



September 25, 2017

US Environmental Protection Agency
Office of Water: Feedback Waters of the US Recodification
Docket ID No. EPA-HQ-OA-2017-0203
Online Submission

The Stormwater Equipment Manufacturer's Association (SWEMA) strongly supports the maintenance of the Waters of the United States Rule and definition as promulgated by the Environmental Protection Agency (EPA) and the Department of the Army in 2015 and rejects the recodification of pre-existing rules as proposed in Docket ID EPA-HQ-OW-2017-0203. SWEMA member organizations develop, manufacture, market, and sell water quality systems for the treatment and storage of stormwater runoff. These systems improve the quality of America's receiving waters by reducing harmful pollutants in stormwater discharge and by regulating discharge flow rates to prevent scour and erosion of receiving streams. Products and solutions provided by SWEMA member organizations can also be used to facilitate groundwater recharge or stormwater harvest and reuse. The member organizations of SWEMA feel that the definition of the Waters of the United States Rule from 2015 should be maintained for a number of reasons:

- This current proposal to rescind the Clean Water Rule is only a temporary measure until the second step in the process, a separate rulemaking process, begins. However, the Clean Water Rule as enacted in 2015 provided thorough and detailed support for the process. There is no need to rescind the current definition prior to evaluation of the full measure.
- The due diligence provided as part of the development of the Waters of the United States rule demonstrates the value our country places on the importance of protecting our natural resources and water quality.
- These national water quality regulations have helped lead to the development of innovative stormwater quality and quantity products, such as those supported by the member organizations of SWEMA, which lead to economic growth and job creation, while simultaneously protecting our natural resources and water quality.
- Environmental regulations, such as the Waters of the United States Rule, also lead to new infrastructure projects which provide living-wage jobs and improve the quality of life for all in our country.

Thank you for the opportunity to comment on the proposed changes to the definition of the Waters of the United States Rule. SWEMA believes that reducing the reach of the water quality regulations currently in place will adversely affect our nation's water quality, the quality of life for all citizens, and the ability of our companies to support economic growth.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jay Holtz".

Jay Holtz, PE
SWEMA Government and Regulatory Committee Chair



September 25, 2017

A handwritten signature in black ink, appearing to read "Derek Berg". The signature is stylized and cursive.

Derek Berg
SWEMA President