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November 13, 2013

AUDITOR 11/12/13 PM 3:16

Portland City Council
1221 SW 4th Avenue
Portland, OR 97204

RE: Application Fees for Stormwater Treatment Technologies

Dear City Council,

Contech would like to provide comments associated with Agenda Item 1072 - "Update BES Sewer and Drainage Rates and Charges fee schedule to establish application and appeal fees for evaluation of manufactured stormwater treatment technologies."

Contech appreciates the time and energy that City staff has dedicated towards an application process for manufactured stormwater treatment technologies. The general goal and direction recommended by City staff is fully supported by Contech Engineered Solutions, LLC (Contech). We would like to share the following comments and recommendations associated with the proposed ordinance:

- **Contech fully supports the inclusion of Portland State University as a neutral third party to facilitate application review. (Section 1.7)**
Portland State University is a great resource for the City of Portland and collaboration will likely benefit both parties.
- **Contech supports an application fee but with reservations. (Section 1.8)**
Contech fully supports the need for an application fee to review manufactured treatment technologies. The reservations are associated with the review process, the "renew" process fees, and the overall costs incurred by Contech for the program.
- **Contech requests an effective date change to June 1, 2014. (Council Directive A & B)**
The intent is to allow manufacturers an opportunity to work with City staff to develop an application process that can be fully operational and sustainable for the next decade.

Thank you for the opportunity to discuss the proposed ordinance.

Sincerely,

Contech Engineered Solutions, LLC



Sean Darcy

NW Regional Regulatory Manager