



International Association for Great Lakes Research
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U.S. Environmental Protection Agency

Ms. Stacey Jensen, Director
Oceans, Wetlands and Communities Division
Office of Water
U.S. Environmental Protection Agency

Mr. Milton Boyd, Acting Director for Policy and Legislation
Office of the Assistant Secretary of the Army for Civil Works
Department of the Army

Re: Docket ID No. EPA-HQ-OW-2025-0322
Comments on the Proposed Revision to the Definition of “Waters of the United States” (WOTUS)

Dear Ms. Jensen and Mr. Boyd,

On behalf of the International Association for Great Lakes Research (IAGLR), I am writing to express our deep concern regarding the proposed revision to the definition of “Waters of the United States.” Clean, healthy freshwater ecosystems are central to our mission as a scientific association that has, since 1967, advanced the understanding and sustainable management of the Laurentian Great Lakes—the largest freshwater system on Earth.

Clean water matters to our members because it sustains the ecosystems, communities, and economies we study and serve. Many of our researchers and practitioners work directly on drinking water protection, fisheries, coastal resilience, and watershed management. Others live, work, and recreate on these waters—boating, fishing, or depending on groundwater and lake-based supplies for safe drinking water. Whatever their role, our members share a common commitment: safeguarding the freshwater resources that close to 40 million people rely on every day.

The Great Lakes region supports an economy valued at over \$6 trillion, making it one of the largest economic engines in the world. This economy depends fundamentally on access to clean, reliable, and healthy water—for shipping, manufacturing, agriculture, tourism, hydropower, and drinking water. Protecting the streams, wetlands, and headwaters that feed the Great Lakes is therefore not only an environmental imperative but an economic one. Weakening water protections threatens both the ecological integrity and the economic productivity that sustain this globally significant region.

The Great Lakes are shared waters governed through long-standing binational commitments between the United States and Canada, most notably the Great Lakes Water Quality Agreement (GLWQA). Since the 1950s, the environmental, public health, and economic consequences of pollution in the Great Lakes have demonstrated the high costs of weak or fragmented water protections, driving substantial public investments to restore impaired waters, including through the Great Lakes Restoration Initiative (GLRI). Proposed changes to the definition of “Waters of the United States” are inconsistent with both the spirit and the operational intent of these commitments. Narrowing federal jurisdiction undermines the integrated watershed-based approach that underpins the GLWQA and conflicts with the objectives of the Clean Water Act (CWA) to maintain and restore the chemical, physical, and biological integrity of downstream waters. Such changes risk eroding regulatory certainty, shifting costs to states, communities, and water utilities, and weakening the binational framework that has guided coordinated Great Lakes protection and restoration for decades.

For these reasons, 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 essential protections from wetlands and streams that feed into our lakes, rivers, and drinking water sources—including the Great Lakes.

These waters are not peripheral; they are fundamental components of healthy watersheds. Wetlands and headwater streams filter pollution, reduce flooding, recharge groundwater, support fisheries and wildlife, and improve the resilience of communities. They underpin the ecological integrity and the economic vitality of the Great Lakes region. Yet the proposed rule gives little to no consideration 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—and the costs—onto communities, taxpayers, and water utilities. Increased treatment costs, degraded ecosystems, disrupted economic activity, and heightened flood risks represent avoidable—and often irreversible—outcomes.

For more than 50 years, the Clean Water Act has protected our nation’s waters, and 94% of Americans support strong safeguards for clean water. The EPA should strengthen—not weaken—protections for aquatic ecosystems that directly influence downstream water quality and the drinking water of tens of millions of people in the Great Lakes region alone.

We respectfully urge the EPA to withdraw the proposed rule and ensure that all waters with meaningful connections to downstream water quality remain protected under the Clean Water Act.

Thank you for the opportunity to comment, and for your continued work to protect the health, safety, and environmental quality of U.S. waters.

Sincerely,

Jérôme Marty, Ph.D.
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