



CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

November 28, 2017

Ms. Damaris Christensen
Office of Water
(4504-T)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Ms. Stacey Jensen
Regulatory Community of Practice
(CECW-CO-R)
U.S. Army Corps of Engineers
441 G Street, NW
Washington, DC 20314

RE: Comments to Docket ID No. EPA-HQ-OW-2017-0480; Definition of Waters of the United States: Public Meetings

Dear Ms. Christensen and Ms. Jensen,

As a coalition of the nation's largest labor unions and environmental organizations, collectively representing millions of members and supporters, we write to express our opposition to weakening the definition of "waters of the United States" as currently defined by the Clean Water Rule.

Water is essential to life and critical for a healthy community, prosperous economy, and clean environment. Following Supreme Court rulings in 2001 (SWANCC) and 2006 (Rapanos), Clean Water Act (CWA) protections were called into question for an estimated 20 million acres of wetlands and about 2 million miles of streams. These wetlands and waterways feed a larger system of waters, which communities depend upon for health and economic productivity. That is why the BlueGreen Alliance supported the Clean Water Rule: Definition of "Waters of the United States" (80 FR 37054), which remedied this confusion and protected drinking water for 117 million Americans.

Clean waters are a powerful economic engine supporting millions of jobs across recreational, manufacturing, and transportation sectors. Protected watersheds that provide clean drinking water and support abundant fish and wildlife are critical to the health of communities and local economies. Clean, healthy waters that are fully protected by the Clean Water Act are valuable to the U.S. economy. For example, farms rely heavily on clean water for irrigation; manufacturing companies use 9 trillion gallons of freshwater yearly; the beverage industry uses more than 12 billion gallons of water annually to produce products valued at \$58 billion; and around 40 million anglers spend \$45 billion annually to fish the nation's waters.

Additionally, the impact of pollution on streams can impose real costs to the economy, slowing

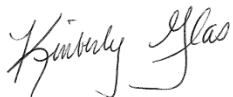
growth and harming human health. Clean water ensures safety and good health, resulting in fewer missed days from work and lower expenses for health care. Jobs that stem from environmental regulations concerning clean water are diverse, and include engineers, factory workers, truck drivers, and construction workers. These jobs require various skill sets, encompass a range of occupations, and are vital to supporting a strong middle class.

The Clean Water Rule is solidly grounded in science and the widely accepted legal standard for Clean Water Act coverage. Any reassessment of the law's protections must also be grounded in the science and not on a new and unlawful standard. Clean Water Act safeguards must extend to all tributary streams and adjacent wetlands as well as other waters that the science shows to be important. This would ensure that CWA pollution protections apply throughout the watershed, and ensure the health of our citizens, the economic competitiveness of our nation, and the environmental integrity of watersheds that are vital to supporting life. EPA must further ensure a public comment process that is at least as rigorous, transparent, and inclusive of all clean water stakeholders as the 200+ day public process that formed the basis of the 2015 Clean Water Rule.

Rescinding or otherwise weakening Clean Water Act protections would threaten the health of America's water bodies and drinking water for millions of Americans. This would come at a time when we are being reminded of the serious implications that an action like this could have on the health of residents nationwide. From Maine to California, we have seen how communities are struggling to provide clean, safe drinking water to their communities. Rolling back or weakening these vital protections would put hundreds of thousands of miles of ecosystems at risk of dangerous pollution and endangers the health of our environment and citizens.

It is common sense that a clean, safe environment—including bodies of water and drinking water—would benefit the health of Americans, and our economy. These waterways help avert floods, recharge groundwater supplies, remove harmful pollution, and provide a safe habitat for fish and wildlife. Streams and wetlands also serve as economic drivers throughout this country because of their roles in fishing, hunting, agriculture, recreation, energy, and manufacturing. We need to put the health of our residents and our economy first. Keep the Clean Water Rule in place to protect bodies of water that help drive our local economies and supply our children and families with clean, safe drinking water.

Sincerely,

A handwritten signature in cursive script that reads "Kimberly Glas".

Kim Glas
Executive Director
BlueGreen Alliance