



Columbia Pacific Building and Construction Trades Council

4/16/2025

RE: Bull Run Remand Process

Hearings Officer Fancher,

The Columbia Pacific Building Trades Council, representing over 20,000 skilled construction professionals across 22 local Building and Construction Trades Unions, specializes in diverse sectors of the construction industry, including critical infrastructure projects. Our state-registered apprenticeship programs are dedicated to training and diversifying the future local workforce, ensuring they remain current with the latest construction technologies, with a strong emphasis on conservation and quality.

The current pause of this essential Filtration Facility project has significantly impacted the livelihoods of approximately 450 construction professionals and numerous DBE firms in the Portland area. Moreover, arguments advocating for the relocation of this facility overlook a fundamental reality: the Bull Run Filtration site is not pristine wilderness. Decades of agricultural use have already stripped it of its natural resources. Some groups are advocating to relocate this already in motion project to an urban area, that has yet to be identified. Trying to relocate this project to an urban area is irresponsible and wasteful, causing further road congestion in addition to substantial, unquantifiable financial losses of public dollars.

Relocating to undeveloped areas would cause greater environmental harm to locations lacking similar prior intensive use. The existing site's history as a commercial nursery involved the application of pesticides, including substances with the potential to harm fish species in Johnson Creek, and its past drainage patterns contributed to surface runoff into the creek. Developing this already impacted land is arguably the least environmentally disruptive option.

Furthermore, this project has been thoughtfully designed to incorporate significant ecological enhancements, including the creation of additional habitat areas through the planting of native trees, shrubs, and groundcover. Notably, the project will also replace any removed trees at a ratio of 1.5:1, exceeding standard code requirements.

In light of these factors and the urgent need to bring our water system into compliance by the September 2027 deadline, we respectfully request that the hearings officer expedite the remand process. Further delays in the completion of this much-needed project will have significant negative consequences.

Thank you for your time and careful consideration of this critical matter.

Sincerely,

Randall Friesen
Executive Secretary-Treasurer
Columbia Pacific Building & Construction Trades Council

The Columbia Pacific Building Trades Council proudly represents:

- International Union of Bricklayers and Allied Craftworkers
- International Brotherhood of Electrical Workers
- International Union of Elevator Constructors
- International Union of Painters and Allied Trades
 - Drywall Finishers, Glaziers, Floor Coverers, Painters Local
- Laborers' International Union of North America
- Office & Professional Employees International Union
- Operative Plasterers' and Cement Masons' International Association
- International Association of Sheet Metal, Air, Rail, and Transportation Workers
- United Association - Union of Plumbers, Fitters, Welders and Service Techs
- United Union of Roofers, Waterproofers and Allied Workers
- International Union of Operating Engineers
- International Brotherhood of Boilermakers, Iron Ship Builders, Blacksmiths, Forgers and Helpers
- International Association of Heat and Frost Insulators and Allied Workers
- International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers
- International Brotherhood of Teamsters