

March 4, 2019

The Honorable Andrew Wheeler, Administrator  
U.S. Environmental Protection Agency  
Office of the Administrator: 1101A  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460



Administrator Wheeler:

We are strongly opposed to the changes to the definition of the “Waters of the United States”, currently being proposed by the U.S. Environmental Protection Agency. As members of the Choose Clean Water Coalition, we are committed to maintaining and restoring clean water to the rivers and streams throughout the Chesapeake Bay region and we rely on the Clean Water Act as the foundation of restoration and protection efforts.

The proposed changes regarding the definition of the “Waters of the United States” would be, by far, the biggest step backwards on clean water in our region since the Clean Water Act became law nearly a half century ago. And this is all occurring while EPA’s leadership has been very vocal by taking every opportunity to talk about its new mission statement, “EPA is returning to its core mission of protecting human health and the environment.” The proposed changes to the Clean Water Act contradict this basic core mission of EPA.

Approximately 11 million people (nearly two out of three) in the Chesapeake Bay watershed get their drinking water directly from the 147,149 miles of rivers and streams flowing into Chesapeake Bay. All of these rivers and streams are dependent on high quality water from the 56,689 miles of intermittent and ephemeral streams in their headwater areas, so we are extremely troubled at the proposal’s plan to remove all Clean Water Act protections for ephemeral streams and its suggestion that the final rule might also eliminate protections for intermittent streams.

Removing protections for intermittent and headwater streams throughout our region not only impacts our surface drinking water sources, but also threatens key habitat for shrinking populations of eastern brook trout. Protections would also be removed from valuable wetlands throughout our region that are critical for mitigating flooding and providing habitat for numerous species of fish and waterfowl. These wetlands are the primary reason that the Chesapeake is home to more than 1 million migratory geese, ducks and swans every winter. This great and critical part of the Atlantic Flyway would collapse if these critical wetland areas are lost.

The Chesapeake Bay Program partnership, coordinated by EPA, came together in 1983 to work to restore clean water to the 64,000 square mile watershed in Delaware, Maryland, New York, Pennsylvania, Virginia, West Virginia, and the District of Columbia. Promulgating this rule to weaken the Clean Water Act and rollback protections would be a blow for the progress made in the Chesapeake Bay watershed in recent years.

On January 16, 2019, at your confirmation hearing in the U.S. Senate you stated, “There is no more important responsibility than protecting human health and the environment. It is a responsibility I take very seriously.” We urge you to abide by these words and to stop this attempt to weaken the Clean Water Act endangering human health and the environment in the

Chesapeake region and nationwide.

Sincerely,

Action Together Northeastern Pennsylvania  
American Chestnut Land Trust  
American Rivers  
Anacostia Riverkeeper  
Anacostia Watershed Society  
Annapolis Green  
Arundel Rivers Federation  
Audubon Maryland/DC  
Audubon Naturalist Society  
Audubon Society of Northern Virginia  
Back Creek Conservancy  
Baltimore Tree Trust  
Blue Heron Environmental Network  
Blue Ridge Watershed Coalition  
Blue Water Baltimore  
Butternut Valley Alliance  
Cacapon Institute  
Capital Region Land Conservancy  
Catskill Mountainkeeper  
Center for Progressive Reform  
Chapman Forest Foundation  
Chemung River Friends  
Chesapeake Bay Foundation  
Chesapeake Climate Action Network  
Chesapeake Conservancy  
Chesapeake Wildlife Heritage  
Clean Fairfax  
Clean Water Action  
Clean Water Linganore  
Coalition for Smarter Growth  
Conservation Voters of Pennsylvania  
DC Environmental Network  
Delaware Nature Society  
Earth Conservation Corps  
Earthworks  
Earth Forum of Howard County  
Eastern Pennsylvania Coalition for  
Abandoned Mine Reclamation  
Eastern Shore Land Conservancy  
Elizabeth River Project  
Environmental Integrity Project  
Environmental Justice Center of Chestnut  
Hill United Church

Environmental Working Group  
Experience Learning  
Float Fishermen of Virginia  
Friends of Accotink Creek  
Friends of Frederick County  
Friends of Herring Run Park  
Friends of Little Hunting Creek  
Friends of Lower Beaverdam Creek  
Friends of Quincy Run  
Friends of Sligo Creek  
Friends of the Bohemia  
Friends of the Cacapon River  
Friends of Dyke Marsh  
Friends of the Middle River  
Friends of the Nanticoke River  
Friends of the North Fork of the Shenandoah  
River  
Friends of the Rappahannock  
Friends of St. Clements Bay  
Goose Creek Association  
Interfaith Partners for the Chesapeake  
James River Association  
Lackawanna River Conservation  
Association  
Lancaster Farmland Trust  
Little Falls Watershed Alliance  
Lower Susquehanna Riverkeeper  
Lynnhaven River NOW  
Maryland Conservation Council  
Maryland Environmental Health Network  
Maryland League of Conservation Voters  
Maryland Native Plant Society  
Maryland Nonprofits  
Maryland Science Center  
Mattawoman Watershed Society  
Mid-Atlantic Council Trout Unlimited  
Middle Susquehanna Riverkeeper  
Muddy Branch Alliance  
National Aquarium  
National Parks Conservation Association  
National Wildlife Federation  
Natural Resources Defense Council  
Nature Abounds

NeighborSpace of Baltimore County  
New York League of Conservation Voters  
New York State Council of Trout Unlimited  
Neighbors of the Northwest Branch  
Otsego County Conservation Association  
Otsego Land Trust  
Partnership for Smarter Growth  
Patapsco Heritage Greenway  
Patuxent Tidewater Land Trust  
PennEnvironment  
PennFuture  
Pennsylvania Council of Churches  
Pennsylvania Council of Trout Unlimited  
Piedmont Environmental Council  
Potomac Conservancy  
Potomac Riverkeeper  
Potomac Riverkeeper Network  
Potomac Valley Audubon Society  
Queen Anne's Conservation Association  
Preservation Maryland  
Rachel Carson Council  
Restore America's Estuaries  
Rappahannock League for Environmental  
Protection  
Richmond Audubon Society  
Rivanna Conservation Alliance  
Rock Creek Conservancy  
St. Mary's River Watershed Association  
Savage River Watershed Association  
Severn River Association  
Shenandoah Riverkeeper Shenandoah  
Valley Network  
ShoreRivers  
Sidney Center Improvement Group  
Sierra Club – Maryland Chapter  
Sleepy Creek Watershed Association  
Southeast Rural Community Assistance  
Project  
Southern Environmental Law Center  
Southern Maryland Audubon Society  
SouthWings  
Susquehanna Heritage  
Talbot Preservation Alliance  
The Downstream Project  
Transition Howard County  
Trash Free Maryland

Trout Unlimited  
Upper Potomac Riverkeeper  
Virginia Association of Biological Farming  
Virginia Conservation Network  
Virginia League of Conservation Voters  
Warm Springs Watershed Association  
Waterfront Partnership of Baltimore, Inc.  
Waterkeepers Chesapeake  
West Virginia Citizen Action Group  
West Virginia Environmental Council  
West Virginia Highlands Conservancy  
West Virginia Rivers Coalition  
Wetlands Watch  
Wicomico Environmental Trust