



May 15, 2015

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Washington, D.C. 20510

The Honorable Barbara Boxer
Ranking Member
Senate Environment and Public
Works Committee
Washington, D.C. 20510

Dear Chairman Inhofe and Ranking Member Boxer:

The International Council of Shopping Centers (ICSC) writes to endorse S. 1140, *The Federal Water Quality Protection Act*. 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. S. 1140 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. S. 1140 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

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