

# MOUNT-TABOR

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NEIGHBORHOOD ASSOCIATION

Stephanie Stewart, MTNA Land Use co-Chair, 1121 SE 50<sup>th</sup> Ave; Portland, OR 97215; [www.mttaborpdx.org](http://www.mttaborpdx.org)

May 1, 2009

**Via Email**

Commissioner Nick Fish, Commissioner Amanda Fritz, Commissioner Dan Saltzman, Commissioner Randy Leonard, Mayor Sam Adams

**Re: Water Bureau Budget regarding LT2 Compliance Projects – Avoid Filtration  
Requesting a Deadline Extension from EPA**

Dear Commissioners and Mayor Adams,

By now we hope you've heard about the success of our community meeting on April 11<sup>th</sup> – an estimated 175 community members turned out to learn about, and weigh-in on, the future of Portland's water system. We feel this is an impressive number given that it was a holy weekend for so many members of our community. As you may recall, Water Bureau staff, Commissioner Leonard, representatives from Oregon's Congressional Delegates, and community stakeholder groups like Oregon Wild and Friends of the Reservoirs were all in attendance.

The overwhelming sentiment from the community was in favor of avoiding LT2 compliance projects. It was obvious at this meeting that Portlanders are passionately protective of their pristine drinking water. We do hope that you will keep this in mind as you navigate the long series of decisions you have before you regarding our drinking water and LT2 projects. And we hope you will be especially mindful of this sentiment these next few weeks as you contemplate specific budget proposals from the Water Bureau.

The Mt. Tabor Neighborhood Association would like to once again emphasize its support for the vigorous pursuit of legislative relief from costly LT2 projects that add no public-health value to our drinking water system. And to that end, we respectfully urge you to seek an extension with the EPA regarding the deadlines: 1) to build a treatment plant and 2) to bury reservoirs. While we may be years away from these actual deadlines, we will begin investing large sums of money today (for planning, design, site prep, etc.) in order to meet these deadlines in a timely manner. Pushing back the final due dates will allow our city some much needed breathing room while we give the legislative effort a chance to succeed. Seeking an extension *now* is prudent – it will prove to save us money in the long run should the legislative effort provide relief for our pristine water system. The compliance schedule as it stands today doesn't make sense. It doesn't allow a City like ours time to both pursue variance-testing *and* stay

on schedule with compliance construction without making possibly unnecessary and massive investments in projects from which we might be exempted. We believe a solid case can be made for an extension to pursue the variance-testing option, which is a request for time to work an EPA program. We should be allowed to exhaust the variance-testing program before we are forced into the cycle of build-option expenses. Notably, an extension for time to work the variance-testing program will also give us more time to work a legislative solution.

The Mt. Tabor Neighborhood Association strongly urges you to vigorously pursue all efforts designed to avoid LT2 construction projects for the Bull Run treatment plant and for burying reservoirs. However, we understand that because of the way the compliance timeline is currently structured you are being asked by the Water Bureau to choose the specific treatment plant we would build should we have no other option than to build one. To that end, the Mt. Tabor Neighborhood Association respectfully urges that if even after a strong legislative effort we find ourselves forced to build a treatment plant, we absolutely avoid spending four-times as much money for a filtration plant (estimated at \$385 million) when other, lower-cost options such as ozone or UV Radiation exist. We believe that an accurate cost/benefit model -- that considers the costs of sludge disposal, energy-usage and staffing associated with a filtration plant in addition to data that clearly links a specific benefit to *each* dollar invested over a lower-cost option -- would steer the City away from constructing a filtration plant. The rate increases proposed by Water Bureau for LT2 compliance projects are shocking; the City can realize treatment regulation compliance for ¼ the cost, and it should.

The Mt. Tabor Neighborhood Association believes that the right move today is to minimize our LT2 investments, while vigorously seeking relief from compliance. We appreciate your dedicated efforts to protect our drinking water and our pocket books from degrading regulation.

Warm regards,

Stephanie Stewart  
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Cc:

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Cyreena Boston, Senator Merkley's office  
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