

August 25, 2021

8/25/21 US Environmental Protection Agency and Army Corps of Engineers Listening Session Regarding the Agencies' Intent to Repeal and Replace the Navigable Waters Protection Rule

Molly Mugglestone- Director of Communications and Colorado Policy

Thank you for this opportunity to comment on your intent to repeal and replace the 2020 Navigable Waters Protection Rule (2020 Rule) that dramatically reduces protection for our nation's waters.

Clean water is good for business.

Business for Water Stewardship works with businesses across the U.S. to advance solutions to water challenges, sustaining the wellbeing of our communities, economies and rivers through water restoration, policy and stewardship. We have worked with over 1400 businesses and restored over 28 billion gallons of water to U.S. rivers and streams.

In partnership with Arizona State University, we found that the Colorado River alone supports <u>\$1.4</u> <u>trillion</u> in economic output and supports 16 million jobs. Protecting our rivers and waterways is critical to the country's economic success. According to the <u>American Sustainable Business Council</u>, "more than 70% of small business owners polled in 2017 believe that clean water protections help spur economic growth. Only six percent believe such protections are too burdensome. Strikingly, 67% of these small business owners were concerned that water pollution could hurt their business operations."

Across all sectors of the U.S. economy, and across all areas of the country, businesses depend on clean water and reduced water risk. For the economic health of our nation, I ask you today to please repeal the 2020 Rule as soon as possible – at least by the end of the year. The President recognized that it needs to go in his Executive Order signed on his first day in office.

As a case study from one state, when the 2020 Rule became effective in Colorado, two of our partner organizations, Trout Unlimited and The Nature Conservancy, mapped the effects of the rule on the state's many streams and wetlands. These two maps, for streams and wetlands, provide powerful visualizations of the threats of the 2020 Rule in Colorado. In each, the darker the color, the higher the percentage of streams or wetlands lost in each watershed, accounting for <u>68% of all of Colorado's waters.</u>





Streams at risk

Wetlands at risk

There is no reason for delay.

We ask that you act as quickly as possible to repeal and then replace the NWPR, and to assess steps that can be taken immediately to mitigate the damage being done. Clean water benefits everyone, including our families, our businesses, our employees and customers, and our communities.

Sincerely,

Molly Mugglestone Business for Water Stewardship