

Date: 6 September, 2023

To: Mr. Alan Rappleyea, Multnomah County Hearings Officer

From: Jennifer Hart/ Black Gold Springs

Subject: TE3-2022-16220

Response to Testimony of Agricultural Soils Impact July 27, 2023 Submission
(Exhibit I81)

Below is my response to Denny Mengel's comment:

Exhibit E.1: Jennifer Hart comments dated June 26, 2023

Comment 3: "Putting pipes through fields and with the 100-foot construction easement will ultimately ruin the soil. The soil will never yield nursery stock as it did before construction. This has happened in several fields in the area."

Response to Comment 3:

See response to comment 1. Adherence to the contractor specifications as developed from the Agricultural Soil Restoration Plan **will** restore soil conditions as nearly as possible to pre-construction conditions. The reference to impacts to several fields in the area are not for pipelines installed according to the tight specifications included in the Water Bureau pipeline design and Agricultural Soil Restoration Plan. Much of the 100 ft wide construction easement will be used for storage of topsoil and subsoil, materials, and machine access —activities which will not require any digging, removal of topsoil, nor create any risk of soil mixing. These areas of temporary construction impacts will be exposed to compaction and **will** be ripped and plowed to restore soil tilth and infiltration capacity as part of the site remediation. The pipeline trenching itself will occur predominantly in an area that is currently, and will continue to be, a farm road. This further reduces the potential for significant impacts on yield, as the road area is not farmed.

Monitoring and additional remediation for two years will allow remediating any locations that show significant impact including tillage as agreed by the farmer and addition of fertilizer, mulch, or organic matter if needed. The area of the pipe trench and backfill will have topsoil preserved and replaced and **will** also have a 2-year period of additional remediation as needed to minimize the impacts of construction.

My Response: I am have worked as a Estate Manager since 1991. As an Estate Manager, I was required to do many large scale projects. One project, required me to bring in thirty three, 12 yard loads of soil. I had to dump the soil on a yard. The yard has never drained

since this project. The dump trucks, excavators, and loaders driving in the yard ruined the drainage -even after I tilled it up and replanted it. I am very aware of equipment compacting on soils. Mr. Mengel's states, "*Adherence to the contractor specifications as developed from the Agricultural Soil Restoration Plan will restore soil conditions as nearly as possible to pre-construction conditions*". The words will restore soil conditions as nearly as possible to pre-construction conditions, is a loose statement with no guarantee. Running thousands of dump trucks through a field is going to do damage to the soil. Rain will pack the top soil and subsoil, leaching out all of its nutrients. Oils from the trucks and equipment will not help the situation. Two years of remediation is not long for soils to settle on a ditch that size. This is a Mega Industrial Project, according to the PWB, I would think they would remediate a lot longer.

The CPO contacted Steve Culman, WSU Endowed Chair of Soil Fertility. He is a Soil Fertility Scientist. His study of Ohio Farmland that was effected by pipeline digging and other soil removal practices, showed that generally and often the soil never came bak to its original fertility after it was dug up. Even the 2- lift system did not work very well. The 2-lift system is what Denny Mengel's states as the new and improved method of soil removal. Culman stated, that the 2 lift system is not that new. The crews who do the removal are careless or worse, and certainly do not use "soft hands" in doing this type of work. Therefore, the so- called protocols that should be followed are not done with any real care and consequently the soil does not do well. He also mentioned that Oregon is a wet climate, the rain will pack the topsoil piles, ultimately ruining the soil. To restore the soil will be a difficult task.



File # T3-2022-16220 Comments on Exhibit I81

1 message

Jennifer Hart <sandyjen23@gmail.com>
To: LUP-Comments@multco.us

Tue, Sep 5, 2023 at 4:09 PM

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

Multnomah County,

Can you please add this to the record. F# T3-2022-16220

Thanks,
Jennifer Hart

 **Exhibit I81 Response-pdf.pdf**
88K