



Robert Stallman
President
American Farm Bureau Federation
600 Maryland Ave. SW
Suite 1000W
Washington DC 20024

July 10, 2014

Dear Mr. Stallman:

The American Farm Bureau Federation has dedicated significant attention in recent months to efforts to stop the proposed Clean Water Protection Rule developed by the Environmental Protection Agency and the U.S. Army Corps of Engineers. Specifically, your organization has alleged that the rule would represent a federal takeover of all farming and other land uses, and has made similarly inflammatory claims about government overreach with respect to "virtually all water."

EPA Administrator Gina McCarthy recently described claims made about the proposed rule as "misinformation" and stated that some of the rhetoric is "just silly." In Congressional testimony in June, Deputy Administrator Robert Perciasepe likewise directly rejected suggestions that "puddles" or "wet spots" could be covered by the rule, and EPA's top water official, Nancy Stoner, recently explained how numerous misrepresentations that have been made about the rule just are not accurate.

Notwithstanding these direct responses by the agency that Congress charged with implementing the Clean Water Act, the American Farm Bureau Federation persists in making outlandish arguments about the proposal.

It seems to us that the American Farm Bureau Federation would much rather invent absurd requirements that the proposal does not include -- but that frighten farmers -- than have a serious discussion about whether streams, nearby waters, and wetlands that perform important functions in their watersheds ought to be covered by the Clean Water Act. However, we believe that the American people, who overwhelmingly support the Act and who benefit from the services performed by these critical waters, deserve an honest discussion about this initiative.

Accordingly, we challenge the American Farm Bureau Federation to a public debate, presided over by a mutually-agreed-upon moderator, to explore such issues as whether the rule is needed, whether it is

consistent with the law as the Supreme Court has interpreted it, whether the rule goes far enough or too far, and what it would actually do. We look forward to your response.

Sincerely,

A handwritten signature in blue ink, appearing to read "JD", is positioned above the typed name.

Jon P. Devine, Jr.
Senior Attorney, Water Program
Natural Resources Defense Council