August 4, 2025

Dear Mayor Wilson and Members of the Portland City Council:

As organizations committed to environmental justice, public health, housing stability, climate resilience, and economic opportunity, we write to urge the City of Portland to place affordability, specifically water affordability, at the center of its engagement on the Portland Harbor Superfund cleanup.

Water affordability is already a crisis in Oregon and across the nation. The nation's first Water Affordability Needs Assessment found that between 30 and 48 million Americans live in households with unaffordable water costs. In Oregon, nearly 10 percent of residents are already at high risk of water affordability challenges, while approximately 30 percent could struggle to pay their water bills in the future. These burdens fall disproportionately on low-income households, seniors on fixed incomes, renters, communities of color, and families already struggling with rising costs of living.

For the communities we serve, water affordability is not simply a utility issue. It is a housing, public health, and economic justice issue. When families cannot afford water and sewer bills, they are often forced to choose between paying for housing, food, healthcare, transportation, and other necessities. Unpaid utility bills can contribute to housing instability, damaged credit, and barriers to future housing opportunities, while lack of access to affordable water can undermine health, sanitation, and quality of life.

Portland families are already experiencing this crisis. In 2017, the average Portland household paid approximately $1,295 annually for water, sewer, and stormwater services. Beginning this July, that same household will pay more than $2,040 annually, an increase of 57.5 percent in less than a decade. Current projections indicate annual utility costs could exceed $2,600 by 2030, effectively doubling household water and sewer costs since EPA issued its Record of Decision for Portland Harbor in 2017.

Rising utility bills are being driven largely by infrastructure costs. The Bull Run Filtration Project illustrates the challenge. Approved in 2017 with an estimated cost of approximately $500 million, the project is now expected to exceed $2.5 billion and has become the most expensive municipal infrastructure project in Portland's history. Bull Run demonstrates how quickly major infrastructure projects can grow in cost and how directly those costs are ultimately borne by ratepayers.

That experience is particularly relevant as the Portland Harbor Superfund as the EPA moves towards finalizing plans for a cleanup remedy in the coming months. When EPA issued its Record of Decision in 2017, the estimated cost of the cleanup was approximately $1.05 billion. Since then, inflation, labor costs, construction costs, fuel prices, and transportation costs have increased dramatically. Oregon gasoline prices have increased by more than 100 percent since 2017, while diesel prices have increased by more than 120 percent. Yet Portland residents have not been provided updated estimates that reflect these realities or a clear understanding of how cleanup costs could ultimately affect utility rates, taxes, and public budgets. Bull Run serves as a reminder that large infrastructure projects rarely become less expensive over time and that ratepayers often bear the consequences when costs exceed original projections.

Pressing questions about the environmental costs must also be answered. Current cleanup plans call for approximately five million tons of sediment to be dredged from Portland Harbor and transported to disposal sites in the Columbia River Gorge. Estimates suggest this could require 200,000 truck trips over the life of the project. Beyond the substantial transportation costs, this approach raises concerns about diesel emissions, air quality, greenhouse gas emissions, traffic safety, and environmental justice. Many communities along transportation corridors are already disproportionately burdened by pollution and associated health risks.

We recognize that Portland Harbor must be cleaned up and that investments in water infrastructure are essential. Our concern is that affordability too often becomes an afterthought, with the consequences ultimately falling on households least able to absorb additional costs.

As implementation of the cleanup moves forward, we urge the City of Portland to:

- Call for updated and realistic estimates of total cleanup costs that reflect current economic conditions.
- Seek a clear accounting of how cleanup-related obligations could affect future utility rates, taxes, public borrowing, and household affordability.
- Request full disclosure of projected transportation impacts, diesel emissions, air quality impacts, greenhouse gas emissions, and environmental justice implications associated with implementation of the selected remedy.

- Prioritize cleanup approaches that achieve environmental objectives while minimizing unnecessary costs and burdens on ratepayers, taxpayers, and vulnerable communities.
- Support creation of a permanent federal water affordability assistance program and sustained federal investment in water infrastructure so that critical infrastructure costs are not borne solely by local ratepayers.

Portland has an opportunity to demonstrate that environmental restoration, environmental justice, and affordability can advance together. Water affordability is already a crisis for too many Portland families, and the rising cost of major infrastructure projects is a significant reason why.

We encourage the City to work with state and federal partners to understand and address the full environmental and economic costs of possible remedy solutions for Portland Harbor; we ask the City to commit itself to strengthening water infrastructure, expanding affordability assistance, and reducing financial burdens on Portland families wherever possible.

Sincerely,

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