

Bruce W. White
20646 Wild Goose Lane
Bend, OR 97702

September 20, 2012

Via Hand Delivery and Email

Sewer Infrastructure Advisory Group
Attn: Jon Skidmore, Assistant City Manager
Bend City Hall
710 NW Wall St.
Bend, OR 97701

Dear Jon:

In reviewing the agenda for this evening's Sewer Infrastructure Advisory Group (SIAG) meeting I see that one of the topics for discussion and potential decision is how to proceed with the proposed Southeast Interceptor project. I am concerned that in making a determination on this issue now, the SIAG will be pre-judging an issue that should be reviewed and evaluated by the group as one of a range of alternative solutions to sewer collection issues. I am not able to attend tonight's meeting and therefore am unable to offer public comment at the meeting. Please pass these comments on to the committee for their consideration as they debate proceeding with the Southeast Interceptor. Although my knowledge of the City sewer issue comes from my employment as a land use attorney and advocate for certain property interests associated with the UGB expansion, I make these comments on my own behalf as a City resident, taxpayer, and ratepayer concerned about the affordability of future sewer rates for City residents and businesses and the role of infrastructure availability and costs in attracting or deterring economic development opportunities in the City.

The Southeast Interceptor project is based on the Collection System Master Plan (CSMP) that was proposed by the City and its consultants over the last several years and that was the subject of a public hearing process last year. The CSMP assumed that a series of large gravity interceptors, including the Southeast Interceptor, would best serve the City's needs for sewer collection in the existing city limits and beyond. During the hearing process, the CSMP came under criticism as to whether it was realistic and could be feasibly and timely financed and implemented, and those concerns prompted the suspension of the hearing process and the formation of the SIAG. In particular, there was concern about whether a collection system based entirely upon gravity collectors could be delivered within a time frame that would offer relief to areas within the City where immediate solutions to sewer collection capacity issues were needed.

As I understand the SIAG's charge, the SIAG is to review the City's options for sewer collection including the following process and considerations:

- identifying community priorities,
- reviewing short-term and long term collection needs,
- considering financial, engineering, economic, environmental, growth management, and public policy implications of sewer system alternatives;

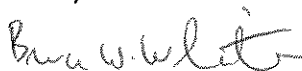
- evaluating financing options and impacts on sewer rates and charges;
- soliciting public input on sewers system improvements and funding solutions.

The intent is to end up with a final report that can be used to guide the City Council's thinking on how to proceed with its sewer collection alternatives and adoption of an updated CSMP. The SIAG has only begun the review process contemplated in its charge. In that review process, one would expect the SIAG to look at the entire range of sewer collection system alternatives before making a judgment on any part of a particular solution. The range of alternatives would include, in addition to the system of gravity interceptors proposed in the CSMP, such considerations as short or long-term satellite treatment systems, temporary storage options in areas of limited capacity and other system upgrades that could make the existing collection system and strategic pump stations utilize existing system capacity more efficiently and operate in a more co-ordinated manner. Although the existing collection/ pump system has come under some criticism from the City's consultants, and some system corrections and upgrades are undoubtedly needed, it remains a flexible system that can be added to incrementally at lower cost than a gravity-only system of deep collectors. The many values of a more flexible collection system, with a variety of solution options, lower incremental capital costs, regional pump stations, etc. was not considered in the CSMP.

It is hard to imagine maintaining the integrity of a review process where all issues/ alternatives are ostensibly on the table if at the outset of that process the SIAG is asked to separately validate a key component of one of the alternatives under review. I note that the question posed in the meeting agenda for today's SIAG meeting is not *whether* to proceed with the Southeast Interceptor, but *what is the best option for moving forward* with that facility. By, in effect, endorsing the Southeast Interceptor as part of the final solution at this initial point in the process, the SIAG would likely skew and undermine the validity of the remainder of its evaluation process. In addition, even if it is ultimately determined that the Southeast Interceptor should be part of the sewer collection system solution, authorizing construction of portions of it at this point may have the effect of giving priority to the Southeast Interceptor when there may be more pressing and cost-effective solutions needed for adding capacity to and for other segments of a gravity collector system, such as for underdeveloped economic development lands at the City's north end or in the central City and west side by utilizing a possible Northern Interceptor. Moreover, if ultimately it is determined that the Southeast Interceptor should not or cannot be completed for another 10-15 years, would it be a wise use of funds to expend scarce dollars now to construct portions of a project that would not be used for that length of time? Finally, why is the City not asking this same question for road construction projects that may occur along the path of other components of the possible gravity interceptor system, such as along the path of the Central Interceptor or the Northern Interceptor that were likewise proposed in the collection system master plan?

I believe the City has been premature in incurring costs and proceeding with the Southeast Interceptor project without having an adopted plan and without giving adequate consideration to other less costly and more timely alternatives. The SIAG ought not to compound that situation by making a premature judgment on the Southeast Interceptor before that option can be fully evaluated in comparison with other alternatives through the SIAG process.

Thank you for consideration of these comments.



Bruce W. White