



Natural Areas Conservancy
1234 Fifth Avenue, New York, NY 10029

January 5, 2026

Lee Zeldin, Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington DC 20460

Dear Administrator Zeldin,

On behalf of the Natural Areas Conservancy (NAC), we are writing in opposition to the proposed rulemaking revisions regarding the Clean Water Act found in the following dockets: EPA-HQ-OW-2025-0093, EPA-HQ-OW-2021-0602, and EPA-HQ-OW-2021-0602.

As the champion for urban natural areas in New York City, the NAC works to increase the health and resilience of our urban forests and wetlands, which provide critical habitat to hundreds of species of flora and fauna as well as critical protection for communities across the five boroughs. We know that healthy urban waterways are essential to help mitigate flooding and storm surge during extreme weather events, lower summer temperatures, and store carbon. Additionally, per research we conducted with the Trust for Public Land, they contribute at least \$2.2 billion in recreational value and \$1.1 billion in public health value.

We are deeply concerned that the proposed rule change doesn't account for impacts to public health or the impacts on water quality and flood protection. We are also incredibly concerned about the potential impacts to wetlands, which are already an increasingly rare ecosystem, especially in New York City, which has lost 99% of its historic freshwater wetlands since the late 1600s. As a waterfront city, New York is particularly vulnerable to both storm surge and inland flooding, and we are concerned that the proposed changes to the Clean Water Act will leave millions of New Yorkers exposed to waters that are grossly polluted and unsafe for public consumption and recreation.

We strongly urge the U.S. Environmental Protection Agency to withdraw the proposed change to the definition of "waters of the United States" and believe that we must do more to ensure the protection of vital wetlands and streams that help provide safe and clean water for millions of Americans. Rolling back these protections will hurt humans, animals, and the habitats we share for generations to come. Thank you.

Sincerely,

Andrew Wallach

Interim Executive Director
Natural Areas Conservancy