PORTLAND WATER BUREAU
FROM FOREST TO FAUCET

Director Ting Lu, Ph.D., P.E.

1120 SW Fifth Avenue, Room 405
Portland, Oregon 97204-1926
Information: 503-823-7770
Portland.gov/water

February 10, 2026

Carrie Gentry
Oregon Health Authority
Drinking Water Services
PO Box 14450
Portland, OR 97293-0450

Subject: Bilateral Compliance Agreement – Quarterly Status Report

Dear Carrie:

This letter and attachment constitutes the Portland Water Bureau's (PWB) submission of its quarterly status report for the Bilateral Compliance Agreement, Section IV.D.6 (Oregon Health Authority; Revised November 17, 2023). This report covers the period of October – December 2025.

If you have any questions regarding this report, please feel free to contact me at (503) 823-1251 or yone.akagi@portlandoregon.gov.

Sincerely,

Yone Akagi, P.E.
Water Quality Manager

Enclosure
Cc: Ann Levy, Kimberly Gupta, David Peters

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Status Report

Bilateral Compliance Agreement

February 10, 2026

Reporting Period: October 1, 2025 – December 31, 2025

As part of the Bilateral Compliance Agreement (BCA) Interim Measures, Section IV.D.6 requires that Portland Water Bureau (PWB) provide Oregon Health Authority – Drinking Water Services (OHA) a status report every quarter until *Cryptosporidium* treatment compliance is achieved. The report is intended to be a summary and must be submitted no later than 10 days after the end of the first month following the end of each calendar quarter. The following information must be included:

1. Intake monitoring results and genotyping results received the previous quarter;
2. Watershed activities conducted the previous quarter including inspections (security, sanitary facilities, landslides, diversion pool fence), significant events or changes, and tributary or scat monitoring results received the previous quarter; and
3. Status of progress towards construction of filtration facility and any milestones specific in Section III of the BCA.

This status report covers the period of October 1 – December 31, 2025.

1. Intake Monitoring and Genotyping Results

Intake monitoring results for *Cryptosporidium* were submitted to OHA in monthly compliance reports on November 13, 2025, December 15, 2025, and January 13, 2026, and are provided in Appendix A.

The PWB laboratory did not process any *Cryptosporidium*-positive samples for genotyping during this reporting period. This is due to the continuation of a known method sensitivity issue, likely related to manufacturer changes in at least one of the PCR reagents. PWB is currently working to mitigate the issue and is holding positive samples in the meantime. For the reporting period of October 1 to December 31, 2025, 24 intake samples and three tributary samples were held for future genotyping.

2. Watershed Activities

The following subsections provide status updates on the inspections conducted and monitoring results received during the reporting period, as well as any significant watershed events or changes identified.

Security

Watershed Rangers routinely conduct security inspections of the Bull Run Watershed Management Unit. On a weekly basis, Rangers inspect multiple boundary access points and look for evidence of illicit activity including trespass. During the reporting period, Rangers reported four security incidents. Two of the incidents occurred inside the water supply drainage boundary.

Sanitary Facilities

Sanitary facility condition inspections at Bear Creek House, including the permanent holding tank and the portable toilets, took place in November 2025 (Table 1). No deficiencies were observed.

Table 1. Sanitary Facility Condition Inspections

Date	Location	Deficiencies
11/5/2025	Bear Creek House Holding Tank	None
11/25/2025	Bear Creek House – ADA	None
	Bear Creek House – Unit #1 of 2	None
	Bear Creek House – Unit #2 of 2	None

A waste transport inspection at the Bear Creek House holding tank was conducted on November 5, 2025, with no deficiencies noted.

Landslides

The most recent annual aerial inspection of the Bull Run Watershed, including the South Fork landslide, was completed on July 30, 2025. The next aerial inspection is scheduled for Summer 2026.

PWB continues to assess and monitor the area of the 2023 Camp Creek Fire, including the South Fork slide, for fire-related erosion impacts. The most recent drone ortho imagery and lidar survey of the South Fork area took place over five days in October 2025. Data was received in December 2025 and will be analyzed in the first quarter of 2026.

Diversion Pool Fence

Routine (daily) inspections of the Diversion Pool fence were completed by Water Treatment Operators. On October 27, 2025, an operator discovered a missing coyote roller on the north side of the Diversion Pool. The repair was performed within 48 hours.

Monthly comprehensive inspections were conducted by Watershed Specialists on October 22, November 26, and December 30, 2025. No additional deficiencies were reported.

Wildlife-specific inspections were conducted by Water Quality staff on October 16, November 13, and December 11, 2025. One side of a coyote roller needing reattachment to the fence was reported for maintenance in December.

Tributary Water Monitoring Results

The results received during the reporting period for water samples collected at tributary locations are presented in Table 2. A total of 11 samples were collected from the four major tributaries during the reporting period and analyzed using EPA Method 1623.1. *Cryptosporidium* was detected in three of the samples.

Table 2. Results of Tributary Water Samples Reported October 1 – December 31, 2025

ID No.	Collection Date	Report Date	Location	*Crypto.* (count)	*Giardia* (count)	Volume (L)
BD62681	10/26/2025	11/7/2025	Key Station 15 – North Fork	1	0	22.5
BD62683	10/26/2025	11/7/2025	Key Station 35 – South Fork	0	1	23.75
BD62684	10/26/2025	11/7/2025	Key Station 44 – Fir Creek	0	0	24.25
BD64086	11/18/2025	11/24/2025	Key Station 15 – North Fork	0	0	50
BD64087	11/18/2025	11/24/2025	Key Station 18 – Mainstem	1	1	50
BD64088	11/18/2025	11/24/2025	Key Station 35 – South Fork	0	0	50
BD64089	11/18/2025	11/24/2025	Key Station 44 – Fir Creek	1	1	50
BD65515	12/9/2025	12/15/2025	Key Station 15 – North Fork	0	0	50
BD65516	12/9/2025	12/15/2025	Key Station 18 – Mainstem	0	0	50
BD65517	12/9/2025	12/15/2025	Key Station 35 – South Fork	0	0	28.5
BD65518	12/9/2025	12/15/2025	Key Station 44 – Fir Creek	0	0	50

Scat Monitoring Results

The *Cryptosporidium* PCR and genotyping results received during the reporting period for wildlife scat samples are presented in Table 3. Two out of the nine samples were *Cryptosporidium*-positive. One sample was identified as *C.* sp. novel, and one sample was identified as *C.* sp. vole genotype (W15), which is not known to be human infectious.

Table 3. Results of Wildlife Scat *Cryptosporidium* Samples Reported October 1 to December 31, 2025

Sample ID	Wildlife	Collection Date	Report Date	PCR Result	Genotype / Sequence Result
251006-1347	Roosevelt elk	10/6/2025	10/8/2025	Negative	
251014-1103	Black-tailed deer	10/14/2025	11/3/2025	Negative	
251014-1106	Black-tailed deer	10/14/2025	11/3/2025	Negative	
251014-1114	Black-tailed deer	10/14/2025	11/3/2025	Negative	
251014-1259	Black bear	10/14/2025	11/3/2025	Negative	
251016-1228	Bobcat	10/16/2025	11/3/2025	Positive	*C. sp.* novel
251110-1152	Bobcat	11/10/2025	12/1/2025	Negative	
251110-1244	Roosevelt elk	11/10/2025	12/1/2025	Negative	
251113-1042	Bobcat	11/13/2025	12/1/2025	Positive	*C. sp.* vole genotype (W15)

Significant Watershed Events or Changes

Examples of events or changes in the Bull Run Watershed that may be included in this report include wildfire, flooding or other extreme weather events, a landslide and/or major turbidity event, major changes in operations, or a significant wildlife or domestic animal incident or incursion related to *Cryptosporidium* risk.

One wildlife finding was reported to OHA during the reporting period. A dead Roosevelt elk was discovered in shallow water along the shoreline of Reservoir 2 in early October 2025. The elk was removed and transported outside the water supply drainage area and a fecal sample was collected. The

sample tested negative for *Cryptosporidium*. No *Cryptosporidium* was detected at the raw water intake during the week of the elk discovery.

In December 2025, there was a turbidity event and a change in operations due to a heavy rainstorm. The Bull Run supply was shut down from December 19 to December 26, and 100% groundwater was served for seven days while raw water turbidity levels subsided. During the shut down of the Bull Run supply, *Cryptosporidium* monitoring at the intake occurred at a frequency of 50 liters per week, in accordance with BCA Interim Measures requirements.

3. Filtration Facility Construction Update

During the last quarter, the Filtration Facility contractor continued construction of multiple facilities such as the clearwell, treatment processes, overflow basins, dewatering process areas, and electrical buildings. Other activities included installing duct banks, laying rebar and formwork, and pouring concrete for multiple structures. The Program Team continued to work with the City of Gresham to obtain Filtration Facility building permits, trade permits, and site inspections as well as with Multnomah County to communicate on various activities such as road closures and traffic impacts.

On the Pipelines Project, the contractor completed excavation of the raw water tunnel bore pit, began work on the north raw water tunnel and micro tunneling north of the clearwell, and continued shaft excavation on the Filtration Facility site. Contractors finished shoring and excavation for the Finished Water Intertie (FWI) and are preparing to pour the bottom slab of the FWI vault.

For both projects, the Program Team supported ongoing permitting efforts to manage compliance with various construction permits and conditions of approval. Staff continued to process equipment and material submittals, respond to RFIs, and participate in Contractor Preparatory and Initial Phase meetings. The Land Use and Permitting staff continued to provide support for the land use process.

Both project teams continue to work with various county and community groups, as needed. The teams continue to communicate project schedules to stakeholders and create opportunities for neighbors to meet with contractors and PWB staff to understand activities. Project updates are provided to property owners near the future facility and pipelines, as well as to other relevant stakeholders through email, surveys, and teleconferencing. Project updates and feedback are posted online. A Good Neighbor Agreement, which was finalized and signed by PWB in June 2021, continued to guide project strategy.

The Land Use and Permitting staff continued to provide support for the land use process. With regard to the land use, some parties to the first Land Use Board of Appeals (LUBA) appeal filed a second appeal. Oral arguments were heard by LUBA on December 16, 2025. LUBA was scheduled to release its latest decision on January 20, 2026, but has delayed the release of its decision to no later than February 17, 2026.

PWB continued to work with the EPA's WIFIA Program which is financing both projects and has been submitting eligible project costs and quarterly reports for review.

PWB continues to discuss the impacts of ongoing land use process on project status and construction schedule with OHA. The Water Bureau is working with its contractors on revising the projected substantial completion date as (1) a direct result of construction stoppage during the remand during 2025 as well as (2) the future impacts resulting from more restrictive construction requirements and

timing. The City has been working closely with the OHA regarding the anticipated impacts to the project schedule and has formally requested to amend the BCA to extend the construction schedule deadline of September 30, 2027 to deliver treated water to its customers. PWB remains highly committed to completing the project as quickly as possible and continuing to implement the interim measures outlined in the BCA to protect public health.

Portland Water Bureau Laboratory
2010 N Interstate Ave, Portland, OR 97227

Cryptosporidium and *Giardia* Laboratory Analysis Report

Water System Information

PWS ID: OR4100657
PWS Name: Portland Water Bureau
1900 N Interstate Avenue
Portland, Oregon 97227
County: Multnomah

Sample Information

Collection Month & Year: Oct. 2025
Report Date: November 13, 2025
Monitoring Regime: Bilateral Compliance Agreement
Source Water: Bull Run Intake - WTP-A

PWB Sample ID	Loc ID	Sample Collection Date	Sample Type	Sample Volume Filtered (L)	Analysis Method	*Cryptosporidium*			*Giardia*		
						No. of Oocysts Spiked	No. of Oocysts Counted	Oocyst Matrix Spike Recovery (%)	No. of Cysts Spiked	No. of Cysts Counted	Cyst Matrix Spike Recovery (%)
BD61450	Intake 2PIS	10/5/2025	Field	25	PWBL-SOP-61 3	0	0		0	0	
BD61451	Intake 2PIS	10/5/2025	Field	25	PWBL-SOP-61 3	0	0		0	0	
BD61452	Intake 2PIS	10/6/2025	Field	25	PWBL-SOP-61 3	0	0		0	0	
BD61453	Intake 2PIS	10/6/2025	Field	25	PWBL-SOP-61 3	0	0		0	1	
BD61454	Intake 2PIS	10/7/2025	Field	25	PWBL-SOP-61 3	0	0		0	1	
BD61455	Intake 2PIS	10/7/2025	Field	25	PWBL-SOP-61 3	0	0		0	1	
BD61456	Intake 2PIS	10/8/2025	Field	25	PWBL-SOP-61 3	0	0		0	20	
BD61457	Intake 2PIS	10/8/2025	Field	25	PWBL-SOP-61 3	0	0		0	21	
BD61965	Intake 2PIS	10/12/2025	Field	25	PWBL-SOP-61 3	0	0		0	NA*	
BD61966	Intake 2PIS	10/12/2025	Field	25	PWBL-SOP-61 3	0	1		0	NA*	
BD61967	Intake 2PIS	10/12/2025	MS	25	PWBL-SOP-61 3	100	81	80.0	NA*	NA*	NA*
BD61968	Intake 2PIS	10/13/2025	Field	25	PWBL-SOP-61 3	0	0		0	NA*	
BD61969	Intake 2PIS	10/13/2025	Field	25	PWBL-SOP-61 3	0	0		0	NA*	
BD61970	Intake 2PIS	10/14/2025	Field	25	PWBL-SOP-61 3	0	0		0	NA*	
BD61971	Intake 2PIS	10/14/2025	Field	25	PWBL-SOP-61 3	0	0		0	NA*	
BD61972	Intake 2PIS	10/15/2025	Field	25	PWBL-SOP-61 3	0	0		0	NA*	
BD61973	Intake 2PIS	10/15/2025	Field	25	PWBL-SOP-61 3	0	0		0	NA*	
BD62281	Intake 2PIS	10/19/2025	Field	25	PWBL-SOP-61 3	0	0		0	69	
BD62282	Intake 2PIS	10/19/2025	Field	25	PWBL-SOP-61 3	0	0		0	57	
BD62283	Intake 2PIS	10/20/2025	Field	25	PWBL-SOP-61 3	0	1		0	70	
BD62284	Intake 2PIS	10/20/2025	Field	25	PWBL-SOP-61 3	0	0		0	71	
BD62285	Intake 2PIS	10/21/2025	Field	25	PWBL-SOP-61 3	0	0		0	120	
BD62286	Intake 2PIS	10/21/2025	Field	25	PWBL-SOP-61 3	0	0		0	123	
BD62287	Intake 2PIS	10/22/2025	Field	25	PWBL-SOP-61 3	0	0		0	103	
BD62288	Intake 2PIS	10/22/2025	Field	25	PWBL-SOP-61 3	0	1		0	100	
BD62651	Intake 2PIS	10/26/2025	Field	25	PWBL-SOP-61 3	0	0		0	NA**	
BD62652	Intake 2PIS	10/26/2025	Field	25	PWBL-SOP-61 3	0	1		0	NA**	
BD62653	Intake 2PIS	10/27/2025	Field	25	PWBL-SOP-61 3	0	0		0	43	
BD62654	Intake 2PIS	10/27/2025	Field	25	PWBL-SOP-61 3	0	0		0	43	
BD62655	Intake 2PIS	10/27/2025	MS	25	PWBL-SOP-61 3	100	79	79.0	98	128	86.7
BD62656	Intake 2PIS	10/28/2025	Field	25	PWBL-SOP-61 3	0	0		0	19	
BD62657	Intake 2PIS	10/28/2025	Field	25	PWBL-SOP-61 3	0	0		0	17	
BD62658	Intake 2PIS	10/29/2025	Field	25	PWBL-SOP-61 3	0	0		0	28	
BD62659	Intake 2PIS	10/29/2025	Field	25	PWBL-SOP-61 3	0	0		0	33	

Unless otherwise noted, all data were generated in accordance with EPA Method 1623-modified(PWBL-SOP-61 3)/1623.1 and 100% of the filtered volume was examined for each sample.

NA* = Not Analyzed due to a presumptive Giardia cyst detected in the weekly PWBL-SOP-61 3 Method Blank sample.

NA** = Giardia results are nullified due to the matrix spike requirement of 1 per every 20 field samples not being met. This was due to the Giardia cyst detection in DAMM MB 25-03.

Reviewed by Marsha Farooqui Date Reviewed: 11/13/2025

Appendix A: Intake Monitoring Report

Portland Water Bureau Laboratory
2010 N Interstate Ave, Portland, OR 97227

Cryptosporidium and *Giardia* Laboratory Analysis Report

Water System Information		Sample Information	
PWS ID:	OR4100657	**Collection Month & Year:**	Nov. 2025
PWS Name:	Portland Water Bureau	**Report Date:**	December 4, 2025
	1900 N Interstate Avenue	**Monitoring Regime:**	Bilateral Compliance Agreement
	Portland, Oregon 97227	**Source Water:**	Bull Run Intake - WTP-A
County:	Multnomah		

PWB Sample ID	Loc ID	Sample Collection Date	Sample Type	Sample Volume Filtered (L)	Analysis Method	*Cryptosporidium*			*Giardia*		
						No. of Oocysts Spiked	No. of Oocysts Counted	Oocyst Matrix Spike Recovery (%)	No. of Cysts Spiked	No. of Cysts Counted	Cyst Matrix Spike Recovery (%)
BD63104	Intake 2PIS	11/2/2025	Field	25	PWBL-SOP-61 3	0	0		0	47	
BD63105	Intake 2PIS	11/2/2025	Field	25	PWBL-SOP-61 3	0	0		0	36	
BD63106	Intake 2PIS	11/3/2025	Field	25	PWBL-SOP-61 3	0	0		0	33	
BD63107	Intake 2PIS	11/3/2025	Field	25	PWBL-SOP-61 3	0	0		0	33	
BD63108	Intake 2PIS	11/4/2025	Field	25	PWBL-SOP-61 3	0	0		0	8	
BD63109	Intake 2PIS	11/4/2025	Field	25	PWBL-SOP-61 3	0	1		0	9	
BD63110	Intake 2PIS	11/5/2025	Field	25	PWBL-SOP-61 3	0	1		0	4	
BD63111	Intake 2PIS	11/5/2025	Field	25	PWBL-SOP-61 3	0	0		0	3	
BD63431	Intake 2PIS	11/9/2025	Field	25	PWBL-SOP-61 3	0	1		0	2	
BD63432	Intake 2PIS	11/9/2025	Field	25	PWBL-SOP-61 3	0	0		0	5	
BD63433	Intake 2PIS	11/9/2025	MS	25	PWBL-SOP-61 3	100	74	74.0	98	71	67.3
BD63434	Intake 2PIS	11/10/2025	Field	25	PWBL-SOP-61 3	0	0		0	6	
BD63435	Intake 2PIS	11/10/2025	Field	25	PWBL-SOP-61 3	0	1		0	4	
BD63436	Intake 2PIS	11/11/2025	Field	25	PWBL-SOP-61 3	0	2		0	12	
BD63437	Intake 2PIS	11/11/2025	Field	25	PWBL-SOP-61 3	0	1		0	0	
BD63438	Intake 2PIS	11/12/2025	Field	25	PWBL-SOP-61 3	0	0		0	3	
BD63439	Intake 2PIS	11/12/2025	Field	25	PWBL-SOP-61 3	0	0		0	2	
BD63876	Intake 2PIS	11/16/2025	Field	50	1623.1	0	1		0	1	
BD63877	Intake 2PIS	11/17/2025	Field	50	1623.1	0	2		0	0	
BD63878	Intake 2PIS	11/18/2025	Field	50	1623.1	0	2		0	5	
BD63880	Intake 2PIS	11/18/2025	MS	50.5	1623.1	100	74	72.0	98	55	51.0
BD63879	Intake 2PIS	11/19/2025	Field	50	1623.1	0	3		0	1	
BD64385	Intake 2PIS	11/23/2025	Field	50	1623.1	0	0		0	2	
BD64386	Intake 2PIS	11/24/2025	Field	50	1623.1	0	0		0	5	
BD64387	Intake 2PIS	11/25/2025	Field	50	1623.1	0	0		0	0	
BD64388	Intake 2PIS	11/26/2025	Field	50	1623.1	0	0		0	0	
BD64571	Intake 2PIS	11/30/2025	Field	50	1623.1	0	2		0	1	

Unless otherwise noted, all data were generated in accordance with EPA Method 1623-modified(PWBL-SOP-61 3)/1623.1 and 100% of the filtered volume was examined for each sample.

Reviewed by Michael Roche Date Reviewed: 12/08/2025

Appendix A: Intake Monitoring Report

Portland Water Bureau Laboratory
2010 N Interstate Ave, Portland, OR 97227

Cryptosporidium and *Giardia* Laboratory Analysis Report

Water System Information		Sample Information	
PWS ID:	OR4100657	**Collection Month & Year:**	Dec. 2025
PWS Name:	Portland Water Bureau	**Report Date:**	January 5, 2026
	1900 N Interstate Avenue	**Monitoring Regime:**	Bilateral Compliance Agreement
	Portland, Oregon 97227	**Source Water:**	Bull Run Intake - WTP-A
County:	Multnomah		

PWB Sample ID	Loc ID	Sample Collection Date	Sample Type	Sample Volume Filtered (L)	Analysis Method	*Cryptosporidium*			*Giardia*		
						No. of Oocysts Spiked	No. of Oocysts Counted	Oocyst Matrix Spike Recovery (%)	No. of Cysts Spiked	No. of Cysts Counted	Cyst Matrix Spike Recovery (%)
BD64572	Intake 2PIS	12/1/2025	Field	50	1623.1	0	1		0	2	
BD64573	Intake 2PIS	12/2/2025	Field	50	1623.1	0	1		0	0	
BD64575	Intake 2PIS	12/2/2025	MS	50.25	1623.1	99	68	67.7	100	70	70.0
BD64574	Intake 2PIS	12/3/2025	Field	50	1623.1	0	0		0	1	
BD65351	Intake 2PIS	12/7/2025	Field	50	1623.1	0	1		0	0	
BD65352	Intake 2PIS	12/8/2025	Field	50	1623.1	0	0		0	0	
BD65353	Intake 2PIS	12/9/2025	Field	50	1623.1	0	1		0	0	
BD65354	Intake 2PIS	12/10/2025	Field	50	1623.1	0	0		0	0	
BD65636	Intake 2PIS	12/14/2025	Field	50	1623.1	0	0		0	0	
BD65637	Intake 2PIS	12/15/2025	Field	50	1623.1	0	0		0	0	
BD65638	Intake 2PIS	12/16/2025	Field	50	1623.1	0	0		0	0	
BD65639	Intake 2PIS	12/17/2025	Field	50	1623.1	0	0		0	0	
BD66099	Intake 2PIS	12/21/2025	Field	50	1623.1	0	2		0	1	
BD66100	Intake 2PIS	12/26/2025	Field	50	1623.1	0	0		0	0	
BD66102	Intake 2PIS	12/27/2025	Field	50	1623.1	0	0		0	0	
BD66322	Intake 2PIS	12/28/2025	Field	50	1623.1	0	2		0	0	
BD66323	Intake 2PIS	12/29/2025	Field	50	1623.1	0	1		0	0	
BD66324	Intake 2PIS	12/30/2025	Field	50	1623.1	0	2		0	0	
BD66325	Intake 2PIS	12/31/2025	Field	50	1623.1	0	2		0	0	

Unless otherwise noted, all data were generated in accordance with EPA Method 1623/1623.1 and 100% of the filtered volume was examined for each sample.

Reviewed by Michael Roche Date Reviewed: 01/07/2026