



## Healing Our Waters-Great Lakes Coalition

May 14, 2017

Docket ID No. EPA-HQ-OA-2017-0190

To whom it may concern:

On behalf of the Healing Our Waters-Great Lakes Coalition, we submit these comments per the U.S. Environmental Protection Agency's request for public input on regulations that may be appropriate for repeal, replacement, or modification in accordance with Executive Order 13777. We are concerned that this process focuses on the negative aspects of federal regulation and fails to adequately prioritize the tremendous benefits they provide to our health, environment, and economy.

Protecting and restoring the Great Lakes requires robust protections at all levels of government including vigorous enforcement of federal laws by EPA. Our waters are connected. If our region of Illinois, Indiana, Michigan, Minnesota, New York, Ohio, Pennsylvania, and Wisconsin is to succeed in restoring and protecting the Great Lakes, strong federal rules must be in place to ensure the economic benefits of restoring the Great Lakes can be maintained.

Clean Great Lakes water supports good-paying jobs and lays the foundation for long-term prosperity in the region. Investments in Great Lakes restoration – investments protected by strong regulations – lead to long-term economic benefits for the Great Lakes states and the country. A Brookings Institution report shows that every \$1 invested in Great Lakes restoration generates at least \$2 in return.<sup>1</sup> Research from Grand Valley State University shows that the return for certain projects is closer to 6-to-1.<sup>2</sup> The University of Michigan has also demonstrated that over 1.5 million jobs are connected to the Great Lakes, accounting for more than \$60 billion in wages annually.<sup>3</sup> Great Lakes businesses and individuals account for about 27 percent of the U.S. gross domestic product, according to a profile of Bureau of Economic Analysis data presented by World Business Chicago.<sup>4</sup>

Great Lakes restoration investments are paying off. Over the last seven years, the U.S. Congress and has invested more than \$2.2 billion to restore the Great Lakes. These efforts are producing results in communities around the region—including restoring thousands of acres of wetlands and other habitat, cleaning up of toxic hot spots, controlling invasive species, and reducing agricultural runoff.<sup>5</sup> While the Great Lakes demonstrate what environmental progress looks like, the area also provides dramatic examples of regulatory and enforcement failures: the 2014 drinking water crisis in Toledo, Ohio, and the ongoing water crisis in Flint, Michigan.

Instead of facilitating a public dialogue on how we strengthen landmark safeguards like the Clean Water Act and common sense protections like the Clean Water Rule, EPA is asking the public to help it

---

<sup>1</sup> Austin, et.al. 2007. "Healthy Waters, Strong Economy: The Benefits of Restoring the Great Lakes Ecosystem." Metropolitan Policy Program, The Brookings Institution. Washington, D.C. 16 pp.

<sup>2</sup> Isely, et.al. 2011. "Muskegon Lake Area of Concern Habitat Restoration Project: Socio-Economic Assessment." Grand Valley State University, Grand Rapids, Michigan. P. 23

<sup>3</sup> Michigan Sea Grant. 2011. "The Great Lakes: Vital to our Nation's Economy and Environment." University of Michigan. 2 pp.

<sup>4</sup> Found at: [http://wbc.j54pnklrkyh8eao1j.netdna-cdn.com/wp-content/uploads/2015/12/GLSL\\_Economy\\_2015-2013-data-rev-022415.pdf](http://wbc.j54pnklrkyh8eao1j.netdna-cdn.com/wp-content/uploads/2015/12/GLSL_Economy_2015-2013-data-rev-022415.pdf)

<sup>5</sup> U.S. Environmental Protection Agency. 2016. "Fiscal Year 2017: Justification of Appropriation Estimates for the Committee on Appropriations." Washington, D.C. P. 289.

potentially roll back environmental protections. This runs counter to what the American people want. Gallup public opinion polling continues to show that the majority of the American people (56 percent) support prioritizing protecting the environment even at the risk of curbing economic growth.<sup>6</sup> A Pew Research Center poll also showed nearly three-fifths of Americans believe stricter environmental laws are worth the cost.<sup>7</sup>

Rolling back protections worries us. We've all seen what happens when access to safe and clean water is interrupted in places like Toledo, Flint, and Charleston, W.V. Life is interrupted. Businesses and schools are shuttered. Families have to spend money on bottled water for cooking and bathing or drive miles and miles to find access to clean water. In some cases, low-income families and those who aren't native English speakers haven't even been aware their drinking water was compromised. The social and economic toll of dirty and unusable water is massive. Communities throughout the nation rely on strong federal safeguards to ensure their water is swimmable, drinkable, and fishable.

And too often the communities with the least power bear the brunt of pollution and impaired public health after decades of policies that have located polluting facilities and other industrial activities near their homes and schools. These communities need a strong and robust EPA to stand with them and resist weakening the safeguards that protect their family's health.

The EPA was created, and landmark laws like the Clean Water Act and Clean Air Act were passed, because unchecked pollution was impacting the lives of families, businesses, and communities. Though there's still more to do, we've made great strides cleaning up our water and promoting public health while growing the economy and strengthening small businesses. Commonsense federal guidelines to help states and municipalities control and reduce the pollution in our rivers, lakes, and bays is vital to the health of our communities today.

Rather than focusing on how much of a burden EPA rules are on businesses, EPA should be asking how much they benefit our families and how they can be updated and strengthened.

Sincerely,

Molly M. Flanagan  
Vice President, Policy  
Alliance for the Great Lakes

Tony Janisch  
Executive Director  
Bad River Watershed Association

Shirley Roberts  
Executive Director  
BaySail

Brian Smith  
Associate Executive Director  
Citizens Campaign for the Environment

Deanna White  
State Director  
Clean Water Action of Minnesota

Elizabeth Moran  
Water and Natural Resources Associate  
Environmental Advocates of New York

Howard A. Learner  
Executive Director  
Environmental Law & Policy Center

Jill M. Ryan  
Executive Director  
Freshwater Future

---

<sup>6</sup> See: <http://www.gallup.com/poll/1615/environment.aspx>; Accessed: May 2, 2017

<sup>7</sup> See: <http://www.pewresearch.org/fact-tank/2016/02/25/public-support-for-environmental-regulations-varies-by-state/>. Access: May 2, 2017

Matt Meersman  
President  
Friends of the St. Joe River Association

Indra Frank  
Environmental Health & Water Policy Director  
Hoosier Environmental Council

Laura Rubin  
Executive Director  
Huron River Watershed Council

Darwin Adams  
Chairman  
Illinois Council of Trout Unlimited

Ivan J Hack Jr  
President  
Headwaters Chapter  
Izaak Walton League of America

Rick Graham  
Chair  
National Great Lakes Committee  
Izaak Walton League of America

George Guyant  
Great Lakes Committee  
Wisconsin Division  
Izaak Walton League of America

Sandy Bihn  
Executive Director  
Lake Erie Foundation

Krista Grimm  
President  
League of Women Voters Lake Michigan  
Region

Kimberlee Wright  
Executive Director  
Midwest Environmental Advocates

Cheryl Nenn  
Riverkeeper  
Milwaukee Riverkeeper

Kathryn Hoffman  
Executive Director  
Minnesota Center for Environmental Advocacy

Gary Botzek,  
Executive Director  
Minnesota Conservation Federation

Lynn McClure  
Midwest Director  
National Parks Conservation Association

Mike Shriberg  
Great Lakes Regional Executive Director  
National Wildlife Federation

Lori Andresen  
President  
Save Our Sky Blue Waters

Natalie Johnson  
Executive Director  
Save the Dunes

Lee Willbanks  
Upper St. Lawrence Riverkeeper  
Executive Director  
Save The River

Jill Schanon Macek  
Executive Manager  
Schlitz Audubon Nature Center

Jennifer McKay  
Policy Director  
Tip of the Mitt Watershed Council

Dendra J. Best  
Executive Director  
Wastewater Education 501(c)3

Lynda Schneekloth  
Advocacy Chair  
Western New York Environmental Alliance

George Meyer  
Executive Director  
Wisconsin Wildlife Federation