



# FRIENDS *of the* RESERVOIRS

*Citizens joining to protect Portland's historic reservoirs and water system*

3534 S.E. Main Street, Portland, OR 97214      [www.friendsofreservoirs.org](http://www.friendsofreservoirs.org)

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Mayor Ted Wheeler  
1221 S.W. 4<sup>th</sup> Ave.  
Portland, Oregon 97214  
**sent via e-mail**

June 14, 2017

Dear Mayor Wheeler,

Re: No Bull Run Treatment Plant

Thanks to our forefathers Portland had been blessed for well over 100 years with a treasured perfectly designed water system from forest to faucet, a pristine watershed producing pure, safe, minimally treated Bull Run water and marvel of engineering open reservoirs. Friends of the Reservoirs appreciated your statement during the Mayoral campaign that the city should have fought harder to retain Portland's open reservoirs. Ratepayers and citizens are now suffering the consequences of the city's failure to fight for sound science and its perfectly designed water system. Indeed, Portland should have fought harder to retain its Mt. Tabor and Washington Park open reservoirs as a functional part of our water system.

We implore you to fight to avoid an unnecessary Bull Run treatment plant as it will provide no measurable public health benefit, create new public health and ecosystem risks, and make Portland's water even more unaffordable. Introducing new costly and unnecessary toxic chemicals, acrylamide, alum, iron salts and other polymers and negatively altering the taste and composition of our water is contrary to long-standing community values. Portland must resist in order to protect the ecosystem and the purity of Bull Run water from the risks of breaking mercury bulbs and more human activity in the watershed. Any new treatment plant will only add to the city's carbon footprint. Please fight to protect ratepayers from the enormously costly creation of an endless cycle of building and rebuilding treatment plants to address a "problem that does not exist" benefiting only cozy consultants and water industry corporations.

There remains no scientific evidence of any infectious *Cryptosporidium* being found in Bull Run drinking water. More than 115 years of history demonstrates that pure Bull Run water is safe and

free from infectious forms of *Cryptosporidium*. The goal of the one-size-fits-all EPA LT2 rule is to reduce the level of disease in the community from drinking water. There has never been any disease in the community from Bull Run drinking water. Intensive disease surveillance found fewer cases of Cryptosporidiosis during the Water Bureau's recent period of "detects" than are usually found in the community from other sources. Historically public swimming pools (Sellwood Park pool, Clackamas Aquatic), daycare centers are the sources of *Cryptosporidiosis*.

EPA's Long-term2 Enhanced Surface Water regulation (LT2) was flawed from the start. The EPA LT2 draft and final rule relied on flawed data, and unproven modeling of risk and benefit estimates, utilizing a sampling method that does not distinguish between the majority harmless (noninfectious) *Cryptosporidium* species and the few species that are infectious to humans. In establishing the LT2 rule EPA controversially counted as positive detects dead, degraded (hollow and harmless) oocyst organisms. This is why every other large unfiltered water system (Unfiltered Working Group, 2004) in the nation (Seattle, Tacoma, San Francisco, Boston, and New York), every system except the Portland Water Bureau jointly submitted lengthy, substantive, scathing comments to the draft LT2 rule (most of these utilities also submitted substantive individual comments as well). They not only addressed the flawed sampling methodology used by EPA, but addressed EPA's erroneous estimate of benefits. The actual number of annual *Cryptosporidiosis* cases from all sources like public swimming pools and daycare centers in these cities did not come anywhere close to EPA's estimate. The Unfiltered Working Group water system's joint comments also included concerns regarding unscrupulous interest groups who would use this rule to taking advantage of communities.

The American Water Works Association Research Foundation has repeatedly over the years commented on EPA's flawed sampling method, as well as EPA's overestimation of risk and benefits. In 2008 and 2009 the Portland Water Bureau participated in an American Water Works Association Research Foundation scientific *Cryptosporidium* study (AwwaRF 3021) as the only non filtered utility in the study. The study utilized an improved sampling method, sampling a massive 7000 liters of finished drinking water at the outlet of Portland's open reservoirs. A total of zero (0) *Cryptosporidium* were detected. The AwwaRF 3021 researchers concluded that Portland and all participating utilities already meets the goal of the rule which is to reduce the level of disease in the community from *Cryptosporidium*, *Giardia* and virus. At one point, when confronted with the study results the Portland Water Bureau admitted that this study vitiated the LT2 rule, but said that by the time EPA corrected its mistakes, all of the treatment plants would be built.

The 1993 *Cryptosporidium* outbreak in Milwaukee Wisconsin involved the failure of a costly, state-of-the-art filtration plant that allowed human and cow sewage present in their watershed to back flow into their drinking water. All significant public health outbreaks related to drinking water systems have involved human or cow sewage. Bull Run watershed protections that keep humans ( human activity) and cows out of the watershed have proven to be Portland's best protection against not only infectious *Cryptosporidium* species, but against other contaminants including pharmaceutical contaminants. Watershed protection is the best protection against the harms from chemicals and mercury associated with costly treatment plants.

When in 2007 organizations including Friends of the Reservoirs, the Portland Water Users Coalition, and Physicians for Social Responsibility helped secure unanimously approved legislation for a state clean water “variance” provision in line with the federal “variance” provision we did not do so such that Portland would be forced to build a Bull Run treatment plant based on a flawed sampling method for no measurable public health benefit.

In December 2011 immediately after the November 2011 notice of Portland's securing the LT2 source water “variance”, the Portland Water Bureau proceeded with a Land Use (LU) process in Clackamas County which would allow them to fast-track a UV Radiation Bull Run treatment plant when predictably EPA's flawed sampling method detected non-infectious *Cryptosporidium*. The PWB had crafted a Bull Run Watershed Master plan of projects, a long list of watershed construction projects including the construction of multiple buildings, a UV Radiation treatment plant, and other structures including logging to build LEED-certified buildings, a waste water treatment facility. The PWB failed to notify community stakeholders, budget committees or City Council of this Land Use action. A few days before the Land Use hearing Friends of the Reservoirs received an anonymous e-mail alerting us. The Water Bureau was securing a 10-year permit for a UV Radiation treatment plant and other watershed construction projects. A consultant paper detailing the risks to Bull Run water and the watershed from breaking mercury bulbs was subsequently presented at a conference in Paris but withheld from the Portland community.

**Portland's Bull Run water continues to meet federal filtration avoidance criteria. Just as there is no reason to build any Bull Run treatment plant there is certainly no reason to construct a \$400 million filtration plant.**

**Turbidity:** Despite storm after storm this last winter, annual turbidity including during rain events was very low, below 1 NTU. The action level is 5 NTU. In 2015 turbidity was at or below 3 NTU including during 3 winter rain events. Turbidity related to human activity is less of a problem with the decommissioning of the logging roads.

**Emergency Backup: Multiple backup supplies exist to address emergencies:** Columbia South Shore Wellfield. Huge costs were incurred in building and cleaning up the CSS Wellfield so that it could serve as a back up when needed. Powell Valley wells were acquired in 2006. Additional back up supplies include regional interties, linkage of several municipal distribution systems were developed in last decade (without any public involvement, considered top secret). Costly construction of a Bull Run dam variable intake structure to divert cold water for fish. How much more money do we need to spend on back up systems?

**Water Demand:** While population has increased water demand had declined-see PWB graph showing usage decline between 1988 and 2006 the year Powell Valley customers came on board. See PWB water consumption data through 2016 showing water demand remaining low. Tualatin Valley, a large wholesale customer will be leaving Bull Run in a few years. Drinking water supply augmentation is needed relatively few times. More than \$425 million was spent to reduce in town storage by 50 million gallons via the elimination of open reservoirs (which held 50MG more water than the replacement underground tanks.)

Portland is capable of conserving more than we do, if ever necessary.

**Fire:** Big fires in watersheds are most often caused by humans and human activity (construction). The largest and most devastating fires in the Bull Run watershed subsequent to human settlement were fires ignited by humans. The risk from a devastating fire has been

considered so remote by the PWB that many of the community-suggested additional fire prevention measures were deemed unnecessary. Conversely, most catastrophic fires lead to shutdowns of filtration plants. Keeping humans out of the watershed is the best protection against major fires. Bull Run tours should be drastically cut if the PWB has any watershed fire or contaminant concerns.

**Future Regulations:** Evidence does not support the argument that construction of a filtration plant anticipates any future one-size-fits-all regulations. In fact, filtration plants do not remove pharmaceuticals such as those found at the Columbia South Shore Wellfield (estrogens, psychotropics, pain killers etc.), the most likely target of future regulations. Watershed protections keep these contaminants out of Bull Run.

Those who planned our Bull Run system knew the risks of human entry in a drinking watershed of this importance.

Why did the Portland Water Bureau keep secret their March 2017 letter to the Oregon Health Authority (OHA) that essentially asked OHA to revoke Portland's variance 7 months early? Why did the PWB fail to share this information with budget committees, Portland City Council, and Bull Run stakeholders prior to going forward with their 6.7% rate increase, an increase that piled on top of a decade of staggering annual water rate increases and base rate increases? At the April 2017 Water Manager meeting in Tualatin Yone Akagi (PWB) advised the regional managers of their letter to OHA, but failed to publicly disclose the text.

We support strategies that keep our Bull Run water free from an unnecessary treatment plant. Bull Run water purity has historically been and remains a strong community value for Portland citizens. Portland must be relieved of the burden of a treatment plant designed to protect from contaminated and polluted watersheds, not pristine Bull Run. We support securing a lengthy deferral while working to secure permanent relief. The city should work with Senator Chuck Schumer who has argued against the “onerous”, unnecessary LT2 requirements that would require NYC to “treat or cover” to address a non-existent open reservoir *Cryptosporidium* problem (NYC has a current deferral until 2034). This could be the one situation where New York and Oregon could work with the Trump administration to force EPA, at a minimum, to modify the LT2 rule to accept sampling method improvements that the Water Research Foundation, New York, and Bull Run community stakeholders have long recommended.

We look forward to working with you in the fight to protect Portland's long-treasured pure Bull Run water and the pristine Bull Run watershed.

Sincerely,

Floy Jones  
for Friends of the Reservoirs