



**OREGON  
WILD**

Formerly Oregon Natural Resources Council (ONRC)

Randy Leonard, Commissioner  
City of Portland  
1221 S.W. 4<sup>th</sup> Avenue  
Portland, Oregon 97204

Dear Randy,

Thank you for your letter of January 9, 2009. Protecting the legacy of Bull Run and the public health of Portland residents is a shared responsibility that we take very seriously. This has been a difficult journey and frustrating for many. Though we're not all on the same page at the same time, I believe that all are working in good faith to protect and preserve our pure water and the system that delivers it. I have strong faith that, in the end, our combined efforts will serve future generations well.

Oregon Wild certainly appreciates your work, your support for the City's legal challenge to the LT2 regulation, and your efforts to achieve alternative methods of compliance, including what we consider to be the best method: legislative relief.

We also appreciate your appointment of Floy Jones to the Budget Committee and that the Bureau provided both Floy and Scott Fernandez with public documents. Floy understands the budget far better than most of us who have worked on Water Bureau panels and issues for years. She has been a good source of key budget information to stakeholders who cannot attend regular budget meetings ...

While appreciating your effort to take a minimalist approach to compliance, Oregon Wild didn't support the proposal to build a UV system in the Bull Run because it would bring additional traffic into a closed watershed, would create a new market for mercury, and would rely on drinking water conduits to serve as clear wells, capturing and then dumping accidental releases of mercury into the Sandy Basin.

You requested my insight and advice on concerns I may have with alternative plans for a direct filtration system. To be clear, Oregon Wild does not support the proposal to build a filtration plant. It is a tremendously costly "fix" to a problem that exists elsewhere - but not in Portland. Constructed to filter out infectious cryptosporidium, a filtration system won't do that. Why? Because we have little-to-no cryptosporidium in our protected watershed, we have no evidence of cryptosporidium specifically infectious to humans, and no evidence of any cryptosporidium infections originating in our drinking water since our system was put in place over 100 years ago.

We have such pure water because of historic protections against human entry and associated human and bovine waste. The general prohibition on entry into the Bull Run Management Unit by humans and domestic animals ensures that cryptosporidium will not pose a public health threat. Consistent water purity is a direct result of the watershed's isolation from human entry and development and the exclusion of livestock. That is what makes our watershed unique.

Oregon Wild (ONRC) and others toiled for years to protect the Bull Run from logging and development that would force costly treatment. We achieved the highest standard of legislative protection in 1996 and in 2001. We are now faced with a bitter irony: construction of a filtration system will create a new demand to open the watershed to logging, development and human entry. The argument: Why should logging and development interests be hampered by site-specific Bull Run safeguards if Portland's water is filtered - like that the water of most other large municipalities in the world (whose watersheds are open to logging, development, cows and cryptosporidium)?

There is no source of infectious cryptosporidium in the Bull Run now, but that's likely to change if we build a filtration plant. That would indeed be a tragedy.

Also, if the City builds a filtration system, it could add anticoagulants, plastic polymers, aluminum, etc. to our water before sand filtration. Our water will taste different and it will be different. All this to comply with a cookie-cutter national approach to treat for infectious cryptosporidium that doesn't exist in our protected watershed!

The cost of building such a plant (approximately \$385,000,000) is mind-boggling, particularly during these terrible economic times. The City has critical needs that must be met, including public health and safety needs, and this is not one of them.

Another consideration: while you state that use of filtration would allow the City to cease reliance on east-county well fields, my understanding from David Shaff is that the City will continue to use the well fields, regardless. And while you believe that with filtration we will not need to build a third dam, Water Bureau engineers state that a filtration system is required before construction could begin on a third dam.

These are the reasons why Oregon Wild staff is focusing energy on securing a legislative remedy from LT2. And, for these reasons, we respectfully ask that you:

- 1) Do not spend any City money on construction of LT2-only projects;
- 2) Request an extension in compliance deadlines from the EPA and the Obama administration (the EPA grants extensions for dirty water systems all the time);
- 3) Request that the Oregon congressional delegation support the City in its request for a such an extension;
- 4) Implement and maintain an aggressive effort to secure legislative relief; and
- 5) Don't give up.

Legislation never comes easy. It took years for Oregon Wild (ONRC) and the Portland City Council to pass Bull Run legislation in 1996 and 2001. Oregon Wild has worked with the Oregon congressional delegation to protect the Lewis and Clark Mount Hood Wilderness for ten years and that legislation will likely pass this very week.

Surely Council and Congressional efforts to protect our pure Bull Run water, and the system that serves it up, are just as deserving of such passion and persistence.

Sincerely,

A handwritten signature in blue ink that reads "Regna Merritt". The signature is written in a cursive, flowing style.

Regna Merritt  
Executive Director,  
Oregon Wild  
503.283.6343 x 214