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Executive Director & General Counsel  
**Julia Anastasio**

1725 I Street, NW, Ste. # 225,  
Washington, DC 20006

TEL: 202-756-0600

WWW.ACWA-US.ORG

January 20, 2026

Lauren Kasperek  
Office of Water  
Oceans, Wetlands, and Communities Division  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Re: Comment Period Extension Request related to Docket ID No. EPA-  
HQ-OW-2025-2929, Updating the Water Quality Certification  
Regulations

Dear Ms. Kasperek,

On behalf of the members of the Association of Clean Water Administrators (ACWA), we appreciate the opportunity to provide input on the U.S. Environmental Protection Agency's (EPA) proposed rule, "Updating the Water Quality Certification Regulations."

ACWA is the independent, nonpartisan, national organization of state, interstate, and territorial water program managers who serve alongside EPA as co-regulators of the Clean Water Act (CWA). States have a unique and important interest in any national regulatory updates or policy positions affecting implementation of the CWA, including water quality certification under Section 401.

The proposed rule raises significant legal, technical, and policy issues related to the scope of state and tribal authority under CWA Section 401, the interpretation of statutory and regulatory timelines, and the interaction of this rule with other federal, state, and tribal water quality programs. Given the breadth and potential long-term implications of these proposed regulatory changes, additional time is necessary to allow stakeholders to conduct a thorough review and provide informed, substantive comments.

Reviews of proposed regulations often require consultation among state technical experts, legal counsel, policymakers, and may at times require review by the highest levels of state government, which can be difficult, and sometimes impossible, to complete within a 30-day comment period.

An extension of the designated comment period would promote meaningful public participation, improve the quality of the

administrative record, and support the development of a final rule that is well-informed, durable, and consistent with the Clean Water Act. Providing additional time would also be consistent with EPA's stated commitment to transparency and stakeholder engagement for significant rulemakings.

For these reasons, we respectfully request that EPA extend the public comment period by at least an additional 30 days. We appreciate your consideration of this request and look forward to continued engagement with EPA throughout this rulemaking.

Sincerely,

A handwritten signature in black ink that reads "Julia Anastasio". The signature is written in a cursive, flowing style with a large initial 'J'.

Julia Anastasio  
Executive Director and General Counsel  
Association of Clean Water Administrators