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March 14, 2019

Krista Osterberg  
Water Quality Division  
Arizona Department of Environmental Quality  
1110 West Washington Street, Suite 127  
Phoenix, Arizona 85007  
Submitted via email to [Osterberg.Krista@azdeq.gov](mailto:Osterberg.Krista@azdeq.gov)

Re: Arizona Department of Environmental Quality's (ADEQ's) official response to the Environmental Protection Agency (EPA) regarding the proposed rule revision for Waters of the United States (WOTUS)

Dear Ms. Osterberg:

This is in response to your request for comments on the Arizona Department of Environmental Quality's (ADEQ's) official response to the Environmental Protection Agency (EPA) regarding the proposed rule revision for Waters of the United States (WOTUS). We offer these comments on behalf of Sierra Club's Grand Canyon Chapter and our 50,000 plus members and supporters in Arizona. It is unclear how you are gathering input from organizations representing stakeholder groups such as ours, as the means of commenting provided to the public is a SurveyMonkey survey, which is anonymous. That is why we are submitting this short letter to you directly. As you know we are very interested in this matter and in the comments of ADEQ.

Sierra Club is a national environmental organization dedicated to exploring, enjoying, and protecting the wild places of the earth; to practicing and promoting the responsible use of the earth's ecosystems and resources; to educating and enlisting humanity to protect and restore the quality of the natural and human environment; and to using all lawful means to carry out these objectives. Sierra Club's Grand Canyon Chapter was organized in 1965, and, prior to that, our members were also involved in protecting Arizona's resources. We have a significant interest in the Clean Water Act and in protecting and restoring the water quality in Arizona's rivers, lakes, and streams.

Redefining WOTUS to exclude ephemeral waters will essentially remove Clean Water Act protections from most of the state. ADEQ should advocate for Arizona's interests by asserting the significance of ephemeral waters in our unique, arid climate and desert hydrology. Ephemeral waters contribute pollutants to rivers that provide drinking water, sportfish habitat and recreational opportunities to millions of people and to exclude them from the provisions of the Clean Water Act reveals a lack of understanding of how Arizona's watersheds function. The State, through ADEQ, should vigorously oppose the proposal in support of its mission to "protect and enhance public health and the environment in Arizona." We ask that you support a definition

that recognizes the significance of these Arizona waters and the importance of having them protected under the Clean Water Act.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Sandy Bahr". The signature is written in a cursive, flowing style with some loops and a trailing flourish at the end.

Sandy Bahr  
Chapter Director  
Sierra Club – Grand Canyon Chapter