



April 12, 2019

Mr. Andrew R. Wheeler  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Mr. R.D. James  
Assistant Secretary of the Army for Civil Works  
U.S. Army Corps of Engineers  
441 G Street, N.W. Washington, D.C. 20314

U.S. Environmental Protection Agency EPA  
Docket Center Office of Water Docket Mail Code  
28221T 1200 Pennsylvania Avenue NW  
Washington, DC 20460 OW-Docket@epa.gov

Via regulations.gov: Docket ID No. EPA-HQ-OW-2018-0149

Dear Administrator Wheeler and Assistant Secretary James:

Members of the [Interfaith Center on Corporate Responsibility](http://www.iccr.org) ([www.iccr.org](http://www.iccr.org)), a faith and values-based coalition of active investors with \$400 billion in assets under management, have engaged the world's largest corporations on water stewardship for over a decade. We are writing to express our opposition to the EPA and the U.S. Army Corps of Engineers' new rule to replace the 2015 Waters of the U.S. Rule (WOTUS) that will result in a rollback of Clean Water Act protections for a majority of the nation's streams and wetlands.

Water is the life blood of our global economy. It is a fundamental necessity for lives and livelihoods, for economic prosperity, health and development, and environmental sustainability. The investor community has worked diligently to advocate for clean water protection over the years, recognizing that even with current protections, our waters are still impaired. Agricultural runoff leads to water quality problems as nutrients and fertilizers drive toxic algae outbreaks. Improperly designed industrial and commercial development destroys wetlands and other small streams, leading to the loss of important habitats and greater risk of floods, which in turn upsets local economies.

This proposed rule ignores the overwhelming scientific evidence that protecting small streams and wetlands is essential to ensuring the quality of America's water sources. It establishes the narrowest definition of federally protected waters in the history of the Clean Water Act. This proposal—for the first time—eliminates at least 18 percent of streams and 51 percent of wetlands from federal protection. This means thousands of miles of streams — roughly half of the nation's wetlands — and other critical water bodies would no longer be guaranteed protection under the Clean Water Act's pollution control, prevention, and clean-up programs.

We need a Clean Water Act that protects all wetlands and streams. Wetlands stop flooding by soaking up excess water, and prevent algal blooms by filtering pollutants like nitrogen and phosphorus. By keeping these upriver waters clean and clear, downriver waters are protected from pollution.

We are calling on you not to roll back the safeguards established under the Clean Water Act. It is vital to the health of communities across the nation. Protecting clean water is central to our long-term investments, and business success.

We urge you to withdraw this rule and instead embrace the EPA's stated mission to protect human health and the environment.

Sincerely,



Nadira Narine  
Senior Program Director, ICCR

*Representing:*

Adrian Dominican Sisters, Portfolio Advisory Board  
American Baptist Home Mission Society  
Aquinas associates  
As You Sow  
Avera Health  
Bon Secours Mercy Health  
Boston Common Asset Management  
Catholic Health Initiatives  
Conference for Corporate Responsibility Indiana and Michigan  
Congregation of Divine Providence of Kentucky  
Congregation of Sisters of St. Agnes  
Congregation of Sisters of the Holy Names of Jesus and Mary  
Congregation of St. Basil  
Congregation of St. Joseph  
Dana Investment Advisors  
Daughters of Charity, Province of St. Louise  
Dignity Health  
Domini Impact Investments  
Dominican Sisters ~ Grand Rapids  
Dominican Sisters of Hope  
Dominican Sisters/Racine Dominicans SRI Committee

Felician Sisters of North America  
FOR Investment Partners  
Franciscan Sisters of Perpetual Adoration  
Jesuit Committee on Investment Responsibility  
JLens Investor Network  
Justice, Peace and Integrity of the Creation  
Justice, Peace and Reconciliation Commission,  
Priests of the Sacred Heart, US Province  
Marist Fathers and Brothers  
Maryknoll Sisters  
Maryland Province of the Society of Jesus  
Mercy Investment Services, Inc.  
Midwest Coalition Responsible Investment  
Mount St Scholastica  
Northwest Coalition for Responsible Investment  
Priests of the Sacred Heart, US Province  
Providence St. Joseph Health  
Region VI Coalition for Responsible Investment  
Religious of the Sacred Heart of Mary WP  
Responsible Sourcing Network  
School Sisters of Notre Dame - Central Pacific  
Province CR Committee  
School Sisters of Notre Dame Cooperative  
Investment Fund  
School Sisters of St. Francis

Seventh Generation Interfaith Coalition for  
Responsible Investment  
Sinsinawa Dominicans Peace and Justice Office  
Sisters of Bon Secours, USA  
Sisters of Charity Halifax  
Sisters of Charity of St. Vincent de Paul of New  
York  
Sisters of Mary Reparatrix  
Sisters of Notre Dame de Namur Base  
Communities  
Sisters of Saint Joseph of Chestnut Hill,  
Philadelphia, PA  
Sisters of St. Francis Charitable Trust, Dubuque  
Sisters of St. Francis of Philadelphia  
Sisters of St. Joseph of Orange  
Sisters of the Humility of Mary  
Sisters of the Presentation of the BVM of  
Aberdeen SD

Sisters of the Sorrowful Mother  
Sisters, Servants of the IHM  
Skye Advisors, LLC  
Social Justice Committee, UU Congregation at  
Shelter Rock  
Socially Responsible Investment Coalition  
The Province of Saint Joseph of the Capuchin  
Order  
Tri-State Coalition for Responsible Investment  
Trillium Asset Management  
Trinity Health  
Unitarian Universalist Association  
Unitarian Universalist Congregation at Shelter  
Rock  
United Church Funds  
Ursuline Sisters of Tildonk, US Province  
USA Northeast Province of the Society of Jesus