

Document ID: OW-2002-0050-0218

Docket ID: [OW-2002-0050](#)

Title: Comment for 68 FR 1991 entitled "Comments of Ann Arbor Charter Township, Washtenaw County Michigan"

Description :

Type: Public Comment

Phase: Advanced Notice of Proposed Rulemaking

Company/Group/Association Name: Ann Arbor Charter Township, Washtenaw County Michigan

Author Date: 02-25-2003

Effective Date:

Ann Arbor Township finds that clean water is essential for drinking, recreational, industrial, commercial and agricultural uses and for aquatic life and wildlife; that for 30 years the CWA has played an essential role in protecting and restoring waterways; that this progress would not have been possible without the Act; that a more restrictive definition of the waters subject to the CWA would be detrimental to residents of AAT. We find that scientific studies have shown the interconnectedness of surface waters, wetlands and groundwaters; that isolated wetlands provide essential groundwater recharge; that the SE Michigan aquifer levels have been declining; that smaller isolated wetlands provide as many ecological services to the Huron River Watershed as larger wetlands; and that flood control is dependent on proper management of the entire watershed; and enforcement of water protection for isolated non-navigable or adjacent waterbodies at the state level without federal support under the CWA would be inadequate because enforcement by the state of Michigan of existing water protection programs is underfunded and regularly inadequate and without the leverage provided by the CWA requirements, state compliance with water protection rules would be much less likely to occur. AAT has non-navigable waterways and for the above reasons urges that the definition of waters subject to the CWA include, in addition to traditionally navigable waters, all non-navigable tributaries, intermittent and ephemeral streams, waters that pass through man-made conveyances, and all wetlands whether or not there is a visible connection to surface waters.