

Arbor Brewing Company * Arcadia Brewing Company * Baxter Brewing Company * Blue Mountain Barrel House *
Blue Mountain Brewery * Brewery Ommegang * Brewery Vivant
Central Waters Brewing Company * Dryhop Brewers * Engrained Brewing Company * Finch's Beer Company
Flossmoor Station Restaurant and Brewery * Founders Brewing Company * Great Lakes Brewing Company
Half Acre Beer Company * Hamburger Mary's Chicago * Harmony Brewing Company * Hi-Wire Brewing
Hops & Grain Brewery * Horse & Dragon Brewing * Kelso Beer Company * La Birreria
Lakefront Brewery, Inc. * Maine Beer Company * Odell Brewing Company
Old Bust Head Brewing Company * South Street Brewery * Revolution Brewing * Right Brain Brewery
Rolling Meadows Brewery * Temperance Beer Company * Wild Onion Brewing Company

November 13, 2014

The Honorable Gina McCarthy
Administrator
Environmental Protection Agency
Mail Code 1101A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OW-2011-0880

Dear Administrator McCarthy:

Please accept these comments in support of the Environmental Protection Agency's (EPA) draft rule, "Definition of 'Waters of the United States' Under the Clean Water Act."

For us, it's simple. Our breweries can't operate without a reliable, clean water supply. EPA's proposed rule will restore protections under the Clean Water Act that will do far more than protect the water sources for our great-tasting beer – it will ensure that the more than 117 million Americans whose drinking water comes from systems drawing supply from such streams are protected as well.

Beer is about 90 percent water, making local water supply quality and its characteristics, such as pH and mineral content, critical to brewing. Changes to our water supply – whether we draw directly from a water source or from a municipal supply – threaten our ability to consistently produce our great-tasting beer and thus, our bottom line. Those changes can also threaten the water supplies for our agricultural partners, who provide us with essential ingredients, such as hops, barley, wheat and other agricultural resources. That said, we understand that some agri-business interests have expressed concerns about the potential impacts of this rule on normal farming operations. We understand that EPA and the Army Corps of Engineers, along with the U.S. Department of Agriculture, have assured farmers that nothing in this rule will change the exemptions that apply to discharges by agricultural producers. We urge the agencies to continue these outreach efforts to the agricultural community and to partner with them as you work to finalize clear rules.

As businesses that depend on clean water, both directly and indirectly, we are pleased to see that the rule clearly protects all tributary streams and waters adjacent to such streams. As the rule makes clear, the science is unequivocal on the biological, chemical or physical connections between these waters and downstream water bodies.

The proposed rule has other benefits, including reducing flooding, filtering pollution, providing wildlife habitat, supporting hunting and fishing, and recharging groundwater. As a result of these benefits, it's not a surprise that the public benefits of implementing this rule significantly outweigh the costs. Your agency's analysis was reviewed by outside experts and estimates benefits would be \$388-514 million per year, which compares very well to the estimated costs of \$162-279 million per year to mitigate impacts to streams and wetlands.

We hope that you continue to rely on the science as you finalize the rule, especially as you consider how best to protect additional waters, such as prairie potholes, vernal pools and other so-called "isolated" waters. We understand the draft rule doesn't categorically protect these waters, although it would allow for their protection on a case-by-case basis.

We are pleased to be part of the broad base of support for this proposed rule which includes a diverse group of stakeholders. As different as our groups are, we have at least one thing in common – an understanding and appreciation of the critical role these waters play in our communities' economic and environmental health.

We urge you to finalize this rule as quickly as possible. Protecting clean water is central to our businesses and our long-term success. Both the great-tasting beer we brew and the communities in which we operate depend on clean water. Thank you in advance for the opportunity to comment on this rule.

Sincerely,



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Co-owner
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Ben Finch
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Chicago, IL



Josh Hare
Owner
Austin, TX



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Brewer
Flossmoor, IL



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