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February 9, 2015

Ms. Gigi Steele  
Wastewater Regulatory Program  
Watershed Protection Branch  
2 Martin Luther King Drive  
Suite 1152 East  
Atlanta, Georgia 30334

RE: City of Atlanta CSS East and West NPDES Permit Reissuance

Dear Ms. Steele,

The Council for Quality Growth is a 30 year-old trade association representing over 250 member companies within the growth and development industry, with the mission of promoting balanced and responsible growth in the Metro Atlanta Region and Georgia. We bring the development community and policy makers together as we focus on long-range community planning, encouraging adequate government services, catalyzing consensus on growth issues and convening discussion on responsible development.

We are writing in support of the reissuance of the NPDES permits to the City of Atlanta for its combined sewer system. These permits are an important update to the existing permits which were written in 2005 before the construction of the improvements to the City's combined sewer system. These improvements have resulted in better water quality in the Chattahoochee River and South River Basins. Most importantly, these improvements have allowed the City of Atlanta to capture in its storage tunnels and treat at its advanced wastewater treatment plants about 90% of the combined sewage in these basins. The remainder of the combined sewage is treated at the City's dedicated combined sewage water quality control facilities and combined sewage control facilities.

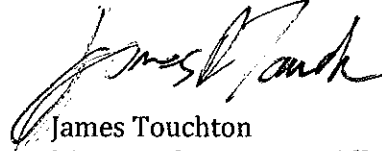
The proposed permit re-issuances are based on this improved combined sewage system and are consequently more stringent than the 2005 permits. Also, the proposed permits are consist with, and in some respects more stringent than, the EPA CSO Policy which was adopted by the U. S. Congress in 1992. The permits are unique in Georgia (and maybe in the Nation) in the inclusion of implementation of green infrastructure for new and existing developments in the combined sewer system area. The Council for Quality Growth is a strong proponent of the appropriate use of cost-effective infrastructure to address nonpoint source pollution.

Finally, we concur that removal of the antiquated and non-effective targets for BOD/TSS in the 2005 permits is the correct decision. These targets are not meaningful and are not a valid measure of the effectiveness of the management and treatment of combined sewage.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael E. Paris".

Michael E. Paris  
President & CEO

A handwritten signature in black ink, appearing to read "James Touchton".

James Touchton  
Director, Government Affairs & Policy