

## May 2, 2017 US EPA, Office of Water Listening Session on Reducing Regulatory Burden: Transcript of Verbal and Written Comments

In response to Executive Order 13777 (Enforcing the Regulatory Reform Agenda), on May 2, 2017 EPA's Office of Water held a three hour listening session by telephone and web conference to get public input on existing water regulations that could be repealed, replaced or modified to make them less burdensome. More than 850 people joined in with participants giving either verbal or written comments. The transcript of these comments (edited to remove extraneous comments such as operator instructions or participants commenting on the sound quality) are below.

Christine Ruf: I'm Christine Ruf, the Associate Director of the Water Policy Staff here at EPA. I'll be facilitating today's call along with two other colleagues from Water Policy staff.

Sandy Evalenko: Good morning. My name is Sandy Evalenko. I'm the Senior Regulatory Manager for the Office of Water on the Water Policy Staff.

Bob Rose: Good morning. My name is Bob Rose and I'm a Senior Policy Analyst also with the Water Policy Staff.

Christine Ruf: Thank you, Bob and Sandy. The Office of Water is hosting today's call because we're interested in hearing about the steps that EPA can take to reduce regulatory burdens. So let me first start by providing a quick overview of the listening session.

First, we'll hear a few opening remarks from Mike Shapiro, our Acting Assistant Administrator for the Office of Water. And then following Mike's remarks, I'll provide a quick summary of the logistics for today's three-hour call. And then we'll turn it over to you folks for your verbal and written comments.

So, Mike, I'll hand it over to you.

Michael Shapiro: Thanks, Christine. Good morning and thank you to everyone for joining us

both on the phone and the web conference. My name is Michael Shapiro and I'm the Acting Assistant Administrator for the Office of Water.

On February 24th of this year, President Donald Trump issued Executive Order 13777 on Enforcing the Regulatory Agenda. The Executive Order establishes the policy of the United States to alleviate unnecessary regulatory burdens placed on the American people. Among other things, it requires each agency to create a Regulatory Reform Task Force to evaluate existing regulations and identify any that should be repealed, replaced or modified.

To inform these recommendations, EPA is holding today's public listening session so that we can listen and learn from those directly affected by our regulations. This includes federal state, local and tribal governments, small businesses, non-governmental organizations, trade associations and the general public, in general everyone who is impacted by our regulatory programs.

To inform these recommendations – well, as well part of the Executive Order, we're particularly interested in regulations that you feel may no longer be necessary, regulations with benefits that do not justify cost, regulations that are redundant or inconsistent, or regulations that otherwise do more harm than good.

We invite you to take this opportunity to share your views today. We also invite you to submit your comments to EPA's regulatory reform docket. The docket, which is accessible through [www.regulations.gov](http://www.regulations.gov), will remain open through May 15, 2017. We will give equal consideration to input provided through the docket or through today's listening session both via teleconference and the webinar.

Both audio and written – and the written part of this listening session will be transcribed and submitted to the EPA docket as well as (that) received through other meetings and written comments will inform EPA's regulatory reform efforts and help us fulfill the commitment to complying with Executive Order 13777.

Today's listening session is only one of several meetings that the EPA has been holding on regulatory reform. The administrator has directed the other EPA offices to provide recommendations and consult with their stakeholders in doing so just as we are doing.

Some of you may have participated in those sessions last week or earlier this week. A list of all of the EPA's planned meetings can be found on our Regulatory Reform website. This is a big one, [www.epa.gov/laws-regulations/regulatory-reform](http://www.epa.gov/laws-regulations/regulatory-reform). I know everyone got that.

Under the Executive Order, the Regulatory Reform Task Force is tasked to provide and report to EPA's administrator detailing the agency's program – progress by May 26th.

Once again, thank you for joining us today. I'm going to turn it back over to Christine for some logistics for today's call.

Christine Ruf: OK. Thank you, Mike. And I think our sounds as improved on the Adobe Connect line. As you know we are broadcasting by telephone and by Adobe Connect.

By those that joined us by the conference today, you will be able to submit written comments through the chat module and see other comments that are written. We posted a one-page PowerPoint at the top, about the goals of today's meeting and where you can find EPA's docket. We requested through written remarks be suitable for posting and be concise. But folks on the webinar will not be able to provide verbal input.

For those joining by phone who pre-registered, everyone has two minutes to deliver your remarks. We realize this is a short amount of time but we wanted have as many people voicing their comments today as possible.

At the one and a half minute mark you will hear short chime saying that you have 30 seconds remaining. It will sound like this. So when you hear that sound, if you could start to wrap up. We may – if you go pass that two-minute time limit, we may interrupt you so that we can move on to the next speaker.

I want to emphasize that we will be in listening mode. We do not have the opportunity today to answer any questions by phone or text, including those questions you might have about specific rules or actions. It's possible the callers who signed up and got a pre-registered number to call in may not end up having enough time to speak. If that's the case or if you have additional remarks that go beyond your two-minute time, please submit your comments to the docket as Mike indicated, and EPA will give equal consideration to input provided through today's session or those through the docket,

## **START OF VERBAL COMMENTS**

Christine Lederer: OK. For a specific comment on the NPDES General Permit for Oil and Gas Operations, which is GMG290000 for Region 6. As the language is currently written, it only covers our offshore rigs when we are drilling for oil and gas. It would be good to have that language clear, that the permit coverage extends while we are not drilling and waiting for a contract. Many of our rigs are not operating and the language is not very clear and even the attorneys with the EPA would not give us the OK to operate under that permit.

Our discharges are exactly the same while we are drilling or when we are not drilling. However they're actually less when we're not drilling. So that's the end of that comment. The one thing I did want to make as a general note is that when EPA is collecting – requiring us to collect a report data for the EPA to assess whether regulations need to be imposed. They really need to look at whether we are already collecting that information or if we have to make an investment in either equipment or higher outside personnel to collect that. So that's just some of the things that we have to deal with on our end. And that's it.

Operator: Your next comment comes from the line of (Brian Mohanon) representing himself.

(Brian Monahan): (Brian Monahan) who works for 36 years in the (Comwap) Massachusetts at

the local level. I just simply wanted to acknowledge the work of the existing EPA staff (while I) always sound supportive I think one thing that would help reduce regulatory burden is to increase staffing who can provide assistance to the regulated community. I think they should – EPA should build upon the existing partnerships with state, county and local officials. I always found that clear, concise enforcement in the use of (supplemental), environmental penalties was very helpful.

The web pages I think should be reviewed and improved, I found them very good but there are certain things that are hard to find, so I think that's important to look at. And I just wanted to comment that I don't really think it's a regulatory burden, it's an obligation to protect all. Thank you very much.

Operator: And your next comment comes from the line of (Rock Mishra) from (REFPET).

(Rock Mishra): Good morning. I am (Rock Mishra) and I work for environment concerning the (mid-east spec) as a senior environmental engineer. Thanks for the opportunity to speak on this executive order on reducing regulatory burden. The way that (E.O.) is verdict, it seems like the environmental demolition cause excessive economic burden on a society and impede growth. In my professional career my primary focus has been water quality modeling to investigate water quality issues across the United States.

Today I would like to present a case how the regulation related to my research and profession can help a society and provide an economic boast. As a native of India who visits India regularly to meet family and the water research faculty there, I would also draw contrast by focusing on the effect of ineffective and pure regulations.

The U.S. has made a significant progress since the Clear Water Act of 1972. It is a vast amount of work that needs to be done to ensure clean and healthy water ways. Just focusing on surface water there are existing regulations that limit the number of pollutants that can enter a water body without negatively affecting its intended use, such as drinking water leakage. These regulations may appear burdensome to the entities which (discussed) the water body, but

the resulting positive economic effect of cleaner water can only (ousted).

Cleaner surface water ensures that the downstream communities can get cleaner drinker water (process). In contrast (fewer) ineffective regulations and enforcement in some developing nations such as India can turn the entire rivers into (sewer) channel. I have witnessed community of the (starting region ways) on cities and factories directly into the water body. The unregulated discharge (deserves) many preventive water-borne disease.

I have witnessed drinking water pipes going right to the (ways of show). There are simply no incentive for the discharges to process the pollutants. Proper regulations for surface water ensures that the current and future populist are not constantly affected by water-borne diseases and can realize the full economic potential while using these natural resources. Innovative research improves our understanding of how to address pollution more effective and what new pollutants must be addressed.

If anything water-related research must be funded to enhance our scientific understanding of the current and future issues affecting the availability of clean water to the cities of United States. Thank you.

Operator: Your next comment comes from the line of Beth Stewart from Cahaba River Society.

Beth Stewart: Good morning. The Cahaba River is the main drinking water source for the Birmingham area and a global biodiversity treasure but increasingly degraded and not achieving water quality restoration goal. Clean water regulations needs to be strengthened not weakened. Clean water is essential to our health, our businesses, biological diversity, our quality of life and the majority of American support clean water protection. These are not burdens.

The EPA needs to step up its game. Many programs under the Clean Water Act are not achieving the goals of the act because of inadequate regulatory systems and too many loopholes. Nonpoint source pollutions flow protection, drinking water safeguard, storm water (consoles) are example. Under no circumstances should regulatory change reduce existing clean water or

drinking water protection.

Any proposal should be analyzed based on sound science with inclusive opportunity for diverse public participation and education. We need strong federal regulations because our state is not doing near enough to restore degraded rivers especially from flow, storm water runoff and waste water. Without EPA our state has and would at time do less than the minimum under the Act, and the minimum is not achieving the goals of the Act to clean up our water and protect it.

The waters in the U.S. rule is a science-based necessary restoration of the scope of the Clean Water Act. Don't weaken it and allow uncontrolled pollution discharge that will eventually make its way into water resources that people and wildlife depend on. In 2002 it was only because of the original (specific) Act that we were able to stop horrendous chicken processing ways into small seasonal creak that eventually (sour) our entire river above the drinking water intake. Without the new rule this could go unchecked.

Please increase your focus on environmental justice and protecting communities with color and low-income from environmental impact. Provide the external civil rights compliance office, adequate funding to ensure civil rights complaints are timely addressed. Three complaints in Alabama have impending unaddressed for two to nearly four years. Expect that state and local agencies that apply for federal funding demonstrate they have adequate financial resources, personnel, legal authority and effective program to ensure that (desperate) impact on minorities are prevented. Thank you.

Operator: Your next comment comes from the line of Luke Frazza from National Environmental Banking Association.

Luke Frazza: Thank you. Ecosystem services like Clean Air and Water are required for human well-being providing economic and non-economic benefits. Wetland filter and store water naturally creating urban and agricultural runoff by reducing pollutants, lowering nitrate and trapping sediments. Wetlands provide water during droughts and they soak up runoff and flood waters avoiding (cause of) flood damage. They sustain essential habitat for wildlife,

birds and fish to feed, nest, breed, spawn and rear their young.

The National Environmental Banking Association represents environmental banks across the U.S. This industry's phenomenal success was formalized in 2008 with the final rule for mitigation which put mitigation banks as the top priority in the hierarchy of mitigation options. Today these banks drastically reduce permitting time and regulatory staff and are the most dependable option for mitigation.

Private investors are lined up to build these banks to enable compensatory mitigation through preservation in order to meet government requirements, but they need the rules to be applied consistently. Too often the 2008 rule is not uniformly applied and the mitigation hierarchy not followed.

Regulatory adherence for the 2008 rule and the mitigation hierarchy will remove unfair competitions of private industry and will resolve the historical conflicts between economic development and responsible.

It will unleash private investment in wetlands, streams, (species) and other environmental restoration fueling infrastructure and business expansion. The environmental (alteration) industry accounted for approximately 126,000 jobs in the U.S. in 2014. The National Environmental Banking Association believes that if EPA will strictly and consistently implement the 2008 rule and its hierarchy regulatory burden will be reduced, private sector jobs will be created and sustained and local economies will be boasted. Thank you.

Operator: Your next comment comes from the line of Andrew Grinberg for Clean Water Action.

Andrew Grinberg: Hi there. My name is Andrew Grinberg. I'm with Clean Water Action. I appreciate the opportunity to comment and I thank the Office of Water for all their hard work protecting our most vital resources. Clean Water Action, our organization strongly objects to the promise behind Executive Order 13777 and this whole process. Regulations including environmental and health protections are not holding back our country. On the contrary regulations that protect our water and health are some of the most powerful driving forces for

out economy and our communities.

We need more protections for water not less. Whether it's water for drinking, fishing, swimming, boating, irrigation, food production, brewing other industries clean water is the essential input. It's the foundation of our healthy communities. The benefits of environmental and health regulations have repeatedly been shown to far outweigh the cost and we hope that this process takes an honest look at the many benefits of regulation. For any regulation under review EPA must quantify all the benefits, not just the cost. That includes cost in water treatment, cost to downstream communities, health-related cost including medical bills, lost productivity as a result of missed work days from pollution-related illness and even death.

2013, OMB study found that the benefits of regulations far outweigh the cost across numerous agencies. At EPA though the benefits are most striking, over the preceding decade the benefits of EPA regulations were as high as \$600 billion and only cost the economy as much as 45 billion. This excellent return on investment is even more stark when looking at cost and benefits of source water protection. According the EPA website every dollar spent on protecting a drinking water source results in savings of \$27 on water treatment.

With such clear benefits at relatively low cost rather than looking for regulations to cut EPA should be working to develop new protections that bring with them even greater benefits. EPA's own policy dictates that it must prioritize drinking water protection. Since 1980 it has been the agency's policy as part of its human health criteria not to pass on the burden of water pollution to drinking water users or the providers who are responsible for treatment.

Clean Water Action strongly objects to rolling back any protections for drinking water, our nation's water ways or public health. A number of regulations have already been named by this administration and others have been identified by polluting interest for potential rollbacks in other stakeholder meetings, so we want to flag those. First and foremost the clean water rule which protects drinking water sources for one in three Americans. The steam electric ELGs which keeps toxic chemicals from power plants out

of our water ways.

And finally unconventional oil and gas ELGs which prohibits waster water from fracking and other ...

Operator: Your next comment comes from the line of John Divine, from National Resources Defense Council.

John Divine: On behalf of NRDC, more than 2 million members and supporters please don't sacrifice our water to a reckless and unfounded search for allegedly burdensome regulations without a meaningful detailed investigation of the benefits that Americans get from rules. Water's value becomes clear when there's a drought, a sewage spill, a boil-water alert or a closed beach. But that value is there everyday.

Accordingly the Clean Water Act directs EPA to develop federal regulations in order to restore and maintain the integrity of the nation's waters. Congress adapted this framework in 1972 to fix weak laws that allowed water waste to literally catch fire and others to become biologically dead. EPA rules under the act provides significant benefits, discharge limits for 58 industries set a level playing field for tens of thousands of facilities and prevent more than 700 billion pounds per year of toxic water pollution.

Wetland protection regulations help reduce flood risk, benefiting people owning approximately 800 to 900 billion in property located in flood plains. But the Act's work isn't done. Most water bodies assessed don't meet one or more data established standards designed to protect uses like swimming and fishing. During 2004 to 2009 the rate of Wetland loss accelerated 140 percent, nitrogen and phosphorus caused serious harms across the country.

Without a basis to presume environmental protections are hurting the economy the administration seemed bound to undermine beneficial clean water rules and for these remaining challenges by seeking complains about existing safeguards. EPA allowed only four and half weeks for public input on the value of all agency safeguards adapted in its 46 years plus history, and today's session allows only a few of us to speak.

That's bad enough but the administration couldn't even wait for this sham process before rolling back the protections they most want to kill. Take the clean water rule which ironically is estimated to produce as many as \$572 million a year in benefits and to exceed cost while improving protections for the kinds of water that feed drinking water supplies of 117 million Americans. Administrator Pruitt and President Trump has targeted this from the beginning.

Americans strongly protect ...

Operator: Your next comment comes from the line of Maia Raposo from Waterkeeper Alliance.

Maia Raposo: Hi my name is Maia Raposo and I'm the Director of Communications & Marketing at Waterkeeper Alliance. Waterkeeper Alliance strengthens and grow the global network of grassroots leaders protecting everyone's right to clean water. We are comprised of 320 waterkeeper organizations and affiliates in 35 countries in six continents covering over 2.5 million square miles of watersheds.

Waterkeeper Alliance and our 165 waterkeeper organizations and affiliate in the U.S. work closely with communities to protect and preserve local waterways. We have first-hand knowledge of how important EPA regulations are for public health and the environment. These regulations were implemented to put the health of Americans before corporate interest. They are necessary for protecting our citizens.

The Clean Water Act (both) U.S. policy and the appropriate legal standards for protecting and restoring our nation's waters. It's EPA's legal duty to implement these policies and standards. EPA does not have the authority to alleviate industry of their legal obligation to comply with laws. There is not evidence that environmental safeguards prevent job growth. In reality clean water is the economic lifeblood of many American communities.

Anglers alone generated nearly \$115 billion in economic activity in 2011, (breathing) life into rural communities and supporting more than 1 million

jobs. The only entities that benefit from revoking or weakening regulations are companies that will increase process by pushing pollution cost on to communities. If EPA rolls back environmental protections American citizens will suffer the cause of painted drinking water sources, fish that are unsafe to eat and the closure of recreational areas due to dangerously high pollution level.

Finally the rate at which this regulatory review is happening is irresponsible, environmental regulations have many complex interactions with federal and state statutes and laws that cannot be accurately assessed in such a short timeframe. The public needs more time to comment on specific regulations that have been I.D.'d for repeal replacement or modification. Thank you for this opportunity to speak.

Operator: And your next comment comes from the line of Julia Anastasio from Association of Clean Water Administrators.

Julia Anastasio: Good morning and thank you for providing us with the opportunity to provide comments on the executive order. My name is Julia Anastasio and I'm the Executive Director & General Counsel for the Association of Clean Water Administrators. ACWA is an independent, non-partisan national organization of state and interstate water program managers who on a daily basis implement the water quality programs of the Federal Clean Water Act.

Many of our members have responsibility for clean water programs, drinking water programs and groundwater protection programs. In order to advance the most focused and results-oriented program as possible, EPA must maintain a priority of involving states early in this process. And as you undertake this process we would like to provide you with the following high-level principles to guide your work.

Jointly prioritized regulatory review actions with your state water quality program partners ACWA is here to service your conduit. States and EPA must work together to maintain the current progress, avoid future declines in water quality and invest in those programs areas were the most important and meaningful water quality benefits can be achieved. EPA headquarters,

regions and states must jointly plan, evaluate and better orchestrate federal and state clean water programs to direct resources and expertise for the highest priority water quality problems for that region and/or state.

Moreover do not proceed quickly, take the time to evaluate recommendations since these regs are complex and interwoven. And what may seem like a simple tweak may have quite the domino effect. Preserver enhanced flexibility for states to implement the Clean Water Act. Streamline processes and eliminate duplicative requirements, rely on sound science to guide your decisions. No backsliding, preserve the gains that we've already made. And as much as possible please limit unfunded mandates, state resources are already stretched very thin and any reductions in that funding will make it more difficult for them to continue to implement the Clean Water Act as they see fit in their states.

Once again thank you for the opportunity to provide comments, and we look forward to working with our partners in the Office of Water.

Operator: And your next comment comes from the line of Peg Bostwick from Association of State Wetland Managers.

Peg Bostwick: Good morning. This is Peg Bostwick. I'm the Senior Staff Policy Analyst with the Association of State Wetland Managers which is a professional non-profit organization. Our primary interest today is in speaking regarding Section 404 of the Clean Water Act which regulates dredge and fill activities in wetlands and other waters. Like other water programs Section 404 has a very long 40-year history of cooperative federalism, this is nothing new for us. Under 404, qualified states and tribes maybe authorized to (some) administration of this program and many but not all waters of the U.S.

However today only two states have fully taken advantage of the opportunity to assume the program, this is for multiple reasons but one of them is because of uncertainly over the scope of waters that maybe assumed under the program. This is issue will be addressed in a report to the EPA to be provided later this month through a federal advisory committee process that's been going on for a couple of years now. And we urge EPA to consider the

majority recommendations in this report and to adapt these recommendations in revising EPA's Section 404 state program regulations at 40 CFR Part 233.

I also would like to echo the previous speaker and more broadly encouraging EPA as it proceeds to carefully consider the extensive collaboration among states and tribes and federal agencies. This is very important in addressing multiple concerns and integrating those in the permitting process. Such concern is not only state and federal water quality but (hand) drinking water programs, flood plain management and so on. And of course we are concerned with providing and timely and efficient service to those land owners and agencies to apply for a permit.

Any revision of the federal regulation that desynchronizes this integrated process may result in delays and an increase in regulatory burdens rather than what is intended. So we encourage you to look at these regulations in a context of the local administration. Thank you.

Operator: Your next comment comes from the line of Jane Gerdes from the City of Peoria, Illinois. Jane your line is open.

Jane Gerdes: Oh, thank you so much. My name is Jane Gerdes I am with the Public Works Department at the City of Peoria, Illinois. We're a community of about 115,000 located along the Illinois River. Today I'd like to specifically talk about the NPDES requirements for combined sewer overflow or CSO communities. And so my comments basically relate to the facts that these are unfunded mandates on small communities. We like clean water, we know the State of Illinois likes clean water, we know the EPA likes clean water. Everyone does but small communities are very challenged to pay for these unfunded mandates.

So in order to use our resources more likely or more wisely at the local state and federal levels, we'd encourage EPA to let the community's technical judgment stand instead of having, you know, many reviews on a state level and on a federal level, to allow the maximum use of adapted managements and project selections addressing CSO. And we'd like to have flexibility to

change our projects, our technologies as the years go by to better avail ourselves of new best management practices.

We'd also like EPA to recognize that the affordability challenges and its 2 percent of median household income does not address things like local governments, municipal budget, taxing authority. If I could wrap up I love what EPA does, I think they should focus on providing resources and funding to address clean water issues. Thank you very much.

Operator: Your next comment comes from the line of Edward Dorsey representing himself.

Edward Dorsey: Hello, I'm Edward Dorsey and I want to thank you for giving me this opportunity to speak. I have 27 years working in regulatory programs for municipal POTWs. And today I just wanted to say in general that I believe that the regulations worked well and they worked well for years. I believe we need to continue to have environmental protections that have good remedies to enforce the regulations. I do believe that if you look specifically at some of the regulations there are opportunities for efficiencies to be built that will help small communities and help municipalities implement these regulations more efficiently.

For instance under 40 CFR Part 403, the pretreatment regulations. There's a requirement that we inspect permitted users on an annual basis. This is not necessary during a five-year term if we inspected each facility twice during that five-year term and then perhaps if that individual was found to be insignificant, noncompliance and other inspection can be done. Affluent monitoring should certainly be done annually. Another example of inefficiency that could be built in relates to permit extensions when permits expire.

Under 40 CFR 403 we're required to renew permits after a five-year period and there's no allowance for an administrative extension. However under 40 CFR Part 1 226 there's an allowance for administrative extensions. I ask that that be also be allocated to Part 403. Finally I think that it's important that we look at the electronic reporting (rules chrome) 40 CFR Part 3 and allow

electronic submission of signed PDF documents. Currently we got fax documents and that's a big burden, we should be able to submit them electronically. Again thank you very much for your hard work and I appreciate your consideration.

Operator: Your next comment comes from the line of Mark Oliver representing himself.

Mark Oliver: Hi there. My name is Mark Oliver, thanks for this opportunity to provide my input. I have 30 years of Clean Water Act permitting and wetland and river restoration for a diverse number of clients throughout the forth quarter states. My comments related primarily to Section 404, the Clean Water Act. I believe its regulations provide only a minimum standard to protect water quality and wildlife habitat. The EPA and the Army Corps of Engineers are already basically a permitting agency. They're not really a regulatory agency since Clean Water Act permits are pretty easy to obtain.

The regulatory burden stems from the lack, if there is any, stems from the lack of personnel at EPA, Army Corps of Engineers, Fish and Wildlife Service, State Historic Preservation Office and tribal offices to process these relatively simple applications within a timely manner. It's the lack of personnel not the regulations that are causing time delays and burden if there is a burden. So I believe these agencies need to hire additional staff to turn permits around in a timely manner.

Violations also need to be rigorously addressed and persecuted because a lot of the agencies don't have the time to deal with these issues. And then one last thing is the jurisdiction of irrigated wetland needs to be revised as some (core) districts, take jurisdictions of irrigation water that's on a slope because wetland becomes established on a slope. And that normally would not persist in nature in most cases. And so, that's one thing I would like for EPA and Corps to take a look at.

That's all I have, thanks for your ability to take my input. Thanks.

Operator: Your next comment comes from the line of Renee Hoyos from Tennessee Clean Water Network.

Renee Hoyos: Hello, thank you for the opportunity to speak with you today. As the only state-wide organization in Tennessee dedicated to protecting the state's waterways TCWN has used the EPA OW rules and regulations to help meet our goals of safe drinking water and clean water for use for recreation. It is the position of the Tennessee Clean Water Network board of director, staff and its members that any changes to the regulatory framework should only be made after extensive research and public input on the topics and not driven by an artificial deadline of a new administration.

When you say making regulations less burdensome I have to ask less burdensome for whom? Certainly not the public. Polling show overwhelmingly the public wants clean water to drink. These regulations should not be relaxed for the convenience of industry but should continue to help protect the nation's waters that provide drinking water for millions of water and provide economic development through recreational opportunities for many as well.

Industry will always find regulation burdensome but they are not the only ones who live here. They are happy to use the resource and then share the pollution with the rest of us without having to pay their fair share of the burden they create. Rules and regulations that have helped protect our nation should not be changed in just 104 days. As a matter of fact we need more rule making from EPA to help protect our citizens from health threatening water pollution.

TCWN is part of 10 state collaborative tracking and fighting new (trends) pollution in the Mississippi River, the largest watershed in the U.S. and the third largest in the world. Right now states in the Mississippi River basin pollute the water with so much nitrogen and phosphorus, the beaches are regularly closed, drinking water is under constant threat and people's pets are dying. We want numeric standards for new (trends) nationwide.

EPA has battled this problem for decades with no avail, protecting the Mississippi River will take more common sense regulations not less. Thank you for this opportunity to speak.

Operator: And your next comment comes from the line of Eva Dillard from Black Warrior Riverkeeper.

Eva Dillard: I represent Black Warrior Riverkeeper, clean water advocacy group based in Birmingham, Alabama. We asked EPA Director Pruitt and the President not to rollback federal clean water protections unless you aim is to remake the entire nation and the image of Alabama. Federal laws and regulations provided critical regulatory minimum in places like Alabama which are essential to protect the public health and environment. Alabama always – already struggles to meet his minimum. We're number one in fresh water biodiversity but also number in rare species that at risk of extinction because of our failure to protect water quality.

Diseases more commonly found in the developing world are still found in the areas of Alabama plagued by sewage problem. We are beginning another recreation season where people will swim in sewage because our infrastructure is failing and we don't have a consistent or robust sewage notification policy. This is the result when there are many programs under the Clean Water Act that are not operating as intended because the regulatory systems are not sufficiently developed, implemented, funded or enforced.

Rolling back clean water regulations or cutting program funding weakens the minimum requirements in states like Alabama. You risk reigniting a race to the bottom that will harm the nation and the economy. Stakeholders have devoted years of careful study and thought to regulations like the Waters of the U.S. Rule, the Clean Power Plan and the Coal Combustion Residuals Rule. Rules like this protect the public health and environment but also afford certainty, debt measure goal and keep the playing field level and encourage innovation.

And importantly their economic benefits exceed their cost. Please make your focus bringing states like Alabama inline with the rest of the nation, thank you.

Operator: And your next comment comes from the line of Bob Zales from National Association of Charterboats.

Bob Zales: Yes, my name is Bob Zales II I'm President of the National Association of Charterboats operators. We represent Charterboats owners and operators across the United States and we are platforms and provide the opportunity for anglers to recreationally fish.

Our comment has to do with the NPDES general vessel permit issues. And we've been involved with this issues since 2007 and have fortunately have been able to have Congress to give us a current temporary exemption to the requirements for this PGP requirement.

And the fact sheets that EPA put out in 2008, they said that there were 13 million recreational vessels, 81,000 commercial 53,000 fret and tank barges. The 13 million recreational vessels have been completely exempted from these requirements. In the charter boat industry the vast majority of charter boats are simply a recreational vessel that has been licensed to operate commercially and has to have a U.S. coast license captain to carry passengers for hire. There's essentially no difference at all between the vessels that we own and operate versus the recreational vessel.

We're simply looking for this exemption instead of being temporary which runs out this coming December to be a permanent exemption because of all the issues that are here. This general permit would require the deck wash including rain runoff (inaudible) or among the many discharges that will require a permit to allow the discharge. These – currently we're regulated by the United States Coast Guard and by state resource agencies to ensure that the runoffs and discharges that we have comply with all the EPA's slated requirements.

So there's no need to burden us even further with more permitting, more log books, more possibilities, more liability for noncompliance and things of this nature. So we would recommend that this exemption, temporary that we have be applied permanently to the charter boat fleet in the United States. Thank you very much.

Operator: And you next comment comes from the line (Dulah Abusen) from Sierra

Club.

(Dulah Abusen): Oh, thank you very much. Sorry I was on mute. Good afternoon and thank you for the time. Today I wanted to highlight the importance of the EPA in ensuring clean and healthy waters across the nation. As a child from Southern West Virginia I've spent many days playing in a small creak catching crayfish, salamanders and frogs and I never thought and neither did my parents, I'm sure, think twice about letting me play all day in the creak in front of my cousin's house.

However as I became older and my world expanded beyond that small creak I learned that that creak was just a small part of a larger watershed and I learned about things like mountaintop removal in Southern West Virginia and its negative and polluting impacts not only on the water bodies near the mining sites but on the many smaller water bodies across Appalachia like my childhood creak.

I bring up these memories because EPA was established decades ago to deal with such scenarios, to look at the natural environment as a whole and to make it safe and healthy for all Americans. And even though the EPA has made many strides in protecting our waters, there's still a lot of work to be done. Too many communities across the nation often low income or communities of color still lack access to clean water. EPA needs to follow through in its core mission, not eliminate protections to ensure that all of us no matter where we live and work are protected from risks and have access to clean water.

We cant' afford EPA right now to pull back on its mission to protect human health and the environment even though it's being dictated right now by President Trump and Administrator Pruitt. Thank you. We may hear today about our environment and – a strong environment and building a strong economy are at odds with each other. But I think that if you look over the last course of the four decades you'll see that a strong economy equal – excuse me, clean water equals a strong economy and a healthy workforce.

So I close with thank you EPA staff and the Office of Water for their

dedication to our nation's waters and the all the work you have done in the past. And I ask that you continue your core mission of this agency to ensure that my children and all children across the U.S. can continue catching frogs and playing in their local waters that are safe and healthy. Thank you for the time.

Operator: Your next question comes from the line of Aviva Glaser from National Wildlife Federation.

Aviva Glaser: Yes hello, my name is Aviva Glaser, I'm with the National Wildlife Federation. I want to thank you for the opportunity to address the important issue of water regulation. We have 6 million members, supporters and affiliate from the country, the National Wildlife Federation is the largest national wildlife conservation organization in United States. It goes without saying that clean water is critically important for public health and the environment. We need stronger relations in place in order to present clean water for drinking, for public health, for businesses in order to maintain healthy fish and wildlife habitat for sports men and women and to support the (outdoor) economy and \$887 billion a year (history).

The conversation we are having must be how to strengthen not weaken these safeguards. Safeguards like the clean water act and the clean water rules. These safeguards are there for a reason, to protect public health and the environment. We depend on the health of our streams and wetlands and forest waters and we depend on the EPA to protect these water bodies. EPA regulations work analyses of water regulations show that it yields tremendous economic public health and environmental benefit.

So we need the EPA now more than ever to standup for people and public health and the environment. To make sure there are strong national safeguards in place so that all Americans have access to drinkable water and breathable air, and so sufficient wildlife that hunters and anglers (dependence) in water need truly have that crystal clear water. The last thing we should be discussing right now is weakening the commonsense protections that make our water, (clean), feasible and drinkable.

We are also concerned that this process comes short of the necessary public input required to made decisions of this scale, decisions that could result in real danger to the health of our communities and our environment. And so we urge you to have a more robust public input process before making these critically important decisions. Thank you for the opportunity to provide comments and we look forward to continuing to work with EPA and protect the health of our waters.

Operator: Your next comment comes from the line of Hayley Carlock from Scenic Hudson.

Hayley Carlock: Hi, thank you. I am the Director of Environmental Advocacy for Scenic Hudson. We are an organization that preserves land and farms and creates parks that connect people with the inspirational power of the Hudson River while fighting treats to the river and natural resources that are the foundation of the Hudson Valley prosperity.

Scenic Hudson is deeply opposes the proposed rollbacks of this nation's bedrock environmental safeguards under the Clean Water Act and other laws. The clean water act and the regulations that implemented have been vital to the Hudson Valley's economic and environmental resurgence over the past 40 some years. Today the Hudson River is the lifeblood of this region which is home to over 2 million people and it's the foundation of our \$5.2 billion tourism economy.

It's easy to take for granted all of the environmental health and economic benefits that the Hudson River bring to our region today. But before the Clean Water Act the majestic river that inspired the Hudson River's wall painting was essentially a cesspool and dumping ground for industries. For most of the 28th century the Hudson River was considered a nuisance and a scourge to the region. Communities abandon their river fronts seeing river front as a liability rather an asset.

People who lived downstream from the General Motors factory in Sleepy Hollow, in Winchester stated that they would know what color G.M. was painting the cars on any given day because of the color of the river. The

discharge brought sewage into the Hudson lead to bacterial level over 170 times the safe limit in the 1960s.

(Off-Mic)

... reduction in develop Oxygen so severe, it wipes out nearly all fish for 25 miles downstream. But today our natural resource economy is thriving and attracting outside investment and creating jobs. Far from being a job killer clean water regulations have been a boon to the Hudson Valley's economy. Regulations like the clean water rule would help further enhance Hudson Valley's economic health, ensuring that clean water necessary for drinking water supplies, hunting and fishing and water-based recreation will be protected from pollution.

Going back on the fundamental goal of the Clean Water Act to make all water swimmable and fishable would be enormously detrimental to our economic health, our quality of life and not to mention environmental and public (households). Thank you.

Operator: Your next comment comes from the line of John Noel from Clean Action.

John Noel: Hi, my name is John Noel of Clean Water Action. We oppose any efforts to bring in private sector lawyers to help rewrite the Clean Water Rule. It will remove the cornerstones of regulatory development, transparency and accountability. Large polluting industry is right now believes they should have the freedom to operate at the lowest possible level of environmental and public health standards. (It's a reasonable) update the EPA rule and attack on their freedom too, but there's another type of freedom, it is freedom.

We should be able to raise our families and communities free from pollutants from coal ash, ag runoff and oil and gas waste water discharges. We should be able to live free from pollutants discharge by industries operate at the lowest cost possible at the expense of everyone else downstream. In this vein we strongly support EPA's work on ELGs for unconventional oil and gas dissolving.

This is a commonsense step to protect community downstream from oil and gas development. Drinking water protections need to evolve along with industry practices and this rule striking appropriate balance that protects drinking water at zero cost and includes an extended deadline of compliance for operators who requested it. We also strongly support the UIC program. The number of injection while it's being drilled is increasing but EPA resources in this program have (flat line).

In order to protect drinking water from the continued expansion of oil and gas development it's imperative to fund this program at increase levels. The program must also be able to provide enough grant funds and state programs so these states can safely manage drinking water resources in tandem with oil and gas development. EPA should look in removing aquifer exceptions provisions which are currently not being implemented or managed correctly in many states across the country.

The aquifer exception rules are written 30 years ago and do not reflect current drinking water reality. We should also be clear about this process. It is not a good faith discussion about (wait solve) serious problems, this is about reducing the government's ability to do set minimum protections for public health and the environment while maximizing profits for polluting industries that are influential in Oklahoma political circles. Thank you.

Operator: Your next comment comes from the line of Navis Bermudez from Southern Environmental Law Center.

Navis Bermudez: Thank you. Hi. This is Navis Bermudez with Southern Environmental Law Center. SELC works in six states in southeast with local and national partners to protect the environment of its citizens. We believe that EPA should not be getting rid of regulations for the benefit of polluting industries. Instead EPA should be focused on its mission to protect human health and the environment by implementing, enforcing and strengthening protections.

I'll mention two regulations that we feel should immediately be implemented. The first is the 2015 Clean Water Rule. Under all scenarios the agency's analyses has indicated that there are more benefits than cost to this rule. And

in the southeast, in our region at least, 20 million people get their drinking water from sources that are feed by streams, wetlands and other waters the Clean Water Rule would help protect. The rule as finalized in 2015 should be implemented.

Another recent finalized regulation that EPA has (indefinitely stayed) is the affluent guidelines for stream electric power generating source category. The rule is projected to reduce the amount of toxic metals, nutrients and other pollutants that are allowed to be discharged by stream, electric power plants by 1.4 billion pounds and reduce water withdrawal by 57 billion gallon.

The estimated compliance cost for the final rule is \$408 million and the benefits are on (top), \$451 million to \$566 million. We feel this rule should be implemented immediately because in our region at least there are plans that are polluting our streams and rivers in Tennessee. I'll just give you one example before closing. The Cumberland Fossil Plant is ranked as the largest mercury polluter among coal plants reporting to the toxic release inventory in 2015.

So for those and other reasons, (I'll feel) that EPA should continue to enforce regulations on the book and strengthen those as necessary. Thanks for your time.

Operator: Your next comment comes from the line of Kaity Friedman from Charles River Watershed Association.

Kaity Friedman: Hello, my name is Kaity Friedman and I'm calling from the Charles River Watershed Association in Greater Boston, Massachusetts. The Charles River has made a tremendous turnaround since the 1990s and is today considered the cleanest urban river in the United States. The Charles River Watershed Association worked very closely with EPA Region 1 on the Charles River cleanup, and we think the staff and programs here in New England are outstanding.

The EPA played a monumental role in the complete revitalization of the Charles River in Boston Harbor by setting high standards for stronger

pollution control requirements such as the national pollutant discharge elimination system. The Clean Water Act section 303(d) has been pivotal in creating pollution plans that have lead to the revitalization of many urban watersheds in Massachusetts, helping to address nitrogen and phosphorus pollution which have negative impacts on the tourism economy and public health.

Environmental regulations need to be maintained and in fact strengthened rather than repealed. We have proven firsthand that investments in clean water, our economic drivers for the larger economy. All of the investments in cleaning up Boston Harbor and the Charles River which are considered a tremendous burden at that time have had a fantastic return on investment, our region is booming. Programs should be revamped to make it easier to get money out to the states and partner groups.

Regional EPA offices should be staffed up so that they can do their necessary work in a thorough and timely way. Finally, I would like to thank the EPA Office of Water for inviting me to speak as I feel our experience here in the Charles River can help other rivers and water resource professionals around the country. Thank you.

Operator: Your next comment comes from the line of Victoria Sullivan from the American Coalition for Clean Coal Electricity.

Victoria Sullivan: Thank you. I am with the American Coalition for Clean Coal Electricity which is a national trade organization, its mission is to advocate on behalf of coal-based electricity generation. ACCCE support's EPA's efforts to evaluate existing regulations for repeal, replacement or modification. At the same time we expect the EPA's effort to continue protecting our precious water (quality). Among EPA's regulations the steam electric effluent limitation guideline rule is a particular concern to ACCCE and its members.

Fortunately EPA has announced it will reconsider the ELG rule and has implanted a (stay) of its compliance state, pending reconsideration judicial review. ACCCE wholeheartedly supports EPA's reconsideration of the ELG rule. This rule is already having a severe impact on the existing (play) of coal-

fired power plants. The ELG rule along with its companion coal commotion residual rule are imposing hundreds of millions of dollars in cost that are being sighted by power plant owners as primary reason for announced coal plant retirements.

For example, southern company forecast the cost of a CCR and ELG rules to be 1.8 billion, in (northern India), a public service company projected the total cost for the ELG and CCR rules to these as much as 830 million and to be a major driver in the retirement for coal-fired electric generating (end). In contrast to the cost and plant closure burden of the ELG rule, even the previous EPA's cost benefit analysis of the rules shows that its cost exceeds its water quality benefit. Therefore we commend EPA for reconsidering steam electrical and look forward to working with EPA and other stakeholders of the agency reconsider the Effluent Limitations Guidelines rule. Thank you.

Operator: And your next comment comes from the line of Cara Cook from the Alliance of Nurses for Healthy Environments.

Cara Cook: Hi, thank you. This is Cara Cook. I'm a registered nurse and speaking on behalf of the Alliance of Nurses for Healthy Environments. Our organization strongly supports public health regulations such as the Clean Water Act, as the health benefit of these regulations far outweigh the cost. These regulations should be strongly enforced not weaken. As nurses we recognize clean water as essential component of human health while the Clean Water Act has made grate strides to ensure all of our citizens have access to clean drinkable water. There are many families who still do not have access to clean water.

As highlighted by the recent crisis in Flint, Michigan many communities need the EPA to strongly enforce current regulations so children and families are not unknowingly being exposed to toxic metals such as lead and other toxic chemicals. Many of those impacted by unsafe drinking water are low-income families or communities of color as we saw in Flint and Charleston, West Virginia. These families had to resort for bottled water for cooking and bathing or had to drive long distances for clean water. And families in Flint are still struggling.

These are expenses these families cannot afford and these communities should not be forced access clean water in this way. Water contamination also creates concerns for hospitals and health care facilities. Their patients are already some of the most vulnerable and not having access to clean water creates a significant burden on these facilities.

Following the chemical spill in Charleston, West Virginia hospitals are scrambling to find enough clean for routine but necessary operations such as hand washing for staff and visitors, laundry, sanitation even newborn's first bath. Due to the central public health protections afforded by clean water the Alliance of Nurses for Healthy Environments supports strong enforcement of clean water regulation. Thank you.

Operator: Your next comment comes from the line of (Eric Ulson) representing himself.

(Eric Ulson): Thank you. Compliance cost for regulations are too often seen as simply a profit eroding drag on the bottom-line, and this appears to be the premise of today's hearing, reducing regulations to improve the economy. This simplistic view is really consistent with President Trump's campaign rhetoric and the slogan of "Make American Great Again". But United States is already great when it comes to a 21st century economy that supports jobs while protecting the environment.

U.S. is a global leader in developing innovative technology that businesses require to cost-effectively protect and enhance our water resources, everything ranging from water filtration systems to advance manufacturing methods. Access to clean water is a growing global issue. And the United States can either be the economic leader in developing and deploying innovations to provide clean and save water to billions of people, or we could do what this proposal suggests, new regulation as a zero-sum game that pits jobs against clean water.

Now is not the time to back away from such innovation and regress to a more polluter-friendly nation. The Clean Water Act or much of what the EPA works to accomplish is premised on the idea that common-pool resources like

rivers and lakes can no longer be treated as free garbage dumps by profit-seeking industries. There are real cost to water pollution. The Deepwater Horizon explosion and spill lead to a \$20 billion settlement. The cost to fishing in Louisiana was pegged at \$2.5 billion. A much smaller chemical spill in Oak River in West Virginia cost the local economy \$19 million per day, roughly 24 percent of the economic output of the region.

The clean water industry on the other hand provides jobs and economic development throughout the country. A 2014 analysis by the clean – by the Water Research Foundation concluded that water, waste water and strong water utilities contribute \$52 billion annually and support almost 300,000 permanent jobs in the next decade. We need to basically keep moving forward and not be rolling back at regulations. There's really too much to lose by going backwards. Thank you.

Operator: Your next comment comes from the line of (Kalah Pendetwinn), Natural Resources Defense Council.

(Valerie Berrin): This is (Valeri Berrin) speaking on behalf of my colleague (Kalah). On behalf of NRDC, more than 2 million members and supporters did stop this misguided attack on public protections. The Office of Water provides vital drinking water protection for the American people, gaps and critical safeguards that only this office can fill remain and are endangering the American public and future generations.

The Safe Drinking Water Act, one of our bedrock environmental laws established the role of government in providing safe, clean drinking water. To protect drinking water, the Safe Drinking Water Act direct EPA to develop federal regulations. Under the Safe Drinking Water Act, the EPA is required to identify dangerous drinking water contaminants from arsenic to xylene and develop rules that either set maximum permissible levels for them or establish protocols to treat them.

NRDC today published a report showing that nearly 77 million people, roughly a quarter of the United States population spread across all 50 states were served by water systems reporting violation of the Safe Drinking Water

Act in 2015.

We also found that systems serving very small communities such as rural areas have significantly higher rates of violation of the health standards and a higher percentage of total violation compared with larger systems. Systems serving less than 500 people accounted for nearly 70 percent of all violations and a little over half of all health-based violations. One in every 12 Americans were served by a drinking water system with the health-based violations.

Health-based violations of the rules are most frequently cause cancer causing family of chemicals called disinfectant byproducts, coliform bacteria, the failure to properly treat surface and ground water, remove dangerous pathogens, nitrates or nitrites that can cause Blue Baby Syndrome and lead and copper.

President Trump and the (administrator) who had appeared want to roll back these vital protections which protect the public health based on the process of (basically) seeking complaints about existing federal safeguard. But it's clear that we need more safeguards and our job isn't done.

EPA has not set a single new standard for drinking water under the Safe Drinking Water Act since 1996. And in those 20 years, EPA has decided that only one new contaminant should be regulated (inaudible) on the safeguards that we need and focus the agency's time and expertise on fixing depressing pollution problems facing our country.

Operator: Your next comment comes from the line of Jennifer Chavez from Earthjustice.

Jennifer Chavez: Hello. The federal government has a fundamental interest and duty to protect waters that play an important role in interstate commerce. Any burdens associated with these regulatory protections are temporary and monetary in nature. While the harm caused by water pollution and lost of wetlands is difficult, it's not impossible to reverse and very expensive at that.

It's entirely appropriate that businesses that exist to generate profit should pay

for the cost of preventing their industrial operations from harming waters. And those costs should not be shifted to overburden taxpayers.

If EPA is looking to reduce regulatory burdens and we have two suggestions for regulations that are creating unnecessary burdens and are not helping EPA fulfill its statutory duties to protect water.

Number one, EPA should repeal its regulations that allow states to adopt water quality standards variances. Variances served no useful purpose that isn't already served by compliant schedules, which are established in the ordinary course of permitting and only need to – five years when a permittee is required to go through a renewal process anyway. Variances create confusion, unnecessary process and serve no interest other than delay. They have to be submitted to EPA and revisited every three years, creating uncertainty and more work for everyone including the regulated community.

Number two, EPA should repeal its recently adopted regulation that (our) regional administrators and regional water quality division head from making the finding under Clean Water Act Section 303(c) that revise our new water quality standard is necessary to achieve the goals and requirements of the Clean Water Act.

This regulation removed a crucial tool from EPA's regional offices and local staff who are sometimes in the best position to judge the local needs of water protection. Forcing this process to go through to the few staff at EPA headquarters served no useful purpose other than to burden and delay the much needed process of updating water quality standards.

Operator: Your next comment comes from the line of (Steve Jackson) from SCAP.

(Steve Jackson): Thank you for the opportunity to speak today. This is (Steve Jackson) Executive Direction for the Southern California Alliance of Publicly Owned Treatment Works, SCAP.

We represent over 80 public agencies providing essential waste water service for 20 million people in seven counties of Southern California. Our issue of

greatest concern is an unpromulgated water toxicity test method being required by EPA and NPDES permits. The Test of Significant Toxicity or TST statistical endpoint has not been adopted into title authority of the Code of Federal Regulations Part 136, and therefore, should not be incorporated into NPDES permits.

The TST guidance was not promulgated through notice-and-comment rulemaking, and includes an explicit disclaimer confirming that the document is not a permit or regulation itself. Yet, the EPA has been incorporating the use of unpromulgated TST into NPDES permits.

Furthermore, the State of California working with EPA is in the process of adopting a statewide action that would require NPDES permittees to incorporate the TST. Through these actions, the EPA is exceeding its authority by using an unpromulgated statistical procedure. The false positive error rate, which is the frequency of incorrectly identifying a nontoxic sample as toxic of the TST is between 15 percent and 50 percent. This false positive error rate has and will continue to result an increased rate payer rate costs with no environmental benefit.

California has approximately 230 waste water treatment plants based on the range of false positive error rates. This regulation would result in an economic impact to the public, conservatively estimated a \$20 million per year in California.

We are asking the EPA to issue a clarification that the TST is not promulgated under 40 CFR Part 136, and as such, should not be used to assess toxicity under the NPDES permitting program. This clarification should direct states to formally resend any previous violations, assess using the non-promulgated TST statistical endpoint. Thank you.

Operator: Your next comment comes from the line of Ward Wilson from Kentucky Waterways Alliance.

Ward Wilson: Greetings from the home of the Kentucky Derby and the Bourbon capital of the world. Thank you for the opportunity to comment.

Kentucky Waterways Alliance works to protect, restore and celebrate the waterways of our great commonwealth. We look to USEPA to set a floor of standards that we apply locally. Water regulations do impose some cost and time and money, but their benefits are even greater.

All along the Ohio River, our state's northern boarder. Cities use the river for drinking water, recreation and economic development. All of which are possible because the river is now much cleaner than it was before 1972. Let's work together in a meaningful inclusive process to make regulations work better to achieve their objectives, not lose the games that we already have won through hard work and expense. And this Saturday, when you're watching the Derby, remember those (inaudible) looks are made from clean water. Thank you.

Operator: Your next comment comes from the line of (Nancy Turek) from – representing self.

(Nancy Turek): Thank you for this opportunity.

Non-Hodgkin lymphoma, ovarian gastric and bladder cancers, methemoglobinemia, and birth defects are diseases that results in many burdens including human suffering and enormous cost for treatment, health care, and missed work. These are diseases that, in some cases, could be avoided if drinking water was not polluted with nitrates.

I would talk – like to talk about the burdens placed on people from unhealthy drinking water. Many people aren't familiar with the Flint, Michigan water contamination problem, which has yet to be fully addressed. Currently, much of the burden is on the families, the consumers.

But we live in Wisconsin, and unlike a city, our water comes from private wells. It has been known for many decades that over 20 percent of the wells in areas which makes agriculture exceed drinking water standards that were intended to protect human health. Treatment costs are shouldered by the consumer not the polluter, yet little is being done to enforce those health standards, which again bare cost for water treatment disease and health

insurance.

Pollutants like nitrates, pesticides and herbicides have been increasing in Wisconsin ground water. Treatment and replacement cost for individual and municipal well caused families millions of dollars annually. That's three times more to remove a pound of nitrogen from drinking water than it does to purchase the pound of fertilizer.

We cannot continue to place the burdens of water treatment and disease on individuals. We need to reform how this is handled. We need the EPA and the states to enforce the standards that are in place and substandards for the thousands of additional chemicals found in ground water that currently lack standards. Thank you.

Operator: And your next comment comes from the line of Marvin Wright Jr. from Pyramid Lake.

Marvin Wright Jr.: And thank you. I'm with the Pyramid Lake Paiute Tribe in Nevada. And I just wanted to acknowledge the work of the environmental protection agency with it in charge across the country.

Water is fishable and swimmable are the foundation of – for water quality. (Manageable) waterway, you know, certainly has to have the water, you know, to be (manageable). Those that know the hard work and struggled to achieve water quality systems know the danger of those and authority that do not know what hard work earns, you know, in earning our place in the quality ecosystem.

Reducing the regulatory burden should provide the proper designated authority to continue with the enforcement of water quality standards. And of course, controlling water quality standards are the only means to assure acceptable water quality for any water system that have no control, or reducing the regulatory enforcement can move pollution controlled backward instead of forward, or moving as sustaining water quality will not destroy any quality ecosystems.

Clean water is important to any reasonable person. The dependency upon limited water supplies create a natural response to protecting that supply legally and by managing it to exercise the right for entitlement or the purpose to use. The management of water supply is for purposes designated throughout a season of use and through the water here established the meaningful effort to restore and maintain aquatic ecosystems.

Human life has its place in the life cycle. That lifecycle must – and the water management is important attribute to the balance of lifecycle with water use. Internal watershed is not like any other waters that flow into the ocean. This makes a great basin, important to sustain quality standards amenable to support life as we know it. The supply must balance with demand, all demands.

So, I just wanted to acknowledge just in closing that, you know, our tributaries falling into Pyramid Lake, you know, is really important that the regulations that allow the management, you know, continue and that things are not going to be turned back, you know, by the political forces and the political, you know, influences out there, you know, that ignore, you know, the importance of water quality. Thank you.

Operator: Your next comment comes from the line of (Jeff Dailey) representing himself.

(Jeff Dailey): Good morning. My name is (Jeff Dailey) I am from the State of New Hampshire. And I would like to address the fact that President Trump and Secretary Pruitt, if they roll back the EPA work to clean water sources, this will increase the health cost due to the contaminated water sources being consumed.

EPA and other agencies need to continue its research on emerging contaminants such as 1,4 Dioxane, PFOA, PFOS, PFCs, and the other recently recognized chemicals. Nothing has been done with the water act since 1996. Here in New Hampshire also the (inaudible) New York, we have serious water source problems with no real federal support to resolve the previously mentioned chemicals, including lead, arsenic and chrome 5 and 6.

Do not allow lobbyists or industry lawyers or industry to be involved with the (blue writing) or determination of future EPA rules on clean water. Clean water is life. You cannot survive without it. I thank you very much for this opportunity of making my comment. Thank you.

Operator: And you do have a comment that just came in from the line of Cheryl Nenn from Milwaukee Riverkeeper.

Cheryl Nenn: Hi. I thought I was on hold to make a comment. So, I'm not sure what happened. But thanks for the opportunity.

We are really concerned, as others have mentioned at this effort, to reduce, replace and modify regulations, target safeguards without fully considering the benefits they bring to average Americans like clean water and healthy communities. It's EPA's duty to enforce these safeguards like the Clean Water Act and not to make things easier for industry. Plus, the idea that environmental regulations are hurting business is an alternative fact.

In reality, there's ample evidence that environmental regulations greatly improve our economy, our health and our quality of life. And weakening safeguards like the Clean Water Act and common sense protections like the clean water rule would diminish water quality and lead to more erosion and runoff that would threaten the 3 billion lakeshore tourism economy that we have in Wisconsin, our 9.4 billion recreational boating industry, and movement of 7 billion in cargo through our ports.

In addition, hundreds and millions of people depend on clean water for drinking water, livelihoods and recreation, and we've benefited immensely from regulations reducing water pollution and would be very harmed by proposed removal of these regulations. Approximately, 83 percent of the citizens in the Great Lakes depend on public drinking water systems that rely in intermittent, ephemeral, and headwater streams. And those water supplies would be harmed if the clean water rule, for example, is revoked.

In addition, increases in polluted runoff to the Great Lakes from removal of regulations would threaten the drinking water supply of 40 million Americans

and Canadians. And we really can't afford another drinking water crisis like what happened in Toledo, Ohio in 2014, when as we know, phosphorous included runoffs for harmful algae blooms that shut down water supplies.

We've had similar close calls with harmful algae in Wisconsin, in both Green Bay and Lake Winnebago. And we need to be making sure that our water regulations are stronger and not weaker. In addition, the only entities that benefits from revoking or weakling regulations are polluters, and then the American public essentially has to pay for the financial and health cost of cleaning that up.

In Wisconsin, (inaudible) has just finished up cleaning a large portion of the Milwaukee River. And we removed over 180,000 cubic yards of contaminated sediments to the cost of 50 million. So, contamination always has a cost, so we must ...

Operator: Your next comment comes from the line of Doug Krapas from Inland Empire Paper Company.

Dough Krapas: Good morning. I assume you can hear me.

We're located on the Spokane River in Washington State, that is a 303 (d) listed water body for PCBs. In lieu of the conventional TMDL process, our community has implemented a direct implementation plan referred to as the Spokane River Regional Toxic Taskforce to address PCB water quality concerns in the Spokane River.

The taskforce is represented by municipal and industrial permit dischargers, conservation and environmental interest in the state and federal regulatory agencies. It's evidenced from our analysis that significant contributions of PCBs to the Spokane River watershed originate from sources currently allowable under EPA's Toxic Substance Control Act regulations.

Studies by the taskforce show that allowable concentrations of PCBs and consumer products represent an ongoing source of PCB loading to the small Spokane River that through normal use, contributes to exceedances of the applicable water quality standards.

The taskforce has then identified numerous consumer products that contains significant concentrations of PCBs that pose a potential threat to human health and the environment, with pathways including storm water, industrial and municipal waste treatment plant discharges, and ambient contributions.

On November 28th, 2016, the EPA published revised Water Quality Standards for Washington State that lowers the PCB criterion, from 170 parts per quadrillion to 7 parts per quadrillion. The new water quality criterion is over 7 billion times lower than the 50 parts per million currently allowable for inadvertently generated PCBs under the Toxic Substance Control Act.

With this new rule, potentially every water body in the State of Washington will fail to meet water quality standards for PCBs. And this situation is not unique to the State of Washington.

The taskforce request that EPA evaluate and correct the discrepancies that exist between the Toxic Substance Control Act and the water quality criteria for PCBs based on the merits of the executive order in EPAs reference stockists. Thank you.

Operator: And your next comment comes from the line of Philip Cernera from the Coeur D'Alene Tribe.

Philip Cernera: Thank you. I am the Director of the tribes Lake Management Department, the Coeur D'Alene Tribe or those people that were found here, that create or put them on Lake Coeur D'Alene to protect this body of water.

Protecting human health and the environment is our paramount concern. The tribe has been at the forefront in this effort of protecting our natural resources in our homeland. In Idaho, polluters, with the support of the State of Idaho have called the shots and have trashed our homeland, and therefore, we are one of the largest super funds sites, a \$3 billion cleanup effort that is spearheaded by EPA.

Clean Water Act regulations also are critical in this effort to clean up our basin. EPA is currently our biggest ally and its safeguards are critical.

Without EPA's regulation, we go back to the dark ages of unfettered pollution.

Our water system and Lake CDA, Coeur D'Alene is the economic strongholds of our regions. Without a healthy lake, all is lost for a healthy future, both economically and environmentally. Thank you.

Operator: Your next comment comes from the line of Danielle Cioce from Harris County Engineering Department.

Danielle Cioce: Good afternoon. Harris County Engineering Department has years of experience in water quality, as well as a member of the regulated community, and as a regulator. Harris County is our nation's thirds largest county in population and home to more than 4 million residence with over 1700 square miles.

In order to properly serve and protect our community and the environment, Harris County must comply with numerous regulations, including the CWA and state water quality protection counterpart, the Texas Water Code.

We submit the comments that follow for consideration. Number one, support the continued use of best management practices rather than numeric limits in stormwater quality MS4 permits. This has been a recent effort by the EPA to move towards an excellent limit standard for MS4 permits. However, the Federal Clean Water Act does not require MS4s to strictly comply with Chapter 33 U.S. Code Section 1311 B1C. Instead, Congress required MS4 discharges to "reduce the discharge of pollutants to the maximum extent practicable, including best management practices, control techniques and systems, design and engineering methods, and other such provisions as the administrator determines appropriate for the control of such pollutants."

Chapter 33 U.S. Code Section 1342P3B. Best management practices have been shown to be an effective way to improve water quality in our community. Numeric excellent limits for stormwater are burdensome for the regulated entity of the taxpayers.

Number two, support the incorporation of nutrient data with regards to

bacteria total maximum daily load. The relationships between that nutrient and bacteria is not explored in current TMBL (detector). It is challenging to address waters that are impaired for bacteria without all the science to understand the complex interactions that may make meeting the bacterial limit impossible. Regulations should be based on complete science for the benefit of the taxpayer. Thank you.

Operator: Your next comment comes from the line of Ian Lyle from the National Water Resources Association.

Ian Lyle: Thank you all very much. Appreciate the opportunity to comment today. And thank you for your work on Clean Water Act.

I offer these comments on behalf of the National Water Resources Association and the 20 plus million, our members to supply water too.

Our members are responsible, members of the regulated community, however, we feel that the Clean Water Act needs to be applied appropriately. We recommend clarifying that isolated non-navigable interstate waters should not be jurisdictional. Clarify that manmade irrigation canals, ditches and drains are not navigable waters and are not waters of the U.S. are non-tributaries and should not be subject to Clean Water Act jurisdiction.

Further, we believe that a clarified and expanded processes to preserve agricultural conservation practices and their exemption from Clean Water Act are continued. We also believe that a clarification is needed to make sure that jurisdictional impoundments do not include manmade off stream facilities that are lawfully appropriate and remove water from the environment, such as a drinking water system, offstream storage pond, a intake canal or a forebay at a hydroelectric plant. We also believe that we need to clarify jurisdictional tributaries are not limited to waters that contribute – are limited to waters that contribute direct flow towards additional navigable water.

We will file additional comments in the docket. And thank you again for the opportunity to comment today.

Operator: And your next comment comes from the line of Mitchell Reid from the Alabama River Alliance.

Mitchell Reid: Hello and thank you for taking my call and for giving me the opportunity to call in.

Alabama has over 132,000 miles of rivers and streams, and unfortunately, the current regulations do not go far enough to protect these waters. Some examples of these include routine failure to adequately regulate stormwater discharges, which is waiting to impairment, for instance, the Cahaba River near Birmingham, Alabama. And the failure to require permits be updated for what is often decades. And we're seeing this with administratively continued (colash) permits that have well over 10 years of expired time.

The last thing I would say is in response to the waters of the U.S. rule and previous comments, that if there is a connection to navigable waters or waters where people will be in contact with those waters, that water should absolutely be regulated, whether that is a tributary stream or where that that is a manmade conveyance that would carry water into a tributary stream or navigable water. There is, in my opinion, no safe place to dump pollution if that pollution is going to end up in the waters of the U.S.

Thank you very much and we look forward to participating further in the comment session.

Operator: Your next comment comes from the line of Emily McKee representing herself.

Emily McKee: Given comments from the top of the executive branch lately, I'm very concerned that reducing regulatory burden may mean actually review – removing environmental protections, as I know a lot of the other callers from this line have expressed. Removing protections may enhance short term benefits for some companies but it would extent. I actually enjoyed breathing clean air and drinking clean water and I would find it quite burdensome not be able to do so.

These regulations that we have to protect our air and water were developed to meet a need, namely this deep temporal discounting that we humans tend to employ. As an environmental anthropologist, I have seen how we tend to undervalue the future. We weigh down the short term end side of the scale when thinking about long and short term benefits.

This means that I'd favor the ease of dumping my own factory that's flowing in the streams today over filtering and processing it even if that affluent may raise my kid's risk of cancer. And the problem is that I can't necessarily know these long-term risks myself as an individual.

It takes some collective reminder that the long term effects of our actions to keep that scale balanced, and this isn't simply hypothetical. History has shown how necessary environmental regulations are. I don't want to return to the days when the Cuyahoga River was so slick with oil that it caught fire. And that's not ancient history. The river was burning in 1969 when my – the year my dad graduated from college.

So, thanks a large part to the EPA's regulatory work, the river is now home to dozens of species of fish, where 50 years ago there were none. And human nature hasn't changed in those 50 years. There are still both altruistic and more focused folks among us.

Just as importance, economic incentives through global competition for cheap products pushed companies to cut corners more now than ever. Cutting corners often means externalizing environmental cost. But if a business owner is not required to take class in terms of pollution controls, recycling, et cetera, there's others who will shoulder those costs. And it is usually those marginalized and disadvantaged among us, low income people and people of color who have to do so. Cancer Alley in Louisiana is a shameful example of how poorly companies may "regulate themselves in environmental matters."

The harmful effects of pollutants do not go away simply because we ignore them. Would like us to remember how burdensome a more polluted environment ...

Operator: Your next comment comes from the line of (Gene Lumis) representing themselves.

(Gene Lumis): Hello. I'm speaking just as a private citizen with concerns about my country, my family and my friends.

I believe that America deserves to have clean water and clean air for its citizens now and in the future, and that we owe it to ourselves and the global environment to be good stewards of the earth.

The regulations are necessary to ensure clean air and water and I'm opposed to any actions that limit the ability of the EPA to ensure strong regulations to protect public health. Business and industry will profit – will be profit driven and they won't self-regulate.

Regulations won't kill jobs. Regulations will ensure that our water is drinkable and our air is breathable, so our public health is at risk. We can't put the profits of business owners over the lives of citizens. And I urge the EPA and the Trump administration to support strong regulations.

We can afford to turn back all the gains we've made, clean up the environments that we know are toxic. We can afford the increased cost of hospitalization that will come for citizens affected by the poisons we know that are present in our water and in the air. So again, I urge the EPA and the Trump administration to make our regulations stronger not weaker. And I thank you for the opportunity to comment.

Operator: And your next comment comes from the line of Valerie Nelson from Water Alliance.

Valerie Nelson: Thank you very much. The Water Alliance have worked with multiple stakeholder groups. The development of integrated water resource management approaches, one water where you bring water, waste water, storm water issues all together in one framework. And we've also trying to focus on non-point surface of pollution that are – were not typically part of the original Clean Water Act areas of concern. And we're also very interested in green and natural systems approaches to mitigating problems.

Our comment would be that the regulations developed sometime in the past do not necessarily match either the problems or the best solutions going forward. They don't typically allow for relatively non-conventional approaches such as natural oyster reef or wetland protection that nature can do as well as any kind of waste water treatment plant, for example.

So, I'd like to encourage EPA to continue its work in development of innovative consent decrease, where allowing for pilot projects and for non-point solutions, green and natural solutions have happened in some cities and I think that's a tremendous kind of flexibility and support for the optimal identification of the problems and the best solutions as they can evolve with demonstration and pilot projects. Thank you.

Operator: And your next comment comes from the line of Madeline Foote from the League of Conservation Voter.

Madeline Foote: Great. Thank you so much. My name is Madeline Foote and I am testifying on behalf of the League of Conservation Voters over a million members nationwide.

The EPA's mission is to ensure that all people in this country are protected from significant risk to human health in the environment where they live, learn and work. We haven't even come close to accomplishing this goal yet. Too many communities, often low income or communities of color, still lack access to clean air and healthy water. EPA needs to step up its game, not eliminate protections that ensure that all of us, no matter where we live, work or learn are protected from risks and have access to clean water. We can't afford for the EPA to pull back on its mission.

Often, communities with the least power bear the brunt of pollution and impaired public health after decades of policies located polluting facilities and other industrial activities near their homes and schools. These communities need a strong and robust EPA to stand with them to create a floor through common sense, guidelines to ensure their cities and states don't sell their health to the highest bidder.

The last thing we need right now is for EPA to consider weakening the safeguards that protect these communities and all of us from polluter's efforts to jeopardize our water and damage our public health.

We've seen one happens when access to safe and clean water is interrupted as it was in Flint, Michigan. Life is interrupted, business and schools are shattered, families have to spend money on bottled water for cooking and bathing or drive miles and miles to find access to clean water. In some cases, low income families and those who aren't Native English speakers haven't even been aware that their drinking water was compromised. The social and economic toll of dirty and unusable water is massive.

Instead of eliminating regulations, we urge the EPA to spend its time and resources on exploring how to protect clean water for all communities across the country. Thank you.

Operator: Your next question comes from the line of Stephanie Madsen from At Sea Processing Association.

Stephanie Madsen: Yes, good morning. I hope that everyone can hear me. This is a little bit awkward. I'm calling in from Alaska.

I understand people's concern about drinking water for sure, but I'm a little disappointed that EPA doesn't (been) some of the regulatory programs for people to specifically comment on their program. We certainly don't want to roll back clean water regulations, but there are burdensome regulations for my industry which is a fishing industry that doesn't go towards protecting your clean water but increases the cost of operations, particularly in compliance not in regulating clean water.

So, I think this would be a much better process if we look at the different programs and you've been them according to the regulated industries' concerns. I certainly appreciate and respect people's concerns about drinking water in other parts of the country. I think if the regulations were working, we wouldn't have those problems. So I'm not sure it's the lack of regulations that are causing the problems.

So I would appreciate EPA being a little more strategic in their request for regulatory burden comments versus just opening it up why, because I think a lot of things are being confused here. And I certainly don't want my comments to be interpreted as relaxing drinking water regulations, but the regulatory burden to some industries is quite high. Thank you.

Operator: And your next comment comes from the line of Julia O'Neal from MCSC.

Julia O'Neal: The Mississippi Chapter of the Sierra Club. I live on the Gulf Coast, and for seven years and counting, we've been coping with the (B.P.) oil spill. It killed many animals and it corrupted the sound waters of the Mississippi sound and the entire Gulf Coast in many other states.

So, I'm speaking just as an observer that if we want to have water that we can drink and swim in and cook with, then it's going to be much more expensive for taxpayers to revoke the Clean Water Act. They will have to figure out locally how to clean up water that industry has happily and cheaply polluted.

If industry has no responsibility, then why do we have government? I know that the current number 45 and (through it) want to get rid of government and this will certainly do that and excellent way to do it. Welcome back to the dark ages as one of the earlier speakers said. It's going to increase all of our cost health wise. If we leave our water polluted and drink it and eat it, but we're going to have to clean it up and it's going to be local that we're going to pay for. Thank you.

Operator: And your next comment comes from the line of (James Hui) from University of New Hampshire.

(James Houle): Hello. Yes, my name is (James Houle). I work at the University of New Hampshire. And specifically with the stormwater center, we've been researching stormwater issues for over a decade and a half. And I just wanted to bring to like two things that I haven't heard discussed. So we value clean water as well and it's in our mission. We're dedicated to it. But I wanted to talk about three particular things.

One, originally, we were funded by the National Oceanographic and Atmospheric Administration, NOAA, and we simply became aware of the division and ambiguity that exists between the two federal mandates between EPA and NOAA. And so, we'd really like a scientists, we'd really like to – for EPA to understand that land work issues quickly affect and contribute to coastal issues and more effort. I know some effort has been done, but more effort to really integrate, these land work and coastal issues should be addressed.

Another term that is of concern regarding policy on water infrastructure is particularly with respect to stormwater management. It's a fact that much of our existing infrastructure especially in the eastern seaboard is half a century old or older. And if we're going to invest in infrastructure upgrades, either (planned) or social response to catastrophic failures like hurricanes, then we need to make sure that the latest and greatest science and best management practices are being implemented. To be clear, business as usual, likely represent practices that are over a half a century old.

(And note), much of the testimony offered today presents a duality, either for or against, or for clean water or against over burden some regulation. And in fact, I want to present an alternative that scientific technology with respect to non-point source control especially with respect to stormwater management is evolving and has changed and is rapidly developing.

New innovations from implementation are coming out that clean water better and are cheaper to implement, and that also has to be considered as well. So regulations need to be flexible in order to incorporate these innovations that are adopting over time. Thank you very much.

Operator: And your next comment comes from the line of a (Bob Hoffman) representing himself.

(Bob Hoffman): Yes. Hi, can you hear me? My comment is in how this entire conference is being framed as reducing burdensome regulations. Regulations are not burdensome. They are protections for consumers so that we can have clean water. Regulations are necessary component in our society. Without

regulations, then for profit entities will simply (collude) at will without any sort of repercussions, our health, the health of our children and our grandchildren is at stake.

I beg the EPA to stop deregulating existing system and, in fact, add more regulations because all of our water is polluted. We are being poisoned. And I can point to any number of ways we're being poisoned everything from nuclear ways to extractive industry pollutants from fracking that use chemicals that are known carcinogens, waste from a public systems that are poorly managed, that are dated, not the list of which is laid in our water.

I fail to see how deregulation does anything except poison more people, as well by maintaining regulations and putting (bar) into play. We are actually creating jobs by importing – there you go. OK. What can I say?

Operator: And your next comment comes from the line of William Hannemann from Aqualete Industries.

William Hannemann: Hello, and thank you for taking my call. He'd never cease to amaze me as I've been in construction for the last 45 years, the amount of advancements in technology on the job site. The masons get out of their car, they bring the tools, they bring the lasers, they can build a concrete wall accurate within a quarter inch of a half a mile. Everybody is walking around the job site with cellphones talking to their relatives in Europe. The technology use to check the airflow on the buildings. But what do we bring on the job site to protect the most precious natural resource water, bales of hay and (platter) bags.

I think that it's time that we step up our technology. And when the – we start to deal with the regulations, we make sure that we are not deregulating the law set there in effect regarding storm order and job site runoff. For sediment and hydrocarbons that are washed down the street and into our water ways. It is essential that we keep these in place and – but we can also streamline the regulatory process and we can streamline the inspections.

Most of the soil conservation districts are overwhelmed and do the best job they can, but they are very, very overwhelmed. I think it might be possible to

incorporate the township plumbing inspectors into these regulatory bodies into their on-the-job site any way, and pumping order and plumbing as part of their expertise. I think it would be excellent if we could use that. So I think that if we could incorporate – I think it would save some money to incorporate the plumbing inspectors along with the other regulatory bodies to do some cursory inspections and we can truly work on what you're trying to accomplish here which is to – it avoid multiple inspections and multiply layering of regulations that's really causing us money. And that's my comments.

I just want to clarify that the company I was -- (really the) comments here, representing the Aqualete, A-Q-U-A-L-E-T-E Industries, we're in New Jersey. And I hope everybody got my comments before. If anybody didn't, if you'd like me to repeat them, it's basically says that the technologies that we've made in so many other areas of the – of construction industry has been excellent. But the advancements that have been made in the water treatment industry are still back in the dark ages.

We're still using (platter) bags and bales of hay to process the water that's discharged from job sites foundations and so forth that should be – and the law had clearly states EPA that was passed. And I believe in May 8th, 2015 or '14 clearly states that that order must be treated before it's discharged. These laws are not being enforced by any stretch. I think everybody would agree with that.

And that we really need to step up our inspections on that. But one of the ways that we could do that was how to over burdening the regulatory body is to possibly incorporate that into the plumbing inspections of the houses. If we can incorporate that into the national code enforcement division, that would allow the plumbing inspectors who are already inspecting the pipes and the boarder and so forth and already have expertise in this field, they're on the job site anyway. And that will be part of their inspection and that would relieve the regulatory bodies not to have to stop by at every job site and every building under construction and they can then concentrate their efforts unto other areas.

And I think it would be a great relief both for regulations, not that we relieve the regulations but – one of the problems we have is the soil conservation districts are overburdened with what they have to inspect. And this would take the old construction industry and free up all those inspectors to inspect other areas more effectively.

Operator: And your next comment comes from the line of Rob Moir from Ocean River Institute.

Rob Moir: Hello. I'm Rob Moir from the Ocean River Institute up in Cambridge, Massachusetts. And I would urge, you know, given the state of our water ways, the EPA should be fully funded. When Congress fail to pass a bill to give funds to municipalities to test for the drinking water for harm for chemicals, you know, the EPA was all that was left to help us out with testing for that.

We just had a study of drinking water in the thousand schools in the Boston area of Massachusetts and majority of them had lead in the water. But we wouldn't know unless funds are spent to test this. So it's very important.

Time and time again, we see the EPA working with businesses to help them find ways to reduce their pollution. Please, fully fund the EPA.

Operator: You're next comment comes from the line of (Karen Melubam) from Environment Now.

(Karen Melubam): Hi there, this is (Karen Melubam) from Environment Now, calling from the city of Los Angeles, California. We are the largest city and the second largest county in the country, 4.5 million people lives in the city of Los Angeles, 9 million lives in the country. And as many as you know we've experience the historic drought here in California over the past five years, only recently experiencing some relief.

But I'll tell you a story about how we've change our dependency on water supply during drought years when we cannot import water to Southern California because of drought which happens cyclically and more often here in California in recent years. We depend more and more on ground water.

And when we look to our groundwater basins in Southern California and Los Angeles, we find decades upon decades of pollutants in our groundwater basin. Industrial pollutant and in the (peripheria) of Los Angeles out into the agricultural area, we find legacy pollutants from the agricultural sector.

The reason that pollutants are there was because regulation failed us for decades. This means that we have to spend more and more money, (rate) care money on cleaning up those groundwater aquifers, have the regulations been enforce to begin with than we would have had clean water available to us.

These expenses hold disproportionately on poor people throughout the basin. And we need the help of the EPA to not only enforce regulation but to work equitably with rate payers to clean up and protect their groundwater resources moving forward. I not only support the continued issuance and enforcement of regulation. I believe the EPA's office needs to be better funded and the state agency that carries out a lot of their regulations must be better funded as well.

I know that here in Los Angeles Country, we have 3,000 permitted industrial facilities. We have between 6,000 and 8,000 un-permitted facilities that contribute to the pollution.

Operator: Your next comment comes from the line of (Ann Hatwain) representing herself.

(Ann Hatwain): Hi, yes. I just wanted to say that I agree with everything that the previous speaker said about we don't – we need to maintain all the regulations from the EPA and support with budget items in the budget, both at the federal and state and local level. And we don't need to repeal any of the regulations. What we need to do is strengthen them and make sure that this country has clean water for everyone, both in the city and in the country and in all the states.

So again, I'm just supporting the EPA and all of its regulations. So please make note of that. Thank you so much.

Operator: Your next comment comes from the line of Scott Yager from the National

Cattlemen's Association.

Scott Yager: This is Scott Yager from the National Cattlemen's Beef Association. Our organization represents the whole cattle value chain and cattle expertise goes all the way to the retail side. We represent mostly (cattle) producers, feedlot operators, stockers, and these are folks who are (raving) down those on the ground. And we've been through a lot of (inaudible) issues on their behalf.

Cattle producers biomark one (on March), want an healthy environment and then personally invested in (inaudible) and water clean for their kids and grandkids. Conservation programs are especially useful to them and provide them a flexibility they need to make smart conservation decisions.

I think the conservation we're having here today is a really good one to start to ask. And it's not just about rolling back the regulations. I think that's part of it but it's looking at current programs to figure out how do we streamline and how we make them easier and better for the regulative entities to comply with them and for them to execute programs and packages on their operations that will help not only through environment but only group to the bottom line, which is really vital that culture industry and you have futures who are really living year by year on the margins.

So with that I want to say, therefore they are working together with the EPA and I would urge the agencies to listen to the voice of producers and to hear what they're saying, and to really try to work together collaboratively with them to figure out way to solve some major issues. Thank you.

Operator: Your next comment comes from the line of (Bob Weaver) representing himself.

(Bob Weaver): Thank you. I urge the administration to continue funding support for the National Pollutant Discharge Elimination System Permit Program. And to rely on that for both short term and long term requirements and to dispense with the use of civil consent decrees for implementing or, yes, for implementing long terms schedules for publically owned treatment works.

The use of long term – the use of consent decree, so a consent decree has been misused by many prior administrations, Republican and Democrat, and both the administration and the Congress must spend more funding into the NPDES Permit Program as administered by many or even most of the states. Thank you very much.

Operator: Your next comment comes from the line of John Hill from the Board of Church and Society.

John Hill: Good afternoon. Thank you for holding this listening session of the chance to make comments. My name is John Hill. I serve as the Director of Economic and Environmental Justice for the United Methodist Church's Board of Church and Society. Our church has around 7.5 million members across the United States and another 4.5 million who was outside of the U.S.

When our church gathers every four years to take official statements, we have a number that express our belief in water as a sacred gift from God, and our responsibility is stewards our God's creation for protecting and rightly sharing that gift of water. Our policy is clear and opposing effort to privatize or monopolize water and it clearly calls on government at all levels to make transparent in community-centered decisions around water use.

A lot of our members are front line responders in times of disaster, both natural disasters but also human-created disasters like those of Flint, Michigan and Charles West Virginia, for people particularly those with least resources have been expose to dangerous toxins. And who's lives have been abandoned because of the failure of government to properly regulate and properly fund clean water systems.

We have worked with EPA in the past and we are hopeful to do so going forward in support of strong regulation to protect God's people and God's planet. In addition, we support full funding for EPA to carry out its vital mission. We know how critical water is for the help and well-being of our communities and all the creation. So thank you again for the change to make these comments and look forward to strong efforts by EPA to protect God's gift of water, thank you.

Operator: And your next comment comes from the line of (Mary Neggy) from – representing herself.

(Mary Neggy): Hello. My name is (Mary Neggy). I'm a graduate student in public health, going to U of M. I have learned a lot in the last year about what the EPA does and their mission, and how successful the Clean Water Act is in for example. And I've also learned a lot about what happens when companies regulate themselves and it's frankly terrifying, and I think that the EPA has a very important mission and I don't think that air regulatory policy be diminished in many way. If anything, I think it should strengthen and that is what I have to say.

Please keep doing the good work, EPA. That's all.

Operator: Your next comment comes from the line of (Arianna Suttengrare) representing herself.

(Arianna Suttengrare): Hi, thank you very much. I am (inaudible) Ecologist and an Ecosystem Ecologist. And one of the things I wanted to say particularly about the Clean Water Act is that, this is one of the strongest piece of legislation we have that actually protect wetland in the United States. And we lands provided tremendous amount of value to the American public, (someone in) ecosystem assessment gave wetlands a value of \$15 trillion that was back in 1997. So obviously, those – that value would probably even greater today, actually hard to put an actual estimate on these things.

But in terms of reducing things like the severity of hurricanes, et cetera, there's another \$22.2 billion per year that U.S, wetlands provide to the United States. And so, because of the Clean Water Act is such an important part of the way this country protects our wetlands, I am very much against any changes in the Clean Water Act without very careful assessments of what kinds of impact that would mean for both the Clean Water Service which we haven't even spoken about, but also all the other benefits that wetlands provide to the American people.

And so, I am very strongly oppose to changes in the Clean Water Act which is one of the federal pieces of legislation we have in this country and quite honestly has been the model from any other countries as well.

My experience with the Clean Air Act is a little bit less related to my own profession, but I also very interested in the protection of the Clean Water Act – sorry, the Clean Air Act. And in particular, the more recent advances in terms of thinking about regulating carbon dioxide through the Clean Air Act. Carbon Dioxide in excess is a pollutant and it should be regulated like any other pollutants and it is causing tremendous harm already to the planet. Mostly in the United States, we are seeing that in terms of changes in precipitation patterns. We're seeing increase drought and we're seeing more severe precipitation in many cases.

And we are then also seeing obviously raise or sea level rise that are increasing and beginning to affect many, many communities that previously did not ever experience flooding. We're having flooding not just from major storm events from also nuisance flooding. So you're getting regular blue skies, beautiful day flooding of coastal communities and all of that is related the building greenhouse gases in the atmosphere.

So again, EPA, you've been doing a great job on implementing this very (inaudible) amount of legislation in the country. I don't want to see it weakened in any way. And we need to be very careful as we make any changes in the regulations that EPA enforces because all of them have been put together based on very sound science by most community science. And so, it's very important that we not weaken this key legislation. Thank you.

Operator: Your next comment comes from the line of (Cynthia Hagre) representing herself.

(Cynthia Hagre): This is (Cynthia Hagre), I'm an Aquatic Ecologist. And I've worked for many years in areas related to wetlands, surface waters, et cetera. I don't support any kind of weakening of any regulations with EPA. Currently work – has in place and in fact believe that we should be strengthening regulations and working harder at some mandatory controls for nonpoint source solutions

including from agriculture. Thank you.

Operator: Ladies and gentlemen, as a reminder if you would like to make a comment, please press star then the number one on your telephone keypad. That is star one to make a comment.

Your next comment comes from the line of (Mike Swarovski) representing himself.

(Mike Swarovski): Hi, this is (Mike Swarovski). I'm representing myself having dealt with the EPA for a long time. I would very much hope that we could take the regulation and if it's something that's required every six months, make it a year if it's something that's year, maybe make it 18 months, to try to reduce the reporting burden that is just choking America. If we could just not demanded in such a frequency, I guess that would be – that's the word. If it's something that has to be, you know, we're got to do all the tests and everything but if we could still push back so we could have a 50 percent or something less frequency, it would be such a help to America.

Again, nothing would change the quality of the water, wouldn't change. It's just the burden that the EPA just annihilates people with. If they could just, you know, help us with that, instead of every six months a year, instead of every year, every 18 months, it would be a great help. Thank you very much.

Operator: And your next comment comes from the line of (Robert Wayland), also representing himself.

(Robert Wayland): Good afternoon. I'm quite concern about reducing regulatory burden and at the same time reducing environmental protection. I think EPA's regulation is generally have been well thought out. I had been subject to extensive public comment in many cases. They've been litigated. Usually with both sides that is – those from industry and those from the environmental community represented. And we still have a lot of work to do to have our nation's water meet the statutory objectives of the Clean Water Act.

I have been off and on for the last seven years working as a volunteer member

of the Virginia Water Control Board, and the Chesapeake Bay executive committee advisory committee. And I know we have a lot of additional work to do to allow Americans to enjoy the many services that are provided by surface water and by wetlands. And I think that there should be a very careful look at proposals to reduce burden, to ensure that they don't have the same time reduce the protections that all American deserve and most Americans want. Thank you.

Operator: Your next comment comes from the line of Kathy Phillips from Waterkeeper Alliance.

Kathy Phillips: Thank you. I'm a coast keeper with Waterkeeper Alliance. I'm from the Eastern Shore of Maryland. I do not support any weakening of EPA regulation and in fact I would like to see better controls of non-point sources through EPA, particularly as it relates to agriculture. That is the number one source of pollution to my water shed and to the Chesapeake Bay watershed.

There are too many exemptions given to ag compared to other polluting industries. I think that we need all the current Clean Water Act protections that we have right now. This is important in my watershed especially protections of water, of wetlands, for this low coastal community of mine, on the eastern shore of Maryland is our last line defense against sea level rise. We'd not want to see any regulation rolled back on protecting our wetlands.

Back to agriculture again, the Clean Air Act, ammonia disposition is also one of the largest contributors of nitrogen to My coastal water shed as well as the Chesapeake Bay watershed. I think there's – encourage by recent legal decisions to have EPA monitor and regulate ammonia emissions from combined animal feeding operations.

And I would just like to end by saying that sea level rise is a major concern, salt water intrusion into our drinking water is a major concern and coastal resiliency is the best way to protect the economies of these coastal regions. I think that the EPA has been doing a fantastic job so far, the men and women who've work within the EPA have always been very helpful to me when I've had to contact them on issues. And I just want to say thank you EPA and to

our current administration and to those listening in on this call, I support protecting the EPA, the Clean Water Act and the Clean Air Act. Thank you very much.

Operator: Your next comment comes from the line of (Jennifer Coffey) from ANJEC.

Jennifer M. Coffey: OK, thank you. This is (Jennifer Coffey) from ANJEC, the Association of New Jersey Environmental Commissions. I would like to say that we oppose any roll back to the Clean Water Act or any EPA regulation. This phrase reduce regulatory burden as a euphemism. And it comes from Governor Chris Christie here in New Jersey. We have seen it before. And what it has translated into is roll back and protection for drinking water, for clean air, for soil erosion.

It is not acceptable to happen at the federal level. We need if anything stronger rules and regulations to protect the water we drink, the air we breathe and the food that we eat. I want to echo the comments of several people before me and say that the clean water act is essential and could even be enhanced in terms of its implementation for agriculture in nutrient management, manure management, paying more attention to sea level rise that is happening as for climate change. We are seeing it happen in our coastal community such as New Jersey, the South Jersey bayshore, the Atlantic coast.

We are our lands eroding. We are doing work to try to fortify out wetlands. We are seeing our community wells being infiltrated with ocean water because it's coming in further and faster than we've ever seen before. We have drinking water issues in New Jersey. Some of our lead levels are higher than they were in Flint, Michigan.

So to have a conversation that implies anything, that indicates any kind of a roll back in monitoring measurement, public access to data, information. Where standard is completely unacceptable to us and those that we represent. And so thank you for the opportunity to speak and again, also echoing the comments of others.

I'd worked with EPA for a long time and there are staffs at the EPA New York

Headquarters in D.C. and I know in other places that do a fantastic job in providing resources, expertise, counsel ...

Operator: Your next comment comes from the line of (Rebecca Rotor) from – representing herself.

(Rebecca Rotor): Yes, thank you for the opportunity to speak. I have not prepared my comments. I am very concerns that there's no weakening of any environmental regulations, especially pertaining to water and air in my case. I'm a Pennsylvania shale gas refugee. I live in a rural country, South (Rohana) County

I had organic chemicals in my well water. I had documented impacts (inaudible) in science from flaring at Wellpass that happened 1,800 feet from my house, from using (inaudible) PM 2.5 spec monitor that documented very high levels of PM 2.5 which I think most likely came from one of the natural gas compresses, processing in this extraction field gas.

I feel that EPA does a wonderful job. At the end of the day, that's all I had, to reach out to protect my health, my air and my water because rural communities fall through the crack. And I am against any additional consideration being given to industry to roll back regulation, because that's going to translate into people getting sick like myself, because the environment, protecting the environment is protecting public health. Thank you.

Operator: Your next comment comes from the line of Susan Masten representing herself.

Susan Masten: Hello. This is Susan Masten I'm an Environmental Engineer, has been working in the field for over, almost 40 years now, which is frightening. Live outside of New York City, can remember the smog and the asthma attacks that I had because of the smog.

I want to, (of course), offer my thanks, gratitude (inaudible) with EPA for all of the regulation for their own place that have improved public, improve the

environment and I want to request that no additional weakening of regulations being made. EPA is there to protect public health, to remember what life was like before the EPA. So even now, it's clear that there are significant numbers of death still due to poor air quality.

There still issues with our water quality. We need to protect our air. In terms of CO<sub>2</sub>, CO<sub>2</sub> is clearly a pollutant, correlation to CO<sub>2</sub> level. And I mean, sea level rise, have a T-value of less than 0.0001, correlation to explain CO<sub>2</sub>, and already excited to also have a T-value of less than 0.0001.

So we're on almost unbelievable correlation between sea level rise and CO<sub>2</sub>. We know the reasons for this. We understand the science. It's time we at, thank you.

Operator: Your next comment comes from the line of Ryan Sinclair representing himself.

Ryan Sinclair: I'm a Environmental Microbiologist that work as an Assistant Professor and Loma Linda University. And right now I have a project out in some of the tribal lands around. And I wanted to say that I'm against reducing any regulatory or even any attention to the Safe Drinking Act. I go out to this, tribal areas and I measure drinking water and, you know, the EPA regulations are great.

But I mean, if this people can't meet these regulations now and they don't have safe drinking water, what it the regulations and requirements were, you know, somehow ease up. And we wouldn't even have leg to stand on when we're approaching the environmental justice issues for these tribal communities.

So, yes, I'm against – against any repeal or revisions and if anything, there needs to be research but effective indicators, microbial indicators to this, to monitor drinking water. Thank you.

Operator: Your next comment comes from the line of (Kathryn Thomas) representing herself.

(Kathryn Thomas): Hi, I'm an Aquatic Scientist with an environment law background. And

over my 40 year career, I have worked for a variety for entities including watershed, a major water supply, utility for East Coast city, state and federal river conservation programs.

Like some of the others on this call, I'm often asked to remember the world Free Clean Water Act and free most of our other environment laws. I spent my childhood and teen years living in world without these laws. I object to characterization of this inquiry on it's phase, that the term regulatory burden implies that there some sort of unequal attention being placed on private industry that is not fair. And I think we have to stop (commoditizing) air, clear air and water. And we have to in capitals, capitalistic system, expect that any business that uses public trust resources such as air, water and land if required to internalize the externalities they place on those resources.

That means they do not get to keep all the process while expecting the public to bear all of the burdens of anything that they do to these resources, so thank you.

Operator: Your next comment comes from the line of (Emily Summer) representing herself.

(Emily Summer): Hello. I'm (Emily Summer). I'm an instructor for the Alabama Real Estate Commission and have been practicing real estate (inaudible) since '81. I'm also on the advisory council for local clear water organization called Dog River Clearwater Revival.

We do not need to throw back any of the regulations where you have scene that benefits of clear water and clear air here in Mobile.

The problem is that the children are being educated K through 12 about environmental issues with there as I said lack among adults. I teach them in the (will to) continuing education classes and then this news to them about clean water and clean air. So we need to put a bigger push on educating a general public but we did not roll back any regulations. Thank you.

Operator: Your next comment comes from the line Faith Zerbe with the Delaware Riverkeeper Network.

Faith Zerbe: Hi. Yes, I'm biologist with Delaware Riverkeeper Network, I've been doing this work for about 20 years. Before that I did private consulting for about four years related oil soil response in national research damages assessments. And clearly this is far as this idea regulatory burden to protect our air and our water, which again we cannot have a state economy, a healthy environment if we do not have a clean air and clean water.

Here in Pennsylvania where I have lived pretty much my whole life, we look to the APA to really help us to enforce the rules that are available to us. And where soft of few like extraction has clearly left, abandoned mine drainage in rural communities and people who are very sick in rural communities of Pennsylvania, who look to the EPA to often step in and to be that voice from a community perspective also with NEPA and other rules by having the ability to work with various agencies as the community. We have the ability to look at things like pipeline, the fracking pipelines that are coming across Pennsylvania and the more south chill region right now, really big issue.

The methane emissions with GPA had been regulating and now there is a step back, another really big issue. So certainly we need to be strengthen to these rules and any point that these rules are burdensome. Again, it's a policy and it's not true because of anything we need think. So thank you for the time.

Operator: Your next comment come the line of David Loveday from WQA.

David Loveday: I'm Director of Government Affairs for the Water Quality Association. We represent the water treatment industry for residential, commercial and industrial. We also represent dealers and install water treatment.

As more contaminant are found and more emergency contaminants are become regulated, we think that our products have been brought in as to create and remediate these contaminants. We run the ground on Flint, Michigan. We have products in the ground now and Petersburg, Milwaukee and other communities.

So we would like to see this as continue use our product as short term, in

some cases maybe a long term solution in rural and this advance communities. So please keep this type of treatment in mind as you – as we find the contaminant to the emerge contaminant. Thank you.

Operator: Your next comment comes from the line of (Mark Selinger) from the Slump School. (Mark), your line is open.

(Mark Selinger): My name is (Mark), I'm at the Slump School. One thing I'd like to offer up is, one way to reduce regulatory back log with Clean Water Act with reestablished the Army Corps of Engineers, (certified with the) linear program that was around in the 1990s. The idea was a test program was to basically -- to attempt to privatize the wetland delineation process. And the press idea behind this was enable highly trained certified professionals to undertake the rule which is currently filled by Army Corps of Engineers.

And this new idea would basically be for the cordial to kind of take a back seat to this delineation process and basically simply administer certification programming get out of the jurisdiction, a real process entirely. Private sector developers currently enjoy the benefit that the U.S. tax payer covers all the expenses related to these establishments but what with boundary by the core. By transferring this rule to private professionals developer can cover the course associated with this effort rather than the taxpayer.

As they are benefiting from one of the project profit regenerate, it seems reasonable to expect as they could cover this expense. And so now that we save the tax payer money, it will also generate jobs and also with this (inaudible) will be subject to income tax, and that effect is a government revenue with the lot. One other benefit is that the private sectors that are able to handle the work volume and the turn around time with jurisdiction determinations can play with the increase.

And one of the biggest complaints is the construction relates as results of U.S. on credentials back logs as one of the biggest challenges facing in the developments. Thank you.

Operator: Your next comment comes from the line of (James Cleghorn) representing

himself.

(James Cleghorn): Hi. This is (James Cleghorn) living in Maryland now formerly at Western Pennsylvania in the fracking fields. I did submit written comments.

The first thing I want to say is that I just heard about this conference call here today 20 minutes ago then I would encourage GPA to do this again. You need to hear from the voices of people who are affected by regulations that are right now good but not good enough. There is no – there is no validity to the premise that this regulations are burdensome if they don't need to be made less burdensome. If anything else, they need to be improved upon and tighten but the industry has been at the table every single time or DPA regulation has been formed as we can do to the best of their ability.

And now they want to weaken that more with this red hearing that there are burdensome regulations that are affecting them. So my point here in addition to what I've submitted in written testimony is that, this listening session needs to continue. What I've heard here is just about everybody is say that it is not burdensome that we need to in fact preserve the regulations that protect our environment. Thank you.

Operator: And your next comment comes from the line of Jenifer Collins from Earthjustice.

Jenifer Collins: Hello. My name is (Jennifer Collins) and I'm an associate legislator representative for Earthjustice. I appreciate the opportunity to speak today, I grew up in Florida and my childhood was been spent on the water.

From the time as I was graduated from college, I lived within walking distance of lake or river. But even as I appreciated the beauty of my local water ways, I saw signs of environmental problems. From water quality advisory posting to the smell of algal blooms and fish kill.

Unfortunately that reality is not uncommon, with some 46 percent at our country streams in rivers and 32 percent of wet lands and poor condition unfit for swimming, drinking or fishing. The EPA was created and went to laws

like the Free Water Act were pass because unchecked pollution was impacting the lives of families, businesses and communities like mine.

But I still want to do, we made great strive and cleaning up our water in promoting public health for growing the economy and strengthening small businesses.

Common sense that all safe guards to help space and municipalities control and reduce the pollution of our rivers, lakes and bays as vital to the health of these communities.

The conversation we need and should be having now is how to strengthen landmark safe guard like the Clean Water Act and common sense protection like Clean Water Rule. More than 117 million people get their drinking water from store that (inaudible) streams that are protected by the Clean Water Rule. Yet, instead of insuring that these sources of drinking water are clean and safe, our elected officials are doing everything they can to make it harder to protect free water and public health.

We know that it is not the – in the interest of polluters to police themselves, strong safe guards from EPA and other agencies ensure that polluters can't simply process to poor people and when they do, there are consequences. Communities need strong and robust EPA to stand with them and create common sense safeguard, not with move protected regulation. Thank you.

Operator: The next comments come from the line of Ben Alexandro from the Legion Association.

Ben Alexandro: Hi. This is Ben Alexandro from the Maryland League of Conservation Voters actually. And basically we're more worried about drinking water than we have been for year.

So when looking at the disasters in Flint, Toledo, Charleston and many others, it's clear that we really need to be discussing how to strengthen our protection not weaken them. Because often it's communities with the least power that really bear the branch of the pollution, the effects of entire public health and

water pollution. So we really need to be talking to how we can strengthen landmark safeguards like the Clean Water Act and the Clean Water Rule, et cetera.

And from perspective here in Maryland we've had a huge effort to restore the local rivers and streams in Chesapeake Bay. And these efforts are working, you know, the bay started to come back with the (head stone) starting to shrink, bay grasses are starting to re-grow, bull crab is starting to come back, et cetera. And this bay is the huge economic engine of the state and the whole, you know, Mid-Atlantic Region.

But this recovery is fragile and it's not a long way to go. So, it really mean in enforcing existing regulations is incredibly important as most cost effective way to reduce pollution. And the economic benefits that we get far that way at any sort of that cost burdens with them. So, we really need strong regulations to protect the health and welfare of all Americans and I hope that we can have that conversation soon. Thank you very much.

Operator: The next comment comes from the line of Diana Mahmud representing herself.

Diana Mahmud: Yes, good morning, at least it's morning here in Los Angeles. I am speaking for myself although I am an elected council member for the city of South Pasadena. I'm chair of the San Gabriel Valley Council of Government Water Committee. Our council of governments represents 31 cities and in our region, the cost then as four compliance is \$6 billion. The estimated cost within the 88 cities of L.A. County is \$20 billion.

In one of my region smallest cities, within my council of governments, the cost is estimate at \$1 million per resident. Part of the region the cost is still high is that 33 (PMDLs) had been identified in our (MS4) permits based upon dubious science.

The cost is absurd in Los Angeles County because we are essentially being required by our local water quality control board to capture and infiltrate storm water within our respective jurisdictions. This in turn revolts in cities

being required to do such things as digging up parks, building a substructure within the parks and then replacing the lawn. I should mention that to estimate the cost that I have cited are capital cost only, they do not include operation and maintenance.

We are prohibited from using existing flood channels which are concrete line structures because they are considered (wodust). We have little control over the pollutants in our storm water. We need to strengthen regulations to require more robust science in establishing water quality objective. In a workshop scheduled later on this week, a (303D listing) is based upon a single water sampling. We need to codify in regulations, EPA Financial Capability Assessment Guidance for (MS4) system to make consideration of the guidance mandatory, where an existing water way has been dramatically altered here in Los Angeles County over the decades by concrete lining. We need to ..... from the definition of (wodust). Thank you very much.

Operator: The next comment comes from the line of (Jenny Neumann) representing herself. (Jenny), your line is open.

(Jenny Neumann): Thank you. My name is (Jenny Neumann) from Los Angeles, California. I'm not – replaced or modify the existing environmental regulation. They are critical to protect or share natural resources. The benefits of these regulations are at way a new burden of complying with them. Yes, they cost money but as a tax payer and a consumer to whom the cost will be passed.

I'm willing to pay of little extra to ensure that we have clean water, clean air and healthy forest because I believe our economy, our national identity and our national security depends on it. Thanks.

Christine Ruf (EPA): I think this speaks the last of the commenters, it's 2:00. We need to close the session. But thank you to everybody on the phone and also online for hanging in there for three hours, we only have a few folk to drop off the webinar. So, thank you so much, we appreciate your inputs, we will be transcribing your written and verbal comments. I just put a – we just put a link online to folks about sending us an e-mail. I thought we would have your e-mail addresses through the webinar, but I was advised otherwise.

So, the e-mail address to send in a request for the transcript is online, but it's owregulatoryreform@epa.gov. All the folks that were on the phone, we do have your e-mail so we can send you to that information as well.

A reminder that EPA docket on this issue across all the program will close on May 15th. So if you want to send an additional comment, please do so by the 15th.

So, thank you for joining us. (Joe), any last – anything you want to say?

**THE COMMENTS BELOW WERE SUBMITTED AS WRITTEN  
COMMENTS VIA THE WEBINAR, IN ADDITION TO THE  
VERBAL COMMENTS ABOVE**

Mateland Mayes: I'm from Warren County, NC. WE fought against having a PCB dump forced on our community in 1982. After of decades it was discovered that the landfill was not sealed and that the liner was breeched. The EPA and the state were forced to clean and decontaminate the landfill. Water safety is very important and without proper regulations, poorer communities can once again be tared to become waste towns. I think that the EPA should be strengthened NOT weakened.

Andy Kimmel: EPA rules were prepared through lengthy and thorough rule-making processes. This rushed process does not properly provide enough opportunity to properly evaluate the value of current protections. It also presupposes that protections need to be removed. Each rule should be reviewed through a full process with ample opportunity for public comment.

Christina: Agree with Andy

Jesse Iliff: one wonders whether rolling back regulations that protect our health and environment makes sense, when it seems unlikely that EPA can effectively enforce the regulations we currently have, considering they can't organize a conference call.

Shirley Clark: Under the federal Multisector General Permit, certain industrial dischargers are required to meet specific stormwater discharge limits (numeric limits). The regulations should require that municipalities, specifically new development and large-scale redevelopment, should be on a timeline to move into that direction.

Curt McCormick: I will also submit in writing : 1. 40 CFR Part 403: EPA needs to adopt administrative extension for IU permits that mirror the criteria used in the NPDES regulations (40 CFR Part 122.6). 2. 40 CFR Part 403: EPA needs to put out a policy that makes it clear to EPA regions and States that POTWs must keep their local limits, legal authority and program up-to-date even where a NPDES permit is expired. An expired (administratively extended NPDES permit) cannot be modified by EPA/states to incorporate a pretreatment program approval as a minor modification of the NPDES permit. EPA must allow POTWs to adopt updates at the local level (with an appropriate newspaper notice) where the POTW is operating on an administratively extended permit. The modifications should be reviewed by the Approval Authority to assure they are approvable. Then, when the NPDES permit is reissued, EPA/states can incorporate the minor modifications. Curt McCormick, POTW.com

Brady, City of: There seems to be no “reality check” by the USEPA on mandating rules and regulations and how it impacts different type of “customers”. For instance: a small rural community is not “equal” to say, a large metro-plex. A regulatory mandate on a rural city is a big deal. Most times small communities or towns are so “cash strapped” that a regulatory mandate places a real economic hardship on it's residents. Many times the rule cannot be met simply because there is no money. The point here is there needs to be improved regulatory implementation methodologies that takes into account the reality of the diverse communities and urban landscapes of America

Shirley Clark: The Chesapeake Bay model runs primarily on percent removals. However, the science has moved well beyond that limitation and we can do a better job investing in the actual science in the model. The International Stormwater

BMP Database, funded initially by the US EPA, provides information on the expected performance of stormwater control measures. We are able to begin to develop numeric criteria and to use numeric calculations to predict water quality benefits.

Robert Adams: I have lived near Philadelphia all my life, as did my mother and earlier ancestors, back to the 1850's. When my mother was young, you could smell the Schuylkill River a mile away. When I was little, we swam in it, but probably shouldn't have. It was always muddy. I was by the River earlier this year, and realized to my surprise that the water was clear! Please do not do anything that would jeopardize the significant progress we have made since the Clean Water Act was passed.

Ward Wilson: Kentucky Waterways Alliance works to protect, restore, and celebrate the waterways of our great Commonwealth. We look to USEPA to set a "floor" of standards that we apply locally. Water regulations do impose some costs in time and money, but their benefits are even greater. All along the Ohio River, our state's northern border, cities use the river for drinking water, recreation, and economic development - all of which are possible because the river is now much cleaner than it was before 1972. Let's work together in a meaningful, inclusive process to make regulations work better to achieve their objectives, not lose the gains we already have won through hard work and expense.

Shirley Clark: As a proposed reform, stormwater and TMDL needs to be integrated. In the Chesapeake Bay basin, the urban runoff component is not shrinking and is a source of impairment to many waterways. MS4 plans must address the TMDL requirements in their areas.

Ward Wilson: typos corrected in this version: Kentucky Waterways Alliance works to protect, restore, and celebrate the waterways of our great Commonwealth. We look to USEPA to set a "floor" of standards that we apply locally. Water regulations do impose some costs in time and money, but their benefits are even greater. All along the Ohio River, our state's northern border, cities use the river for drinking water, recreation, and economic development - all of which are

possible because the river is now much cleaner than it was before 1972. Let's work together in a meaningful, inclusive process to make regulations work better to achieve their objectives, not lose the gains we already have won through hard work and expense.

Shirley Clark: ASCE-EWRI has developed a document that is in publication that will address costs documented by MS4s in implementing their low impact development/green infrastructure. I will attach that document to my docket comments.

Jesse Iliff: In the Chesapeake we use millions of federal dollars to install clean water best management practices, in the industrial waste water sector, agricultural sector and to address urban and suburban stormwater loadings.

Julia Anastasio (ACWA): ACWA submits the following high level principles to guide OW's work as you undertake this process: 1) jointly prioritize regulatory reform actions with state quality programs and ACWA can serve as the conduit; 2) preserve or enhance flexibility for states to implement the CWA; 3) streamline processes and eliminate duplicative requirements; 4) rely on sound science to guide these decisions; 5) no backsliding -- preserve the gains we have made; and 6) limit unfunded mandates

Jay Sauber: EPA policy of listing 303d waters using a standard exceedance frequency of no more than one occurrence in three years for metals regardless of whether or not there are 2 observations or 500 observations is clearly not scientific. This policy practice needs to change. And at a minimum should include biological confirmation prior to overloading the 303d list when clearly unnecessary.

concerned\_citizen: Jesse Iliff - we do now, but when the 97% cut to the Ches Bay Program takes effect, we may not. :(

mitch reid: Making the system more efficient is always a good thing but there must be a protection for water quality. This will require a baseline and making sure that we do not have backsliding.

Shirley Clark: Jesse Iliff - yes, millions are going in throughout the Chesapeake Bay region;

however, in PA, the planning is poor and the science has moved on past most of the regulatory guidance. EPA should be updating their guidance to states frequently.

Janice Beecher: Speaker is making a very valid point about building capacity for compliance as a means of reducing "burdens" without sacrificing vital protections.

Robert Adams: In Pennsylvania, the DEP has been cut and cut and cut again, to the point that our state enforcers can no longer do their jobs effectively.. Please add federal funding to help state agencies to do their jobs.

Ward Wilson: Regulations have costs, but also benefits. Clean Water Rule, 40 C.F.R. § 230.3 - the agencies' analysis indicated that under all scenarios, the change in benefits of Clean Water Act programs because of the rule exceeded the costs. Benefits were projected to range from \$338.9 to \$572.3 million/year, compared to an estimated range of \$158.4 to \$465 million/year in costs. U.S. EPA & U.S. Dep't of the Army, Economic Analysis of the EPA-Army Clean Water Rule (May 2015), [https://www.epa.gov/sites/production/files/2015-05/documents/final\\_clean\\_water\\_rule\\_economic\\_analysis\\_5-15\\_2.pdf](https://www.epa.gov/sites/production/files/2015-05/documents/final_clean_water_rule_economic_analysis_5-15_2.pdf)).

Bijaya Shrestha: EPA's mission is to protect human health and the environment. We don't do that by getting rid of laws and guidelines that protect our waterways and public health from industrial pollution. EPA should be asking the American people which laws and regulations they want to strengthen and make more robust.

mitch reid: It seems like most of the inefficiencies that folks are highlighting can be chalked up to an agency that is understaffed and underfunded.

Shirley Clark: In the Chesapeake Bay basin, our streams are impacted by the discharge from coal-fired power plants. Air pollution regulations should be cognizant of that fact and continue to reduce mercury discharges.

Jesse Iliff: @Juan, in large measure, EPA provides funding to enable states and municipalities to protect their own resources. In Maryland, many millions of federal dollars are used by our state department of environment for improving and monitoring

water quality.

Janice Beecher: Re devolving to states, water and air do not respect state boundaries and children do not choose where they are born. There are equal protection considerations here.

Jason Flickner 2: EPA Office of Water should provide a minimum 30-day comment period on "Reducing Regulatory Burden" from the date the transcript of this call/webinar is made available to the public.

Linda - Red Cliff Band: I echo what Mr. Jason Flicker 2 has stated: EPA Office of Water should provide a minimum 30-day comment period on "Reducing Regulatory Burden" from the date the transcript of this call/webinar is made available to the public.

Shradha Upadhayay: PA Office of Water should provide a minimum 30-day comment period on "Reducing Regulatory Burden" from the date the transcript of this call/webinar is made available to the public.

Jason Longbine: Juan Garrido, air and water pollution do not respect state boundaries. States with relaxed environmental regulations would burden their neighbors who have higher standards. States' rights doesn't work with regards to air and water quality.

mitch reid: The term unfunded mandate keeps getting batted around. It sounds like this is an backdoor request to be able to pollute without oversight. The cost of reducing pollution must be shared by the states. Alabama is last in the nation in funding environmental protection. We do not need less regulation from EPA. We need more participation from the states and local entities. They must do their part and in Alabama they are not.

Amanda Loeper: The new EPA DMR requirements for those facilities with a State Water Authority are being asked to input data twice. This regulatory burden is not benefiting water quality in any way, it is only increasing administration work. California has more stringent regulations than EPA and facilities located in states with a strong water authority should not be required to also input data to

the EPA. If the EPA wants the data, they should go through the State to gather the information, not burden facilities with additional admin work. Our resources are better spent implementing BMPs for better water quality, because improving water quality is what we all support and want to achieve.

Janice Beecher: Coordination and harmonization of reporting requirements to improve regulatory efficiency and transparency is a good idea.

concerned\_citizen: mitch reid - couldn't agree more! i could live the rest of my life w/o hearing the term "unfunded mandate."

Ward Wilson: What would Phoenix pay to have a Hudson River in their city?

Katie Friedman: Hello my name is Katie Friedman and I am calling in from the Charles River Watershed Association (CRWA) in Greater Boston, Massachusetts. The Charles River has made a tremendous turnaround since the 1990s and is today considered the cleanest urban river in the United States. CRWA worked very closely with EPA Region 1 on the Charles River cleanup and we think the staff and programs here in New England are outstanding. The EPA played a monumental role in the complete revitalization of the Charles River and Boston Harbor, by setting high standards for stronger pollution control requirements such as the National Pollutant Discharge Elimination System. The Clean Water Act section 303(d) has been pivotal in creating pollution plans that have led to the revitalization of many urban watersheds in Massachusetts, helping to address nitrogen and phosphorous pollution which have negative impacts on the tourism economy and public health. Environmental regulations need to be maintained and in fact strengthened rather than rep

Katie Friedman: rather than repealed. We have proven firsthand that investments in clean water are economic drivers for the larger economy. All of the investments in cleaning up Boston Harbor and the Charles River, which were considered a tremendous burden at the time, have had a fantastic return on our investment. Our region is booming. Programs should be revamped to make it easier to get money out to the states and partner groups. Regional EPA offices should be

staffed up so they can do their necessary work in a thorough and timely way. Finally I would like to thank the EPA Office of Water for inviting me to speak as I feel our experience here on the Charles River can help other rivers and water resource professionals around the country.

Curt McCormick: EPA pulled back the signed Dental Rule (40 CFR Part 441) . This final Rule was worked on for years and balanced comments from municipalities, states and industry. This Rule was as lenient as possible while requiring basic BMPs to be instituted to reduce mercury. EPA should issue this final rule.

MITCH REID: Frankly this whole thing feels like a kangaroo court to allow Admin Pruitt to enact changes that he has already decided on. Considering that state agencies are already talking about EPA "intention to rescind" certain rules why has EPA not put out a draft list. Very few regulated entities are participating on this webinar but I fear they will get the overwhelming attention when the rule comes out.

Bill Hurd: I received an EPA Audit of the Approved Pretreatment Program that I manage on September 24, 2015. EPA has failed to report its finding!! EPA should be required to release inspection reports within 30 days of conducting inspections. 2 years is too long!

Evelyn Wendel: WeTap is on line. We need to improve public drinking fountains and safe public drinking water access for healthy communities.

Eric Olson: The Brookings Institution recently found that a quarter of "clean economy" jobs are manufacturing jobs, with higher pay and greater export potential than other sectors of the U.S. economy.

Madeleine Foote: We're all impacted by water regulations. Cities and municipalities represent and work for their citizens, citizens who care about clean water and don't want water protections rolled back.

Dean: for us regulated cities, I very much appreciate the Clean Water Act, but please if the state is mandated to carry out, then the EPA

Ward Wilson: Good point on regulation limiting ability to implement new WQ standards.

Dean: should not be allowed to audit MS4 cities

Dean: that is the state's job now

Amanda Loeper: Dean, I agree. The EPA should go after States who are failing or lack state and local authorities.

Dean: amen

Dean: we in the MS4 world who

Scott Caldwell: The Dental Rule (40 CFR Parts 403 and 441) would cost programs nationwide an expected \$69-71 Million dollars at and create a reduction of 992 pounds of mercury being discharged annually. The problem lies with the 50 POTW study and data that is not likely to be accurate. Saying this measure being implemented nationwide is balanced and fair may be disingenuous. Many POTWs have no issues with mercury loadings or meeting discharge limitations.

Dean: are trying are always are in fear of the EPA coming in and the state refusing to give ample guidance

Shirley Clark: We also need to continue to increase how many areas are subject to MS4 regulations.

Dean: yes, even though we are only 8% of the problem and ag continues to be voluntary. ridiculous

anon: Ag will continue to be voluntary. And you will continue to have food on your plate, clothes on your bqck, and a roof over your head.

Jason Longbine: Dean, I agree with that. I was told by an EPA representative that even if EPA

had delegated NPDES authority to my state, and they approved the state NPDES program, and my MS4 was in full compliance with the state program, EPA still reserved the right to determine that we were in violation and take enforcement action.

Bill Hurd: EPA must always reserve its right to oversight enforcement

Dean: yes, oversight to the regulating state, not to the permit holders

mitch reid: Alabama Rivers Alliance has just filed an appeal with circuit court to overturn an arbitrary decision by the EPA to not hold EPA accountable. In an effort to protect Alabama, EPA failed to follow its own regulations. The regulatory burden here is on the people of Alabama who are suffering from polluted water. Oversight should be strengthened not rolled back.

<http://alabamarivers.org/alabama-conservation-groups-appeal-to-court-to-hold-epa-accountable-to-clean-water-act/>

Patricia Schuba: I am from a community impacted by coal-fired power plant pollution - air, water, soil. The Ameren Power Plant in Labadie MO is the largest in the state and 14-15th largest in the nation and does not have scrubbers, discharges coal ash pond waste water into the Missouri River, etc. We formed a nonprofit to fight the siting of a new coal ash dump in the water table of the Missouri River as the EPA finalized the CCR Rule in 2015. Communities, like mine, are engaged and want a robust EPA regulatory framework to protect us and the natural resources we all depend on (drinking water, surface water, productive communities for people and businesses to inhabit). Our experience has been that the federal EPA plays a crucial role in setting regulation based on facts and science and that they could be doing even more but industry stakeholders and politics always gets in the way of agencies doing their best. This is not the time to tie EPA's hands. Our community advocated for 7 years to get keep toxic ash out of our water

Eric Olson: The long term cost of lead poisoning in Flint, MI is estimated at \$400 million. If anything, we need more regulations going forward, not less.

Patricia Schuba: Our floodplains clean drinking water for free... how can "reducing regulatory burden" be in the service of the American public or our economy?

mitch reid: In Alabama the two greatest burdens to the people of the state that rely on clean water are the failure of the EPA to protect streams from hydrologic alteration and the virtually non-existent regulation of Non-point sources

Scott 3: We only need to protect water that can float a boat?!?! That makes a LOT of sense

Shirley Clark: @Scott 3, that is how the Interstate Commerce Act has been interpreted in many states. However, some states put recreation in as interstate commerce because the recreation attracts people from across state lines. Small kayaks.

Nancy Hammett: Inspired by the many tributes to the benefits of the Clean Water Act. I hope this Reg Reform process will require those requesting reg roll backs to demonstrate that water quality benefits will not be lost or are not worth the costs, rather than requiring EPA staff to demonstrate again what has already been shown in past cost-benefit analyses.

Scott 3: INtegrated planning addressing all water issues in a watershed is a good way to go. Prioritize our efforts, there is not enough \$\$\$ to do everything right away.

anon: Regulated entities need the flexibility to innovate. the conventional regulatory approach falls short and boxes in without allowing a common sense approach.

Nancy Hammett: Agree, Scott 3. Some hard challenges given multiple jurisdictions, source types and pollutants, to ensure benefits aren't lost, but this is a fruitful approach to pursue.

BARRY BLUNDIN: Amen !!! sensible regs and pro growth are not mutually exclusive

KK 3: complexity leads to midnight contractors and non-compliance. Streamlining the entire process to focus on stie work as opposed to paperwork would likely be quite beneficial

BARRY BLUNDIN: "burdensome" = a good regulation that is being inefficiently enforced or executed resulting in unwarranted cost to the regulated stakeholder -- this can be one definition

William R. hannemann: To be clear, the name is Aqualite Industries from New Jersey, we are manufacturers and distributors of patented technology that reduces pollutants in groundwater and stormwater. Our # is 732-695-6336.

mitch reid: cow producers work really hard to roll back the regulations that protect the water they say they care about.

Tom Sanders: Thank you EPA. I support the majority of what you do to keep us all safe. I hope you survive the current administration.

mitch reid: "reducing regulatory burden" is a euphemism. Great comment.

Elizabeth Herron: Elizabeth Herron - private citizen and water resource professional. Thank you EPA for helping restore our water over the past several decades. More needs to be done, particularly in light of changing climate and increasing population. Water is an essential resource - it must be protected now and into the future. While I am certain some paperwork regulations can be reduced, the overall framework is essential. Regulations must be science based, effectively and fairly enforced.

BARRY BLUNDIN: fun fact -- The Clean Air Act is 234 pages in length

mitch reid: Its not even close -overwhelming majority of participants reject rolling back regulatory protections of clean water. Most want EPA to go further.

Josh: People, Try to view this positively, like reducing the paperwork that Mike mentioned a while back. Think about ways to make the PROCESS more efficient

Ina L. Nez Perce: Extend comment period to 30-Days from posting of comments from this session. I agree we need to preserve the gains we have made since the days before EPA was in existence. We need to rely on sound science to protect our

water for our future generations.

Ed Wheeler: Everyone wants clean water and clean air but if you work with these regulations and regulators day in and day out you will know that there is a lot of waste in the regulations and how they are enforced.

Adam: well mitch thats because these are all climate change crazies. EPA should be abolished and athority given to the states to regulate. The answer is not more government intervention

Josh: How come the standard in place for testing water allowed the LOOPHOLES for pollution in drinking water from the tap?

MLP: agree with Josh. look for effieency improvements.

Ed Wheeler: They don't its how they are /are not implemented

MLP: oops efficiency

Shona Ganguly: The Nature Conservancy supports EPA water quality regulations to protect people and nature. Communities are adversely affected when water regulations are not in place. Also, ecosystems are already threatened and need restoration, which can't happen without these regulations.

Janice Beecher: Thanks to the EPA staff for all that you do to protect public health and the environment.

Josh: Look to manufacturing efficiencies- Such as manufacturing acceleration in production, Initially there are many problems but within a few months the loopholes are closed and the process for revalidating quality becomes less frequent because things are done efficiently the first time

Daniel Marx: representing the Minnesota Environmental Science and Economic Review Board (MESERB). MESERB is municipal organization of 45 National Pollutant Discharge Elimination System ("NPDES") permits and we have worked since

1997 to ensure that water quality regulations affecting municipal wastewater are reasonable and based on sound science. MESERB supports both responsible regulatory reform and clean water regulations. To suggest that being pro-regulatory reform is anti-regulation is a false narrative. As rural communities we face an economic crisis related to aging infrastructure and increasing regulatory burdens. Practical environmentalism requires removing unnecessary regulatory burdens so that the limited local, state and federal resources available to deal with clean water problems can be used most effectively and efficiently to clean and protect water. The focus of EO 13377 is “to alleviate unnecessary regulatory burdens placed on the American people.” In our perspective an unnecessary regulation is one t

Jennifer Gadzala: I have heard stories from elders stating that women's nylons would melt during the day while at work in our industrial areas along Lake Michigan. We have come such a long way from then, working hard to protect our air, the lake and its tributaries. We have seen a positive shift of industry working directly with regulators and environmentalists in northwest Indiana. There is a tremendously dedicated group of individuals and organizations who would support streamlining EPA regulation procedures but would not support rolling regulations back.

Shirley Clark: Unfortunately, this has presented as a rollback and not a streamlining. Streamlining is important.

theo whitehurst: i would like to apologize to the next generation for giving them polluted water

Matt Johnston: After 16 years of getting permits from the Corps for County projects the biggest issue I've seen is in the timeliness of permitting, particularly with regards to NOAA and USFWS consultation. The Service in particular was cut back so severely that they cannot do site visits. Trying to drown it in a bathtub is working to make permitting unreasonable.

mitch reid: Thank you EPA! #DefendRivers!

Ed Wheeler: Oddly most comments didn't stick to the topic of existing regulations that could be

repealed, replaced or modified to make them less burdensome."

theo whitehurst: no dapl no fracking

Jason Flickner: Please extend the comment period to more than 7-days after the transcript of this webinar is available!!!!

Cathy McDade: Thanks for fighting the good fight!

Tom Black: The definition of "Waters of the United States" needs to be reduced to navigable streams and not included in every spring head and small stream

Justin 2: the Clean Water Act and Clean Waters Rule are not the same thing

Scott 3: Just need to protect water for people in boats!?!?

Justin 2: Tom Black is actually on topic

James Houle: second that Shirley, thank you for your comments, they reflect what we are learning up here in the northeast as well

Josh: I agree Tom is on topic, trying to understand the point of not protecting small streams and springs?

Justin 2: No one in the WH is threating the CWA, but scrutinizing the Clean Water Rule

Janie Jones: Have you sent anyone to St. Joseph Louisiana to address their water crisis and lead levels?

Nathan Boon: Comment: As a citizen and tax payer in Jenkintown PA, I am more than willing to pay any additional cost associated with current regulations and new regulations designed to protect clean water for healthy ecosystems and human communities, including the Clean Streams Rule addressing mine waste and the Waters of the United States a.k.a. Clean Water Rule. In the watershed where I live, the Delaware River Basin, 15 million people drink the surface water and almost 40% of the stream miles across the basin are ephemeral headwaters and source water areas that would receive important recognition

and protection under the Clean Water Rule. Thank you. - Nathan Boon

Tom Black: Protecting the small streams from what activity? It is unreasonable to require a Corp Permit for a pond on private property.

Cynthia Babich: WATER IS LIFE! That said, no weakening of regulations. Need strong protections, thank you.

Scott 3: Protect small stream from pollutants. We figured out the small streams become big streams, etc.

Josh: I agree Less big government as it processes much slower, however, do you trust that all individuals will abide by the morality to not destroy ground water sources which will be affected by personal property?

Tom Black: I don't think a Corp Permit would stop an evil person from dumping Nuclear waste. The issue is and always has been the private property rights. The regulation is to control rights of the citizens and not just to provide for a common purpose.

Josh: Well then I guess the issue is with our culture then right? If regulations have become implemented to "control rights of citizens" and not to provide common purpose, then something triggered that action.

Patricia Schuba: and that this public meeting was in response to Pres Trump's EO directing the EPA and Corps to review, revise and potentially rescind the Clean Water Act - - just want to be certain what types of comments your are accepting under this docket. Thank you.

Patricia Schuba: ...excuse me - I meant to say EPA and Assistant Secretary of the Army for Civil Works - not Corps. Thank you.

Janie Jones: Our Disaster Relief and Reserch Team would like to work with you and help host a series of listening session for communities affected by water quality issues.

Ashley Hogshead: I hold two BSBA's, Real Estate and Finance, and have become an agricultural

developer over the last half decade. EPA Regulations are too heavily reliant on fining businesses and individuals, collecting revenue rather than finding plausible solutions to complicated situations. I have three solutions to our water issues. First, if your'e truly looking to solve an issue regarding nature, then you have to look to Nature to find those solutions.... For instance, I work with a natural enzyme solution (think Exxon Valdez Oil Spill Clean Up, unprecedented natural remediation in a matter of weeks!) that can inexpensively, quickly, and safely remove petroleum based products (everything from crude oil to jet fuel to gas station tank leaks to Exxon Valdez to fertilizers and pesticides, which are mostly ALL oil based as well, poop too!) in the ground waters, surface waters, and soil. Current regulations require expensive excavation and processing of the soil, which does not get it out of the ground water, and costs anywhe

Ashley Hogshead: anywhere from \$300k to \$600 per 1/4 acre.... My second solution regards agriculture. I have developed a system that uses 97% less water than traditional irrigation practices, has no runoff issues of soil nor water, and creates no pollution, and doubles organic food or foliage production without electricity or greenhouses. The system is easily implementable for residential use or all the way to industrial agriculture. Third, we are literally strangling our waterways. The practices of locks and levies are eliminating the earth's natural need to breathe, literally, it's breathing with the water flowing in and out, which allows a natural elimination process that is being cut off because people don't like having to build another dock when the water levels change. To that I say, build floating docks that can be moved, and property values around water aren't that great when no one wants to swim in these disgusting algae blooms -- all of which would be naturally taken care of if we as a species would just act like we

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**END OF ONLINE WRITTEN COMMENTS**