



April 27, 2015

United States House of Representatives

Dear Representative:

On behalf of the National Multifamily Housing Council (NMHC) and the National Apartment Association (NAA), we urge your support of H.R. 1732, the “Regulatory Integrity Protection Act of 2015.” The apartment industry is profoundly aware of the fact that clean water resources are essential for thriving, vital communities and as such we strongly support a strong Clean Water Act.

NMHC and NAA have long urged Congress to clarify jurisdictional matters under the Clean Water Act. We are concerned, however, that the rule to redefine “waters of the U.S.” that has been jointly proposed by the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers would create additional confusion for the regulated community rather than provide regulatory certainty. The agencies have failed to work with critical state and local stakeholders in the development of the rule and as such critical issues like the treatment of municipal separate storm sewers as possible “waters of the U. S.” remain ambiguous.

For more than 20 years, the National Multifamily Housing Council (NMHC) and the National Apartment Association (NAA) have partnered in a joint legislative program to provide a single voice for America's apartment industry. Our combined memberships are engaged in all aspects of the apartment industry, including ownership, development, management and finance. NMHC represents the principal officers of the apartment industry's largest and most prominent firms. As a federation of more than 170 state and local affiliates, NAA is comprised of over 67,000 members representing more than 7.6 million apartment homes throughout the United States and Canada. The combined spending by the apartment industry and its 36 million residents contributed \$1.3 trillion to the U.S. economy and supported 12.3 million jobs in 2013.

On behalf of the NMHC and NAA we urge you to support the passage of H.R. 1732, the “Regulatory Integrity Protection Act of 2015.” We look forward to working with you to ensure clean water across the nation.

Sincerely,

Douglas M. Bibby
President
National Multifamily Housing Council

Douglas S. Culkin, CAE
President
National Apartment Association