No. 21-454

In The

# Supreme Court of the United States

MICHAEL SACKETT; CHANTELL SACKETT,
*Petitioners*,

*v.*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY; MICHAEL S. REGAN, ADMINISTRATOR,
*Respondents*.

*On Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit*

## BRIEF OF THE CATO INSTITUTE, ASSOCIATED GENERAL CONTRACTORS OF AMERICA, MOUNTAIN STATES LEGAL FOUNDATION, NFIB SMALL BUSINESS LEGAL CENTER, AND WASHINGTON LEGAL FOUNDATION, AS *AMICI CURIAE* IN SUPPORT OF PETITIONERS


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## QUESTION PRESENTED

Whether the Ninth Circuit set forth the proper test for determining whether wetlands are "waters of the United States" under the Clean Water Act, 33 U. S. C. §1362(7).

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## INTERESTS OF *AMICI CURIAE*[1]

The Cato Institute is a nonpartisan public-policy research foundation established in 1977 and dedicated to advancing the principles of individual liberty, free markets, and limited government. Cato's Robert A. Levy Center for Constitutional Studies was established in 1989 to help restore the principles of limited constitutional government that are the foundation of liberty. Toward those ends, Cato publishes books and studies, conducts conferences, and produces the annual *Cato Supreme Court Review*.

The Associated General Contractors of America ("AGC") is a nationwide trade association of construction companies and related firms. It has served the construction industry since 1918, and over time, it has become the recognized leader of the construction industry in the United States. The association now has more than 27,000 members in 89 chapters stretching from Puerto Rico to Hawaii. Its members are engaged in building, heavy, civil, industrial, utility, and other construction for both public and private property owners and developers. Because Section 404 permits are commonly required for those projects, AGC members depend on the stability and predictability of the federal government's permitting process, which is a prerequisite to hundreds of billions of dollars in investments each year and massive amounts of economic activity.

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[1] All parties consented to the filing of this brief. No party's counsel authored this brief in any part and *amici* alone funded its preparation and submission.

Mountain States Legal Foundation ("MSLF") is a nonprofit, public-interest law firm organized under the laws of the state of Colorado. MSLF is dedicated to bringing before the courts issues vital to the defense and preservation of individual liberties, the right to own and use property, the free enterprise system, and limited and ethical government. Since its creation in 1977, MSLF attorneys have been active in litigation regarding the proper interpretation and application of statutory, regulatory, and constitutional provisions. *See Adarand Constructors, Inc. v. Pena*, 515 U.S. 200 (1995) (MSLF serving as lead counsel).

The National Federation of Independent Business ("NFIB") is the nation's leading small business association. Its membership spans the spectrum of business operations, ranging from sole proprietor enterprises to firms with hundreds of employees. Founded in 1943 as a nonprofit, nonpartisan organization. NFIB's mission is to promote and protect the right of its members to own, operate, and grow their businesses. The NFIB Small Business Legal Center is a nonprofit, public interest law firm established to provide legal resources and be the voice for small businesses in the nation's courts.

Washington Legal Foundation is a nonprofit, public-interest law firm and policy center with supporters nationwide. WLF promotes free enterprise, individual rights, limited government, and the rule of law. It often appears as *amicus curiae* in cases interpreting the phrase "waters of the United States." *See, e.g., Solid Waste Agency of N. Cook Cnty.* v. *U.S. Army Corps of Eng'rs*, 531 U.S. 159 (2001).

All *amici*, as organizations interested in properly constitutionally limited government, have an interest in a constitutionally faithful interpretation of agencies' regulatory powers.

## INTRODUCTION AND SUMMARY OF ARGUMENT

In reviewing agency action, courts face conflicting constitutional principles. On the one hand, the judiciary must refrain from "arrogating to itself policymaking properly left, under the separation of powers, to the Executive." *City of Arlington v. FCC*, 569 U.S. 290, 327 (2013) (Roberts, C.J., dissenting). On the other, courts have an "obligation," one that is "no less firmly rooted in our constitutional structure," to ensure that the executive branch "confine[s] itself to its proper role." *Id.* Given this dichotomy between judicial deference and Article III oversight, "[a] congressional grant of authority over some portion of a statute does not necessarily mean that Congress granted the agency interpretive authority over all its provisions." *Id.*

The Clean Water Act illustrates the point. Most of the statute consists of interlocking regulatory programs with technical sounding names, including Water Quality Standards, Total Maximum Daily Loads, and the National Pollutant Discharge Elimination System. *See* 33 U.S.C. §§ 1313(a), 1313(d), 1342. For these complex regulatory schemes, agencies exercise interpretive primacy, subject to searching reasonableness review by the courts.

The question presented here, however, reflects a different class of statutory text. Defining "navigable

waters" is the jurisdictional key that unlocks the agencies' power under the Clean Water Act's regulatory programs—including the power to seek criminal sanctions. *See, e.g.*, 33 U.S.C. § 1319(c)(1) (authorizing prosecutors to seek prison terms of up to one year for negligent violations). Because it's an authority of a higher order, fixing the statute's jurisdictional scope poses a greater risk of executive overreach, interpretive instability, and regulatory inscrutability, all of which have plagued the agencies' past interpretive approaches to the detriment of landowners and operators.

Of course, Congress bears the ultimate responsibility for the unsatisfactory status quo. Although this Court "expect[s] Congress to speak clearly if it wishes to assign to an agency decisions of vast economic and political significance," *Utility Air Regulatory Group v. EPA*, 573 U.S. 302, 324 (2014) (citations and quotations omitted), the phrase "waters of the United States" is "not a term of art with a known meaning," and this "critical ambiguity" has persisted for fifty years, confounding agencies, courts, and—most importantly—landowners, far too many of whom have been denied regulatory certainty as to the enjoyment of their property. *Sackett v. EPA*, 566 U.S. 120, 133 (2012) (Alito, J., concurring).

For a statute that touches on millions of acres of land, the lack of clarity is both dismaying and counterproductive. Unless and until Congress "do[es] what it should have done in the first place [and] provide[s] a reasonably clear rule regarding the reach of the Clean Water Act," *id.*, the judiciary must "say what the law is" in a manner that regulated entities

can comprehend. *Marbury v. Madison*, 5 U.S. 137, 177 (1803).

In this context, concerns over "judicial policymaking" are misplaced because the judiciary is the appropriate institution to establish limits on the government's regulatory authority under the Clean Water Act. Here, it is this Court's duty to provide long-needed certainty to the regulated public. Accordingly, the Court should reverse and clarify that the *Rapanos* plurality provides the proper test for determining the outer bounds of federal jurisdiction under the Clean Water Act.

## ARGUMENT
## THIS COURT SHOULD NOT DEFER IN DEFINING "NAVIGABLE WATERS"

In 1986, then-judge Breyer set forth workable criteria for balancing the competing constitutional demands placed on courts in administrative law cases, a conflict he presented as pitting "the need for regulation" against "the need for checks." Stephen Breyer, *Judicial Review of Questions of Law and Policy*, 38 Admin. L. Rev 363, 363 (1986). This framework poses a set of questions whose answers allow the judiciary "to allocate the law-interpreting function between court and agency in a way likely to work best within any particular statutory scheme," *id.* at 371, including:

> Is the particular question one that the agency or the court is more likely to answer correctly? . . . A court may also ask whether the legal question is an important one. Congress is more likely to have focused upon, and answered,

> major questions, while leaving interstitial matters to answer themselves in the course of the statute's daily administration. A court may also look to see whether the language is "inherently imprecise," i.e., whether the words of the statute are phrased so broadly as to invite agency interpretation. It might also consider the extent to which the answer to the legal question will clarify, illuminate or stabilize a broad area of the law. Finally, a court might ask itself whether the agency can be trusted to give a properly balanced answer. Courts sometimes fear that certain agencies suffer from "tunnel vision" and as a result might seek to expand their power beyond the authority that Congress gave them.

*Id.* at 370–71.

In other words, the framework instructs which statutory questions are best left to the courts, in their role as a constitutional check, and which are best left to agencies, given their comparative advantages. Each of these factors supports judicial primacy in interpreting the extent of federal jurisdiction under the Clean Water Act.

### A. Relative Expertise: Courts or Agencies?

Under Breyer's framework, courts first ask whether the question presented is "one that the agency or the court is more likely to answer correctly." *Id.* at 370. The purpose of this inquiry is to determine

which institution—the executive or the judiciary—has comparatively greater expertise.

For the Clean Water Act's substantive regulatory programs, the agencies routinely bring their technical and scientific expertise to bear. But, again, defining "navigable waters" is a separate class of statutory interpretation. As the agencies have conceded, "science cannot dictate where to draw the line of federal jurisdiction." *See* 85 Fed. Reg. 22,250, 22,257 (Apr. 21, 2020). This Court, too, has recognized the limited utility of technical expertise in interpreting a legal concept like "navigable waters," writing that the agencies "may appropriately look" to tools of statutory construction, including "the legislative history and underlying policies of its statutory grants of authority" when "[f]aced with [the] problem of defining the bounds of its regulatory authority." *United States v. Riverside Bayview Homes, Inc.*, 474 U.S. 121, 132 (1985).

The regulatory history leaves no doubt that legal expertise, rather than scientific know-how, is paramount in setting limits on federal authority under the Clean Water Act. In practice, agencies defer to judicial interpretations of congressional intent.

In 2015, for example, the agencies completed a rulemaking to define the "waters of the United States" based on Justice Kennedy's opinion in *Rapanos v. United States*, 547 U.S. 715 (2006). *See* 80 Fed. Reg. 37,053 (June 29, 2015). According to the rule's preamble, "[t]he key to the agencies' interpretation of the CWA is the significant nexus standard, as established and refined in Supreme

Court opinions." *Id.* at 37,060. Crucially, the agencies didn't merely adopt Justice Kennedy's "significant nexus" framework for case-by-case jurisdictional determinations of wetlands adjacent to non-navigable waters, which is how the test was set forth in *Rapanos*. Instead, the 2015 rule employed the significant nexus concept as the scientific basis for the categorical inclusion of entire classes of putative "waters of the U.S." *Id.* at 37,068–71 (establishing categorical jurisdiction for classes of tributaries and adjacent waters).

Two years later, a new president ordered the agencies to rethink the 2015 rule "in a manner consistent with the opinion of Justice Antonin Scalia in [*Rapanos*]." *See* Exec. Order 13,778, 82 Fed. Reg. 12,497 (Mar. 3, 2017). So prompted, the agencies undertook another notice-and-comment rulemaking, leading to an interpretation of "navigable waters" that is based on the analysis in the *Rapanos* plurality's opinion. *See generally* 85 Fed. Reg. 22,250 (Apr. 21, 2020) (citing *Rapanos* plurality 147 times).

The current administration has begun yet another judicially driven approach to defining the "waters of the United States." Last December, the agencies proposed to return to the pre-2015 regime. *See* 86 Fed. Reg. 69,372, 69,373 (Dec. 7, 2021) ("[T]he agencies are proposing to exercise their discretion under the statute to return generally to the familiar pre-2015 definition that has bounded the Act's protections for decades[.]"). Under this proposed interpretation, the agencies may choose to apply either Justice

Kennedy's "significant nexus" test or the *Rapanos* plurality's more definite test.

Although the three rulemakings since 2015 have relied on this Court's opinions in *Rapanos*, the agencies' deferential approach began long before that case. In 1974, the Army Corps of Engineers first responded to the passage of the Clean Water Act by adopting the historical judicial interpretation of "navigable waters" and thus limiting the statute's reach to waters that are "navigable in fact or readily susceptible of being rendered so." *Rapanos v. United States*, 547 U.S. 715, 723–24 (2006) (plurality opinion) (recounting regulatory history) (quotations and citations omitted). But then "a District Court enjoined these regulations as too narrow," so the Corps adopted a new interpretation that "deliberately sought to extend the definition of 'the waters of the United States' to the outer limits of Congress's commerce power." *Id.* at 724 (citations omitted). The upshot is that courts have taken the lead in setting the limits of federal authority under the Clean Water Act throughout the statute's fifty-year history.

### B. Is the Question Presented "Major"?

The second query asks whether the legal controversy is "important," because "Congress is more likely to have focused upon, and answered, major questions, while leaving interstitial matters to answer themselves in the course of a statute's daily administration." Breyer, *Judicial Review*, *supra* at 370. Higher stakes call for closer judicial scrutiny as to whether Congress indeed authorized such a

"major" exercise of the government's regulatory power.

There can be no doubt that the instant case involves policy questions of the utmost economic and social significance. The Clean Water Act is "not merely another law but rather was viewed by Congress as a total restructuring and complete rewriting of the existing water pollution legislation." *Rapanos*, 547 U.S. at 804 (Breyer, J., dissenting) (citations and quotations omitted). Defining "waters of the United States" determines the statute's regulatory reach, "and the consequences to landowners even for inadvertent violations can be crushing." *U.S. Army Corps of Eng'rs v. Hawkes Co.*, 578 U.S. 590, 602 (2016) (Kennedy, J., concurring).

Between 1983 and 2019, the EPA criminally prosecuted 828 defendants under the Clean Water Act. *See* Joshua Ozymy & Melissa L. Jarrell, *Illegal Discharge: Exploring the History of the Criminal Enforcement of the U.S. Clean Water Act*, 32 Fordham Envtl. L. Rev. 195, 206–08, 210 (2021). Of those cases, 250 led to incarceration. *Id.* at 218–19. Given the severity of criminal sanctions under the Clean Water Act, it is imperative that there be a clear articulation of what constitutes criminal liability. Yet regulated parties enjoy no such certainty. As the law now stands, they "have to feel their way on a case-by-case basis." *Rapanos*, 547 U.S. at 758 (Roberts, C.J., concurring). Under the prevailing jurisdictional test, "[a]ny piece of land that is wet at least part of the year is in danger of being classified by EPA employees as wetlands covered by the Act." *Sackett*, 566 U.S. at 132 (Alito, J., concurring). Even the agencies concede that

"almost all waters and wetlands across the country theoretically could be subject to a case-specific jurisdictional determination" under the status quo. *See* 80 Fed. Reg. at 37,056 (describing pre-2015 regime). With so much of the nation's land at issue, as well as the financial property and liberty of its citizens, the scope of the EPA's authority under the Clean Water Act is by no means an "interstitial" matter.

### C. To What Extent Is the Text "Imprecise"?

The third question asks if the statutory text is "inherently precise, i.e., whether the words of the statute are phrased so broadly as to invite agency interpretation." Breyer, *Judicial Review*, *supra* at 370–71. Granted, the phrase "waters of the United States" is "notoriously unclear." *Sackett*, 566 U.S. at 132 (Alito, J. concurring). But the text is far from being so "imprecise" that it is rendered immune from judicial interpretation through the traditional tools of statutory construction. After all, in *Rapanos*, a plurality undertook an extensive textual analysis and thereby distilled a workable framework that would provide much-needed certainty to property owners. *Rapanos*, 547 U.S. at 730–42. Before that, this Court rebuffed an attempt by the agencies to read the modifier "navigable" in "navigable waters" as mere surplusage. *See Solid Waste*, 531 U.S. at 172 ("We cannot agree that Congress' separate definitional use of the phrase 'waters of the United States' constitutes

a basis for reading the term 'navigable waters' out of the statute.").

Furthermore, any inferences drawn from textual "imprecision" must account for the social and economic significance of the interpretation. If the question presented is interstitial, then textual ambiguity favors the agencies' interpretative authority. But if the controversy centers on a "major" question, then this Court expects a clear statement from Congress. For regulatory agencies to exercise authority over these sorts of important matters, "Congress must either: (i) expressly and specifically decide the major policy question itself and delegate to the agency the authority to regulate and enforce; or (ii) expressly and specifically delegate to the agency the authority both to decide the major policy question and to regulate and enforce." *Paul v. United States*, 140 S. Ct. 342, 342 (2019) (Kavanaugh, J., statement respecting denial of certiorari) (citations omitted).

Of course, Congress did not itself "expressly and specifically" define the boundaries of the Clean Water Act. Nor did Congress "expressly and specifically delegate" authority to decide this "major policy question" to any agency. In past rulemakings to define the "waters of the United States," the relevant agencies couldn't identify any specific delegation for their action, but instead grounded their interpretive authority in the statute as a whole. *See, e.g.*, 85 Fed. Reg. at 22,251 ("The authority for this action is the Federal Water Pollution Control Act, 33 U.S.C. 1251 *et seq.*, including sections 301, 304, 311, 401, 402, 404, and 501."). Such textual "imprecision" favors judicial

interpretive authority where, as here, the Court is faced with a "major" question.

### D. Which Institution Can "Clarify, Illuminate, or Stabilize" the Law?

The next question asks which institution—courts or agencies—can "clarify, illuminate or stabilize a broad area of the law." Breyer, *Judicial Review*, *supra* at 371. Here, courts possess a clear comparative advantage because agency-driven interpretations are inherently unstable.

Due to the relative ease of regulating versus legislating, "[w]e live today in an era of presidential administration." Elena Kagan, *Presidential Administration*, 114 Harv. L. Rev. 2245, 2246 (2001). In contemporary American government, it is the presidency, rather than Congress, that leads "in setting the direction and influencing the outcome of" administrative policymaking. *Id.* Because "regulatory activity . . . [is] more and more an extension of the President's own policy and political agenda," wholesale shifts in administrative policymaking occur whenever a new person occupies the White House. *Id.* at 2248

Defining the "waters of the United States" provides a quintessential example of our modern era of presidential administration. After *Rapanos*, the Obama administration leveraged the "significant nexus" concept to justify a broad interpretation of federal authority. *See* 80 Fed. Reg. at 37,053. Then President Trump ordered his administration to undertake a rulemaking "rescinding or revising" his predecessor's definition, *see* Exec. Order 13,778,

leading to the agencies' adoption of a narrower interpretation of federal jurisdiction under the Clean Water Act. *See* 85 Fed. Reg. at 22,250.

Now the policy pendulum is swinging back. On his first day in office, President Biden ordered an "immediate[] review" of his predecessor's jurisdictional rule to determine whether it comports with the new administration's agenda. *See* Exec. Order 13,990, 86 Fed. Reg. 7,037, 7,037 (Jan. 25, 2021); *see also* White House Briefing Room, "Fact Sheet: List of Agency Actions for Review" (Jan. 20, 2021), https://bit.ly/3AM85ha (identifying rules subject to review under Executive Order 13,990). The Biden administration currently is considering comment on a "waters of the U.S." definition that would codify the status quo before the 2015 Obama-era rule. *See* 86 Fed. Reg. 69,372 (Dec. 7, 2021). If finalized, this would be the fourth definition of "waters of the U.S." since 2015.

Again, the agencies' pre-2015 jurisdictional framework is the same test at issue in the instant case, and the Biden administration's attempt to resurrect this much maligned interpretation speaks volumes about the agencies' long-running failure to "illuminate" this important area of the law. In prior rulemakings, the agencies heaped criticism on the pre-2015 regime for its failure to clarify the scope of federal jurisdiction under the Clean Water Act. *See* 80 Fed. Reg. at 37,056 (observing that pre-2015 regime "did not provide the public or agency staff with the kind of information needed to ensure timely, consistent, and predictable jurisdictional determinations"); 85 Fed. Reg. at 22,256 (discussing

how stakeholders needed "clarity and certainty regarding the scope of the waters federally regulated"). Members of this Court have been similarly critical of the status quo. *See, e.g.*, *Sackett*, 566 U.S. at 133 (Alito, J., concurring) ("But far from providing clarity and predictability, the Agency's latest informal guidance advises property owners that many jurisdictional determinations concerning wetlands can only be made on a case-by-case basis by EPA field staff.").

In sum, agencies are incapable of stabilizing this important area of the law. Every time the presidency changes hands from one party to the other, the jurisdictional reach of the Clean Water Act gets a new gloss. Of course, political accountability is typically a virtue for administrative policymaking. *See* Kagan, *Presidential Administration*, *supra* at 2332 (observing that "presidential leadership establishes an electoral link between the public and the bureaucracy"). But not always. For obvious "major" policy questions, such as the definition of "waters of the United States," the ping-pong policymaking inherent to presidential administration is too unsettling to pass constitutional muster. Between the courts and agencies, the former is far better suited to clarify, illuminate, and stabilize the law.

### E. Can the Agency Be "Trusted"?

The final question for assessing comparative institutional competence asks "whether the agency can be trusted to give a properly balanced answer." Breyer, *Judicial Review*, *supra* at 371. Regarding this inquiry, Breyer explained that "Courts sometimes

fear that certain agencies suffer from 'tunnel vision' and as a result might seek to expand their power beyond the authority that Congress gave them." *Id.* Such "fears" of agency overreach are evident in this Court's opinions. *See, e.g.*, *Rapanos*, 547 U.S. at 734 (plurality opinion) ("[T]he Corps has stretched the term 'waters of the United States' beyond parody[.]"). Even Justice Kennedy, the progenitor of the "significant nexus" concept, has warned about the agencies' "ominous" application of his idea, which "continues to raise troubling questions regarding the Government's power to cast doubt on the full use and enjoyment of private property throughout the Nation." *Hawkes*, 578 U.S. at 603 (concurring).

More broadly, courts have repeatedly rebuked the government over the agencies' regulatory tactics, including at multiple prior junctures of this case. A decade ago, for example, the Court unanimously rejected the agencies' "strongarming of regulated parties" in these sorts of disputes. *Sackett*, 566 U.S. at 130–31. And in the opinion below, the Ninth Circuit admonished the agencies over their "litigation strategy" of "[f]orcing the Sacketts to engage in years of litigation, under threat of tens of thousands of dollars in daily fines, only to assert at the eleventh hour that the dispute has actually been moot for a long time." *See Sackett v. EPA*, 8 F. 4th 1075, 1086 (9th Cir. 2021); *see also Hawkes Co. v. U.S. Army Corps of Eng'rs*, 782 F.3d 994, 1001 (8th Cir. 2015), *aff'd*, 578 U.S. 590 (2016) (objecting to the agency's "transparently obvious litigation strategy" of forcing on the regulated party the "prohibitive costs, risk, and delay" of dealing with the government).

## CONCLUSION

The statutory context, regulatory history, and importance of the question presented all point to this Court's comparative "expertise" over agencies in establishing limits on federal authority under the Clean Water Act. Because the judiciary—and not the agencies—appropriately exercises interpretive primacy, this controversy does not implicate concerns about "judicial policymaking." To protect reliance interests long harmed by the regulatory uncertainty in this important area of the law, the Court should reverse and clarify the scope of federal jurisdiction under the Clean Water Act.

Respectfully submitted,

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