

RE: Case File NO. T3-2022-16220 (Portland Water Bureau)

1 message

Suzanne <suzcc@me.com>
To: LUP-comments@multco.us

Wed, Sep 6, 2023 at 9:49 AM



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

Please accept this letter in rebuttal to the applicants hired consultant.

Response to Mr Pregel's rebuttal I.80 (Aug 8,2023) to my submitted exhibit E.20 (July 5, 2023) Multnomah land use code 39.7515 (C) (1) and (2)

Because he listed "farm affiliation unknown" for me in the heading on his rebuttal, to clarify I live next to Surface Nursery's farm located adjacent to the proposed water filtration facility site and I work, on a voluntary basis, on West Slope Farm's LLC farm next door.

Mr. Pregel (Globalwise) appears to not really be familiar with this local farming area because so many of his statements are not relevant to the farming practices here. He is an **economist** and his skills would better serve larger industry or larger study areas (like possibly how a loss of a particular product will effect the counties revenue) rather than some local farmers in a portion of a county farming individual farms. Analytical studies, market research etc. are skills of an economist but this is about these individual farmers which he is not and to say "grew up on a farm" is very different from being a farmer. Farmers are very familiar with all stages of their operations - from the soil, planting and harvesting schedules, employees and farm crews all the way up to financials for their individual farm.

Mr Pregel wrote:

Comment: *Severe impacts on Surface Nursery are unfounded.*

Response: Mr Shawn Nerison, VP of Surface nursery has account figures showing how much income is created from his trees and and therefore how much income Surface Nursery has lost and will lose from loss of product and loss of time from interference on roads traveling between the difference properties. Whether or not Portland Water Bureau has no obligation to lease land to Surface Nursery is irrelevant to the fact that Surface has already lost income from the land being forced out of production. Mr Pregel gives alternate routes for Surface which are impossible to use and he should know that if he actually knew this local area. Road closures for pipelines will prevent any access to one of his farm properties. Winter weather and the emergency access road construction will make some of the roads completely impassable. Quoting textbook statements about farming and looking at Google Maps does not constitute a valid knowledge and explanation of these rural farmlands.

Comment: Mr Pregel makes several general statements using terms like "as quickly as possible" "as soon as possible" "to the maximum extent possible" "so can end as soon as possible" "will not force a significant change in, nor significantly increase the cost of", "Farm trucks and most farm vehicles can travel at the posted speed limit on roads".

Response: Those generalized statements are not actually saying anything. I rarely come across a local farm vehicle on our roads that doesn't require reduction of speed for those vehicles traveling behind it. Those statements are meaningless. What does "as soon as possible" or as "quickly as possible" even mean? Those are not time references. To state that "no significant change in, or significantly increase the cost" are not relevant comparisons. For a farmer of a small farm a significant change would be a smaller financial amount than for a much larger farm operation, so again it would need to be a relevant comparison therefore nullifying his statements.

Comment: *"When pipelines go through EFU or MUA-20 land, the alternatives were reviewed and the route through the fields and the area disturbed was chosen for the least farm use impact, such as by following existing farm roads. Disturbed soils in fields are restored to high productivity as quickly as possible".*

Response: This statement means nothing because "as quickly as possible" leaves the possibility open that it will never come back to high productivity and could easily be longer than a farmer's lifetime. Study below shows soil doesn't really come back to any productivity any time in the near future. After five (5) years soil still had widespread disturbances.

ORIGINAL ARTICLE. Published online: 9 February 2023 "Evaluation of Pipeline Installation on Crop Productivity"

Soil degradation and crop yield declines persist 5 years after pipeline installations

Theresa Brehm Steve Culman, currently at Washington State University. Study done while a soil fertility specialist at Ohio State University

We observed significant degradation in soil physical properties, such as surface penetration resistance (15.3% increase) and mean weight diameter of soil aggregates (13.6% decrease) in right-of-way (ROW) areas compared with adjacent (ADJ) areas, respectively. Soils in ROW showed evidence of soil horizon mixing, with 25.0 g kg⁻¹ higher clay compared with ADJ areas. Soil degradation resulted in decreases of 23.8% and 19.5% in corn yields and 7.4% and 12.5% in soybean yields during 2020 and 2021, respectively. Widespread disturbance persisted 5 years following pipeline installation in soil physical, chemical, and biological properties. **Current best management practices of pipeline installation and remediation employed by three companies were insufficient to combat widespread soil degradation and crop yield loss.**

The objective of this study was to evaluate the impact of pipeline installation on soils and field crops after a 4- to 5-year remediation period, coinciding with the end of landowner compensation and when sites are considered fully remediated by pipeline companies.

Conclusion: To make the statement that this project "will not cause any significant change in accepted farm practices nor any significant increase in the cost of farm practices in the Surrounding lands" is unfounded since it already has (cost to Surface Nursery) and the traffic patterns Portland Water Bureau is recommending alone will effect everyone living out in this rural area, especially those making their livings as farmers.

Thank you,

Suzanne Courter

suzcc@me.com