

September 5, 2023

To: Mr. Alan Rappleyea, Multnomah County Hearings Officer

From: Lauren Courter, West Slope Farms

RE: I.80 – Response to Public Comments Related to Farm Use Impacts

Mr. Rappleyea,

Please see responses to Mr. Prenguber’s statements regarding farm use impacts, identified by the county as Exhibit I.80.

Sincerely,



Lauren Courter  
Co-owner of West Slope Farms

*It is false and misleading to state Globalwise made no attempt to interview Mr. or Mrs. Courter or investigate the potential effects on their farm. There were two attempts to contact Mr. or Mrs. Courter, once by leaving a voice message on October 12, 2021, and once by follow up email that same day. No reply was received. [pg. 45]*

Response – We have no email record of Globalwise reaching out and neither Mr. Courter or myself received a phone call nor voice message from Mr. Prenguber or anyone associated with Globalwise. Additional attempts were not made after the supposed day he originally reached out on October 12, 2021. It is curious why Globalwise didn’t put forth a reasonable effort to get in touch given the importance of farm impacts by the project proposal. In the past, PWB sent certified mail by the postal service to ensure that their important communications had been received. It is clear that impacts to our farm was not important to his analysis.

*I was raised on a farm with goats and pigs as well as other livestock. I am familiar with the accepted farm practices for raising these farm animals as well as their reactions to noise. I have also been in contact with an Oregon State University Extension specialist concerning goats and their sensitivity to noise. For this reason, construction noise would not have a significant impact on the goats or other farm animals nor force a change in related accepted farm practices or the costs of those practices. However, the property owner has a concern, the Water Bureau will provide the sound deadening remedy of placing hay bales around a livestock pen or other facility to provide relief from construction sound. The Extension specialist said that this is an accepted farm practice for relief from noise.*

Response – Since Mr. Preguber is very familiar with the behaviors of goats and pigs, he would know that goats are easily spooked to loud and sudden noises. Typical responses are to frantically run, shake or freeze, and hide. We observed this with some of the construction of the solar field that is adjacent to their field. However, the noises generated from the construction of the facility across several years will be more significant than the solar field and dissimilar to the construction of buildings typically seen in our rural area. During the first Site Advisory Group meeting, we were told by one of the engineers that he personally would not want to live in our community due to the intensity of the noise. It is disingenuous and offensive to say that hay bales will alleviate the noise for our livestock. Furthermore, to say that placing hay bales around our livestock pen to dampen the sound would require hundreds or thousands of bales as our pen is over 2 acres. To simply say that Mr. Preguber raised goats and pigs as a child and had a single phone call with an OSU Extension expert without providing the transcript or evidence of that call makes the rebuttal to my argument poor at best. I am confident the scope and scale of this industrial project was not adequately provided to this expert when asking their opinion on noise effects to goats.

Responses to “Dust Impacts” (pp 5-8) as it relates to Mr. Preguber’s response to oral testimony by Lauren Courter outlined on page 45.

*Dust from the filtration facility site is not even a remote threat to neighboring farms for much of the year because of the high rainfall pattern and surface soil moisture. Dust generation there will not occur for about two-thirds of the year.*

Response – Mr. Preguber is correct that it rains for much of the year. However, during those months of rainfall, trees have either been harvested or being harvested. Furthermore, deciduous trees do not have leaves during most of that time, so photosynthesis is not at its peak. Dust generation will occur during peak growing season thereby affecting photosynthesis and growth.

*With the above-described dust control best practices in place, even during the limited season when dust can be an issue, dust will be managed and fugitive release of dust to adjoining properties will be held at a minimal level. There is no reason to expect that dust generation from the project will be significant to the point that adjoining farmers would need to implement extraordinary dust control measures or have protective equipment for their employees.*

Response – 1.25 million cubic yards of soil will be excavated on a massive scale across 2+ years. Dust generated from this type of excavation cannot be controlled with the BMPs outlined by Mr. Preguber in I.80. For example, watering roads, applying lignin, and washing wheels will not prevent acres of loose dirt plus the dirt to be transported and stockpiled directly adjacent to my property from entering my property and onto my blueberry bushes. Mr. Preguber states “While loading trucks from stockpile or excavation areas, when practical, conduct loading and unloading activities on the downwind side of the pile” (pg. 5). The stockpile area of approximately 124,000 square feet will hold 600,000 cubic yards of excavated soil less than 100 ft from my property. Practically speaking, it is impractical to say that loading and unloading

activities will occur on the downwind side of the pile. According to MWH-Kiewit (2023), a 87,000 SF of contractor space for staging, cranes, trailers, offices, parking spaces, equipment storage will be located on the typical downwind side of the stockpile location. If such activities can be accomplished at this location, our property is downwind of the downwind location. Therefore, Mr. Prenguber's statement that "*there is no reason to expect dust generation from the project*" is wholly false and misleading. Significant dust will be generated and the dust will thereby impact my blueberry farm.



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## Rebuttal to I.80, West Slope Farms - T3-2022-16220

1 message

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**Lauren Courter** <lauren.courter@gmail.com>  
To: LUP-Hearings@multco.us, LUP-Comments@multco.us

Wed, Sep 6, 2023 at 11:41 AM



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Please enter the attached document into the record.

Thank you,  
Lauren Courter



**I.80-Response-WestSlopeFarms.pdf**

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