

Alabama Water Watch - American Forests - American Hiking Society - Appalachian Mountain Club - [BearyCozy.com](http://BearyCozy.com) - Buffalo River Watershed Alliance - Cahaba River Society - Calabash River Society - Captains for Clean Water - Coalition to Protect America's National Parks - Coastal Carolina Riverwatch - Concerned Citizen of Alabama - Coney Island Beautification Project - Conservation Fisheries, Inc. - Conservation Voters of Pennsylvania - Cook Inletkeeper - Cross Current Guide Service & Outfitters - Crystal Coast Waterkeeper - "Ding" Darling Wildlife Society - East Bay Regional Park District - Everglades Coalition - Florida Keys Fishing Guides Association - Florida Wildlife Federation - Friends of Dyke Marsh - Friends of Shades Creek, Inc. - Friends of the Little Cahaba - Friends of the Sonoran Desert - Just Get Outdoors - Lost Valley Canoe & Lodging - Miami Waterkeeper - Milwaukee Area Science Advocates - Nantahala Outdoor Center - National Audubon Society - National Parks Conservation Association - Obed Watershed Community Association - Ocmulgee Outdoor Expeditions - Ozark Society - Puget Soundkeeper Alliance - Redwood Parks Conservancy - Reef Relief - River Sports Outfitters, Inc. - Save the Scenic Santa Ritas - Severn River Association - Shank's Mare Outfitters - Sierra Club - Smithfield Township, Monroe County, Penn. - Smoky Mountain Outdoors Unlimited Inc. - Southeast Tourism Society - St. Croix River Association - Susquehanna Heritage - Tennessee Citizens for Wilderness Planning - Tennessee Clean Water Network - United by Blue - University of Alabama at Birmingham - Valley Forge Park Alliance - Voyageurs National Park Association - West Virginia Rivers Coalition - White Oak-New Riverkeeper Alliance

November 28, 2017

Scott Pruitt  
Administrator, Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Ryan Fisher  
Acting Assistant Secretary of the Army (Civil Works)  
Army Corps of Engineers  
108 Army Pentagon  
Washington, DC 20310

*Attention: Docket ID No. EPA-HQ-OW-2017-0480*

Dear Mr. Pruitt and Mr. Fisher:

On behalf our millions of members and supporters, we ask that you keep the value of our public lands and waters in mind as you revise rules important for protecting American's access to safe, clean water.

The nation relies on clean water for our livelihoods and enjoyment. Our organizations represent Americans who enjoy outdoor recreation like hiking, swimming, paddling, diving, fishing, camping, biking, skiing, bird and other wildlife watching; visiting our national parks, refuges, forests, and other public lands; and myriad other ways to enjoy the great outdoors. Access to clean water is imperative for the safety, well-being and economic success of our communities.

The outdoor recreation economy is huge and it's growing. According to the Outdoor Industry Association, consumers spend \$887 billion annually on outdoor recreation; almost \$140 billion on kayaking, rafting, canoeing, and scuba diving and other water sports alone. Outdoor recreation spending accounts for more than many other parts of the U.S. economy, including pharmaceuticals, motor vehicles and household utilities. It fuels many other major American economic sectors including manufacturing, hotels, restaurants and retail trade. Consumers visit local retailers to buy canoes, backpacks, hiking boots and other outdoor gear. Domestic and international families pay for river guides and outfitters, lift tickets and ski lessons, entrance fees, fishing licenses and more. Further, they

rent cars, book hotel rooms, buy plane tickets and stock up on groceries and souvenirs. Our national parks generate \$31 billion from tourism and recreation alone.

The economic engine of outdoor recreation also results in 7.6 million jobs, the benefits of which are felt in each state. For example, outdoor recreation generates 215,000 jobs in Ohio, 260,000 jobs in North Carolina, 485,000 jobs in Florida and 110,000 jobs in Utah. These jobs represent the lifeblood of thousands of American communities and millions of American workers.

What fuels this robust economy – in part – is safe, clean water.

Anglers look forward to their fishing trips and expect trout, bass, or northern pike to be in the rivers and lakes where they drop their lines. Hikers, bikers, paddlers, and visitors to national parks and other public lands want to fill their reusable bottles with clean, quality drinking water for their outdoor excursions. Millions of swimmers visit beaches across the nation, renting umbrellas and chairs, eating at local restaurants and visiting souvenir carts.

These experiences, however, are being endangered by threats to the quality of our nation's water. The last thing a beach goer and related small businesses want is to find a posted 'do not swim' sign because the water is polluted and could make swimmers sick. Yet, polluted beach water from sanitary sewer overflows and other beach pollution sources makes people ill each year. The fish anglers are often after require good habitat found in streams and wetlands for their entire life cycles. Yet, according to the Fish and Wildlife Service, the rate of wetland loss increased by 140 percent nationwide between 2004 and 2009. Even in national parks, which Americans often view as pristine places, are suffering, with over half of park waters impaired.

What causes these problems? Aging water infrastructure leads to sewer overflows contaminating near-shore areas along the nation's coasts and making up to 3.5 million people sick according to EPA. Agricultural runoff also leads to water quality problems as the nutrients and fertilizers that help farmers grow our food also feed algal blooms, one of the most significant water quality challenges we face. Reports show harmful algal blooms or dead zones in Lake Erie, the Gulf of Mexico and other places increasing in size and frequency. Industrial and commercial development has also destroyed wetlands and other small streams leading to the loss of important habitat.

Our nation needs clean water protections that safeguard our public lands and waters from these ongoing threats. We need a Clean Water Act that protects all the wetlands and streams that our members and businesses rely on. The science has never been clearer in showing why it's so important to protect water quality and wildlife habitat. Small headwater and ephemeral streams feed rivers and lakes with the water that one-third of Americans drink. Wetlands stop flooding by soaking up excess water and prevent algal blooms by filtering pollutants like nitrogen and phosphorus and provide homes for fish, birds and other wildlife. By keeping these upriver waters clean and clear, downriver waters are protected from the pollution that doesn't aggregate upstream.

As the EPA and Army Corps evaluate changes to our clean water protections, we urge you to be cautious and not undermine our public lands and waters or our outdoor recreation economy. We ask you to keep in mind the following five principles:

- Ensure clean water protections extend to all streams and adjacent wetlands and other waterbodies that science shows to be ecologically or economically important for our outdoor way of life.
- Recognize that the health of larger water bodies depends on the health of smaller waters by grounding any changes to federal policy in sound wetland and stream science.
- Incorporate the work done to develop the Clean Water Rule, finalized in 2015, and consider that work as a starting point for determining future changes.
- Do not rely on legal interpretations that include only “relatively permanent waters” and wetlands with a “continuous surface connection” to those waters as these will limit the scope of the Clean Water Act.
- Ensure an inclusive, transparent, and robust public process equal to that of the 2015 rulemaking.

Clean water benefits us all. We rely on it for drinking and many of us rely on it for recreational activities. Some of us also build businesses around it and earn a living from it. We hope you keep this in mind as you revise rules important to protecting American’s access to safe, clean water.

Sincerely,

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Miami Waterkeeper  
Milwaukee Area Science Advocates  
Nantahala Outdoor Center  
National Audubon Society  
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