



UNITED FOR A HEALTHY GULF

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May 15, 2017

EPA Administrator Scott Pruitt
Office of Policy Regulatory Reform
Mail Code 1803A
1200 Pennsylvania Ave NW
Washington, DC 20460

Submitted electronically to EPA Docket EPA-HQ-OA-2017-0190 via
regulations.gov

**RE: Benefits of EPA and Clean Water Act regulations for the Gulf of
Mexico Region**

Dear Administrator Pruitt:

It is very important that we take this opportunity to comment on efforts to repeal, replace or modify existing regulatory safeguards spurred by Executive Order 13777. Environmental safeguards broadly benefit our health, safety and communities and are critical in protecting the water we all drink, the air we all breathe and the food we all eat. This ill-conceived effort to roll back environmental protections fails to recognize the great benefits that these vital and effective safeguards provide across the country and here in the Gulf South.

The Environmental Protection Agency (EPA) was created, and landmark laws like the Clean Water Act and Clean Air Act were passed, to protect people from unchecked pollution and to create a level playing field for industry by establishing minimum standards that have been subject to a rigorous and transparent public input process. As a result, we've made great improvement in cleaning up our waterways while also growing the economy. Yet, we still have far to go. Recent clean water crises in Toledo, Ohio, Flint, Michigan, and Charleston, West Virginia along with longstanding problems such as the Dead Zone in the Gulf of Mexico underscore the need to better protect our communities and critical resources from pollution. Moreover, it is often low-income communities and communities of color who still lack access to clean and safe water and funding for water infrastructure, compounding decades of injustice.

Regulatory safeguards provide a range of benefits, but even when we look at economics alone it is clear that the benefits of regulations

far outweigh the costs. In 2014 dollars, the benefits of major federal regulations were up to \$872 billion while the costs were up to \$110 billion.¹ The net benefits of EPA regulations are particularly high. By 2020, the Clean Air Act, for example, will prevent over 230,000 early deaths, and the Clean Water Act is estimated to provide an economic benefit of \$11 billion per year.

In the Gulf South, a number of environmental regulations have provided vital safeguards for our rivers, streams, bayous, and Gulf, and all the people who depend on them. In the Gulf, fishermen, oilmen, teachers, vacationers, snowbirds, and all other folks live side by side. The beauty of the Gulf and the waters that flow into it are why people live here. Without federal systems in place to protect its citizens, the Gulf would not be the fishing and vacation destination it is. To the folks down here, clean water is not a burden, it is a necessity. Weakening or repealing regulations merely reallocates the burdens of pollution from polluters to the public. Clean up costs will be paid by the public in dollars and the impacts will be reflected in lost lives, declining health, decreased property values, increased water treatment costs, degraded fisheries and recreation opportunities, and stifled economic development. Most Americans agree that strong and effective safeguards are not holding us back but instead provide the foundation for access to clean and safe water, land and air for all of us. In many states, these federal safeguards provide a much-needed minimum safety net for communities and waterways.

In closing, we urge you to listen to the many people, businesses, states and local governments in the Gulf South and nationwide, who have benefitted from EPA's common sense approach to protecting people and the environment and not just to those who wish to shift the burden of their pollution control costs onto the public. EPA's inquiry should focus instead on how to carry out the mission of the agency to better protect all people equally, and to protect and restore clean communities, rivers and streams in all states.

Sincerely,



Matt Rota
Senior Policy Director

¹ Office of Management and Budget, 2016 Draft Report to Congress on the Benefits and Costs of Federal Regulations and Agency Compliance with the Unfunded Mandates Reform Act Office of Information and Regulatory Affairs (2016).