



April 14, 2015

**OFFICERS**

- Chairman**
- ROBERT F. WELANETZ, CRX, CSM, The Blackstone Group
- President & CEO**
- MICHAEL P. KERCEVAL, ICSC
- Vice President, Eastern Division**
- KEN McINTYRE, CRX, Hudson City Savings Bank
- Vice President, Central Division**
- VINCENT A. CORNO, CRX, Dick's Sporting Goods
- Vice President, Western Division**
- MARK A. SCHURGIN, The Festival Companies
- Vice President, Southern Division**
- MARTY A. MAYER, Stirling Properties
- Vice President, Canadian Division**
- KAREN FLAVELLE, Purdys Chocolatier
- Vice President, European Division**
- JOHN A. STRACHAN, Cushman & Wakefield

- Secretary-Treasurer**
- DONALD C. WOOD, Federal Realty Investment Trust

**BOARD OF TRUSTEES**

- MOHAMMAD IQBAL B.H. ALAWI, Red Sea Markets Co.
- RONALD A. ALTOON, FAIA, LEED AP, BD+C, CRX, CDP, Alloon Partners LLP
- PETER BALLON, Canada Pension Plan Investment Board (CPPIB)
- KENNETH F. BERNSTEIN, Acadia Realty Trust
- ANDREW W. BRIEN, Suria KLCC
- MICHAEL A. CARRROLL, Brixmor Property Group
- KAREN B. CASE, The PrivateBank
- ALFREDO J. COHEN, Constructora Sambil
- HOLLY COHEN, Nike, Inc.
- THOMAS J. CONNOLLY, CRX, CLS, CDP, Walgreen Co.
- JOSEPH F. CORADINO, Pennsylvania Real Estate Investment Trust
- JOHN C. DOLSON, Nordstrom, Inc.
- KIM ELLIS, Regis Corporation
- THOMAS M. FLEXNER, Citigroup
- SETH D. GELDZAHLER, Bed Bath & Beyond Inc.
- CARL L. GOERTEMOELLER, Macy's, Inc.
- MICHAEL J. GRAZIANO, Goldman Sachs & Co.
- TONY GROSSI, Wittington Properties
- ◊ DAVID B. HENRY, CRX, Kimco Realty Corporation
- GAR HERRING, CRX, CDP, The MGHerring Group, Inc.
- KEN C. HICKS, Foot Locker, Inc.
- WILLIAM B. HORNER, Fitness International, LLC
- ◊ BRAD M. HUTENSKY, Hutensky Capital Partners
- ADAM W. IFSHIN, DLC Management Corporation
- JAMES J. LAMPASSI, PETCO Animal Supplies, Inc.
- ◊ DAVID J. LaRUE, Forest City Enterprises
- LAURALEE E. MARTIN, HCP, Inc.
- SANDEEP L. MATHRANI, General Growth Properties, Inc.
- CARLOS MEDEIROS, BR Malls
- MARK L. MYERS, Wells Fargo Bank
- SCOTT NELSON, CRX, Target Corporation
- KAREN L. ROBERTS, Wal-Mart Stores, Inc.
- MICHAEL RODEL, CRX, emerging market Real Estate
- PETER SCHWARTZ, Westfield, LLC
- ◊ PETER SHARPE, Toronto, ON
- SUK SINGH, Bloomin' Brands, Inc.
- BRIAN M. SMITH, CRX, CDP, CLS, Regency Centers
- ARTURO SNEIDER, CRX, CLS, Primistor Development, Inc.
- JIM SUD, Whole Foods Market, Inc.
- STEVEN B. TANGER, Tanger Factory Outlet Centers, Inc.
- ◊ WILLIAM S. TAUBMAN, Taubman Centers, Inc.
- DOUGLAS H. TILSON, Express, Inc.
- STEVEN G. VITTORIO, Prudential Real Estate Investors
- MARCUS WILD, SES Spar European Shopping Centres
- DAVID ZOBBA, Gap, Inc.

**EX-OFFICIO PAST CHAIRMAN**

- DREW ALEXANDER, Houston, TX
- RALPH BIERNBAUM, Palm Beach, FL
- J. LORNE BRAITHWAITE, Thorhill, ON
- JOHN L. BUCKSBAUM, CRX, CSM, Chicago, IL
- JAMES R. BULLOCK, CSM, Campbellville, ON
- MARY LOU FIALA, Edwards, CO
- KEMPER FREEMAN, JR., Bellevue, WA M.G.
- (BUDDY) HERRING, JR., Dallas, TX
- DAVID E. HOCKER, CRX, CSM, Owensboro, KY
- STEPHEN R. KARP, Newton, MA
- CHARLES B. LEBOVITZ, Chattanooga, TN
- REBECCA L. MACCARDINI, CMD, Ann Arbor, MI
- JAMES E. MAURIN, CRX, CSM, Covington, LA
- KATHLEEN M. NELSON, Cedarhurst, NY
- GARY D. RAPPAPORT, CRX, CMD, CSM, CLS, CDP, McLean, VA
- JOHN H. REININGA, JR., CRX, CSM, San Francisco, CA
- MALCOLM R. RILEY, Los Angeles, CA
- JOHN T. RIORDAN, Coluit, MA
- MEL SEMBLER, St. Petersburg, FL
- RICHARD S. SOKOLOV, Youngstown, OH
- RENÉ TREMBLAY, CRX, Hong Kong
- KENNETH L. TUCKER, Highland Park, IL
- ROBERT L. WARD, Phoenix, AZ
- NEIL R. WOOD, Toronto, ON

- Executive Committee
- ◊ Past Chairman

The Honorable Bill Shuster  
 Chairman  
 House Committee on Transportation  
 and Infrastructure  
 Washington, D.C. 20515

The Honorable Peter DeFazio  
 Ranking Member  
 House Committee on Transportation  
 and Infrastructure  
 Washington, D.C. 20515

Dear Chairman Shuster and Ranking Member DeFazio:

The International Council of Shopping Centers (ICSC) writes to endorse H.R. 1732, *The Regulatory Integrity Protection Act of 2015*. ICSC expresses its thanks for your close examination of the impacts of the proposed joint rulemaking by the U.S. Environmental Protection Agency (EPA) and the Army Corps of Engineers (Corps) to change the scope of federal jurisdiction under the Clean Water Act (CWA).

Founded in 1957, ICSC is the premier global trade association of the shopping center industry. Its more than 63,000 members in over 100 countries include shopping center owners, developers, managers, investors, retailers and brokers, as well as public officials. Recognizing the need for a clean environment and the benefits that it brings to communities, ICSC members have a vested interest in preserving and protecting our nation's land and water resources. As environmental stewards, shopping center developers construct vital business districts and help create thriving communities while maintaining, protecting and enhancing our natural resources.

ICSC appreciates the decades of partnership between federal, state, and local governments to achieve the objectives of the CWA. H.R. 1732 requires EPA and the Corps engage in meaningful consultation with relevant state and local officials to formulate recommendations for a consensus regulatory proposal that would identify the scope of waters to be covered under the CWA, and those waters to be reserved for the states to determine how to regulate.

In light of the significant impacts that this rule will have on job creation in industries such as real estate, construction, and transportation and infrastructure, the importance of getting the rule "right" cannot be overstated. H.R. 1732 makes significant strides in avoiding costly and burdensome new rules for property owners and the state and local partners that have provided a legacy of precise guidance for the regulated community. Thank you for your leadership on this important issue.

Sincerely,

Abigail G. Jagoda  
 Director, Federal Government Relations  
 International Council of Shopping Centers

**International Council of Shopping Centers**

555 12<sup>th</sup> St., N.W. Suite 660, Washington, D.C. 20004  
 +1 202-626-1400 • Fax: +1 202-626-1418 • www.icsc.org