

The Honorable Charles Schumer  
Majority Leader  
United States Senate

The Honorable Kevin McCarthy  
Speaker  
United States House of Representatives

The Honorable Mitch McConnell  
Minority Leader  
United States Senate

The Honorable Hakeem Jeffries  
Minority Leader  
United States House of Representatives

**Date:** March 6, 2023

**From:** American Sustainable Business Network, Brewers for Clean Water and undersigned businesses

**RE:**

Dear Senator McConnell, Senator Schumer, Congressman McCarthy, and Congressman Jeffries,

Businesses throughout the United States depend on the Clean Water Act’s protection of streams, wetlands, and other waterways for their economic success and the health of their communities. From breweries to ecological restoration, real estate and lodging to shellfish harvesters and sustainable farmers, the businesses that power our economy and support our communities need the same thing as our own families do – strong safeguards for clean water and our health.

This is why we, the undersigned businesses and business associations of all sizes and from across industries, write to urge you to **oppose** H.J.Res.27/S.J. Res. 7, the Congressional Review Act resolution of disapproval for the “waters of the United States” final rule. The resolution would inappropriately repeal the Environmental Protection Agency’s (EPA) and the United States Army Corps of Engineers’ (Corps) final rule and attacks the longstanding federal clean water protections which Congress demanded for critical tributaries, wetlands, and other water bodies.

The rule formally reinstates a familiar approach for EPA and the Corps, and for regulated entities like many of us. In the rule, EPA and the Corps identify waters that qualify as “waters of the United States” in a way that tracks with the agencies’ long standing practice and framework. In virtually every respect, the rule is a codification of the approach outlined by the Bush administration, which has been the basis for agency decisions for most of the past 15 years.

The science is clear: downstream waterways are only as clean as their upstream tributaries and wetlands. Allowing pollution of those waters would threaten our businesses and economic health.

For example, companies in the food and beverage industry play vital roles in local economies and rely on a steady supply of clean water to create their products. They are increasingly concerned over risks to clean water. “As of 2021, 71% of [the largest food and beverage companies] consider water risks as part of their major business planning activities and investment decisions, up from 58% in 2019.”<sup>1</sup>

Brewers similarly rely upon the Clean Water Act to protect their water supply and their business operations, and they rely on uniform federal protections to ensure predictability of controls against toxics and pollutants. In 2020 alone, the craft brewing industry contributed over \$60 billion to the United States

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<sup>1</sup> Ceres, Feeding Ourselves Thirsty: Tracking Food Company Progress Toward a Water-Smart Future, Executive Summary at 3 (2021), <https://perma.cc/LUV6-WTLG>.

economy, and over 400,000 jobs.<sup>2</sup> To safeguard the upstream sources that provide their most critical ingredient, craft brewers seek robust federal protections.

There are more breweries today than at any other point in American history. Florida, Texas, Pennsylvania, and California—all downstream states—comprise 4 out of the top 5 states in terms of dollar value for the industry. The industry cannot exist without a reliable clean water supply—for which wetlands eligible for protection under the rule are crucial.

The ecological restoration industry, including mitigation bankers, likewise relies on robust enforcement of the Clean Water Act. The industry is estimated to contribute \$25 billion in annual output and 225,000 jobs to the United States economy.<sup>3</sup>

Clean water is also important for the real estate industry—home values can erode by as much as \$85,000 each on land near water with high nutrient pollution levels.<sup>4</sup> Wetlands play a critical role in preserving property values—particularly on waterfront properties—because they filter pollutants, store water, and provide flood control. In fact, during Hurricane Sandy in 2012, wetlands prevented \$625 million in flood damage by shielding property in twelve states.<sup>5</sup>

For these and many other reasons, small business owners overwhelmingly support robust federal water regulation. According to polling, more than 67% of small business owners—including majorities of self-identified Republicans, Democrats, and Independents—are concerned that water pollution could hurt their business. 80% favor federal rules to protect upstream headwaters and wetlands. And over 70% of small business owners believe clean water protections help spur economic growth, compared to only six percent who believe they are too burdensome.” From recreation to tourism, brewing to aquaculture, clean, unpolluted water matters.

We therefore call on you to oppose the resolution H.J.Res.27, the Congressional Review Act resolution of disapproval for the “waters of the United States” and reject this attack on the Clean Water Act.

Please contact Policy Director Colton Fagundes with any questions or to contact any of the other signatories, [cfagundes@asbnetwork.org](mailto:cfagundes@asbnetwork.org).

Sincerely,

Name of Business	State
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<sup>2</sup> Brewers Ass’n, Economic Impact, <https://perma.cc/HR72-RN8C>.

<sup>3</sup> Todd K. BenDor et al., Defining and evaluating the ecological restoration economy, *Restoration Ecology* 23(3): 209-219 (2015).

<sup>4</sup> Am. Sustainable Bus. Council, Comment letter on Proposed Revised Definition of “Waters of the United States” Docket ID No. EPA-HQ-OW-2018-0149 (Apr. 15, 2019), <https://perma.cc/R3Z7-LLGV>.

<sup>5</sup> Siddharth Narayan et al., The Value of Coastal Wetlands for Flood Damage Reduction in the Northeastern USA, 7 *Sci. Reps.* 9463 (2017), <https://perma.cc/UGJ5-RCP5>.

Fox One Solutions	AL
Herbaliz LLC	AL
Sedona Beer Company	AZ
Wren House Brewing	AZ
Mark's Bookmark Bookseller	AZ
Junxion Strategy	BC
9 Ten Design	CA
A Hundred Years	CA
A.R. Marketing House	CA
Aclaria Partners Inc	CA
Alter Images	CA
AlterEco, inc.	CA
Avocado Mattresses, LLC	CA
B Lab U.S. & Canada	CA
BSR, Sustainable Business Network	CA
C. Wolfe Software Engineering	CA
Caspian Agency	CA
Cheryl L. Elkins Jewelry	CA
DIESEL, A Bookstore	CA
Divine Sage Collective	CA
Dogpatch Biofuels	CA
Dr. Bronner's	CA
EC Sales Co	CA
ECOS/Earth Friendly Products	CA
Ecosia	CA
Eleek Incorporated	CA
Encore Editorial Services	CA
Enigmatics	CA
Financial Alternatives	CA
Green Retirement, Inc.	CA
Green2Gold	CA
<a href="http://greentv.com">greentv.com</a>	CA
Healthy Oceans, Healthy People	CA

HigherRing, Inc.	CA
Impact Coaching & Consulting, LLC	CA
Impact Grove	CA
inNative	CA
Intex Solutions, Inc	CA
James' Solar	CA
Kahl Consultants	CA
KW Botanicals Inc.	CA
Landscape Consultant	CA
Lawrence R. Jensen & Associates	CA
Leadership & Strategy for Sustainable Systems	CA
Marin Sunshine Realty	CA
Marlene Puaoi, CSR	CA
Matt Sheridan Dog Walking	CA
Meaningful Organization Design, Inc	CA
National Stewardship Action Council	CA
Net Impact	CA
Otherwild	CA
Quest	CA
Remarkable Ventures Corp.	CA
Rincon-Vitova Insectaries, Inc.	CA
Santa Cruz Climate Action Network	CA
SFT Mgmt, LLC	CA
Sol Economics	CA
STOKE	CA
Tendaji LLC	CA
The Commons	CA
The Rosebud Agency	CA
Thinkshift Communications	CA
Torrey Project	CA
Unical Aviation	CA
Uplift Accounting	CA
Urban Machine	CA

Wallin Mental Medical	CA
We All Rise	CA
Weil Aquatronics, Inc	CA
AREI, Inc.	CO
Box Canyon Lodge and Hot Springs	CO
Business for Water Stewardship	CO
Dreamweaver Yoga	CO
Durango Compost Company	CO
Equinox Consultancy LLC	CO
Ever Better, PBC	CO
GoodLight Natural Candles	CO
Horse & Dragon Brewing Company	CO
Interiors by Design	CO
<a href="http://Mind-iN-Spire.org">Mind-iN-Spire.org</a>	CO
New Belgium Brewing	CO
PSEC	CO
Relish Studio	CO
Solar Energy Consulting US, Inc.	CO
Spector and Associates	CO
Suite Sleep, Inc.	CO
SunJuice Solar	CO
Sustainable Food Trade Association	CO
The Denver Business Journal	CO
Unite North Metro Denver	CO
Venner Consulting	CO
New Belgium Brewing	CO
American Impact Capital Foundation	CT
Responsible Leader Group, LLC	CT
Winston Eco-Strategies, LLC	CT
4P Foods	DC
Eighty2degrees LLC	DC
Jim Schulman, Architect	DC
National Latino Farmers and Ranchers Trade Association	DC

Shifting Patterns Consulting	DC
Advanced Pavement Group	DE
BrightFields, Inc.	DE
Brown Advisory	DE
Drone Workforce Solutions, LLC	DE
Equality Delaware Foundation	DE
Hatzel and Buehler, Inc.	DE
Ultra Solar and Wind	DE
Wilmington Rowing Center	DE
World Trade Center Delaware	DE
DayQuest Life Counseling	FL
Ethical Markets Media	FL
Florida For Good	FL
Global Cooling Productions	FL
Jarmusz & Associates	FL
Legacy Club Holdings, LLC	FL
Legacy Hospitality Holdings, Inc.	FL
Legacy Vacation Club Management, LLC	FL
Legacy Vacation Club Services, LLC	FL
Legacy Vacation Club, LLC	FL
Legacy Vacation Resorts	FL
LVC Holding Co., LLC	FL
LVC Timeshare Developer, LLC	FL
LVC Timeshare Management, LLC	FL
LVR Assets, LLC	FL
Nancy Deren Financial Coaching	FL
Salt Palm Development	FL
The Global Cooling Project	FL
Vacation Benefits, LLC	FL
Ocaquatics Swim School	FL
"The Paula Gordon Show"	GA
Chicory Wealth	GA
Owens Business & Cnsltg. Llc	GA

Tai Chi 4 LIFE	GA
The Paula Gordon Show'	GA
Barzman Consulting	HI
Front Street Financial	HI
Maui ESG Project	HI
Proof Maui Photography	HI
Ideal Energy Inc	IA
Sisters of Charity, BVM	IA
Toppling Goliath Inc dba Toppling Goliath Brewing Co.	IA
Airetage	IL
Chlorinefree Products Association	IL
Engrained Brewing Company	IL
Eye Love Nature	IL
HJKessler Associates	IL
Human being	IL
Just in Time Direction	IL
NJH Sustainability Consulting	IL
Open Water	IL
Purpose Sustainability Strategy	IL
RetGlore Mill Center for Biodiversity	IL
Ringspann Corp.	IL
Solutions Through Dialogue, LLC	IL
Uncommon Ground & Greenstar Brewing	IL
Sodrel Photography	IN
Maryann Miller- Urban Conservancy	LA
Broadside Bookshop Inc.	MA
Climate Action Business Association/ Climate XChange	MA
DiMatteo Consulting	MA
HealthLink	MA
Irving House at Harvard	MA
Perfect Supplements	MA
Stakeholders Capital	MA
Tech Networks of Boston	MA

The Basil Tree Inc	MA
Topia Inn	MA
Vanderbilt Financial Group	MA
Wild Oats Health Food Store	MA
Amicus Green Building Center, LLC	MD
Biohabitats, Inc.	MD
CEM Design, Architects	MD
CRK properties Inc	MD
Forward Brewing	MD
Harbor West Design	MD
HarborWest Design	MD
Jax Photography	MD
PaverGuide, Inc.	MD
RoundPeg	MD
Tierra Vista Consulting	MD
Allagash Brewing Company	ME
Homarus Strategies LLC	ME
Lamey-Wellehan	ME
ReVision Energy	ME
Zero Energy Homes	ME
Brewery Vivant, Broad Leaf Brewery & Spirits	MI
Humanoid Digital	MI
Right Brain Brewery	MI
Social Good Promotions	MI
Wiltse Kitchen	MI
Bang Brewing	MN
CONTEMPL8 T-SHIRTS LLC	MN
Inclusivi-tee	MN
Iroquois Valley Farmland REIT	MN
Sustainability Associates	MN
Thousand Hills Lifetime Grazed	MN
True North Research	MN
SC Small Business Chamber of Commerce	MO



TriplePundit	MO
Southern Energy Development	MS
Bioroot Energy, Inc.	MT
Kent Mollohan Designs	MT
Natural Upholstery	MT
A Sustainable Design of the Americas. LLC	NC
Bull City Burger and Brewery	NC
Fireplace Editions	NC
Values2Action LLC	NC
Ware, LLC	NC
A.K. A Coach and Company	ND
LeBel Marketing	NH
Megafood	NH
NH Businesses for Social Responsibility	NH
Your Movement Mentor	NH
ANJEC	NJ
Avocado Green	NJ
Bayshore Council	NJ
Bio-Gist Ventures, LLC	NJ
Camden Fireworks	NJ
Camden Print Works	NJ
CASE MEDICAL	NJ
Ciel Power LLC	NJ
Comeback Farm Organic Produce	NJ
Common Interests, LLC	NJ
Cottage Dweller Productions	NJ
Cronheim Consulting LLC	NJ
Ecco Bella	NJ
Middletown for Clean Energy	NJ
Natural Systems Utilities	NJ
Newport Metals, LLC	NJ
NJ Sustainable Business Council	NJ
Offshore Power LLC	NJ

Princeton Hydro, LLC	NJ
Professional Paperwork Services	NJ
Sustainable Business Partners LLC	NJ
The Wei LLC	NJ
Triple Ethos LLC	NJ
Zed's Beer/Bado Brewing	NJ
Beyond BlueGreen	NM
Canyonlights	NM
EnergyWorks	NM
Equiterra Regenerative Design Inc	NM
Law Office of Lara Pearson Ltd, PBC	NV
Reno Acupuncture & Integrative Medicine	NV
Simple Impact LLC	NV
Transition Services, Inc.	NV
A Stone's Throw B&B/Village of Interlaken	NY
A thru G Music	NY
Advanced Telecommunications Company	NY
American Council to Advance Medicare for All	NY
Becket, Inc.	NY
CLC Consulting LLC	NY
Collaborative Solutions	NY
Culture Shift Agency	NY
Dobbs & Bishop Fine Cheese	NY
EcoPlum	NY
Environmental Support	NY
Farmland Preservation NY LLC	NY
Fred F. French Investing LLC	NY
Future Nexus	NY
Garnant Computer Services	NY
Global Women 4 Wellbeing (GW4W)	NY
GlobalReach	NY
Good for Business	NY
Green Circle Accounting	NY

Green Map System	NY
GREENPLAN Inc.	NY
InStep Consulting LLC	NY
Interfaith Center on Corporate Responsibility	NY
JSA Sustainable Properties	NY
Kostis Kosmos Inc.	NY
Krystan Doyle (Farmer)	NY
Laurie Allan & Associates LLC	NY
LIBECO	NY
Longwave Financial	NY
Middlesex Water Company	NY
Miller Howard Investments	NY
Ministry of Maat	NY
My Home Assistsnt, LLC	NY
New Earth Mushrooms	NY
New York State Sustainable Business Council	NY
Octagon Builders	NY
Perlman and Perlman	NY
Pizzigati Designs	NY
Possible Rochester	NY
Seneca Lake Guardian	NY
Sisters of St. Dominic of Blauvelt, New York	NY
Slow Money NYC	NY
Stonetree Productions	NY
Strategic-Creative Consulting	NY
Strugatz Ventures Inc.	NY
SULA NYC	NY
<a href="http://SustainableBusiness.com">SustainableBusiness.com</a>	NY
The CommonSpot	NY
The Paper Straw Girl LLC	NY
The Sustainable Coop Store	NY
What's Good	NY
WWB Asset Management	NY

Naturepedic Organic Mattresses	OH
Schmidt Family Farms	OH
Trammell Consulting Co.	OH
Evergreen Sustainability, LLC	OR
Maracuja Solutions	OR
Oregon PeaceWorks	OR
Please Select	OR
Silver Oak Advisory Group	OR
Southern Oregon Field Mowing	OR
The OIFactory LLC	OR
Urban Ordhards	OR
All Together Now PA	PA
Andropogon Associates	PA
Bar Hygge	PA
Benari LTD	PA
Biohabitats	PA
Birchtree Catering	PA
Cedar Run Landscapes	PA
Cerulean, LLC	PA
Collins Nursery	PA
Community Energy Solar	PA
Community Impact Consulting	PA
Crime & Punishment Brewing Co.	PA
David Brothers	PA
Exact Solar	PA
Green Rush Advisors	PA
GreenTreks Network	PA
GreenWeaver Landscapes	PA
Ground Plan Studio	PA
Gryphon Solutions, LLC	PA
Happy Happy Cleaning	PA
Hillside Equity	PA
ImpactED	PA

Interpret Green	PA
JustLaws	PA
Key Medium	PA
Kind Earth Growers LLC	PA
LG Health	PA
Lynch Music, Inc	PA
Meliora Design	PA
National Foundry Products	PA
Native Scapes Design	PA
New Wave Audio and Video	PA
North Creek Nurseries	PA
OptiRTC, Inc.	PA
PEER Environmental, LLC	PA
Philadelphia Area Co-op Alliance	PA
Phildelphia Green Roofs LLC	PA
Philly Electric Wheels	PA
Power Corps PHC	PA
Progressive Business Services	PA
Redbud Native Plant Nursery	PA
Relaxing into Wellness Reflexology	PA
Remark Glass	PA
Riverbend Nursery	PA
RM Green Environmental Services, LLC	PA
Rodale Institute	PA
Roofmeadow	PA
Sanderson Sustainable Design	PA
Soap Alchemy	PA
Sustainable Solar Systems	PA
The H Trust	PA
ThinkGreen LLC	PA
Triple Bottom Brewing Company	PA
Understand Your Brand	PA
USA Environmental Management, Inc.	PA

Story Walking Radio Hour	RI
Coalition of Large Tribes	Rosebud Sioux Indian Reservatio n
Midlands Entertainment llc	SC
Murells Inlett Seafood	SC
Murrells Inlet Seafood	SC
South Carolina Business Council	SC
Cumberland Recycling, LLC	TN
Ibis Communications	TN
ID2MP	TN
2050 and Beyond LLC	TX
Austin Local Business Alliance	TX
EIS Lighting	TX
Feraway Capital	TX
McDonald Sanders, P.C.	TX
Suraksha	TX
Sustainable Concepts, LLC	TX
Bloomberg BNA	VA
Coherence Collaborative LLC	VA
Greenvest	VA
Revisioning Strategies	VA
Savage Acres LLC	VA
Agrilab Technologies Inc.	VT
Ben&Jerry's	VT
Cx Associates	VT
Marketing Partners Inc	VT
Seventh Generation	VT
Arlington Investments, LLC	WA
Calyx	WA
Clean & Prosperous Institute	WA
Conscious Talk Radio	WA

Crista	WA
Gardow Consulting, LLC	WA
Georgetown Brewing Company	WA
Grounds for Change	WA
JLFG Communications	WA
LolitaMoon Productions	WA
Mone Natural Plant Design	WA
Namu Baru Inc.	WA
Seattle Good Business Network	WA
Share the Wealth Productions	WA
SunOxSyndicate	WA
We Are Well, Charlotte Watts	WA
BoxLatch Products	WI
Dana Investment Advisors	WI
GMB Rentals, LLC	WI
Healthy Mamas	WI
Kickapoo Peace Circle	WI
Lakefront Brewery, Inc.	WI
Quality Cleaning	WI
Seventh Generation Interfaith Coalition for Responsible Investment	WI
Vista Global Coaching & Consulting	WI