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04/16/2003 04:26 PM

To: CWAwaters@EPA
cc: GTracy Mehan/DC/USEPA/US@EPA
Subject: Docket ID No. OW-2002-0050

Please find attached comments from SEMCOG, the Southeast Michigan Council of Governments, concerning the USEPA's Advanced Notice of Proposed Rule Making on how "waters of the United States" shall be defined in the Clean Water Act.

Thank you,

Ted P. Starbuck, Senior Environmental Planner
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SEMCOG . . . Local Governments Advancing Southeast Michigan

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April 16, 2003

Water Docket
U.S. Environmental Protection Agency
Mail Code 4101T
1200 Pennsylvania Ave. NW
Washington, DC 20460

ATTN: Docket ID No. OW-2002-0050

Dear Sir/Madam:

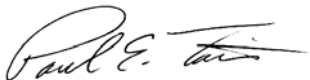
On behalf of 150 local units governments in Southeast Michigan and as the designated Areawide Water Quality Management Agency under section 208 of the Clean Water Act, SEMCOG urges the United States Environmental Protection Agency (USEPA) to abandon the change in regulatory definitions proposed in the Advanced Notice of Proposed Rulemaking on the Clean Water Act Regulatory Definitions of “Waters of the United States” (Federal Register, January 15, 2003).

Adopting this rule would effectively eliminate Clean Water Act (CWA) protection from as much as 50 percent of the nation’s waters. This change runs the risk of reversing the accomplishments that have been realized by the billions upon billions of dollars that federal, state, and local governments and private industry have invested in protecting our water resources.

Only recently have we begun to fully understand the relationship between land use patterns and water resource impairments. At the urging of the USEPA, state and local governments and concerned citizens across the country are developing comprehensive watershed management plans in order to ensure that the quality of our water resources is improved and protected. These plans recognize the interconnected and complex relationships that exist in natural ecosystems and how human activities, no matter how unintentional, often serve to disrupt and interfere with those systems. Removing half of the surface waters from CWA protection will not only result in increased degradation of those waters, but severely deter our ability to continue to make progress “to restore and maintain the chemical, physical, and biological integrity of the” of the waters that remain under CWA jurisdiction.

If you have any questions or comments, please contact me at 313-961-4266.

Sincerely,



Paul E. Tait, CAE

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Executive Director

cc: G. Tracy Mehan, III