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January 5, 2026

Stacey Jensen
Oceans, Wetlands and Communities Division
Office of Water (4504-T)
Environmental Protection Agency
1200 Pennsylvania Avenue
NW, Washington, DC 20460

**RE: Waters of the United States Updated Definition
Docket No. EPA-HQ-OW-2025-0322**

Dear Ms. Jensen:

The Iowa Environmental Council (IEC) offers the following comments on the solicitation for stakeholder feedback on “Proposed Rule: Updated Definition of Waters of the United States” EPA Docket No. EPA-HQ-OW-2025-0322. These comments represent the views of the Iowa Environmental Council (IEC), an alliance of more than 100 organizations, at-large board members from business, farming, the sciences and education, and over 500 individual members. IEC’s members hike, fish, paddle, swim, and recreate in and around wetlands, lakes, rivers, and streams throughout the state.

The proposed updated Waters of the United States (WOTUS) definition limits the scope of protected waterbodies, particularly for wetlands. As established in the *Sackett* ruling, the new definition requires WOTUS wetlands to share continuous surface connection through jurisdictional waters, thereby eliminating countless streams and wetlands from federal protections. The proposed implementation of this rule unnecessarily restricts waters covered as WOTUS, which is not in the interest of Iowa’s strong industrial and farming communities, and we are concerned about the economic and ecological implications of the proposed rule.

In April 2025, IEC submitted comments for EPA Docket No. EPA-HQ-OW- 2025-0093 regarding the importance of Iowa’s wetlands, including the benefits of flood protection, reduced water pollution, and wildlife habitat. Those comments and the benefits of Iowa’s few remaining wetlands remain true today. These benefits are described in the Iowa Nutrient Reduction Strategy, which calls for building and restoring more wetlands to reduce the nutrients in fertilizer we send to our rivers and streams.¹ The state policy – resulting from encouragement by EPA – is funded by taxpayer money, which contributes to the protection and expansion of Iowa’s few

¹ IOWA CODE § 455B.177.

wetlands. Reducing federal protections would undermine these state efforts and public investments.

We request that EPA adopt a definition of Waters of the United States that protects the maximum extent of waters allowed by the *Sackett* ruling, consistent with comments submitted by the Environmental Law & Policy Center. As a state covered with impaired waters that has lost nearly all its wetlands, Iowa faces a threat of further harm from a loss of federal protections. A rule narrowly interpreting the Waters of the United States would worsen life for Iowans and the landscapes we love.

Thank you for your consideration.

Sincerely,

/s/ Michael R. Schmidt

Michael R. Schmidt
General Counsel
Iowa Environmental Council

/s/ Colleen Fowle

Colleen Fowle
Water Program Manager
Iowa Environmental Council