May 2, 2024

Michael S. Regan, Administrator
U.S. Environmental Protection Agency
Office of the Administrator, Mail Code 1101A
1200 Pennsylvania Avenue NW
Washington, DC 20460
regan.michael@epa.gov

Dear Administrator Regan:

Thank you for your statement on March 22 celebrating the importance of clean water to the United States and other countries around the world. The actions that President Biden and the U.S. Environmental Protection Agency (EPA) have taken to protect our waterways are significant and deserve public support. But while we enthusiastically support the Biden Administration’s goal of advancing the Clean Water Act, we want to highlight three areas where more is needed to move us closer to clean, healthy waters for all Americans.

1. Issue Overdue Water Quality Report

More than fifty years ago, the Clean Water Act promised the American people that our rivers, lakes, and estuaries would be both “fishable and swimmable.” To measure our progress in meeting these goals, Congress required the EPA to report on the condition of our streams, rivers, lakes, and estuaries at least once every two years, based on the agency’s analysis of state reports that identify which waterways are clean enough for the public to enjoy and which remain so polluted they are unsafe for boating, swimming, and fishing (both commercial and recreational), or for use as a drinking water source. The EPA’s last national water quality report summarizing all the state reports was released in 2017. EPA’s failure to issue the required national reports since then is a clear violation of Section 305(b)(2) of the Clean Water Act.

Based on the monitoring results reported by states, about half of our rivers and lakes and at least a quarter of our estuaries remain so polluted they are unsuitable for fishing, swimming, or other public uses the Clean Water Act was enacted to protect, while the condition of too many other waterways remains unmonitored. While state agencies issue their own water quality evaluations, their data can be difficult to interpret and inadequate to assess the condition of multi-state watersheds that cross so many state boundaries. There is no substitute for the kind of transparency that comes from a national report card issued by the EPA, which can be used to identify which waters ought to be a national priority for cleanup and to help identify pollution control strategies that work. While we appreciate the initiatives outlined in your March 22 statement, we respectfully request that EPA issue the national water quality report required by law as soon as possible.
2. **Commit to Revising Outdated Technology-Based Pollution Limits**

The Clean Water Act also requires EPA to limit industrial discharges of toxins and certain other pollutants based on the best available pollution control technologies, and to make those regulatory standards more stringent as wastewater treatment methods improve. These national technology-based pollution limits are critical to cleaning up our nation’s waters. While state agencies are supposed to impose technology-based limits on a case-by-case basis where federal rules fall short, states rarely do so. In addition, many states have failed to establish all the water quality standards needed to protect uses like drinking water and aquatic life, and have failed to consistently put in place more stringent permit requirements to meet the water quality standards they have established, resulting in permits that do little to improve local water quality or restrict the discharge of pollutants that contribute to serious contamination further downstream.

In a 2019 opinion addressing national technology-based pollution limits, the U.S. Court of Appeals for the Fifth Circuit made clear that, “The Act therefore mandates a system in which, as available pollution control technologies advance, pollution discharge limits will tighten.” The court then chastised the agency for taking so long to revise discharge limits for power plants that dated back to 1982, “…the same year that saw the release of the first CD player, the Sony Watchman pocket television, and the Commodore 64 home computer.”

EPA has continued to ignore its statutory mandate and the Fifth Circuit’s warning. As can be seen in the chart below this letter, the discharge limits for 40 of the 59 industries subject to these standards are between 30 and 50 years old, including those applying to Inorganic Chemicals (1984), Petroleum Refining (1985), Fertilizer Manufacturing (1986), and the makers of Organic Chemicals, Plastics, and Synthetic Fibers (1994). As a result, many chemical plants, refineries, and other industrial facilities continue to discharge high volumes of nitrogen, phosphorus, salts, and chemical toxins that contribute to algae growth, endanger fish and other aquatic life, or limit the public’s use of river, lakes, and estuaries. Excepting the recently revised wastewater limits for coal-fired power plants, EPA has not completed action to bring the technology-based standards up to date for any industrial category for at least twenty years.

While EPA has finally proposed to update limits for slaughterhouses, the statute does not anticipate EPA promulgating national technology-based permit limits for only one or two industrial categories every ten or fifteen years. At the current pace, it may be a full century before EPA decides whether industrial discharge limits that date back to the 1970s and 1980s are “up to date.” We hope that you will affirm the agency’s commitment to reviewing and improving these discharge limits according to the Clean Water Act’s mandate and timetable.

3. **Identify the Funding Needed and Currently Used to Fulfill EPA’s Clean Water Act Regulatory Responsibilities**

We understand that the EPA may lack the resources it needs to fulfill its statutory responsibilities. But the agency’s annual budget proposal, including the detailed *Justification of Congressional Appropriations*, makes this shortfall invisible. At present, it is easy to identify the billions of dollars the agency proposes to spend (or has spent) every year on Clean Water Act grants to states, cities, universities, consortia, partnerships, and other public and private organizations. But we cannot
identify the much smaller amounts reserved for the regulatory or deadline-driven tasks the law requires EPA to initiate and complete.

EPA's budget request should clearly identify the funding that it needs to discharge its statutory mandates within the deadlines established by the Clean Water Act. While some in Congress may see that as an opportunity to cut appropriations needed to implement the laws it has enacted, greater transparency would at least allow the public to debate and oppose such action. And the situation could hardly be worse than it is today, as budget cuts continue to fall harder on EPA's regulatory programs than on the grants or special initiatives earmarked by Congress.

Thank you for considering our views, and for all that EPA does to protect public health and the environment.

Eric Schaeffer  
Executive Director  
Meg Parish  
Senior Attorney  
**Environmental Integrity Project**  
eschaeffer@environmentalintegrity.org  
mparish@environmentalintegrity.org

Mayor Nickole Nesby  
Environmental Justice Organizer  
**412 Justice**  
600 Penn Avenue  
Pittsburgh, PA 15221  
Mayornesby@412justice.org  
https://412justice.org/

Trey Sherard  
Riverkeeper  
**Anacostia Riverkeeper**  
729 8th St SE  
Washington, DC 20003  
trey@anacostiariverkeeper.org  
www.anacostiariverkeeper.org

Dean Wilson  
Executive Director  
**Atchafalaya Basinkeeper**  
PO Box 410  
Plaquemine, LA 70765  
enapay3@aol.com

Kristen Schlemmer  
Senior Legal Director & Waterkeeper  
**Bayou City Waterkeeper**  
2010 N Loop W #103  
Houston, TX 77018  
kristen@bayoucitywaterkeeper.org  
www.bayoucitywaterkeeper.org

Charles Scribner  
Executive Director  
**Black Warrior Riverkeeper**  
712 37th Street South  
Birmingham, AL 35222  
cscribner@blackwarriorriver.org  
www.BlackWarriorRiver.org

Alice Volpitta  
Baltimore Harbor Waterkeeper  
Blue Water Baltimore  
1801 E. Oliver St.  
Baltimore, MD 21213  
avolpitta@bluewaterbaltimore.org  
www.BlueWaterBaltimore.org

Kemp Burdette  
Cape Fear Riverkeeper  
Cape Fear River Watch  
617 Surry Street  
Wilmington, NC 28401  
kemp@cfrw.us  
www.CapeFearRiverWatch.org
Beverly Graham  
Citizens’ Environmental Association of the Slippery Rock Area  
40 Schmidt Rd  
Grove City, PA 16127  
bevgraham49@gmail.com  

Hannah Connor  
Environmental Health Deputy Director  
Center for Biological Diversity  
1411 K Street NW, Suite 1300  
Washington, DC 20005  
hconnor@biologicaldiversity.org  
www.biologicaldiversity.org  

Walkiria Pool  
President  
Centro de Apoyo Familiar  
6801 Kenilworth Ave Suite 110  
Riverdale, MD 20737  
wpool@mycaf.org  
www.mycaf.org  

Evan Isaacson  
Senior Attorney  
Chesapeake Legal Alliance  
106 Ridgeley Ave  
Annapolis, MD 21403  
evan@chesapeakelegal.org  

Michael Mullen  
Riverkeeper  
Choctawhatchee Riverkeeper  
207 Gail Street  
Troy, AL 36079  
riverkeeper@troycable.net  

Lynn Thorp  
National Campaigns Director  
Clean Water Action  
1444 I Street NW Suite 400  
Washington, DC 20005  
lthorp@cleanwater.org  
www.cleanwateraction.org  

Riley Lewis  
White Oak Waterkeeper  
Coastal Carolina Riverwatch  
4915 Arendell Street  
Suite J, PMB 223  
Morehead City, NC 28557  
rileyl@coastalcarolinariverwatch.org  
www.coastalcarolinariverwatch.org  

Celina Mahabir  
Federal Policy Advocate  
Community Water Center  
716 10th Street, Suite 300  
Sacramento, CA 95814  
celina.mahabir@communitywatercenter.org  
www.communitywatercenter.org  

Julian Gonzalez  
Senior Legislative Counsel  
Earthjustice  
1001 G St. NW Suite 1000  
Washington, DC 20001  
jgonzalez@earthjustice.org  
www.earthjustice.org  

Michelle Montoya  
Policy Director  
Environmental Protection Network  
P.O. Box 42022  
Washington, DC 20015  
michelle.montoya@environmentalprotectionnetwork.org  
www.environmentalprotectionnetwork.org
Tarah Heinzen  
Legal Director  
**Food & Water Watch**  
1616 P St. NW, Suite 300  
Washington, DC 20036  
thuinzen@fwwatch.org  
www.foodandwaterwatch.org

Shannon Smith  
Executive Director  
**FracTracker Alliance**  
216 Franklin St, Suite 400  
Johnstown, PA 15901  
smith@fractracker.org  
www.fractracker.org

Lea Harper  
Managing Director  
**FreshWater Accountability Project**  
PO Box 473  
Grand Rapids, OH 43522  
wewantcleanwater@gmail.com  
www.fwap.org

Marian Dombroski  
**Friends of Quincy Run Watershed**  
6205 Lombard St  
Cheverly, MD 20785  
mdombros@gmail.com  
www.friendsofquincyrun.org

Bryan Hofmann  
Deputy Director  
**Friends of the Rappahannock**  
3219 Fall Hill Ave  
Fredericksburg VA 22401  
bryan.hofmann@riverfriends.org

Andrew Whitehurst  
Water Program Director  
**Healthy Gulf**  
3141 W. Tidewater Lane  
Madison, MS 39110  
andrew@healthygulf.org  
www.healthygulf.org

Michael Washburn  
Executive Director  
**Kentucky Waterways Alliance**  
330 N Hubbards Lane  
Louisville KY 40207  
michael@kwalliance.org  
www.kwalliance.org

Sandy Bihn  
Executive Director  
**Lake Erie Waterkeeper**  
3900 N Summit St.  
Toledo, Ohio 43611  
sandylakeerie@aol.com  
www.lakeeriewaterkeeper.org

Ted Evgeniadis  
Riverkeeper  
**Lower Susquehanna Riverkeeper**  
2098 Long Level Rd  
Wrightsville, PA 17368  
ted@lowsusriverkeeper.org  
www.lowsusriverkeeper.org

Cheryl Nenn  
Riverkeeper  
**Milwaukee Riverkeeper**  
600 E. Greenfield Ave  
Milwaukee WI 53204  
cheryl_nenn@milwaukeeriverkeeper.org  
www.milwaukeeriverkeeper.org

Rachel Bartels  
Director  
**Missouri Confluence Waterkeeper**  
121 W Adams Ave  
Kirkwood, MO 63122  
rachel@mowaterkeeper.org

David Caldwell  
Broad Riverkeeper  
**MountainTrue**  
540 Belwood Lawndale Rd.  
Lawndale, NC 28090  
david@mountaintrue.org
Melissa Marshall  
Community Organizer  
**Mountain Watershed Association**  
1414-B Indian Creek Valley Rd.  
[melissa@mtwatershed.com](mailto:melissa@mtwatershed.com)  
[https://mtwatershed.com](https://mtwatershed.com)

Rich Cogen  
Executive Director  
**Ohio River Foundation**  
4480 Classic Drive  
Blue Ash, OH 45241  
[rcogen@ohioriverfdn.org](mailto:rcogen@ohioriverfdn.org)

Frederick L Tutman  
Riverkeeper  
**Patuxent Riverkeeper**  
17412 Nottingham Road  
Upper Marlboro, MD 20772  
[fredt@paxriverkeeper.org](mailto:fredt@paxriverkeeper.org)  
[www.paxriverkeeper.org](http://www.paxriverkeeper.org)

Abigail M. Jones  
Vice President of Legal & Policy  
**PennFuture**  
610 N. Third St.  
Harrisburg, PA 17101  
[jones@pennfuture.org](mailto:jones@pennfuture.org)  
[www.pennfuture.org](http://www.pennfuture.org)

Katie Ruth  
Executive Director  
**Pennsylvania Interfaith Power & Light**  
321 W Chestnut St.  
Lancaster, PA 17603  
[director@paipl.org](mailto:director@paipl.org)  
[https://paipl.us](https://paipl.us)

Bob Dreher  
Legal Director  
**Potomac Riverkeeper Network**  
3070 M Street, NW  
Washington, DC 20007  
[bob@prknetwork.org](mailto:bob@prknetwork.org)  
[https://www.potomacriverkeepe...](https://www.potomacriverkeepe...)

Jill Taylor  
**Protect Elizabeth Township**  
304 Mohawk Drive  
Buena Vista, PA 15018  
[Protectelizabethtownship@gmail.com](mailto:Protectelizabethtownship@gmail.com)

Gillian Graber  
Executive Director  
**Protect Penn-Trafford (PT)**  
3344 Rt. 130, Suite A  
Harrison City, PA 15636  
[gillian@protectpt.org](mailto:gillian@protectpt.org)  
[www.protectpt.org](http://www.protectpt.org)

Robert K. Musil, Ph.D., M.P.H.  
President & CEO  
**Rachel Carson Council**  
8600 Irvington Ave.  
Bethesda, Maryland  
[bmusil1@yahoo.com](mailto:bmusil1@yahoo.com)  
[www.rachelcarsoncouncil.org](http://www.rachelcarsoncouncil.org)

Bill Schultz  
Riverkeeper  
**Raritan Riverkeeper**  
P.O. Box 244  
Keasbey, NJ 08832  
[raritan.riverkeeper@verizon.net](mailto:raritan.riverkeeper@verizon.net)

April Ingle  
Advocacy Director  
**River Network**  
PO Box 21387  
Boulder, CO 80308  
[aingle@rivernetwork.org](mailto:aingle@rivernetwork.org)  
[www.rivernetwork.org](http://www.rivernetwork.org)

Diane Wilson  
Executive Director  
**San Antonio Bay Estuarine Waterkeeper**  
600 Ramona Rd.  
Seadrift, TX 77983  
[wilsonalamobay@aol.com](mailto:wilsonalamobay@aol.com)  
[www.sanantoniobaywaterkeeper.org](http://www.sanantoniobaywaterkeeper.org)
Matt Pluta
Choptank Riverkeeper
ShoreRivers
114 South Washington St. Suite 301
Easton, MD 21601
mpluta@shorerivers.org

Peter Morgan
Senior Attorney
Sierra Club
2101 Webster St. Suite 1300
Oakland, CA 94612
peter.morgan@sierraclub.org
www.sierraclub.org

Buck Ryan
Executive Director
Snake River Waterkeeper
2101 N. Harrison Blvd
Boise, ID 83702-1238
buck@snakeriverwaterkeeper.org

Abbey Tyrna
Waterkeeper & Executive Director
Suncoast Waterkeeper
PO Box 1028
Sarasota, FL 34230
executivedirector@suncoastwaterkeeper.org
www.suncoastwaterkeeper.org

Staley Prom
Senior Legal Associate
Surfrider Foundation
PO Box 73550
San Clemente CA 92673
sprom@surfrider.org
www.surfrider.org
Arietta Ann DuPre
Executive Director of Operations
Sweet Springs Resort Park Foundation Inc.
19540 Sweet Springs Valley Road
Gap Mills, WV 24941
sweetspringsassistant@gmail.com
www.sweetspringsresortpark.org

Ashby Berkley and Arietta DuPre
President - Executive Director of Operations
Sweet Springs Watershed Association
19540 Sweet Springs Valley Road
Gap Mills, WV 24941
sswatershed@gmail.com

Rebecca Malpass
Director of Policy & Research
The Water Collaborative of Greater New Orleans
1433 N. Claiborne Ave, Suite 201
New Orleans, LA 70116
rebecca@nolawater.org
www.nolawater.org

Heather Hulton VanTassel
Executive Director
Three Rivers Waterkeeper
800 Vinial St Suite B314
Pittsburgh, PA 15212
heather@threeriverswaterkeeper.org
www.3RWK.org

Eve Goldman
Advocacy & Policy Director / Riverkeeper
Tualatin Riverkeeper
11675 SW Hazelbrook Rd.
Tualatin, OR 97062
eve@tualatinriverkeepers.org
https://tualatinriverkeepers.org

Pamela Digel
Upper Allegheny Riverkeeper
25 Bon Air Ave.
Bradford, PA 16701
pasmartin23@gmail.com

Guy Alsentzer
Executive Director
Upper Missouri Waterkeeper
24 S. Willson Ave, Suite 6-7
Bozeman MT 59715
guy@UpperMissouriWaterkeeper.org
www.UpperMissouriWaterkeeper.org
Kelly Hunter Foster  
Senior Attorney  
**Waterkeeper Alliance**  
180 Maiden Lane, Suite 603  
New York, NY 10038  
kfoster@waterkeeper.org  
https://waterkeeper.org

Robin Broder  
Deputy Director  
**Waterkeepers Chesapeake**  
962 Wayne Ave, Ste 610  
Silver Spring, MD 20910  
robin@waterkeeperschesapeake.org  
www.waterkeeperschesapeake.org

Debra Buffkin  
Executive Director  
**Winyah Rivers Alliance**  
P.O. Box 554  
Conway, SC 29528  
executivedirector@winyahrivers.org

Chavaysha Chaney  
Manager of Advocacy and Health Policy  
**Women for a Healthy Environment**  
7371 Thomas Blvd  
Pittsburgh, PA 15208  
chavaysha@womenforahealthyenvironment.org

Lisa Riley  
**Yough Communities Care**  
718 Miller Avenue  
Sutersville, PA 15083  
kresovich@gmail.com
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* Consent decree requires promulgation of MPP revisions by summer 2025.