



September 18, 2019

The Honorable David P. Ross
Assistant Administrator
Office of Water
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Docket ID: EPA-HQ-OW-2019-0405, *Updating Regulations on Water Quality Certification*

Dear Assistant Administrator Ross,

The Association of Metropolitan Water Agencies (AMWA) is an organization representing CEOs and general managers of the largest publicly owned drinking water utilities in the United States and the American Water Works Association (AWWA) is an international, nonprofit, scientific and educational society dedicated to providing total water solutions assuring the effective management of water. AMWA and AWWA appreciate the opportunity to comment on the Environmental Protection Agency's proposed rule, *Updating Regulations on Water Quality Certification* (EPA-HQ-OW-2019-0405).

Section 401 under the Clean Water Act is complex and EPA's proposed changes are numerous and overarching. Sixty days is not enough time for AWWA and AMWA staff to review the proposal, inform the associations' members, and develop thoughtful comments. Therefore, our organizations request an additional 60-day extension to the comment period due to the scope of the requested information and the level of detail that is necessary for the responses. This extension would allow both AMWA and AWWA the time needed to more fully engage our members and to provide the most meaningful and comprehensive comments possible for the agency.

Thank you for consideration of our request.

Sincerely,

Diane VanDe Hei
Chief Executive Officer
Association of Metropolitan Water Agencies

G. Tracy Mehan, III
Executive Director of Government Affairs
American Water Works Association

cc: Lauren Kasparek, OWOW
Eric Burneson, OGWDW
Jennifer McLain, OGWDW