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February 25, 2010

Water Docket
U.S. Environmental Protection Agency
Mail code: 4203M
1200 Pennsylvania Ave., NW
Washington, DC 20460

Attention: Docket ID No. EPA-HQ-OW-2009-0817

Subject: National Association of Flood and Stormwater Management Agencies (NAFSMA) Stakeholder Input; Stormwater Management Including Discharges From New Development and Redevelopment

The National Association of Flood and Stormwater Management Agencies (NAFSMA) appreciates the opportunity to submit comments concerning the Environmental Protection Agency's (EPA) expressed intention to "initiate national rulemaking to establish a comprehensive program to reduce stormwater discharges from new development and redevelopment and make other regulatory improvements to strengthen its stormwater program".

NAFSMA is a 30 year old national organization based in our nation's capital that represents close to 100 local and state flood and stormwater management agencies. Its members serve a total of more than 76 million citizens by providing stormwater management or flood control services. Many of its members are currently Phase I or II jurisdictions falling under the Clean Water Act's (CWA) National Pollutant Discharge Elimination System (NPDES) Permit Program. The association on behalf of its members has a strong interest in the structure and administration of the nation's stormwater management programs.

Our comments, which include detailed and more broadly focused comments that reflect our serious concern with EPA's announced regulatory objective, are organized as follows: 1. **Summary**, 2. **Detailed Comments** responding to each of the topics for which input was requested, 3. **Conclusion**, and 4. **Appendix** on Summary of Responses about Local Conditions for Stormwater Management, and Technical Issues Related to a Uniform National Standards or Criteria. NAFSMA reserves the right to submit future comments concerning EPA's proposed regulatory process, as determined necessary and appropriate.