

December 10, 2025

United States Environmental Protection Agency
Public Comment

RE: Revisions to definition of "waters of the United States"

Since its founding as a 501(c)(3) organization in 1986, Friends of the Rouge has worked to restore, protect, and enhance the Rouge River watershed in metropolitan Detroit. In 1969 the Rouge River ran so thick with oil and pollutants that it caught on fire. Flames leapt 50 feet in the air and the Detroit Fire Department needed 65 men and 10 pieces of equipment to douse the flames due to the levels of pollution in the water. By the 1980s the Rouge had been declared a "dead river" and the 48 communities within the watershed were advised not to touch the water.

The 1972 Clean Water Act was instrumental in changing public perception of the state of our waterways and in putting in place protections for the waters of the United States. The permitting process created through Section 401 of the Clean Water Act has been transformative across the country but especially in the Great Lakes Basin, home to 20% of the world's fresh water. More than 50 years later, we are finally seeing our waterways come back to life. The work is far from over - progress is slow due to the complicated and costly process that major infrastructure work requires. Despite challenges, we continue to fight for clean rivers, lakes, streams, and wetlands. The protections offered by the Clean Water Act ensure that we can continue to clean up our waterways that are so vital to the economic, social, and environmental health of our country.

We urge the U.S. EPA to withdraw the proposed revision to the definition of "waters of the United States." Weakening this definition will remove protections from wetlands and streams that feed into our lakes and drinking water sources - including the Great Lakes. These waters filter pollution, reduce flooding, support fish and wildlife, and provide clean drinking water for millions of people. Yet, the proposed rule gives little to no attention to the impacts on public health, water quality, and flood prevention that will result from removing these protections. Allowing more wetlands to be filled and more streams to be polluted shifts the burden onto communities, taxpayers, and water customers who must pay for increased treatment costs.

The Clean Water Act has protected the water in our nation's lakes, rivers, and streams for more than 50 years, and 94% of Americans support strong safeguards. The EPA should strengthen - not weaken - protections for wetlands and streams. We urge you to withdraw the proposed rule and ensure that all waters that affect downstream water quality remain protected.

Respectfully,

Ashley Flintoff
Executive Director