

June 16, 2017

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Ms. Donna Downing – CWAwotus@epa.gov
Jurisdiction Team Leader
Wetlands Division U.S. Environmental Protection Agency
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Washington, D.C. 20460

Mr. Andrew Hanson – Hanson.Andrew@epa.gov
Office of Congressional and Intergovernmental Relations
Environmental Protection Agency
1200 Pennsylvania Ave. NW Washington DC, 20460

Re: Comments on Waters of the U.S. and the 2015 Clean Water Rule

Dear Ms. Downing and Mr. Hanson,

Thank you for the opportunity to provide comment and potential language regarding the Waters of the U.S. and the 2015 Clean Water Rule pursuant to the Executive Order “Restoring the Rule of Law, Federalism, and Economic Growth by Reviewing the ‘Waters of the United States’ Rule.”

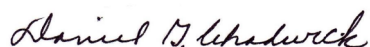
Over the past several weeks, in response to the EPA's request for substantive input, the Idaho Association of Counties has worked with a group of interstate stakeholders to develop a proposed "Waters of the U.S." Rule. The rule is meant to meet Justice Scalia's definition under the *Rapanos* case, and, most importantly, the local county and state needs. The attached rule takes into consideration the various challenges discussed with our respective conservation districts, flood control districts, planning departments, consultants, and attorneys, and with various states including Idaho, California, Nevada, Utah, Arizona, and Wyoming.

The purpose of the working group was to develop a discrete proposal or illustration that our various organizations can support as individual organizations. We believe that we have accomplished the task by submitting the attached definition for your consideration.

The Idaho Association of Counties thank you and supports the efforts of the EPA and the federal government in allowing those at the state and local level the ability to provide input into the rules and regulations that have a vast and important economic impact in our communities. We believe that local and state water rights should be respected in the rulemaking process and would welcome the opportunity for further participation in the process.

Please do not hesitate to contact me if you have questions.

Respectfully,



Daniel G. Chadwick
Executive Director