



Bull Run TREATMENT PROJECTS

Memorandum

Subject: Response to Comments Regarding Scenic Byway

Date: May 19, 2025

To: Multnomah County Hearings Officer

From: Portland Water Bureau

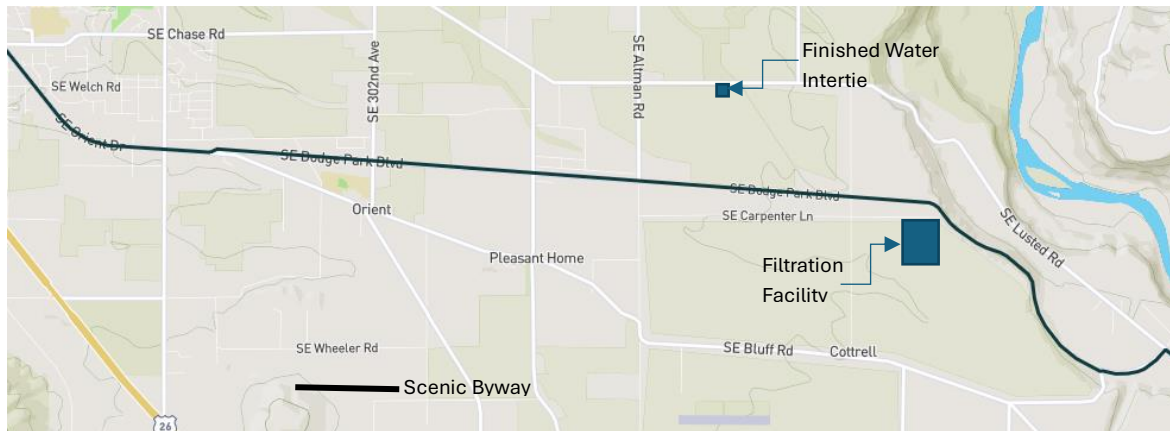
Summary of Testimony

Testimony submitted by John Swinford (S.11) and Cindy Bennington (S.18) claims that the filtration facility impacts scenic values and resources. John Swinford (S.11) alleges that the filtration facility “would permanently alter the character of the scenic byway [Mt. Hood Scenic Byway]...resulting in adverse impacts on natural resources...”. Cindy Bennington (S.18) states that Bluff Road, Lusted Road, Orient Drive, and Dodge Park Boulevard are officially recognized as part of the “American Byways Program” (sic), that the proposed water filtration facility and pipelines are centrally located in this same area, and that “The removal of 433 trees along Dodge Park Blvd ROW Habitat along with many other East County Country Roads represents an adverse effect to scenic views as a natural resource.”

Response to Testimony

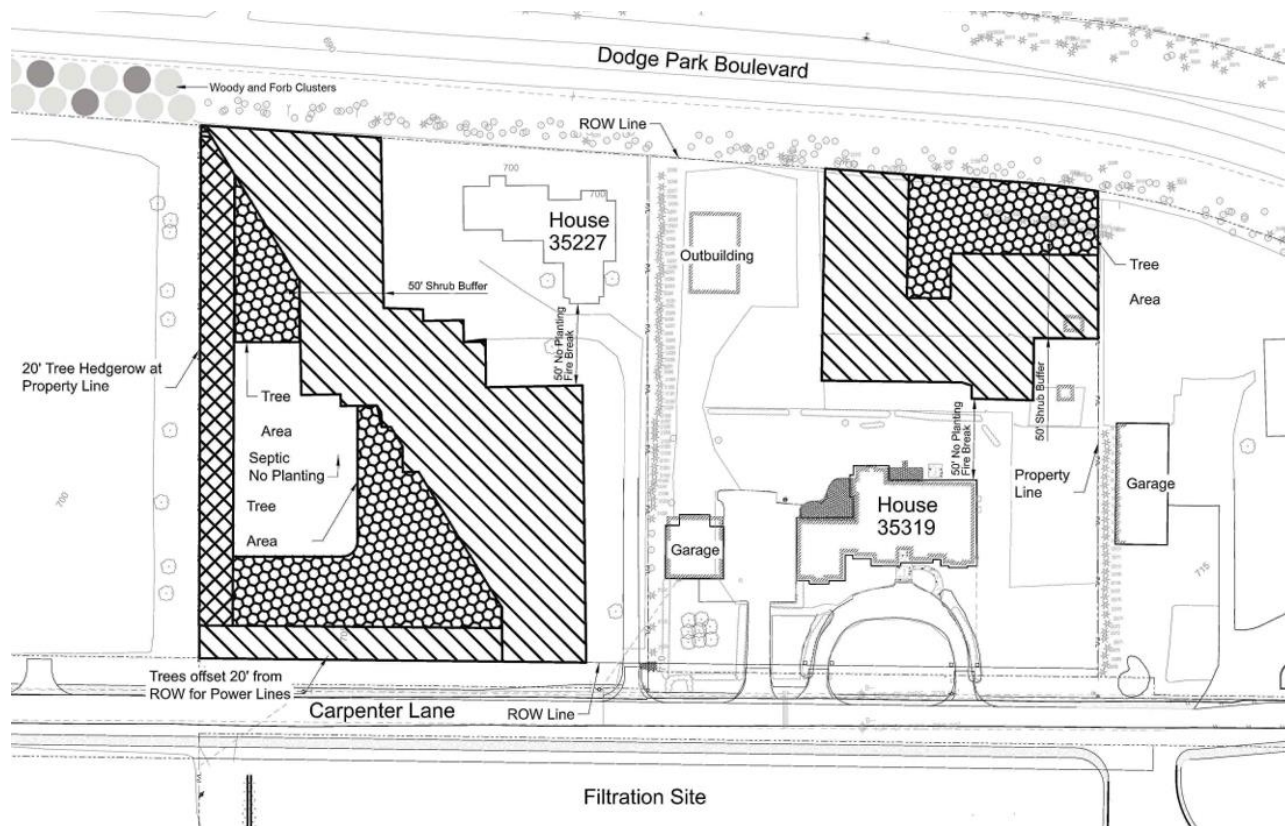
These statements rely on alleged conflicts with the mission of the National Scenic Byways Program. However, the project will not impact scenic views from along the route due to (a) the steep slope and differences in elevation of the Scenic Byway route relative to the filtration facility site; (b) the short distance (and relative driving time) of the area where the byway passes by above ground aspects of the project; and (c) perhaps most importantly, because the filtration facility was very intentionally designed to be consistent with views of agricultural and other facilities in the area.

As shown on the map below of the Mt. Hood Scenic Byway, from traveloregon.com, the route does not pass the intertie site nor the raw water pipeline connection.



Instead, the short section of Dodge Park directly north of the filtration facility site is the only area where a glimpse of the filtration facility site (or any other aspect of the project) might be possible. That section is approximately 1,056 feet long and corresponds with some of the area where the commenter is concerned about the removal of trees in the Dodge Park public right of way for pipeline construction.

To either side of that 1,056 foot section, the area's topography clearly creates natural visual screening between the filtration facility site and vehicles traveling along Dodge Park Blvd. In the 1,056 foot section, Dodge Park Blvd is still below the filtration facility site (it is approximately 15 feet lower in elevation than the properties on Carpenter Lane), and it is not clear whether a glimpse of the filtration facility could be possible, particularly given the existing homes and out buildings that are located along the Dodge Park Blvd right of way and the new landscaping that the project will add to those properties between Carpenter Lane and Dodge Park Blvd in this area. See Exhibit S.32, PDF page 51 (showing landscaping on Water Bureau owned properties north of the filtration facility site):



Even if a driver or passenger could catch a glimpse of the filtration facility driving along Dodge Park Blvd before the steep drop down to the river, assuming they are going at the posted speed limit for the 1,056 feet before passing the filtration facility site, that would only be a 13.1 second window in which to get a view. The Mt. Hood Scenic Byway is a 105-mile route from Troutdale to Hood River, which the document on page 2 of Exhibit S.18 explains will take 3 to 4 hours to complete – making this area of Dodge Park Blvd less than one tenth of one percent (0.09%) of the experience.

That 13.1 second potential for a glimpse of the filtration facility site, if there even was one given the topography and new landscaped areas, *would be consistent with views of agricultural and other facilities in the area.* The design of the filtration facility was based on a review of the architectural and rural context of the area. The filtration facility buildings are one- and two-story structures, designed to be consistent with the design of nearby farm, residential, and school buildings. The tallest structures in the area (seen in the graphic below as bright green) are the existing Pleasant Home Water District water tanks.

Moreover, the buildings are set in a depression and step down in height from the center to the edges of the site and are buffered from off-site views by elevated landforms planted with trees and shrubs. Even directly from Carpenter Lane (which is not along the Scenic Byway route), the view of the site is mostly of the landscaped berms, which were

specifically designed to screen views, and the bright green Pleasant Home Water District water tanks, which were pre-existing on a neighboring property and are not part of the project.

