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Submitted via email and to Docket ID No. EPA-HQ-OW-2025- 0322 via regulations.gov and
OW-Docket@epa.gov

*Re: Updated Definition of 'Waters of the United States'; Docket ID No. EPA-HQ-2025-0322; Request for Extension of
Comment Period*

To whom it may concern,

The [Environmental Protection Network](#) (EPN) harnesses the expertise of more than 700 former Environmental Protection Agency (EPA) career staff and confirmation-level appointees from Democratic and Republican administrations to provide the unique perspective of former regulators and scientists with decades of historical knowledge and subject matter expertise.

EPN is requesting that EPA and the U.S. Department of the Army (Army) extend the comment period for the proposed rule "Updated Definition of 'Waters of the United States,'" (Docket ID No. EPA-HQ-2025-0322). The current 45-day comment period will end on January 5, 2026 and will encompass several federal holidays. The magnitude and impact of the proposed rule — EPA and Army are proposing to substantially reduce the number of wetlands, streams, and other water bodies protected by the Clean Water Act — require a lengthy commenting period to give the public sufficient opportunity to understand and assess the new legal and technical arguments being used to justify the proposal.

We request that EPA and Army extend the comment period for an additional 15 days to allow EPN and other members of the public the time needed to prepare the most comprehensive comments possible.

We would appreciate hearing the agencies' response to this request as soon as possible so that we are able to more effectively engage our membership in our analysis of the proposed action.

Respectfully submitted,

A handwritten signature in cursive script that reads "Michelle Roos".

Michelle Roos
Executive Director
Environmental Protection Network