

Tammy Rickman
First Student
1625 SE Hogan Rd
Gresham, OR 97080

To whom it may concern:

I am writing to express my concern with the responses provided by PWB in address to my letter dated 7/27/23. I listed eight very valid concerns with PWB's proposed work and the issues that will be created by this treatment facility during and after completion. The response from PWB addressed two concerns, with responses that I felt were misleading at best.

These comments are in rebuttal to Ex I.84 pg 27 (Response to testimony of First Student School Bus Services) Applicant's consultant states:

"The pipeline construction will not make it impossible for students to access bus stop locations for long periods of time. The pipeline construction zone moves approximately 30 to 50 feet per day (trenched construction). For this reason, the impact on any one property is temporary and limited. Additionally, the Water Bureau has met with transportation providers. From those meetings it is understood routes change annually depending on where students live. The Construction TIA outlines that the Water Bureau and the contractor will coordinate with the schools and districts on schedules and bus routes that need to be maintained and those that can be temporarily modified."

Response:

First Student wishes to point out the following:

- Consultant's statements about the impact on any one property being "temporary and limited" is mis-leading and in direct conflict with Applicant testimony contained in Attachment 4 of Ex. H.3. which gives estimated duration of various pipeline construction elements. For example, Attachment 4 states that the construction of the finished water pipelines in Altman Rd. between Lusted Rd and Oxbow Dr. will last 22 months (approx. 660 days). The length of this pipeline segment is approx. 2,700'. Using consultants' statement of the trench moving 30-50ft/day, this segment would be completed in 54-90 days. Clearly, the applicant's information and the consultant's statement are in serious conflict. Reliability is in serious doubt.

- Consultant's statement that the "PWB and contractor will coordinate with the schools and districts on schedules and bus routes that need to be maintain and those that can be temporarily modified" is misleading and inaccurate. First Student has never indicated that temporary modifications of bus routes would be acceptable for



any period of time or agreed to “coordinate” with PWB or their contractors. PWB has never presented any written proposal to First Student that would assure our ability to provide unencumbered service to the students of the area.

- Coordination with the PWB or their contractors to modify routes impacted by a massive, lengthy construction project would compromise First Student’s fundamental responsibility to deliver students to and from school safely and on-time every school day. Expectations that First Student would be required to coordinate with the PWB or their contractors during a multiple years long, fluid construction project. is unrealistic and would require “public services beyond those currently provided or planned for in the future”.

Consultant states: " As outlined on page 11 of the Project TIA, truck traffic associated with on-going Filtration Facility operations is forecast to be up to 25 per week. Only a fraction of these trips will occur at times when students and buses are active along the roadways."

Response:

- Consultant misconstrues First student’s previous testimony. Our concerns extend well beyond the on-going traffic related to filtration plant operations. It includes the regular transport of hazardous materials on rural roads and the estimated 308,000 heavy truck trips and 700,000 work force trips that the proposed project would entail. Consultant assertion that increasing traffic volumes does not increase traffic crashes is unsupported by evidence. However, evidence to the contrary is presented by Fire District 10 in their December 2022 testimony (see pg 12 & 13) that graphically displays the impact of increased traffic on vehicle crashes and accidents involving pedestrians and bicyclists. Fire District testimony also documents the fact that crashes on rural roads are twice as likely to result in fatalities as crashes on urban roads (see pg 14).

The proposed projects will create hazardous conditions on the rural roads for the students that we are responsible for safely transporting beyond the timeline given by PWB.

First Students one and only goal is to continue transporting the students in this community to/from school safely. Our hope is that you take the safety of our students and community members as seriously as we do.

Respectfully,

Tammy Rickman







Rebuttal Testimony in Opposition to Application T3-2022-16220

1 message

Terry <tciecko51@gmail.com>
To: LUP-comments@multco.us

Tue, Sep 5, 2023 at 8:01 PM

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

Please enter into the record, the attached rebuttal testimony in opposition to PWB Application T3-2022-16220.
Thank you very much.

 **Tammy Rickman Rebuttal.pdf**
212K