

# Orozco, Rafael S CIV USARMY CENWP (USA)

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**From:** Phil Scoles <pscoles@terrascience.com>  
**Sent:** Wednesday, July 19, 2023 3:14 PM  
**To:** Orozco, Rafael S CIV USARMY CENWP (USA)  
**Subject:** [URL Verdict: Neutral][Non-DoD Source] Re: Request for Additional Information, Irrigation Pond Sediment Removal-Placement, NWP-2023-24  
**Attachments:** Portland Golf Club sediment metals analysis (March 2021).xlsx; Portland Golf Club sediment metals analysis (March 2021).pdf

Mr. Orozco,

Here's the lab results from March 2021. Six samples were collected from different portions of the irrigation pond (which is locally called Junor Lake by the golf club). The samples were tested for some physical properties (like pH, sand, silt, clay and organic matter), which helps inform the contractor on the dredging process. They were also analyzed for arsenic, cadmium, chromium, copper, nickel, lead and zinc -- constituents that are sometimes associated with urban streets (hence runoff). The attached PDF files has the results on 1 page, while the attached Excel file has more detail about the detection or analytical method used by the laboratory.

Thank you for your review of this matter, as well as other aspects of the Joint Permit Application. Cordially --Phil.

At 3:07 PM +0000 7/18/23, Orozco, Rafael S CIV USARMY CENWP (USA) wrote:

Good morning Phil,

Regarding the Corps procedures, you are not required to submit responses to public comments. However, the previous email that I sent you summarized information that I would have also requested in a Request for Additional Information letter. Please provide that information as soon as possible.

Regarding the testing, the previous permit verification showed that the sediment had been tested, and that the attachment for that was listed in the permit application, however, I could not find that document in our files. Testing for heavy metals should be sufficient. I don't foresee the dredging of the material to be an issue with this permit application.

Also, I finished reviewing the submitted alternatives analysis. I will discuss my findings with some of my other staff this week, and will provide you with an update regarding that by the end of the week.

Thanks,

Rafael Orozco

Regulatory Project Manager

US Army Corps of Engineers

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Customer survey - <https://regulatory.ops.usace.army.mil/customer-service-survey/>

**From:** Phil Scoles <pscoles@terrascience.com>

**Sent:** Monday, July 17, 2023 4:55 PM

**To:** Orozco, Rafael S CIV USARMY CENWP (USA) <Rafael.S.Orozco@usace.army.mil>

**Subject:** [URL Verdict: Neutral][Non-DoD Source] Re: Request for Additional Information, Irrigation Pond Sediment Removal-Placement, NWP-2023-24

Greetings Mr. Orozco,

The applicant is looking for some guidance on the testing parameters for the sediment that would be removed from the irrigation pond. In particular, is there a standard set of constituents that should be tested. For example, I would expect offsite stormwater to have oils and grease, as well as some heavy metals. We tested for heavy metals, but no significant amounts were found (not above typical background levels). As you probably know, fertilizers get applied to the turf and naturally filter through the soil during the summer months. While rare, runoff occurs during the rainy season when fertilizers are not applied. I can inquire with the golf course for the kinds of fertilizers and other treatments, then generate a short list to be tested. Would that be adequate? Any feedback is most appreciated.

Also, I am wondering when you would like the project team to respond to the public notice comments. There were many comments, including ones from Oregon Dept. Fish and Wildlife, Tualatin Riverkeepers, and Trout Unlimited, and numerous neighbors. For example, is it satisfactory to address concerns with topic responses, rather than individual's concerns (many commentors had similar input). Related to the public comments, do you have questions about the alternatives analysis framework and details within that our team should respond to?

Thank you in advance for your thoughts on this matter. Cordially --Phil.

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