



National Association of Conservation Districts

April 11, 2017

Mr. Scott Pruitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, N.W.
Washington, D.C. 20460

Dear Administrator:

The National Association of Conservation Districts (NACD) represents America's 3,000 locally-led conservation districts working with millions of landowners and operators to help them manage and protect land and water resources on private and public lands. Established under state law, conservation districts share a single mission: to work cooperatively with federal, state and other local resource management agencies, and private sector interest groups to provide technical, financial, and other assistance to help landowners and operators apply conservation to the landscape at the local level.

For more than 75 years, conservation districts have been leaders in locally-led efforts to ensure a clean and sustainable water supply for the nation. By engaging private landowners, conservation districts provide proactive assistance in putting voluntary conservation practices on the ground. These practices have far-reaching benefits, not the least of which is improved water quality that can mitigate the effects of drought and flooding. With earned trust and a proven ability to form partnerships at the local level, conservation districts are well positioned to play a key role in addressing water quality challenges in local communities. NACD acknowledges the successes of the Clean Water Act (CWA) over its 40-year existence and knows that water is critical for the health and viability of the urban and rural landscapes that conservation districts serve.

This being said, the Clean Water Act's (CWA) authority does not apply to issues of water quantity. NACD opposes the Environmental Protection Agency (EPA) asserting jurisdiction over water quantity from any water source under the CWA and believes any attempt to regulate water quantity with a Waters of the United States (WOTUS) rule would be an expansion of CWA beyond Congress' original intent for the law. NACD is confident the incorporation of local knowledge, heritage, and passion will help ensure a new version of the WOTUS rule is workable at the local level and meets its intended goals.

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We appreciate your consideration and would welcome the opportunity to provide more information as needed in the future. If you or your staff would like more information or would like to discuss this issue further, please do not hesitate to reach out to our Director of Government Affairs Coleman Garrison (coleman-garrison@nacdnet.org).

Sincerely,

Brent Van Dyke
President