Trant Lindsay

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Sent:	Wednesday, April 15, 2015 3:58 PM
То:	Davidson Ian; Trant Lindsay; Rep Clem; Rep Gilliam; Rep Gomberg; Rep Helm; Rep Post;
	Rep Witt; Rep McLane
Cc:	Rep Hoyle; Sen Edwards C
Subject:	No on HB 2666
Attachments:	Karen Reed Register Guard opinion on HB2666 published 25Feb 2015.pdf

Dear Members of the Oregon House Committee on Rural Communities, Land Use, and Water:

I have attached a guest column I wrote about HB 2666 that was published by the Eugene Register-Guard on February 25, 2015. I have added some further points below.

I strongly **oppose HB 2666** which would make it nearly impossible for any proposal to mine gravel on Classes I and II soils to be defeated.

Not all farm soils are created equal. Class I and Class II soils are the ones that have the potential to grow the widest variety of crops. Those soils are essential for growing most vegetables, fruits, and nuts in the State of Oregon. We need the potential to grow food locally, especially as drought overwhelms California, costs of transporting food climbs, and our population and the world population grows. We can't count on getting our food from someplace else into the future.

The term "farm use" in reference to reclamation of farmland is intentionally misleading. The gravel industry claims that land is reclaimed to "farm use" after mining. Many people assume that the gravel industry means that they reclaim the land back to its original condition, but that is not the case. Reclaiming the land to "farm use" does not mean returning the land back to its pre-mining productivity. In almost all cases, reclaiming to "farm use" means creating a hole in the ground that becomes a pond. Refilling the hole to bring the land back up to a level where it could be farmed would require obtaining a tremendous amount of fill from some other source to replace the rock that was mined. Just filling the hole wouldn't return the land to its original productivity, anyway. The fertility and permeability inherent in Classes I and II soils would be lost. The gravel industry has sometimes claimed that they stockpile the topsoil and then replace it when they reclaim land after mining, but even if they replace some of it, sometimes, they don't replace all of it. If they did, they wouldn't be able to sell topsoil, which they do.

Jobs in mining are short-term; jobs in farming are long-term. Number of jobs from mining are equivalent whether mining alluvial gravel or basalt. The gravel industry is that gravel mining creates jobs. Yes, there are jobs in mining, but essentially the same number of jobs exist whether the mine is a gravel mine in the fertile soils of the Valley bottom or a basalt quarry where the soil is thin and less fertile. A study by EcoNorthwest in the early 2000's showed no difference between the number of jobs created in the two types of mining aggregate. Both types of mining need crushers, truck drivers, heavy equipment operators, etc. Mining the Valley bottom causes the loss of jobs on the farms themselves and throughout the greater farm economy. An additional fact is that mining is temporary. As an extractive industry, when the rock runs out, so do the jobs. Farming the land has the potential to go on forever providing food and jobs in perpetuity.

The quality of aggregate from basalt can equal or exceed that of alluvial gravel. Abundant sources of high-quality basalt occur throughout the Willamette Valley. The gravel industry claims that they need the Valley bottom gravel because it is better quality than quarried rock. That is a bogus claim. The quality of rock

in both river bottom mines and in rock quarries varies from place to place, but there is abundant high quality basalt rock distributed throughout the Willamette Valley close to where it is needed. For high quality concrete, river gravel often does not meet the standards required because the rounded, clay-coated surfaces to not adhere as well to the cement. Also, rounded rock from alluvial sources (from the river bottomland) doesn't pack as well as angular rock. It is clear that quarried rock can be used in nearly all situations because many parts of the country, and even within Oregon (such as in the Bend area) alluvial sources of gravel do not exist. Those places rely solely on quarried rock, and do just fine. If the quarry and cement workers in those places have the skills to use the rock available to them, the Willamette Valley gravel industry should be able to do the same. Indeed, there are many operating basalt quarries doing just that in the Willamette Valley already.

Basalt mining avoids destruction of high-quality soils, and uses less land surface area. One more advantage of mining basalt instead of mining in the Valley floor is that much more rock can be mined from a given areal footprint when basalt is mined. Alluvial gravel is typically in a thin layer under the soil, so a lot of land above the gravel has to be destroyed for a given volume of gravel. A rock quarry can be small in area but deep, so that much less land is disturbed for the same given volume of gravel, and the soil above the basalt typically is thin and not very fertile.

The aggregate industry misrepresents and inflates transportation costs. The aggregate industry has claimed that it needs Valley bottom gravel to keep transportation costs down. This is a false claim because there are sources of high-quality basalt up and down the Valley. Also, the aggregate industry, seconded by the DOGAMI (Department of Geology and Mineral Industries) and ODOT (Oregon Department of Transportation), asserted in the early 2000's that the cost of transporting aggregate was so high that it would be prohibitive to get aggregate from any other source than from river deposits. At that time they said the cost was \$.25 per ton-mile by truck, but they could not substantiate that claim. At first ODOT claimed the figure came from a consultant's report, but when asked to show that report, ODOT claimed that the report was not for public view. A survey of the cost of transporting aggregate in other states around the country revealed that the figure cited by ODOT and the aggregate industry was about double that of the rest of the country. It appears that the \$.25 per ton-mile figure was pulled out a hat and was inflated for the purpose of supporting the aggregate industry's assertion that it was necessary to mine the gravel under the best farm soils because otherwise the cost of transporting the aggregate would be prohibitive. (Rail and barge transport is much less expensive than truck transport.)

Aggregate mining versus farming is not an either/or choice. Destroying our best farmland for ephemeral jobs and profit is short-sighted and, frankly, stupid. It isn't necessary to make an either/or choice between gravel and high-quality farmland because we can have both. We are lucky in the Willamette Valley to have sources of aggregate that do not require destroying our most fertile soils.

I urge you to kill HB 2666.

Sincerely,

Karen Reed