August 4, 2023

## Project \# W02563 (Bull Run Pipelines)

## RE: Response to Exhibit E. 21 concerning Stormwater Runoff to Beaver Creek

In response to the comment provided in Exhibit E. 21 concerning the impacts to Beaver Creek from the activities of the pipeline and finished water intertie (FWI) construction, and long-term impacts from the facilities, we provide the following evidence of reduced impacts to the environment from the activities of the project.

According to Oregon Department of Environmental Quality (DEQ), the Sandy River's sub-basin of Beaver Creek has Total Maximum Daily Limits (TMDLs) for bacteria, pesticides, and temperature. The stormwater and erosion control features proposed with the Finished Water Intertie (FWI) Site will reduce the TMDLs leaving the area of impact by treating at least $80 \%$ of the total suspended solids (TSS) associated with stormwater discharge from the project. The design of the project has both construction and project completion best management practices (BMPs) associated with stormwater control, treatment, and mitigation. As compared to the current lack of controls for release of stormwater to the existing conveyance system which discharge to Beaver Creek, the proposed improvements should enhance the runoff water quality delivered to Beaver Creek.

As a part of construction, there will not be use of any pesticides. Only pesticides applied by others could be transported by runoff through the construction and completed site. During construction, the design of stormwater controls will include a sediment trap, silt fences and straw wattles at the perimeter of the construction area, as shown on the Erosion and Sediment Control Plan Sheet FWI-CE-1002. During construction, the newly created stormwater basin will be used as the sediment trap located in the top northern corner of the FWI site. These are all effective BMPs at removing pesticide laden sediment from runoff. Any runoff entering the construction zones will also be filtered through these BMPs. Hence, the overall impact to Beaver Creek from construction will enhance the water quality because of the proposed systems provided during construction.

At completion of the construction, pesticide-laden runoff from neighboring properties upgradient to the FWI site will enter a gravel cutoff trench installed at the upslope side of the FWI site, as shown in FWI-CE-1004 and Stormwater Detail Sheet FWI-C-4000 (attached to this response for reference). The gravel cutoff trench is shown as the hatched area at the southern portion of the FWI site. Gravel filtration is also an effective measure at removing TSS, which pesticides adhere to. After gravel filtration, the offsite runoff is routed to the existing catch basin in the roadside ditch along SE Lusted Road, which eventually discharges to Beaver Creek on the north side of SE Lusted Road. Sediment generated from the onsite FWI stormwater will be controlled through onsite biofiltration as shown in FWI-CE-1004 and Stormwater Detail Sheet FWI-C-4000. The treated onsite stormwater then discharges to an existing catch basin in the roadside ditch along SE Lusted Road. In the final stabilization, the FWI site will not use any pesticides for the onsite landscaping.

If you have any questions, please feel free to contact our office at 503-746-8812.
Respectfully,
Emerio Design LLC


Roy Hankins, PE
Senior Project Engineer
Attachments: Erosion Control Plan Sheets (FWI-CE-1002 and FWI-CE-1004) and Stormwater Detail Sheet (FWI-C-4000)




## EROSION AND SEDIMENT CONTROL NOTES





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SITE INFORMATION







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CUT AND FILL data: see table on esc-00s

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DESIGN ENGINEER
GEOTECHNICAL
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BMP





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