

OUTDOOR ALLIANCE



February 14, 2012

Chair Nancy Sutley
Council on Environmental Quality
722 Jackson Place
Washington, DC 20503

Re: Support for EPA and Army Corps of Engineers Guidance Regarding Identification of Waters Protected by the Clean Water Act

Dear Chairwoman Sutley,

Outdoor Alliance (OA) is a coalition of six national, member-based organizations representing millions of Americans who hike, paddle, climb, mountain bike, ski and snowshoe on our nation's public lands, waters and snowscapes. Collectively, Outdoor Alliance has members in all fifty states and a network of almost 1,400 local clubs and advocacy groups across the nation. On May 2, 2011 the United States Environmental Protection Agency (EPA) and the United States Army Corps of Engineers (USACE) released draft guidance regarding the Clean Water Act definition of "waters of the United States." This letter reaffirms our support for the draft guidance and requests that a final version be released as soon as practicable. We also support, as proposed by the Administration last year, the initiation of a rule-making process on this matter.

Millions of Americans who recreate on our nation's lakes, rivers, and coasts experience primary contact with the water and thus have a vested interest in the safety and quality of our public waters. Protecting the quality of traditionally navigable waters is not only important to us as outdoor recreation enthusiasts; activities on these waters provide substantial economic benefits through recreational tourism.¹

Over the past decade river enthusiasts have watched with great concern as court cases have been interpreted to leave many of these streams unprotected from pollution and other impacts. It is clear that for public health and public-trust-based outdoor recreation to be maintained at the level Americans have come to expect, the Clean Water Act must be broadly applied as intended to protect our nation's rivers, streams, and other water bodies.

¹ According to the Outdoor Industry Association, 24 million Americans paddle kayaks, canoes, and rafts, resulting in 308,000 jobs and \$36 Billion of total economic benefits (http://www.outdoorindustry.org/national-economic-impact-reports.php?action=detail&research_id=26).

Thank you for considering the interests of Americans who seek a healthy connection with nature and their families through water-based outdoor recreation as you address the implementation of the Clean Water Act. We greatly appreciate the efforts to develop this much-needed guidance and look forward to the final version's release and implementation.

Best regards,

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Executive Director
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Executive Director
American Canoe Association

Gregory Miller
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