



13 March 2017

Mr. Richard Whitman
Director, Oregon Department of Environmental Quality
700 NE Multnomah Blvd., Suite 600
Portland, OR 97232

**re: Proposed Renewal of Industrial Stormwater General Permit Number 1200-Z;
Request for a 30 day Extension of the Public Comment Period and Re-Proposal of
the Permit**

Dear Director Whitman:

The Columbia Corridor Association (CCA) urges your support for granting the request by Associated Oregon Industries (AOI) of a 30-day extension of the comment deadline of March 20, 2017 on DEQ's proposal to renew its general industrial stormwater discharge permit, permit number 1200-Z. The CCA also supports the AOI request that DEQ issue a revised proposal that includes an adequate explanation for DEQ's decisions to reduce certain permit's discharge benchmarks.

The Columbia Slough runs through the majority of the Columbia Corridor. The Columbia Corridor is Oregon's largest economic corridor, with 2500 businesses employing 65,000 people and includes most of the permitted holders of the 1200-COLS general permit which DEQ proposed to consolidate into the proposed 1200-Z permit. Business will be significantly impacted by these changes to the stormwater regulatory policies and deserve adequate time and sufficient information to make informed, relevant comments to the proposed 1200-Z permit.

The proposed revised permit currently out for public comment incorporates the 1200-COLS and other geographic areas into one 1200-Z industrial water quality permit for the first time. It is important that adequate explanations of the proposed changes be provided and enough time be given for evaluation of those changes. Most industrial permit registrants have had no previous opportunity to review and provide comments on these proposed revisions and have been limited in their ability for commenting due to the essentially closed process that DEQ has used to develop this proposed permit.

For example, the current benchmark for total suspended solids (TSS) in the 1200-COLS permit is 50mg/l. The proposed benchmark for discharges to the Columbia Slough for TSS would be reduced to 30 mg/L. The permit evaluation report for the proposed 1200-Z permit does not provide adequate support for the reduction of TSS from 50 mg/L to 30 mg/L for Columbia Slough discharge points. This one revision alone will have substantial adverse effect on many of the current 1200-COLS permit registrants.

For these reasons, the CCA supports the AOI request for an additional 30 days for comment as well as a request for DEQ to provide adequate explanation for proposed benchmarks and other permit provisions so that proper evaluation can occur in order to provide meaningful comments to the proposed 1200-Z permit. Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink that reads 'Corky Collier'.

Corky Collier
CCA Executive Director