

To: Scott Pruitt, Administrator, Environmental Protection Agency

From: Todd Leahy, Deputy Director, New Mexico Wildlife Federation

Date: August 10, 2017

Re: Docket ID: EPA-HQ-OW-2017-0203 Clean Water Rule

Dear Administrator Pruitt:

Thank you for this opportunity to submit comments on the proposed repeal of the Clean Water Rule initiated by President Donald J. Trump. The New Mexico Wildlife Federation is the Southwest's oldest sportsmen-led conservation organization. On behalf of our more than 80,000 members, please accept our comments in the spirit in which they are intended; to help the Environmental Protection Agency make decisions that are in the best interest of the American people, wildlife, and an outdoor heritage which defines many of us.

Nearly 45 years since the passage of the Clean Water Act, America has made great strides. Gone are the days when rivers burst into flames; but many of our rivers, lakes, and bays are still not safe for swimming or fishing. Rolling back the Clean Water Rule will set this progress back. No one wants to revisit the Cuyahoga River Fire; but that is exactly where we could be heading. The Trump Administration's rushed repeal of the Clean Water Rule is a first step in an assault that will put the drinking water of millions of Americans and countless wildlife at risk. The Administration hopes that this repeal flies under the radar and is over before Americans know it ever happened.

The Clean Water Rule is not perfect and could be reformed, but by design it stops pollution before it starts. People and wildlife suffer when polluters get a free pass to destroy our rivers and streams; and therefore, our drinking water. The destruction of those rivers and streams is exactly what will occur if the Clean Water Rule is repealed. The country should be doing more to protect the resource that makes life on the planet possible, not less. Sportsmen and women, those of us who are outdoors often and rely on water to keep us and our quarry alive, believe that polluters should be held accountable and that toxic spills should be prevented.<sup>1</sup> Further, 75% of sportsmen support giving farmers and ranchers financial incentives to conserve land for habitat and clean water.<sup>2</sup>

The streams and wetlands protected by the Clean Water Rule are essential not only to drinking water, but to the viability of fish and wildlife populations. The proposed repeal would endanger 20 million acres of wetlands that filter pollutants from water, recharge groundwater, protect communities by absorbing floodwaters, and provide critical habitat for innumerable species of wildlife. We are already losing wetlands at an alarming rate, we should not make it harder to

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<sup>1</sup> <http://www.trcp.org/trcp-national-sportsmens-survey/>

<sup>2</sup> <http://www.trcp.org/trcp-national-sportsmens-survey/>

safeguard these valuable ecosystems which support the health and welfare of all species. It should not have to be said that protecting rivers and streams is essential to our outdoor heritage and way of life; something we hope to pass on to our children and grandchildren.

This is the biggest threat to our water in a generation. On top of President Trump's proposed budget that decimates the water protection programs of the EPA, a reckless and rushed repeal of the Clean Water Rule compounds the potential damage to our outdoor traditions. Clean water is essential to the outdoor economy. 65 percent of New Mexicans participate in outdoor recreation.<sup>3</sup> This rate of participation generates \$9.9 billion in consumer spending, is responsible for 99,000 jobs, and \$623 million in state tax revenue.<sup>4</sup> Repealing the Clean Water Rule and attacking the Clean Water Act puts our state economy at risk. Those of us who value an outdoor lifestyle know how important clean water is to our way of life. The fact that it is also important to our state economy makes it that much more important that our water be clean. Repealing the Clean Water Rule will put streams and wetlands throughout the nation, and therefore our outdoor traditions, at risk of pollution and destruction.

Rolling back the Clean Water Rule will result in the same regulatory confusion that resulted in broad-based calls for clarity about which our nation's waterways are under federal protection. Rolling back the rule is bad governance, bad for businesses who rely on regulatory certainty, bad for our outdoor recreation industry and heritage, and bad for our communities that deserve clean water.

Todd Leahy, Deputy Director

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<sup>3</sup> <https://outdoorindustry.org/advocacy/>

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