



August 16th, 2017

Chris French
Stormwater Program Director
Water Environment Federation
601 Wythe Street
Alexandria, Virginia
22314-1994

Dear Mr. French,

Our associations are pleased to support the development of a National Stormwater Testing and Evaluation of Products and Practices (STEPP) program, as outlined in the recent report: [*Framework for a National Testing and Evaluation Program Based upon the STEPP Initiative*](#).

With the defunding of the only national testing program for post-construction stormwater practices (*EPA's Environmental Technology Verification (ETV) program*), there is a vacuum of leadership at the national level to ensure communities have access to timely, quality data on the effectiveness of stormwater products and practices. This has spurred independent state and local government-led initiatives with inconsistent testing and data analysis procedures.

Many of our members are concerned with limited options and market competition for proprietary manufactured stormwater treatment devices, as well as lack of consistent protocols and specifications for public domain practices. Either scenario has the potential to increase the cost of new construction or re-development projects that must meet stormwater management requirements. In tight urban conditions, for example, businesses may face roadblocks to using proprietary practices to save space because jurisdictions have not added a particular device to their list of approved practices. Similarly, when installing public domain practices such as rain gardens, drywells or simple treatment-train systems, developers often experience a lack of flexibility during the approval process at the local level. Access to simple, nationally-approved field testing protocols could help lower costs and avoid project delays on these sites, and could provide added assurance that installed practices and products will perform as expected.

To address these and other concerns, our associations support the development of a national stormwater testing and evaluation program, provided that such a program will:

- Yield clear product specific performance data and design criteria,
- Allow the testing, verification or certification of products and practices to remain a voluntary, opt-in process,
- Preserve regional and local control in making final determinations regarding the appropriateness of using specific stormwater products and practices,
- Consider the incorporation of long-term maintenance performance into national product testing,
- Develop low-cost field testing protocols for green infrastructure and low-impact development (LID) practices that can be easily replicated with limited resources and training and serve to streamline the acceptance of such practices in place of traditional drainage infrastructure (where deemed appropriate), and
- Provide tools to lower costs for *both* proprietary products and public domain practices.

Our associations look forward to working with WEF and the STEPP Steering Committee as the program development process continues.

If you need additional information, please contact Eva Birk, Environmental Policy Program Manager, National Association of Home Builders at 202-266-8124.

Sincerely,

Associated General Contractors of America

International Council of Shopping Centers

Leading Builders of America

National Apartment Association

National Association of Home Builders

National Multifamily Housing Council

National Association of Realtors

Retail Industry Leaders Association