

Strict compliance for cryptosporidium but flexible compliance for lead?

(testimony to PUB August 1,2017)

The potential for Cryptosporidium is center-stage right now, even as water quality in some homes still suffers from detectable and elevated lead levels according to the Water Bureau's annual Water Quality Report and regulatory lead testing. Discussions of these two contaminants should inherently overlap in how the bureau plans to treat drinking water. Yet, the Water Bureau's plan for optimized corrosion control treatment (aka OCCT) hasn't been part of the current conversation. Does Crypto treatment dovetail in with this? Or not? Commissioner Fish and the Water Bureau need to offer clearer communication and better public information*. Many are interested in public engagement, asking questions, but the silence on the urgency of crypto compliance is disconcerting. A complete picture of the actual or potential threat of crypto in Bull Run has yet to be explained.

I appreciate that the City is responding to emerging new water contaminant threats as well as serious long-term challenges with lead in high risk homes, in this post-Flint era. But which contaminant is more pressing? Cryptosporidium or minimizing lead exposure at customer taps? Portland followed a "flexible", "alternative compliance" to its chronic problem of exceeding lead action levels (ALE's). And now, the OHA's directive for regulating crypto is strict compliance?! I hope you appreciate why I, and citizens like me, might be confused.

I would love to see a fresh Bureau approach; a wave of better education and complete facts, increasing awareness on how the Bureau monitors and treats "pristine" Bull Run water to make it safe for drinking. Finally, last week I spoke about Tigard** recently marking "one year of Independence" when it switched from Bull Run to the Clackamas River. We could learn a lot from Tigard Utility about how dramatically and quickly they minimized lead. Can Baker City or Rochester teach us similarly about Cryptosporidium? Why hasn't PWB held town halls or panels to share strategies from these case studies?

In the meantime, how will The Bureau protect Portland's most vulnerable? Astonishingly, pregnant women, infants, formula-fed babies, and children are not included on the Bureau's "Sensitive Users" list, but our craft brewers and microchip industry water customers are!! Isn't it the former that should be protected? Right now, and not in 2022?

Some cities facing less chronic and less significant lead levels in their municipal water are now providing free water filters to their high-risk homes, pregnant women, children and the immuno-compromised. I believe this is the right thing to do, expeditiously, until Portland's optimized system and crypto (whether real or potential) treatment facilities are operational.

Thank you.

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* (excluded from in-person testimony, for the sake of brevity)

For example, switching to chlorine disinfection, which crypto treatments make possible, could quickly and significantly minimize lead at Water Bureau's customer taps. Another example: with the open reservoirs going underground, CCT inhibitor could now be successful in protecting pipes from leaching lead. As variously used by the bureau and Commissioner Fish, they still follow an "alternative", "creative", "flexible", or "compliance approach to the Lead and Copper Rule. That approach hasn't honored the intention of the regulation, and it has not been successful, as evidenced by the data. Yet water chemistry---which helps to reduce lead----is only being adjusted slowly, "step-by-step" (Gabe Sollmer, 6/27/17 work session) until 2022. How is Crypto regulatory compliance more urgent, if the dangerous type wasn't detected, nor was there a human health problem (per PWB's Yone Agaki and Multnomah Co. Health officer Paul Lewis). I suppose one question is why "One strike you're out"? Why did EPA region 10 allow OHA who allowed the Bureau "Eight strikes you're *NOT* out" for the lead action lead exceedances (aka ALE's; in November 2016, in 2013, in 2006, in 2002, twice in 2001, in 2000, in 1999)?

As captive water customers, we've been assured, "From forest to faucet, we deliver the best drinking water in the world." But is water truly delivered "pristine", as described? That public trust is being compromised, with the rush to treat a non-deadly pathogen with no reported current human health problem (crypto), while The Bureau pursues an unhurried compliance approach to minimize lead in water, deflected and delayed for later.

**Tigard's significant and swift lead reduction, *after* switching from Portland water:

<http://pamplinmedia.com/ttt/89-news/363541-243615-tigard-marks-independence-not-with-fireworks-but-waterworks>