



May 15, 2017

US Environmental Protection Agency
Office of Water: Feedback on Reducing Regulatory Burden
Docket ID No. EPA-HQ-OA-2017-0190
Online Submission

The Stormwater Equipment Manufacturer's Association (SWEMA) strongly supports the maintenance and advancement of national stormwater regulations under the clean water programs of the Environmental Protection Agency (EPA) as well as the continued funding of the EPA. 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 stormwater regulations and EPA funding should be maintained for a number of important reasons:

- Municipal stormwater regulations, as promulgated by the EPA, drive the protection of our water quality and preservation of our natural resources, and provide focus on the long-term health of our communities and resources.
- Federal regulations are important due to the inter-state nature of many of those resources (e.g. the Great Lakes and the Chesapeake Bay); natural resources don't observe state boundaries.
- Innovative industries, like the member organizations of SWEMA, lead to economic growth and job creation. The focus on municipal stormwater and its regulation over the last 30 years has led to the development of an infrastructure-based industry of innovative products that is continually improving and growing – and providing valuable jobs.
- Environmental regulations lead to new infrastructure projects which provide living-wage jobs and improve our quality of life.
- The EPA has been helping drive an effort by the Water Environment Federation (WEF) to develop a national testing program for stormwater treatment technologies and approaches. This program will ensure that stormwater treatment systems and approaches are evaluated according to performance-based criteria and verified by independent third-party organizations. Continued funding of EPA's contribution to this effort is critical to the program's success and ultimately the health of the nation's waterbodies.

Thank you for the opportunity to comment on Executive Order 13777. SWEMA believes that relaxing water quality regulations will kill jobs in the environmental industry and adversely affect water quality and the quality of life for all citizens of the United States.

Sincerely,

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

Jay Holtz, PE
SWEMA Government and Regulatory Committee Chair