

PURB Recommendation to the PSC

On Comprehensive Plan Policies

The Citywide Systems Plan and the Transportation Systems Plan

BES is proposing a capital improvement program that over the next 10 years will of necessity result in substantial yearly sewer rate increases throughout the period. A large part of that program involves projects intended to improve the sewer collection systems. These projects are needed to assure system functioning and private property protection in large part due to the impact that storm water from developed properties has on the sewer system. They needed are regardless of whether or not there was any growth or redevelopment in the city. However because a substantial portion of the storm water load originates on the current city streets their redevelopment with green infrastructure will most likely will work to reduce the costs associated with this portion of the BES capital improvement program. Not surprisingly, the cost of every new project or street improvement project proposed by PBOT in the TSP will be impacted by costs associated with storm water management.

In the CSO areas of the City, "green infrastructure" most likely will work to reduce the costs associated with the "Maintenance and Reliability" projects described in the Citywide System Plan. That appears to have been the result in the "Tabor to the River" project area, where substantial use of the public right of way was made for such installations. It should be remembered that each of the areas proposed for these BES projects have differing conditions which may result in differing benefits from green infrastructure installations. It should also be understood the this portion of BES's CIP is intended to be responsive to METRO's 2040 plan and variations from that plan in the location as well as density of development will probably increase the costs of these program unless other measures are taken to address those costs. Concurrent project development following coordinated storm water planning may to be one such measure.

BES's capital improvement program in the West Hills MS4 storm sewer areas is struggling to adequately respond to the area's current developed character let alone its continued growth or redevelopment. Because of substantial variations in the character of the storm water infrastructure requirements imposed over time on the development of properties in the West Hills the area has to be described as lacking complete storm water systems. One portion of the area has recently been evaluated and it was found that more than 20% of its streets and parcels lack approvable access to a storm water conveyance system. This historic lack of an adequate storm water systems and legal constraints on restricting the use of existing properties means that BES's CIP program in this area - the Inflow and Infiltration program (required by DEQ to prevent the discharge of raw sewage into the environment) is compelled to serve homes that discharge storm water into the sanitary system. Because of costs associated with having the Washington County (Clean Water Services) sewer system accept the large volume of sewage such a combination of flows creates BES chose to build an expensive pump station and a pressure line to return this effluent to the City's treatment plants. To date this system has be plagued with technical problems illustrating quite well the problems associated with pursuing solely a technological or grey solution to the challenge of storm water management. A nearby needed transportation project was blocked

Submitted by - John T. Gibbon, Westside PURB Rep.
9822 SW Quail Post Rd. Portland, OR 97219

because it had to rely on onsite “green infrastructure” to manage its storm water and this approach rendered it too costly. Again concurrent transportation project and storm water project development following coordinated storm water planning appears to be appropriate response to the challenges this area faces.

Outer East Portland’s storm water issues relate to the Johnson Creek watershed, an MS4 area, and UIC areas that drain primarily into the Columbia Slough. In this area of the City there is clearly conflict between the desire for the use of land for economic development versus its use for an environmental benefit. It appears possible that many of these disputed lands are often impacted by the storm water systems functioning within the hydrological cycle. The question presented is if the systems used for the management of storm water are, by altering groundwater levels or displacing other uses, impacting certain areas that might be useful for economic development what are the equity implications of providing this environmental benefit to the City at the cost of an areas potential economic development? An honest response to this dilemma appears to require concurrent project development following coordinated storm water and transportation planning.

PURB recommends as part of its update of its comprehensive plan the City needs to clearly state that it has a policy favoring storm water and transportation project **concurrency**. Such a policy requires coordinated planning of city storm water management and transportation improvement projects. The recently released PBOT- BES Coordination Charter appears to be an excellent step in this direction but it needs to be enhanced by clear policy direction that this approach is and will, without explicit changes to the comprehensive plan language, remain the City’s policy.

A review of the Citywide Systems Plan and the Transportation Systems Plan presented as part of the Comprehensive Plan process has to leave any astute observer concerned regarding the costs associated with meeting the capital demands of the major programs envisioned by both the Bureau of Environmental Services and the Bureau of Transportation. Portland’s citizens and ratepayers need as absolute as possible an assurance that wherever transportation and storm water needs can in some manner be addressed concurrently to produce substantial costs savings to the programs they will be, adopting comprehensive plan policies requiring this and coordinated BES and PBOT planning is needed in order to provide such an assurance.