



The Western Coalition of Arid States

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Submitted electronically to: regulations.gov

December 12, 2017

Ms. Damaris Christensen
Office of Water (4504-T)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Ms. Stacey Jensen
Regulatory Community of Practice (CECW-CO-R)
U.S. Army Corps of Engineers
441 G Street NW
Washington, DC 20314

Subject: Definition of “Waters of the United States”
Addition of an Applicability Date to 2015 Clean Water Rule
EPA-HQ-OW-2017-0644

Dear Ms. Christensen and Ms. Jansen:

The Western Coalition of Arid States (“WESTCAS”) appreciates the opportunity to submit this brief comment letter in support of the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers, (“the agencies”) proposal to add an applicability date to the 2015 Clean Water Rule (“the 2015 Rule”).¹

WESTCAS is a coalition of approximately 75 water and waste wastewater districts, cities, towns, and professional organizations focused on water quality and water quantity issues in the states of Arizona, California, Colorado, Nevada, New Mexico and Texas. Our mission is to work with federal, state and regional water quality and quantity agencies to promote scientifically-sound laws, regulations, appropriations and policies that protect public health and the environment in the arid West.

¹ Definition of “Waters of the United States”-Addition of an Applicability Date to 2015 Clean Water Rule. 82 Fed. Reg. 55,542 (November 27, 2017).

The Voice of Water Quality in the Arid West

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W E S T C A S

WESTCAS believes the agencies' proposal to add an applicability date to the 2015 Rule is appropriate. Extending the applicability date by two years will enable the agencies to complete their efforts in repealing and replacing the 2015 Rule while providing regulatory certainty for our members.

WESTCAS also believes the proposal to add an applicability date is critical to ensuring the agencies have sufficient time to undertake pre-proposal outreach efforts and to gather and evaluate recommendations from states, regulated entities, and the public.

WESTCAS also appreciates the agencies' proposal to complete the supporting analyses outlined in the November 20, 2017, Memorandum for the Record. Interested stakeholders--including WESTCAS--will need this information when considering the Step 2 proposal.

WESTCAS provides our comments in the interest of cooperation, increased regulatory clarity and agency support.

If you have any questions regarding this letter, please feel free to contact me at 760-398-2651.

Sincerely,



Steve Bigley
President

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