

July 20, 2022

Oregon Department of Environmental Quality (DEQ)
Northwest Region Office
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Attention: Kevin Dana, Cleanup Project Manager

Subject: Response to Comments on the Interim Stormwater Source Control Measure Design
Crawford Street South Site, Portland, Oregon
ECSI No. 2363
File No. 6209-010-01

This letter responds to comments prepared by HydroAnalysis on behalf of the Five Tribes on the Interim Stormwater Source Control Measure Design for the South Crawford Street Site located at 8524 N Crawford Street in Portland, Oregon (the Site). The Oregon Department of Environmental Quality provided these comments to Crawford Street Corporation (CSC) and Steel Hammer Properties LLC on June 28, 2022 and requested the comments be addressed in a revised Interim Stormwater Source Control Measure Design memorandum. Responses to HydroAnalysis' comments are provided below and the revised Interim Stormwater Source Control Measure Design is transmitted with this letter.

HydroAnalysis comments are presented in italics followed by our response in regular font.

RESPONSE TO GENERAL COMMENTS

1. *The Design Memorandum fails to clearly specify the interim drainage measures to be taken at the site. Page 5 has a section entitled "Interim Stormwater Source Control Measure Design," but that section fails to provide a clear explanation of the measure. There is reference to a stormwater barrier and "proposed berm" but no clear description or design sketch of what actually is planned to be installed. More details appear later in the Design Memorandum, on page 7, but the initial description on page 5 would benefit from additional detail.*

The detail provided in the Stormwater Barrier Construction on page 7 (of the May 25, 2022 version of the memorandum) has been copied into the Interim Stormwater Source Control Measure Design section on page 5.

2. *Page 7 of the Design Memorandum states, "The stormwater barrier will consist of a 1-foot-tall earthen berm covered with a protective apron and secured by landscape staples and gravel." The nature of the*



apron is not clearly described. Attachment A (GeoEngineers, 2022b) indicates the apron will be impermeable. If that is the intention, page 7 of the Design Memorandum should be modified to say, “impermeable protective apron” rather than simply “protective apron.” Better still, we recommend the report indicate the specific geotextile product that will be used.

The language has been revised to be “impermeable protective apron” to more clearly identify the nature of the apron.

3. Presuming the barrier is intended to be impermeable, the proposed stormwater barrier does not appear to have been adequately assessed. The stated purpose of the berm is to prevent run-on onto the site. To do so, the flow that would otherwise be run-on needs to be diverted elsewhere, and the memorandum provides no indication of where that will be. The landsurface-elevation contours in Figure 2 suggest all of that flow would be diverted along the berm onto the property to the west. Thus, it appears that flow that is now dispersed over several hundred feet and mostly infiltrates will be concentrated as channel flow at the northwest corner of the site along the proposed berm. This design seems likely to exacerbate rather than control erosion. Overall, the plan needs to be assessed more completely.

As presented on page 1 of the memorandum, the stated purpose of the berm is to “prevent stormwater from flowing onto **or off of** (emphasis added for clarity) the Site until redevelopment of the Site is initiated.” It is not the responsibility of the owner of the Site to manage and control off-site stormwater—that is the responsibility of the owner of the property on which that stormwater is generated. Stormwater running onto the Site is primarily from the Crawford Street North property, which is currently owned by Ardent. It is our understanding that Ardent is selling the Crawford Street North property for redevelopment and stormwater management will be incorporated into their development plan. In the interim, the Crawford Street North property owners could develop an interim stormwater management plan to prevent run-off from their property at the direction of the DEQ or the City of Portland.

RESPONSE TO EDITORIAL COMMENTS

4. Figure 3 of the Design Memorandum refers to Figure 7 for details on the stormwater barrier; however, Figure 7 is not included in the memorandum.

Figure 3 has been revised to remove the reference to Figure 7; the information from Figure 7 was added to Figure 3 and, therefore, Figure 7 was redundant and removed from the memorandum.

5. Citations are incorrect throughout the document. There is a citation on page 5 to GeoEngineers, 2022, but it is not included in the list of references. Figures 4, 5, and 6 cite the recent draft City of Portland (COP) Erosion and Sediment Control Manual (COP, 2021) as the source; however, the illustrations are in fact from the 2008 edition of the manual (COP, 2008). There is also on page 5 a citation to COP, 2020, but it appears in the list of references as COP, 2021.

Citations have been reviewed and corrected.



If you have any questions regarding this response to comments or the revised Interim Stormwater Source Control Measure Design memorandum, please do not hesitate to contact me at 503-577-1535 or aspencer@geoengineers.com.

Sincerely,
GeoEngineers, Inc.



Amanda Spencer, PE, RG
Principal Hydrogeologist

cc: Mat Cusma, SSI (pdf)
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