

EPA Administrator Scott Pruitt
Office of Policy Regulatory Reform
Mail Code 1803A
1200 Pennsylvania Ave NW
Washington, DC 20460

May 4, 2017

Submitted electronically to EPA Docket EPA-HQ-OA-2017-0190 via regulations.gov

Dear Administrator Pruitt,

In accordance with Executive Order 13777, the U.S. Environmental Protection Agency (EPA) recently asked the public to provide feedback on which water quality rules should be targeted for repeal, replacement or modification. It is the EPA's mandate to administer rules that protect public health and water quality. American Whitewater feels strongly that regulations relating to water quality should be maintained, and only be modified if doing so serves to strengthen protections for public health and water quality.

American Whitewater is a national non-profit organization representing noncommercial whitewater kayakers, canoeists, and rafters. For paddlers, water quality directly influences our health, our enjoyment of public streams, our tourism contributions to rural economies, and in many cases our livelihoods. The Clean Water Rule in particular (40 C.F.R. § 230.3), and the suite of regulations relating to water quality more generally (including but not limited to 40 C.F.R § 131), have allowed river-based recreation to flourish.

A 2017 report by the Outdoor Industry Association found that watersports directly generates:

- \$139,971,810,172 in retail spending
- 1,234,876 jobs
- \$43,893,049,709 in salaries and wages
- \$10,618,742,884 in federal taxes
- \$9,601,521,150 in state and local taxes¹

Clean surface water is an economic engine that deserves protection at least as strong as current regulations afford, if not stronger. People do not want to swim, fish, or paddle on rivers and lakes that are marred by unhealthy or environmentally damaging levels of water pollution. Repealing regulations relating to water quality

¹ See [The Outdoor Recreation Economy](https://outdoorindustry.org/wp-content/uploads/2017/04/OIA_RecEconomy_FINAL_Single.pdf), pg. 18. Outdoor Industry Association, 2017: https://outdoorindustry.org/wp-content/uploads/2017/04/OIA_RecEconomy_FINAL_Single.pdf

would directly threaten the recreation and tourism economies of countless communities across the United States. American Whitewater partners with many commercial outfitters, equipment manufacturers, and rural municipalities that would be directly financially impacted if water quality were degraded. We ask that you consider these economic benefits (jobs) associated with current clean water regulations, and recognize in your assessment that these benefits would be eroded by weakened regulations. The EPA can best protect rural, recreational, and tourism economies by maintaining or strengthening existing water quality regulations.

Most whitewater rivers and streams can only be descended during higher than normal flows caused by rainfall or during snowmelt. Surface runoff and pollution often spike during these times. Additionally, whitewater boating requires submersion as paddlers get splashed, flip over, and occasionally swim. It is part of the fun, but not if the water that gets in our mouths, ears, nose, and any cuts is polluted. Reducing regulatory protections for surface waters can and will make paddlers sick. Please keep citizens who recreate in rivers, from paddlers to kids playing in creeks, safe from water pollution by, at a minimum, keeping and enforcing the existing suite of water quality regulations.

The recovery of our nation's rivers following the passage of the Clean Water Act has been truly remarkable – though the result has been a tenuous balance between pollution discharges and public health. Many rivers and streams are far from thriving, and exist very near critical public health and ecological function thresholds. Loosening regulations would tip many rivers past these thresholds, putting people, fish, and livelihoods at risk.

For the reasons stated above, regulations relating to water quality should not be repealed, replaced, or modified in any way that weakens their protections for public health and water quality.

Thank you for considering these comments,

Sincerely,

Kevin Colburn
National Stewardship Director
American Whitewater