June 30th, 2023 hearings testimony.

Thank you

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Rod Park - Park's Nursery PDX Water Treatment Plant Testimony 9.6.2023.pdf
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