

COLUMBIA CORRIDOR
A S S O C I A T I O N

28 January 2009

Oregon Department of Environmental Quality
Air Quality Division
811 SW 6th Avenue
Portland, OR 97204

Attn: Brian Finneran

Mr. Finneran:

The Columbia Corridor Association (CCA) represents Oregon's largest economic corridor, home to 2500 businesses employing 60,000 people. The Corridor is also home to the Columbia Slough, Portland's Wellfield and Portland Harbor. We frequently address the relation between industry and environment, seeking solutions that are best for all. DEQ's proposed Regional Haze rules for PGE's Boardman plant also confront these difficult compromises.

PGE's Boardman plant plays a crucial role in the Columbia Corridor's energy supply. The facility provides stable baseline energy at relatively predictable rates. Rate stability is important to business decision-making and a critical factor for recruiting desirable businesses to our area.


Our state and nation are likely on the cusp of new regulations, incentives and penalties for energy production and carbon emissions. Now more than any time in memory, it makes sense to move forward with deliberate speed while also keeping our options open to regulatory changes coming from Salem and Washington D.C.

We support PGE's recommendation for alternative Best Available Retrofit Technology determinations, with decision points in 2012 and 2015. Our recommendation is based on the inherent advantage of keeping the decision process flexible. Doing so allows the best chance to integrate new financial incentives and new technologies while maintaining a strict schedule toward emissions reductions.

Given that the total emissions allowed under the alternative BART determinations would be nearly the same as under DEQ's plan, it makes sense to support the plan with the most decision flexibility and rate stability.

Thank you for the opportunity to comment. Please do not hesitate to contact me with any questions.

Respectfully submitted,



Corky Collier
Executive Director