

PUBLIC HEALTH DIVISION
Drinking Water Program

John A. Kitzhaber, MD, Governor



800 NE Oregon St, Ste 640
Portland, OR 97232
Ph. (971) 673-0405
Fax (971) 673-0694
<http://healthoregon.org/dwp>

August 11, 2011

Mr. David G. Shaff
Administrator
Portland Water Bureau
1120 SW 5th Ave., Room 600
Portland OR 97204

Dear Mr. Shaff:

This letter requests additional information on several topics relating to the City of Portland's LT2 water treatment variance request.

- 1) **Ownership and use of lands within and adjacent to the Bull Run watershed (Figure 2.8).** We request a larger detailed map with information about specific ownership of and uses of lands within and adjacent to both the hydrologic boundary and the management area boundary, known accesses including roads and trails with any gates and/or fences, and known potential contamination sources and locations. Please also submit information on known use by hikers and pack animals of recreational trails including the Pacific Crest Trail within or adjacent to the area boundaries.
- 2) **Existing federal, state, and local legal controls on the Bull Run watershed.** We request copies of all the legal control documents currently in effect, including statutes, contracts, agreements, and regulations.
- 3) **Future projected impacts of climate change and reforestation.** We request any analyses that the Water Bureau has commissioned or prepared on the likely future impacts of climate and vegetation changes on the future nature of the Bull Run raw water source.
- 4) **Cryptosporidium testing and data analyses.** We request the following information on this topic:
 - Recovery rates from Cryptosporidium analyses in historical sampling prior to the LT2 rule.
 - Rationale for not using standard ova and parasite concentration and immunofluorescence methods on scat samples.
 - Age of scat samples and impact of age on likelihood of finding oocysts.
 - How the Poisson distribution formula described in footnote 10, p 3-5 was adapted from Johnson, et. al. 1994.

Our review of the City's variance request is continuing and we look forward to receiving this information by the end of August, if possible. I will be out of the office until August 22. Please contact Carrie Gentry of our office at (971) 673-0191 if you have questions before then.

Sincerely,

A handwritten signature in blue ink that appears to read "Dave Leland".

Dave Leland, PE, Manager
Drinking Water Program

cc: Ed Campbell, PWB
Gail Shibley

Received

AUG 15 2011

**Portland Water Bureau
Administrator's Office**