
January 17, 2019

The Honorable Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

R.D. James
Assistant Secretary of the Army for Civil Works
U.S. Army Corps of Engineers
441 G Street, NW
Washington, D.C. 20314

Re: Docket ID No. EPA-HQ-OW-2018-0149; RIN 2040-AF75

Dear Acting Administrator Wheeler and Assistant Secretary James:

The Western Governors' Association (WGA) represents the Governors of 19 western states and 3 U.S. territories. The Association is an instrument of the Governors for bipartisan policy development, information-sharing, and collective action on issues of critical importance to the western United States.

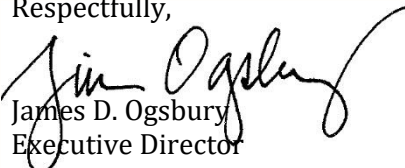
Western Governors recognize that clean water is essential to strong economies and quality of life. In most of the West, water is a scarce resource that must be managed with sensitivity to social, environmental, and economic values and needs. Because of their unique understanding of these needs, states are in the best position to manage and protect their water resources.

WGA requests an extension of the comment period for the proposed rule, Revised Definition of "Waters of the United States" (Proposed Rule). While states are already examining the pre-publication version, we are concerned that the Proposed Rule will have substantial impacts on the balance of state and federal authority to manage and protect the nation's water resources, as well as the state-federal partnerships that are involved in the implementation of the Clean Water Act. The 60-day comment period that has been announced is insufficient for states to adequately review the content, consult with your staff, and analyze the complex implications of the Proposed Rule. Western Governors request an additional 60 days to provide states with a reasonable time for the submission of comments.

As co-regulators of water resources, states should be fully consulted and engaged in any process that may affect the management, allocation, or protection of water resources. Federal decisions that are informed by state expertise and viewpoints result in more effective, efficient, and durable federal policy that positively affects the state-federal relationship and better serves our common constituencies.

Thank you for your favorable consideration of this extension request. In the meantime, with warm regards and best wishes, I am

Respectfully,



James D. Ogsbury
Executive Director