



Rockwood Water
People's Utility District

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July 24, 2017

Chairpersons and Members
Portland Utility Board
Portland City Hall
1221 SW 4th Avenue, Room 110
Portland, OR 97204

Dear Chairs and Board Members,

RE: Long Term Bull Run Treatment Strategy

The main function of a water utility is the protection of public health and the delivery of safe, reliable and plentiful drinking water to its customers. The decision path adopted by the City of Portland in 2009 when the *Cryptosporidium* variance was proposed recognized that function and responsibility.

As General Manager of Rockwood Water PUD, I bring over 33 years of experience operating water utilities including the operation of a Class IV Water Treatment Plant. Rockwood Water PUD encourages Portland to be prudent and thoughtful in its long term treatment strategy. The final decision should take into account health and safety, risk and liability, and a long term solution that will be resilient in the face of catastrophic emergencies.

The comparative values of filtration over ultraviolet disinfection have been addressed in other testimony by Tualatin Valley Water District, the Oregon Citizens' Utility Board and Dr. Paul Lewis, Multnomah County Health Department. I concur with their comments and rationale.

While ultraviolet disinfection may address an immediate regulatory need, it will be ineffective in dealing with turbidity or catastrophic fire, both of which are real threats to the health, safety and reliability of this significant water resource of the region.

We support Portland pursuing a water treatment filtration plant. This decision addresses the regulatory requirement as well as increasing resource capacity, water quality and reliability. It is a prudent fiscal decision that builds foundations for the future rather than a short term regulatory compliance 'fix'. We recognize that difference in cost between a UV and full treatment plant is significant. However the cost of waiting will be far greater than the cost to plan and build.

We encourage Portland to contact the Oregon Health Authority and

- Commit to meeting the requirement to provide a removal or disinfection approach to deal with *Cryptosporidium*, and
- Request an extension of time to develop the most cost effective and regional approach to this issue.

Portland should emphasize to OHA that it recognizes the need for action and its responsibility to make the best, most fiscally responsible and protective health and safety decision for the region and its citizens. The decision being faced today deserves to be well thought out, considerate and informed.

Portland City Council's direction will have profound impacts to the region and on rate payers near and long term. We would encourage you to engage your wholesale water partners in any decision you consider and to build foundations for the future.

Sincerely,



Brian R. Stahl, General Manager
Rockwood Water PUD
19601 NE Halsey Street
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c: Rockwood Water PUD Board of Directors