



CITY MANAGER'S OFFICE

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September 15, 2025

Oregon Department of Environmental Quality  
Aron Borok/Water Quality Standards  
700 NE Multnomah St., Suite 600  
Portland, Oregon 97232-4100

RE: Public Comment – Support for the Proposed Amendments to the Three Basin Rule (OAR 340-041-0350)

Dear Mr. Borok and the Members of the Rulemaking Committee:

The City of Salem is writing to give its support to the Oregon Department of Environmental Quality's proposed amendments to the Three Basin Rule. Salem has actively participated throughout the rulemaking process, including serving on the Rule Advisory Committee.


As you are aware, Salem relies upon the North Santiam River to provide high-quality drinking water for over 200,000 customers. We have been working in close collaboration with Marion County for over a year to find the best solution to address the conflicting expectations and requirements of the *Maui* decision, Water Pollution Control Facilities permits issued under Oregon statutes, NPDES discharge permits issued under the federal Clean Water Act's NPDES program, and the safeguards afforded by Three Basin Rule. Our shared goal is to allow for the communities within the Three Basins to build and improve their wastewater treatment facilities while maintaining the high quality of these waters for downstream users like Salem.

We believe that the proposed amendments achieve this goal.

We urge DEQ to approve the proposed amendments as drafted. The amendments allow communities to receive discharge permits issued under the NPDES program if those discharges meet the criteria identified in the *Maui* decision. These permits establish clear regulatory standards and reporting requirements, which will ensure the quality of the waters in the three basins will continue to be protected. The proposed amendments also ensure that communities have a regulatory way forward to replace their outdated and stressed wastewater treatment facilities.

Accordingly, the City of Salem urges the Rulemaking Committee approve the amendments to OAR 340-041-0352 as proposed.

Sincerely,

  
Krishna Namburi  
Acting City Manager

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