



## Healing Our Waters-Great Lakes Coalition

September 27, 2017

U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

U.S. Army Corps of Engineers  
441 G Street NW  
Washington, DC 20314

*Attention: Docket ID No. EPA-HQ-OW-2017-0203. Definition of "Waters of the United States"—  
Recodification of Pre-Existing Rules*

To whom it may concern:

On behalf of the Healing Our Waters-Great Lakes Coalition, we write to oppose the proposal to repeal the 2015 Clean Water Rule and possibly replace it with a less protective rule. These actions threaten the Great Lakes, a source of drinking water for over 30 million Americans.

The Healing Our Waters-Great Lakes Coalition is a coalition of 145 environmental, conservation, and outdoor recreation organizations; zoos, aquariums, and museums. Our member organizations represent millions of people who share a common goal: restoring and protecting North America's greatest freshwater resource, the Great Lakes.

The Clean Water Rule recognized the important role wetlands, rivers, lakes, and streams play in protecting the water we use to drink, work, and play. Using science, the law, and the public's support as its guide, the Clean Water Rule clarified the Clean Water Act's jurisdiction and created brighter lines for which waters are covered by the act and which waters are not. This was not a simple process. Developing the rule took years and hundreds of public meetings and thousands of comments with and from farmers, conservationists, affected industries, and many others. However, the end result means greater protections for the economy and environment in the Great Lakes region.

This is important because our region is successfully undertaking one of the nation's largest restoration efforts, an effort the Administrator of the Environmental Protection Agency says is producing results. In the most recent Great Lakes Restoration Initiative report to Congress and the President, Scott Pruitt wrote that the GLRI "is protecting public health in the Great Lakes more than any other coordinated interagency effort in U.S. history, and helping to ensure that our children and their children live in safer, healthier communities."

Repealing the Clean Water Rule and replacing it with a new rule based on a weaker standard could put this success at risk. Alarming, the new rulemaking being contemplated could mean the loss of Clean Water Act protections for nearly 60 percent of streams everywhere except Hawai'i and Alaska that do not flow year round. It also threatens protections for most of the 110 million acres of wetlands in the continental United States.

Instead of threatening the chemical, physical, and biological integrity of the nation's waters, we ask instead that the EPA and Army Corps recognize that water is interconnected and support the Clean

Water Rule's implementation. Upstream waters have a strong influence on the quality of water downstream. Pollution in a tributary is carried into bigger and bigger waterways before emptying into one of our country's saltwater or freshwater seas. Our region knows this first hand. The 2014 'do not drink' order in Toledo, Ohio, dramatically underscores this reality.

The Great Lakes and their tributaries are integral to the lives of people in Illinois, Indiana, Michigan, Minnesota, New York, Ohio, Pennsylvania, and Wisconsin. They provide a place to work and to play. Perhaps more importantly, they give us water to drink. They must be protected.

Sincerely,

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