



September 24, 2019

Andrew Gottlieb
Executive Director

The Honorable William Keating
U. S. House of Representatives

BOARD OF DIRECTORS

2351 Rayburn HOB
Washington, DC 20515

Margo Fenn
President

Charles Sumner
Vice President

RE: Opposition to H.R. 1764

Bob Ciolek
Treasurer

Dear Representative Keating:

Maureen O'Shea
Clerk

The Association to Preserve Cape Cod (APCC) respectfully requests that you **oppose H.R. 1764**, which if passed would slow down improvements to water quality by doubling the term length of the Clean Water Act's National Pollutant Discharge Elimination System (NPDES) pollution permits.

Michael Corrigan

DeeDee Holt

Thomas Huettner

Founded in 1968, APCC is the leading regional non-profit environmental advocacy and education organization on Cape Cod. Supported by thousands of members from every Cape Cod town, APCC's mission is to promote policies and programs that foster the preservation of the Cape's natural resources. APCC focuses its efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic.

Pat Hughes

Cheryl Lubin

Elysse Magnotto-Cleary

Blue Magruder

Eliza McClennen

Stephen Mealy

APCC strongly supports maintaining the current requirement to update NPDES permits every five years instead of the ten years proposed in H.R. 1764. As specified in the Clean Water Act, NPDES permits are required for any discharge of a pollutant through a point source into a waterbody covered by the Act. The Clean Water Act requires that these permits include technology-based standards that rely on the latest pollution control methods, as well as water quality-based limitations that must comply with local water quality standards.

Kris Ramsay

Robert Summersgill

Taryn Wilson

It is critically important that NPDES permits continue to be issued every five years so that the permits reflect the most current information about pollution control technologies and the condition of the local water sources receiving the discharge,

which will ensure that pollutant dischargers operate under the most up-to-date standards to protect the environment and public health. This five-year permit term has been a key component of the Clean Water Act since its enactment in 1972.

Imbedded in the Clean Water Act is the assumption that steady progress will be made in reducing water pollution as advancements in environmental science and technology occur over time. Based on that premise, the Act requires the EPA to publish new information about the best available treatment technologies on a regular basis. It also requires states to assess local water quality every two years and, if waters no longer meet standards, to develop a clean-up plan. If the Act were amended to allow ten-year permit terms, pollutant dischargers would operate for a decade or more under outdated pollution control standards.

Instead of legislation that extends the NPDES permit term limit and as a consequence slows progress on reducing pollution, **APCC encourages Congress to focus its efforts on increasing funding for infrastructure upgrades that will improve water quality. H.R. 1497, the bipartisan Water Quality Protection and Job Creation Act, would significantly increase funding for the Clean Water State Revolving Fund—the largest and most important source of federal funds for stormwater and wastewater infrastructure.**

APCC therefore asks you to **oppose H.R. 1764**, which if adopted into law would hamper progress on reducing water pollution, and to instead use your leadership to help **advance H.R. 1497**, which would bring much-needed assistance to communities in their efforts to improve water quality.

Thank you for your consideration of this matter.

Sincerely,



Andrew Gottlieb
Executive Director