

May 12, 2015

Dear Representatives:

The National Association of Manufacturers (NAM), the largest manufacturing association in the United States representing manufacturers in every industrial sector and in all 50 states, urges you to support H.R. 1732, the Regulatory Integrity Protection Act of 2015, introduced by Rep. Bill Shuster (R-PA).

Last year, the Environmental Protection Agency (EPA) and Army Corps of Engineers (Corps) proposed regulations to formalize a new definition of "waters of the United States" with the intention of providing greater clarity. The proposed rule will not provide clarity, but rather will create greater uncertainty and significantly expand the definition of "waters of the United States." As a result, water that has traditionally been regulated by state and local governments would now be regulated by the federal government. This will have a significant impact on manufacturers by increasing regulatory uncertainty. The proposed regulation will subject an almost limitless number of new areas to Clean Water Act permitting requirements, causing additional construction costs, environmental modeling burdens and delays, and potentially exposing facilities to administrative actions and litigation. For manufacturers, on-site drainage and cooling ponds, storm water collection points, retention ponds and even ditches could now be considered "waters of the United States."

The NAM supports the continued use of the term "navigable waters" in the Clean Water Act and opposes overly broad interpretations of that term and the term "waters of the United States." H.R. 1732 would provide manufacturers with a process that is transparent and consensus based, withdrawing the proposed "waters of the United States" regulation and forcing the agencies to fix the many flawed definitions and interpretations of "waters of the United States" before re-proposing. H.R. 1732 ensures that state and local governments, stakeholders, and interested parties will be consulted in drafting the new rule, providing manufacturers with the opportunity to work closely with the agencies to make them aware of our concerns and problems with any regulations moving forward.

The NAM's Key Vote Advisory Committee has indicated that votes on H.R. 1732, including procedural motions, may be considered for designation as Key Manufacturing Votes in the 114th Congress.

Thank you for your consideration.

Sincerely,

Aric Newhouse
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National Association of Manufacturers

KEY MANUFACTURING VOTE LETTER

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