



Rockwood Water
People's Utility District

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July 31, 2017

Mayor and City Council
Portland City Hall
1221 SW 4th Avenue, Room 110
Portland, OR 97204

Dear Mayor Wheeler and Members of Council,

RE: Long Term Bull Run Treatment Strategy

The comparative values of filtration over ultraviolet disinfection have been addressed in testimony from water and health professionals. While ultraviolet disinfection may address the immediate regulatory need, it will be ineffective in dealing with many other situations which are far more likely to occur.

- Climate change and the variability and intensity of storms is a reality. Bull Run Reservoirs are affected by wind, wave action, and rainfall on the exposed earth slopes. Increased turbidity from dirt and silt entering the water supply reduce the efficiency of UV disinfection treatment
- Organic material from leaves and other woody debris in the Bull Run water combine to form chloro-organic disinfection byproducts (trihalomethanes and haloacetic acids ... both regulated by the USEPA). UV disinfection does not remove organic material from water.
- A greater volume of the Bull Run storage can be used because drawdown of Bull Run Reservoirs increases sidewall slope exposures making more soil exposed to wave and wind action increasing turbidity as stated above.
- The Mt. Hood National Forest is experiencing major decadence in dead and down fuel and the forest is at risk for a significant wildfire event that could spread throughout the watershed very quickly. Given the temperature fluctuations from climate change, this exposure to fire is not a matter of if, but when.

We, the undersigned wholesale customers, encourage Portland City Council to be prudent in their decision and build foundations for the future. We encourage the City 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.

- Determine the short and long term costs of building a filtration plant. The analysis should also include consideration of a staged facility that meets average daily demands and utilizes groundwater to meet peak summer demands short term.
- Base decisions on current engineering estimates so that comparisons of cost and returns on investment can be better understood and debated.

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.

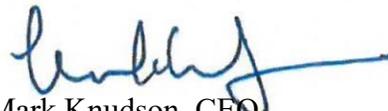
We recommend that Portland pursue a water treatment filtration plant. This decision addresses the regulatory requirement as well as increasing resource capacity, water quality and reliability.

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,



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