

Rebuttal to S.32 - Aesthetic value of Natural Resources

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#T3-2022-16220

The Dodge Park Blvd (DPB) hedgerow that was clear cut for the Portland Water Bureau (PWB) filtration project was ecologically mature. It contained at least 324 trees, including 100 foot tall Douglas Firs, and numerous mature big leaf maples (E.9, pg 8). It was also visually appealing to neighbors and visitors who passed through.

Pages 1 - 4 of S.32 propose three mitigation plantings in response to comments on the loss of habitat from the (DPB) hedgerow. Two of three of S.32's mitigation planting proposals are brand new as of the open record period that closed on May 5, 2025.

Planting locations:

- Filtration Facility Site (figure 1). These are exactly the same as the ones proposed in exhibit A.1.a.
- Two new planting sites on residential Carpenter Lane lots (figure 2)
- New planting proposal along DPB (figure 3). The DPB mitigation planting is proposed to be a low growing native shrub hedgerow, devoid of trees due to root pipeline conflict concerns.

Aesthetic Value of Natural Resources - Original vs Mitigation Plantings

At least 46 neighbors in the 2023 original hearing period submitted statements detailing the aesthetic enjoyment they gained from the natural resources in the area. See Appendix A.

For example, Carol and Rick Bartha, H.22.e, wrote about their property on Dodge Park Blvd:

"If you have not lived in our community you will not fully understand its' character. We would like to share with you some of our experiences. On morning I was driving down Dodge Park Blvd on my way to work. Right before the top of the hill I was forced to stop and wait for a huge herd of elk to cross the road. I counted 25 elk, but did not see the elk at the front of the herd that crossed before I arrived. Later on I discovered that the herd that I witnessed is named the Sandy River Elk herd that migrates through the property where the PWB proposes an industrial site, then the herd crosses both Carpenter Lane and Dodge Park Blvd on their way to the Sandy River...."

...Our friends visiting from other areas remark to us that as they drive down Dodge Park Blvd to our home their blood pressure drops and they are in a very relaxed state of mind sitting on our quiet front porch looking at the trees and beautiful views."

This is from Natalie Vuroz, E.11. also on Dodge Park Blvd:

"We spend every evening sitting on our back porch, listening to chirping birds, watching frolicking squirrels steal from our bird feeders, and watching mother deer lead their fawns through our property. The deer cross Dodge Park at our property and head up the hill towards the property of the proposed filtration facility."

A replanted low lying hedgerow on DPB, and plantings on PWB owned private property will not support the same wildlife viewing and aesthetic experiences that people on Dodge Park detail in their statements. Aesthetic experiences are a vital aspect of the natural resource value.

And it is not just the people that live on Dodge Park Blvd. There are many more from surrounding areas over that cycle, walk, jog, ride their horse, or even just drive down Dodge Park Blvd. Why? To enjoy the aesthetic qualities of the natural resources that were there. In fact, Dodge Park Blvd is part of the "Mount Hood Scenic Byway" (Appendix B).

As Natalie Voruz continues:

"From spring to fall, we enjoy watching others take advantage of the scenic views along Dodge Park Blvd. On most days, you will find many bicyclists, walkers, joggers, and horseback riders enjoying the peaceful countryside."

That experience has already been lost.

Guy Meachem, N.10, who lives on Cottrell Road details:

"I walk along Dodge Park Boulevard 6 days a week 52 weeks a year at 6:00am rain or shine.

The trees along this road were a mix of Big Leaf Maple, Poplar, Western Red Cedar, Douglas Fir, some of these trees were over 70 years old (I counted the rings after they were cut down). There was also wild sown cherry trees and apple trees along with Pines, Hazel, native spirea Vine Maple and countless other shrubs in a strip that was between 25' – 50' wide. This strip was teeming with wildlife from small animals, amphibians (frogs & salamanders) even Opossums could be seen here as well as countless species of birds. When walking this mile long stretch of road every morning it was teeming with the sounds of birdsong and wildlife.

Now when I walk this road each morning there is silence there is no birdsong, no owls hooting, or birds of prey sitting on the wires waiting to swoop down on a meal.

I also cycle this road twice a day on my way to and from work, the trees provided welcome shade on my cycle ride home during the summer months there is no shade anymore for people or animals. This is a significant loss to the habitability for the whole area both for animals, people & plants alike.”

S.32, Exhibit 1, page 52 holds the planting plan for DPB. It calls for clusters of woody shrubs and forbs. The height of the shrubs at planting? 12-18”. Their mature height will be no greater than 10’ in the area that was once the DPB mature, diverse, over 100’ tall hedgerow.

To take points out from Mr. Meachem’s testimony, there is so much aesthetic value that will not be replaced by the mitigation plantings in the shrub-only hedgerow on DPB. The lack of variety in height and species will lack visual appeal. Opossums, Owls, and Birds of prey will not be able to utilize it. There will be negligible shade from less than 2’ foot shrubs. There will be no suitable nesting sites for most birds. There will be no dead-wood habitat. The shrub-only hedgerow will not mimic the mixed-height mature hedgerow ecosystem that was there, so people experiencing the location will miss out on the experience of the “teeming” wildlife of all the smaller critters.

At the facility itself, S.32, page 2, figure 1, highlights the “hedgerow features” that will be planted as mitigation.

However, this is the aesthetic view that someone who was used to enjoying the DPB hedgerow flora and fauna will see of much of their replacements:



Front entrance of facility on Carpenter Lane, May 2025

This is the front entrance of the facility. No community member or recreationalist is allowed to pass it. Those seeking aesthetic pleasure will not be able to aesthetically enjoy many of the mitigating natural resources planted at the facility.

There is 300 to 400 feet (.07 miles) of a mix of tree and shrub plantings that will be visible to the south side of Carpenter Lane if you walk along Carpenter to the entrance of the facility from the West. Since the plantings are at the end of the road right next to the facility entrance, a recreationalist would then need to slow down and turn around and walk back. The trees when planted will be a mix, with the largest between 5 - 15' tall, (N.56 pg 71). This height is not at all comparable to the 100' tall mature trees that were lost. It will take a long time for these trees to provide the same habitat values and resulting aesthetic viewing pleasures.

As for the plantings at the two privately owned lots on Carpenter Lane (S.32 page 3 figure 2), this will be the view of those plantings from DPB:



House 35319 and House 35227 as seen from Dodge Park Blvd, May 2025

The grade is steep here so none of the mitigating plantings that are on the private lots can be aesthetically enjoyed from the road.

From Carpenter Lane, there are no plantings proposed on the part visible from the road at House 35319. The view will continue to be of the house.

At house 35227 on Carpenter Lane we are able as a public to aesthetically enjoy some mitigating natural resources, as the full lot will be planted along Carpenter. There will be about 150 feet of trees that will be visible from Carpenter including some of the lost big leaf maple and Douglas fir. However, these trees will only be 6 feet when planted and will require years to resemble what existed before. 150 feet of immature trees falls far short of the .7 mile mature tree based ecosystem that residents and recreationalists were used to seeing along DPB.

In a final point, there are at least $\frac{3}{4}$ miles of plantings proposed on DPB alone. Who will care for these new plantings until they mature and get fully established? Who will water during the summer or periods of drought? Who will weed? Already invasive blackberries are taking over in the clear cut condition that DPB is in right now. New young plants will have a hard time competing. The County who is in charge of maintaining the ROW only mowed it one time in the last three years according to Mr. Meachem. These new plants will require a lot more care than that, otherwise they will be lost.

To sum up, the mitigation measures proposed by PWB will not replace the aesthetic natural resource value residents and recreationalists gained from the mature DPB hedgerow that was in place. That is if the new plantings get watered in the summer, survive, and aren't overtaken by invasive plants.

APPENDIX A

Statements submitted during the 2023 Multnomah County hearing period by community members detailing the aesthetic enjoyment they gained from the natural resources in the area.

Name	Address	Exhibit Number		
Julie Allot	33341 SE Carpenter Lane, Gresham	H.22.b		
Mary Appelt	624 SE Acacia Lane, Gresham	H.22.c		
Jeff and Mona Ayles	37184 SE Lusted Road, Gresham	H.22.d		
Rick and Carol Bartha	Dodge Park Blvd	H.22.e		
Laura Beving	5238 SE Oxbow Parkway, Gresham	H.23.a		
Kathleen Box	30403 SE Jackson Rd	H.23.b		
Dan Brink	no address	H.23.c		
Jim and Theresa Bunting	37039 SE Lusted Rd	H.23.d		
Terry Ciecko	3630 SE Hosner Terrace, Gresham	H.23.e		
Oriah Colombres	35719 SE Lusted Rd	H.23.f		
Cris Couter	36610 SE Dodge Park Blvd, Boring	H.23.i		
Lauren Courter	36610 SE Dodge Park Blvd, Boring	H.23.j		
Suzanne Courter	36610 SE Dodge Park Blvd, Boring	H.23.k		
Andrea Culver	35534 SE Bluff Road, Boring	H.24		
Braedon Culver	35534 SE Bluff Road, Boring	H.24.a		
Katrina Dawson	36605 SE Dodge Park Blvd, Boring	H.24.b		
Mike Dawson	36605 SE Dodge Park Blvd, Boring	H.24.c		
Samuel Diack	35547 SE Lusted Road, Boring	H.24.d		
Gloria Discoll	36000 SE Bluff Road, Boring	H.24.e		
Janet Edmonson	33318 SE Carpenter Lane, Gresham			
Patricia Fiedler	35840 SE Bluff Road, Boring	H.24.g		
Darren and Michelle Ford	36801 SE Dodge Park Blvd, Boring	H.24.h		
Amy Galasso	35715 SE Lusted Rd, Boring	H.24.i		
Robert Glasso, MD	35715 SE Lusted Road, Boring	H.24.j		
Penny and Michael Haight	31718 SE Lusted RD, Gresham	H.24.k		
Jennifer Hart	38200 SE Lusted Road, Boring	H.24.l		
Sharon Jones	9840 SE 362nd, Boring	H.25.e		
Mike and Carol Kost	35321 SE Carpenter Lane, Gresham	H.25.f		

Kramer	no address	H.25.g		
Debbie Layton	35534 SE Bluff Road	H.26		
Jamie Martin	3633 SE Oxbow Parkway, Gresham	H.26.a		
Holly Martin	39100 SE Lusted Road, Boring	H.34		
Doug and Pat Meyer	34835 SE Carpenter Lane, Gresham	H.26.b		
Kaitlin Mulkey	33144 SE Carpenter Lane, Gresham	H.26.c		
Jesse Nelson	38616 SE Lusted Rd, Boring	H.26.d		
Leslie Newberry	34546 SE Carpenter Lane, Gresham	H.26.e		
Kathleen Obrist	31619 SE Lusted Rd, Gresham	H.25.a		
Jodi Riehl	8031 SE Pleasant Home Rd, Gresham	H.25.c		
Diane Rolen	8207 SE Cottrell, RD, Boring	H.27		
David Shapiro	36014 SE Lusted Rd, Boring	H.28		
John Sieling	5238 SE Oxbow Parkway, Gresham	H.28.b		
Susan and John Swinford	7428 SE Cottrell Rd, Gresham	H.28.c		
Dean and Patricia Walter	Dodge Park	H.41		
Kristy McKenzie	34828 SE Carpenter Lane, Gresham	H.29		
Natalie Vuroz	37185 SE Dodge Park Blvd, Boring	E.11		
Laura Belson	35719 SE Lusted Rd, Boring	H.22.f		



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Please accept attached rebuttal testimony for case #T3-2022-16220.

Thank you.



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