

via email: Michael.deblasi@state.or.us

September 30, 2025

Michael DeBlasi, Aquatic Resource Coordinator
Oregon Department of State Lands
775 Summer Street, NE 100
Salem, OR 97301-1279

**Re: Portland Golf Club Dredging Project, Washington County, Oregon
DSL File no. 63610**

Greetings Michael,

This letter serves as an updated response to the public notice comments for the above-referenced application to dredge Junor Lake and place the dredged sediment in sediment bags at Portland Golf Club ("PGC" or "applicant"). The original response letter was submitted on February 27, 2025. To quickly summarize, the dredging project will temporarily place sediment bags on upland west of Wetland A and have only temporary wetland fill impacts (in addition to sediment removal from the irrigation pond). In the past 6 months, the applicant has reduced proposed wetland impacts by eliminating a 0.05-acre temporary fill along the south edge of Wetland A. There are other minor project modifications, as detailed herein.

Over 90 comments were received during the public notice and this letter provides a response to all of the relevant comments (these were specifically identified by DSL on January 17, 2025). Responses are organized by topic, which is a more efficient approach than by commentor. Approximately 14 commentators mentioned permanent fill impacts to Wetland A, which suggests they might have commented on an obsolete version of the Joint Permit Application (JPA). Those comments were still evaluated in preparing this response, noting that topic is addressed by the final JPA.

1. There are alternatives for sediment disposal that have less impact to aquatic resources.

Applicant's response: The applicant prepared a thorough alternatives analysis as part of the Joint Permit Application (JPA) submitted to Oregon Dept. of State Lands and U.S. Army Corps of Engineers. The applicant originally proposed placing filled sediment bags within Wetland A, since the wetland was well positioned to facilitate seepage water capture and recycling the water back to Junor Lake. After substantial and detailed discussions with both agencies, the applicant revised site plans to place the sediment bags on uplands west of Wetland A. This revision eliminated all permanent impacts to Wetland A (0.72-acre). The proposed project will have only temporary impacts for check dams, coffer dam, and creek bypass pipe, as itemized in the final JPA. These temporary features will be constructed with plastic sheeting, sand bags, and plastic pipe – all hand placed and without any disturbance to creek bed or wetland or pond fringe. Since the project no longer proposes a temporary access along the south edge of Wetland A, the previous submitted revegetation plan is deleted.

In accordance with Clean Water Services (CWS) regulations, the sediment bags placement area will be separated from Wetland A with an undisturbed 50-foot setback. This vegetated corridor

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will be enhanced as part of the project, in accordance with CWS policies. In response to comments submitted during the public notice, PGC is relocating the temporary sump to the low point within the sediment bag placement area. Thus, recovered water will be captured prior to entering the 50-foot setback and Wetland A, then pumped back to Junor Lake. The sump will be decommissioned at the end of the dredging process, and the sediment bags covered with plastic sheeting during the rainy season.

2. The sediment should be hauled offsite rather than pumped into sediment bags situated west of Wetland A.

Applicant's response: The PGC application describes an excavation method for removing the accumulated sediment and a dredging method. The dredge method is less invasive and better suited due to logical constraints. Both DSL and Corps indicated the dredge method was appropriate. There is no practical method of pumping the sediment slurry directly into dump trucks, which leak water while driving on public roads. With dredging, the sediments either get pumped into a settling pond or into sediment bags. Both approaches separate the solids from the water; however, a settling pond requires large, flat areas to construct a containment cell. The golf course lacks sufficient space and topography for a settling pond. Therefore, sediment bags are the only approach to sequestering the sediment. The placement of the filled sediment bags on the upland west of Wetland A is temporary – 8 to 11 months to allow sufficient moisture to drain from the filter fabric sediment bags. The bags will be cut open and sediment loaded into dump trucks to haul to an authorized disposal facility, in accordance with DEQ administrative rules.

3. The filled sediment bags can be placed in the yard debris or turf farm area, rather than west of Wetland A.

Applicant's response The alternatives analysis included in the Joint Permit Application (JPA) explored this location for suitability of sediment bag placement. The yard debris area is in constant use by PGC to temporarily store tree and brush trimmings, downed trees, and stockpiles of soil, gravel and mulch. The yard debris area is also located on uncompacted filled land composed of mixed materials. More importantly, the yard debris slopes directly to Fanno Creek, and there is insufficient space to capture the seepage water from the sediment bags and pump back to Junor Lake. It would be a mistake to utilize such location when seepage water or sediment bags could enter Fanno Creek. The adjacent turf farm area is underlain by natural soil, but it is too small to accommodate the large number of sediment bags. It is approximately one-half the necessary size. Additionally, PGC actively grows sod at this location for turf repairs across the entire golf course. The sod needed for this golf course is not commercially available (it is specialized grass mixture instead of common landscaping sod). It would be unreasonable for PGC to destroy the turf farm when the placement area west of Wetland A has no adverse impacts to golf course operations.

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4. The dredged sediment placed west of Wetland A will pollute the soil and water.

Applicant's response: While PGC utilizes fertilizers and limited herbicides, they are applied to fairways and greens in sufficiently low concentrations and with setbacks to waterways so that no runoff occurs. Fertilizers and herbicides are applied only at times when rain would not occur afterwards (to prevent washing away). Therefore, no chemical discharges to Fanno Creek or Woods Creek occur. In contrast, the presence of contaminants in the accumulated sediment in Junor Lake are from offsite, upstream sources in the watershed. In particular, lead, copper, nickel, zinc, and cadmium are common metals originating in urban runoff from paved surfaces, roof runoff and landscaping runoff -- such contaminants have settled out in the still water of Junor Lake. The applicant's project in no way proposes to add any contaminants to soil or water -- just sediment removal and temporary placement on an upland location.

In preparation for this project, PGC tested the sediment for hydrocarbons (fuels, volatile organic compounds, PAH, etc.), metals, and herbicides). All laboratory results were submitted to Corps, DSL and DEQ. The sediment samples showed very limited hydrocarbon residues, which were likely conveyed to the pond via upgradient street runoff (such as engine oil drippings). Where detected, hydrocarbon concentrations were significantly below DEQ Clean Fill Screening Level Values (SLV). Additionally, chemical compounds were found in small amounts not surprising for an urban environment, and all detected amounts were below the applicable SLV. For metals, the sediment contains concentrations above the SLV for Copper (Cu), Zinc (Zn), and Lead (Pb). Such concentrations are from the result of material that washes off roads and homes (brake pads, roof materials, dust, maybe old lead paint fragments). The detected amounts of metals do not necessitate "clean up." Copper, zinc and lead are stable in moist to dry sediments. That is, these metals do not readily leach from pH-neutral soil materials when simply placed in sediment bags atop upland. In fact, the metals tend to bind with silt and clay soil particles; thus, there is no opportunity for them to leach into underlying soil or runoff in Wetland A or downgradient Fanno Creek. The removal of the accumulated sediment from Junor Lake is beneficial, and placement of the dredged material in sediment bags on uplands will not pollute the soil or water.

At the request of DEQ, a supplemental analysis was conducted for the seepage water proposed for return to the irrigation pond. Such analysis was the Modified Elutriate Test (MET) which mimics water from dredging that is discharged (via pump) to irrigation pond. The laboratory results indicated amounts of copper, zinc and lead were below action levels, so the seepage water from sediment bags can be returned to the irrigation. Appendix B of the final JPA includes the full sampling and laboratory analysis report.

5. The dredging process will have impacts to Fanno Creek and Woods Creek fisheries and water quality.

Applicant's response: The applicant has lift gates that connect Junor Lake to both Woods Creek and Fanno Creek. For the planned work, the applicant will close the lift gates; hence isolating Junor Lake from the creeks. As indicated in the JPA, the dredging operation will install a temporary pipe bypass for Woods Creek (which may be fish-screened if specified by ODFW). Such bypass will be used only during period the lake is isolated and to ensure sediment does not flow into Fanno Creek. Thus, fish passage will be compliant with ODFW specifications. As explained in the JPA, the water level in Junor lake must be maintained for floating the dredge, which will also allow any resident fish to have in-lake refugia. If prescribed by ODFW, the

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applicant will employ fish salvaging procedures, as well as fish screening on the temporary bypass pipe. The in-water work will also be compliant with ODFW specifications, or receive an extension if the dredging is anticipated after Sept. 30.

Any fine clay in seepage water from the sediment bags will be captured at the low point within the sediment bag placement area (aka temporary sump location). As a fail-safe precaution, the 50-foot vegetated setback and temporary check dams in the old railroad ditch will trap sediment if the sump overflows. Since the project will not discharge or leach water to Wetland A or the old railroad ditch, no direct or indirect impacts to water quality or fisheries will occur.

6. Clearing of brush and trees will adversely affect watershed conditions for Fanno Creek.

Applicant's response: The vicinity of sediment bag placement area slopes to Wetland A and an old railroad ditch (impounded by the old railroad berm). The ditch drains to a low terrace parallel to Fanno Creek. The proposed brush and tree clearing on upland will be 0.95-acre for temporary sediment bag placement, staging and driveway access to S.W. 83rd Avenue. The applicant will hand-place of dredge pipe, temporary check dams, coffer dam, and creek bypass pipe to avoid creating any ground disturbance.

Brush and tree clearing on uplands is not regulated by Oregon DSL. Such clearing is regulated by CWS and Washington County, so the applicant is coordinating with these agencies to obtain necessary permitting, and install and maintain erosion control measures during and after the dredging project. Additionally, CWS regulations require enhancement of the 50-feet setback around Wetland A, including removal of non-native brush and planting of native trees and shrubs. Compliance with CWS and Washington County regulations and ordinances assures no adverse effect on the watershed conditions for Fanno Creek. No brush or tree trimming is associated with the dredging part of the project.

7. The project will increase flooding within Fanno Creek floodplain.

Applicant's response: The dredging activity will remove sediment from Junor Lake and the volume of such sediment will be replaced with water. Swapping sediment for water in Junor Lake will not increase flooding within Fanno Creek or Woods Creek. The suction dredge simply loosens the accumulated sediment and pumps the slurry to the sediment bag placement area. Thus, the sediment removal restores the historic water storage.

The sediment bag placement west of Wetland A is located on uplands that are outside of the 100-year floodplain of Fanno and Woods Creeks, and the sediment bags do not create an impervious surface of sufficient size to increase flooding potential. During the process of filling the sediment bags, the seepage water will be returned to Junor Lake via the temporary sump. After decommissioning, runoff from the sediment bags will infiltrate into surrounding soil, as well as the 50-foot setback from Wetland A.

[continued on following page]

This is in stark contrast to the upgradient, offsite portions of Fanno and Woods Creeks, which continue to in-fill with new development and residential remodels that create permanent impervious cover that discharges directly to storm sewers that terminate at Fanno Creek. Thus,

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increased flooding is attributed to offsite development, not the placement of sediment bags west of Wetland A.

8. The project will adversely affect local wildlife.

Applicant's response: The golf course property is used daily, so most wildlife crossing the golf course occurs at night. During the dredging project, wildlife use of the southern portion of the property will temporarily decrease in the vicinity of the sediment bags; however, such wildlife is likely to return at night or use the 50-foot setback around Wetland A. If dredging activity at Junor Lake temporarily diverts wildlife away from the lake, such diversion will temporarily shift wildlife to Fanno Creek or Woods Creek for watering and forage near those resources. There are adequate water and forage opportunities for mammals and birds throughout the golf course, as well as offsite marshes on Fanno and Woods Creeks, or small ponded areas downstream. When the dredging operation is complete and decommissioned, the wildlife and wildfowl habitat will be available as it is currently, and long-term it will have more native shrubs and trees habitat (hence fewer invasive, non-native species).

The sediment placement area west of Wetland A involves clearing of mostly small, non-native trees, and shrubs. The understory vegetation is also mostly non-native forbs and grasses. Adjacent neighbors have noted observations of numerous mammals and birds in the vicinity of the sediment bag placement. Such animals are already acclimated to an urban environment that has significant stressors of yard maintenance noise, bike and people movement on Fanno Creek trail, street lighting, automobile exhaust, natural gas combustion, and related urban activities. The affected wildlife has constant movement in and out of the proposed sediment bag placement area. Given size and connectivity to Fanno and Woods Creeks corridors, such wildlife will have alternate nesting and feeding opportunities during the project in nearby areas. After enhancement, the 50-foot setback around Wetland A will provide wildlife habitat. The small grove of mature Douglas-fir trees will remain as habitat for small mammals, songbirds and predatory birds. Since the project does clear some brush and trees, it is expected that some birds will seek nesting opportunities elsewhere in the golf course or adjacent open spaces. Overall, the project minimizes wildlife disturbances and has no permanent loss of habitat.

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9. *Portland Golf Club has not met with neighbors and concerned parties to hear and/or incorporate their input.*

Applicant's response: While the applicant is not required to meet with neighbors or concerned parties, all stages of the application process are public. Several individuals opposed to the project have confronted and verbally mistreated the applicant's employees and subcontractors working in the vicinity of the Fanno Creek trail. PGC's fence and privacy fabric installed by PGC on its side of the fence have been vandalized. Due to safety concerns arising from agitated persons, the applicant has avoided potential confrontations. The public notice process resulted in a robust amount of comments, and the applicant is fully responding to public comments herein by topic. Numerous comments had similar concerns, so such topics are addressed collectively, rather than individually.

10. *The project unreasonably interferes with navigation, fishing and/or public recreation.*

Applicant's response: The Joint Permit Application specifically addresses this concern on Page 12. To summarize, the dredging portion of the project is located in Junor Lake and will not affect flows or navigation in Fanno Creek. While Woods Creek lacks navigation (too shallow), the temporary bypass for Woods Creek will last for four to six weeks and not unreasonably interfere with upstream or downstream fishing. There is no public recreation in the vicinity of the dredge location. The sediment placement area is upland on private property, so it lacks any navigation, fisheries, or public recreation. The placement of sediment bags will not obstruct or unreasonably interfere with existing use of the Fanno Creek trail.

PGC has deeded access easements that connect their land to adjacent residential streets. The applicant is coordinating with Tualatin Hills Parks and Recreation District (THPRD) to obtain necessary permits to cross Fanno Creek trail with equipment. Very little vehicle access over the trail at the terminus of S.W. 83rd Avenue will occur. The dredging contractor will provide an individual to momentarily halt pedestrian and bike movement, while an authorized vehicles cross the path. Pedestrian and bike movement will resume a few moments later when the vehicle crossing is complete. The contractor will not be allowed by THPRD to park on the trail. To protect infrastructure underlying the trail, PGC will employ steel or fiberglass matting atop of the asphalt trail if prescribed by THPRD and/or City of Portland (for subsurface sewer line). It may be necessary for the contractor to add a beveled board to assist with transition between asphalt and matting. Lastly, the dredge contractor will add construction signage to alert pedestrians and bicyclist of different surface conditions and to slow down accordingly. All such activity will be temporary and employed when access is needed via S.W. 83rd Avenue.

11. *The project does not have a public benefit; the project benefits a private golf club.*

Applicant's response: The applicant revised its application to avoid any permanent impact to Wetland A, and therefore it is not required under Oregon law to provide a public benefit. Similarly, Oregon Removal/Fill law allows DSL to issue permits to private land owners and organizations on the premise that project impacts are consistent with DSL standards and do not result in net loss of aquatic resources (mitigation measures are required to achieve no net loss). Even so, the proposed project will have a public benefit. Temporary jobs will be created for land preparation and dredging. The planned dredging will restore Junor Lake to its original depth – deeper water improves fish habitat. The removal of sediment from Junor Lake will

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improve water quality and flood capacity in Woods and Fanno Creeks, as well as remove sediment washed in from upgradient streets, roofs and landscaping. The project will also result in removal of non-native species and enhancement with native trees and shrubs in CWS's 50-foot buffer surrounding Wetland A, which will provide greater forage, nesting and perching habitat for small mammals, songbirds and predatory birds. While not required for application approval, the project will certainly create a net public benefit.

12. The project evaluation needs to consider cumulative impacts for future replacement of irrigation systems, greens, and bunkers rehabilitation, drainage pipe maintenance, and similar activities.

Applicant's response: The project scope consists of dredging accumulated sediment from Junor Lake and placing that material in sediment bags on upland west of Wetland A. Only the currently proposed activities involving aquatic resources are evaluated by Oregon DSL. The applicant proposed many measures to avoid and minimize impacts for the current project. Future maintenance and capital improvements not related to proposed aquatic resource impacts are not regulated by Oregon DSL.

13. The sediment bags placed west of Wetland A would release PFAS (microplastics); no long term plan for sediment bags.

Applicant's response: The applicant will purchase and utilize only sediment bags manufactured in accordance with Oregon law that are used widely in the State for large capital projects of various kinds. The assertion that the sediment bags will result in the release of PFAS or microplastics is unsupported. As mentioned, PGC will haul away the sediment to an appropriate disposal facility, in accordance with DEQ regulations. The empty sediment bags will also be hauled away for proper disposal, and the ground surface restored to a vegetative cover.

14. The dredged sediment would emit an unpleasant odor; sediment bags placed west of Wetland A devalue the recreational use of the Fanno Creek trail.

Applicant's response: As noted by a commentor, the dredged sediment is being relocated from an anaerobic environment (underwater) to an aerobic environment (in sediment bags). The relative surface area of the sediment bags is low in relation to the volume of the sediment bags. As the water drains out, then pumped back to Junor Lake for reuse, the sediment bags will become more dry and no odor should be apparent on the nearby Fanno Creek trail. From discussions with another golf course that used the same method for sediment removal and placement, PGC understands that no unpleasant odor is emitted from the sediment bags. Regardless, PGC will employ odor-mitigation measures as needed.

The visual impact of the sediment bags was mentioned numerous times in public notice comments. It is the intention of PGC to leave trees along the perimeter of its property to provide shade and visual screening of its work area. 0.95-acre of brush and tree clearing is anticipated in the vicinity of the sediment bags, staging area and temporary driveway access to S.W. 83rd Avenue. The property is also fenced and screened so that work on the property is not visible from the Fanno Creek trail.

15. Applicant needs to ensure that dredging will not result in the exceedance of its water rights.

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Applicant's response: The project involves removing accumulated sediment and does not propose to enlarge Junor Lake beyond its original contours. Junor Lake was constructed approximately 100 years ago, and the applicant holds a water right to store 7.2 acre-feet of water in the lake. Additionally, the applicant holds a surface water right that is used by diverting irrigation water through Junor Lake. Finally, the applicant holds groundwater rights with priority dates dating back to the 1930s and 1940s, and uses Junor Lake as a "bulge in the system" to irrigate the golf course property. Outside of the authorized storage and irrigation seasons, water flows through Junor Lake, and Junor Lake additionally provides capacity for floodwater. Thus, not all water that moves through Junor Lake is actually stored. The applicant conferred with the Oregon Water Resources Department (OWRD) to ensure no water use issues exist. OWRD confirmed that as long as PGC is not storing more water than authorized under its water rights, no water right issues are created by PGC's application.

16. The placement of sediment bags will change the hydrology of Fanno Creek.

Applicant's response: The 0.95-acre sediment bag placement area does not compose a substantial contributor to the hydrology and functioning of Wetland A. In particular, the hydrology source for Wetland A is primarily rainfall and upgradient stormwater delivered via a 6-inch diameter pipe that will not be modified by the project. The contributing area for the stormwater discharge is approximately 18 acres. In addition, there is a minor shallow ground water contribution from upgradient lands to the east and southeast (about 12 acres – difficult to assess due to possible capture by subsurface sanitary and stormwater lines). For comparison, the Fanno Creek watershed in this vicinity has a contributing area of roughly 5300 acres. The 0.95-acre utilized for sediment bag placement calculates to 0.02 percent of the Fanno Creek watershed (just below PGC). Of significant importance, Wetland A will be surrounded with a 50-foot setback. Such setback protect the upland-wetland interface, create afternoon shade that is cast into the wetland, and protect soils closest to the wetland. Given the small size of the sediment bags placement area, there will be no measurable increase or decrease water input to Fanno Creek. While the ground beneath the sediment bags may become slightly compacted, the weight distribution will be diffuse. This means any compaction is limited to the topsoil and the sediment placed on top of that soil will not be compacted. Soil surrounding the sediment bags will be uncompacted and capable of infiltrating typical rainfall rates.

17. The filled sediment bags and/or temporary access road will cause flooding of Fanno Creek trail; nearby homes could be flooded.

Applicant's response: The land in the vicinity of the sediment bag placement area slopes to the north by northwest (parallel to the paved trail). The contractor will install a temporary sump to capture all of the seepage water, then it will be pumped to Junor Lake to keep the dredge afloat. Additionally, there is a small, vegetated swale between the PGC fence and Fanno Creek that anticipated a minor amount of runoff and it gets redirected to the old railroad ditch (further north). As mentioned, access to the sediment bag placement area will be via S.W. 83rd Avenue, which avoids any disturbance to the inflow stormwater pipe to Wetland A. As such, no flooding will occur on the trail that is attributed to placement of the sediment bags.

Several commentors indicated existing subsurface drainage issues with their residences. Such homes are situated upgradient of the sediment bag placement areas, so any flooding is

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unrelated to the Applicant's project. The stormwater ditch along the south side of the Fanno Creek has multiple culverts under S.W. 82nd Avenue, and S.W. 83rd Avenue, S.W. 84th Avenue which ditch and culverts can become blocked with leaf and twig debris that may result in localized flooding. The maintenance of such ditch and culverts are the responsibility of Washington County and not PGC.

18. Compensatory mitigation is not adequate for proposed wetland and/or non-wetland waters impacts.

Applicant's response: Approximately 22 commentors checked a response box stating "Compensatory mitigation insufficient to compensate for adverse impacts." The dredging of the sediment removal from Junor Lake is considered self-mitigating. This infers the post-dredge environmental condition of Junor Lake is equal or better than pre-dredged condition. There are several necessary temporary impacts to non-wetland waters to accomplish the dredging, such as coffer dam construction, Woods Creek bypass pipe installation, and check dam placement. Such minor impacts are reversed by removal of the coffer dam, bypass pipe, and check dams. These are very surgical temporary impacts where no sandbags are left behind in the lake or Woods Creek channel. Sand bags and plastic sheeting are used in a similar manner for the old railroad ditch – a safety precaution in case the sump overflows. These temporary check dams are removed upon decommission by simply lifting out of the ditch. The temporary sump will be located in upland, so no wetland impact for that feature.

19. The golf balls in the sediment bags will be a source of pollution; filled sediment bags constitute an unpermitted landfill on PGC property.

Applicant's response: Golf balls are largely inert objects and when encased in aerobic soil material are not a source of pollution. Removing the sediment from Junor Lake, along with an unknown quantity of golf balls, is more beneficial than leaving the golf balls in the lake. Such material is not hazardous or toxic waste, as alleged in comments. When the sediment bags have drained sufficiently (several months), the applicant will remove the sediment and golf balls from the bags, then haul both to a DEQ-approval disposal facility.

20. Project will adversely impact State or Federal listed fish and amphibians.

Applicant's response: Approximately 6 commentors checked a response box stating "Expect adverse impact to State- or federally-listed species." There are no state or federally-listed species in Junor Lake, Wetland A, or the old railroad ditch. As indicated by Oregon Dept. of Fish and Wildlife (January 10, 2025), Fanno Creek and Woods Creek are fish-bearing streams; however, only winter cutthroat (federally-listed as endangered) occur only in Fanno Creek. The dredging project avoids Fanno Creek entirely. ODFW also identified Western painted turtles as present upstream and downstream of PGC. This species is listed as a state sensitive species, but is not listed as rare, threatened, or endangered. PGC have not observed such turtles in Junor Lake and such potential use is unlikely due to insufficient food sources (the pond is mostly unvegetated) and frequent disturbance by golfers and maintenance staff. Regardless, turtles are quick to respond to noise and vibrations in water, so ongoing dredging would discourage any turtles from utilizing the lake during the project, and the lake will not be dewatered during the project so that habitat is still available in the unlikely event that a turtle is present.

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ODFW also noted that Wetland A could support Northern red-legged frogs, a sensitive species, but not listed as rare, threatened, or endangered. Overall, Wetland A lacks standing water, since it slopes about 10 percent to the northwest (not suitable for frog egg masses). While it is not known if Northern red-legged frogs seasonally utilize Wetland A and/or the old railroad ditch, only two temporary check dams are proposed (about 50 sq. ft. each). As such, no impact to Northern red-legged frogs will occur.

21. PGC cleared vegetation without appropriate permits.

Applicant's response: PGC obtained a Service Provide Letter from Clean Water Services for clearing vegetation. PGC submitted the appropriate paperwork, paid required fees, and has the required permit. Such clearing is not regulated by DSL and is not part of the application.

22. Project may impact cultural or archeological resources.

Applicant's response: The project does not permanently fill any wetland or non-wetland waters. The Applicant's project only removes sediments washed in from Fanno and Woods Creeks. Junor Lake was previously excavated and no additional excavation will occur. Such actions do not necessitate a formal cultural resource survey, which was acknowledged by David E. Witt, a registered professional archeologist working on behalf of Confederated Tribes of Warm Springs Reservation of Oregon (January 08, 2025). The State Historic Preservation Office did not submit a comment during the public notice period.

23. Project may endanger drinking water.

Applicant's response: The project involves only non-potable waters (for dredging) and no intrusion into groundwater. As such, drinking water is not affected by this project.

24. Spraying recovered seepage water will harm trees within small grove of Douglas-fir.

Applicant's response: The applicant has removed the infiltration area from the project plan. Also, the project will not use sprinklers to spray water on the sediment bags with recovered seepage water (Cynthia Nawalinski (1/10/2025)).

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25. *Irrigation water could be purchased for \$40 per member per month.*

Applicant's response: PGC investigated an alternative to purchase water; however, water suppliers are not able to guarantee water deliveries, particularly during warm summer months when irrigation is needed most at the golf course. Recycled waste water is not available at the current time. Moreover, Junor Lake is an essential feature of the golf course, and not merely a source of irrigation water. This topic was addressed in greater detail in the JPA alternatives analysis.

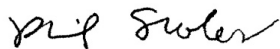
26. *Clearing of vegetation for sediment bag placement will have a climate change impact.*

Applicant's response: The proposed tree and brush clearing of vegetation is not regulated by Oregon DSL. Regardless, the area of brush clearing is too small to measurably affect climate change. Additionally, PGC will conduct vegetation enhancement pursuant to CWS requirements, which increases carbon sequestration and lowers temperatures in the vicinity of the enhancement plantings.

Michael, PGC greatly appreciates your review of this response letter and detailed responses to each topic raised by the comments. If any responses require clarification or additional information, please let us know – it is our job to address these concerns and topics to the satisfaction of Oregon DSL regulations. Thank you again for this opportunity.

Cordially yours,

TERRA SCIENCE, INC.



Phil Scoles
Soil and Water Scientist

Cc: Lonnie Lister, Portland Golf Club

F. Removal Volumes and Dimensions (if more than 7 impact sites, include a summary table as an attachment)							
Wetland / Waterbody Name *	Removal Dimensions					Time Removal is to remain**	Material***
	Length (ft.)	Width (ft.)	Depth (ft.)	Area (sq.ft. or ac.)	Volume (c.y.)		
Irrigation Pond	380	225	4	1.77-ac.	5300	Perm.	Sediment
Wetland A, B +C avoided							
G. Total Removal Volumes and Dimensions							
Total Removal to Wetlands and Other Waters					Length (ft.)	Area (sq. ft or ac.)	Volume (c.y.)
Total Removal to Wetlands							
Total Removal Below Ordinary High Water					380	1.77-ac.	5300
Total Removal Below Highest Measured Tide					N/A	N/A	N/A
Total Removal Below High Tide Line					N/A	N/A	N/A
Total Removal Below Mean High Water Tidal Elevation					N/A	N/A	N/A
H. Fill Volumes and Dimensions (if more than 7 impact sites, include a summary table as an attachment)							
Wetland / Waterbody Name*	Fill Dimensions					Time Fill is to remain**	Material***
	Length (ft.)	Width (ft.)	Depth (ft.)	Area (sq. ft. or ac.)	Volume (c.y.)		
Wetland C (coffer dam)	20	9	4	180 sf.	6.5	Temp.	Sand Bags, Plastic Sheet
Wetland C (ck. dams 1+2)	10	10	2	240 sf.	6	Temp.	Sand Bags, Plastic Sheet
Wetland C (bypass pipe)	440	1.5	1.5	660 sf.	37	Temp.	PVC Pipe, Plastic Sheet
Wetland A (check dam 3)	10	5	2.5	50 sf.	2.5	Temp.	Sand Bags, Plastic Sheet
Wetland A (check dam 4)	10	5	2.5	50 sf.	2.5	Temp.	Sand Bags, Plastic Sheet
(4) PROJECT DESCRIPTION (CONTINUED)							
I. Total Fill Volumes and Dimensions							
Total Fill to Wetlands and Other Waters					Length (ft.)	Area (sq. ft or ac.)	Volume (c.y.)
Total Fill to Wetlands					10	100 sf,	5.0
Total Fill Below Ordinary High Water					10 to 440	1080 sf,	49.5
Total Fill Below Highest Measured Tide					N/A	N/A	N/A
Total Fill Below High Tide Line					N/A	N/A	N/A
Total Fill Below Mean High Water Tidal Elevation					N/A	N/A	N/A