

December 4, 2017

The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency
Office of Policy Regulatory Reform
Mail Code 1803A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

The Honorable Ryan A. Fisher
Acting Assistant Secretary of the Army
Office of the Assistant Secretary of the
Army for Civil Works
Department of the Army
104 Army Pentagon
Washington, DC 20310-0104

**RE: Docket ID No. EPA-HQ-OW-2017-0644: “Definition of ‘Waters of the United States’
– Addition of an Applicability Date to 2015 Clean Water Rule”**

Dear Administrator Pruitt and Acting Assistant Secretary Fisher:

We the undersigned organizations, representing millions of American families, conservationists, supporters of a healthy environment, and supporters of clean and safe drinking water, respectfully urge the United States Environmental Protection Agency and the Army Corps of Engineers to extend the comment period for the above-referenced docket.

The Clean Water Rule provides increased clarity and certainty in the jurisdictional determination process under the Clean Water Act. By contrast, repealing the Clean Water Rule, as the agencies previously proposed, or delaying its enforcement, as the agencies now propose, will result in a reversion to ambiguity and inconsistency, with increased cost and burden to pollution control officials to make provisional and final jurisdictional determinations and ensure compliance with all applicable laws. It also would fail to deliver the regularity for stakeholders that the agencies claim to want to achieve.

Further, the Clean Water Rule was developed after extensive research and review and input from more than one million members of the public, researchers, conservation advocates, decision makers, and more. The current timeframe to submit comments on the delay proposal is grossly inadequate and will not allow concerned citizens to adequately consider the proposed action and its impacts on water quality, businesses, and economies throughout the Nation.

In view of the importance of the issues at stake in the proposed delay rule, a substantially longer comment period is necessary.

Respectfully submitted,

American Rivers
Arkansas Wildlife Federation
Center for a Sustainable Coast
Chattahoochee Riverkeeper, Inc.
Clean Water Action
Clean Water Network
Columbia River Crab Fisherman's Association

Committee on the Middle Fork Vermilion River
WE ACT for Environmental Justice
Earthjustice
Environment America
Environmental Law & Policy Center
Friends for Our Riverfront
Friends of the Kaw
Friends of the River
Great Rivers Environmental Law Center
Great Rivers Habitat Alliance
Green for All
GreenLatinos
Gulf Restoration Network
Harpeth Conservancy
Idaho Rivers United
Illinois Council of Trout Unlimited
Kentucky Waterways Alliance
League of Conservation Voters
League of United Latin American Citizens
National Parks Conservation Association
National Sustainable Agriculture Coalition
Natural Heritage Institute
Natural Resources Defense Council
Ohio Environmental Council
Oregon Environmental Council
OVEC-Ohio Valley Environmental Coalition
PennEnvironment
Physicians for Social Responsibility
Planning and Conservation League
PolicyLink
Power Shift Network
River Network
Save The River
South Dakota Wildlife Federation
Southern Environmental Law Center
Tennessee Clean Water Network
The Passaic River Coalition
The River Project
The Wetlands Initiative
Utah Rivers Council
Water Alliance
Water-Culture Institute