

American Fisheries Society · American Sportfishing Association · B.A.S.S. LLC · Berkley Conservation Institute · Bull Moose Sportsmen's Alliance · Delta Waterfowl · Ducks Unlimited · Izaak Walton League of America · National Wildlife Federation · Pheasants Forever · Quail Forever · Snook & Gamefish Foundation · Theodore Roosevelt Conservation Partnership · Trout Unlimited · Wildlife Management Institute · The Wildlife Society

November 5, 2013

Science Advisory Board Review Panel
Attn: Dr. Thomas Armitage, Designated Federal Officer (DFO)
EPA Science Advisory Board Staff Office (1400 R)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Comments on *Connectivity of Streams and Wetlands to Downstream Waters: A Review and Synthesis of the Scientific Evidence*: Docket ID No. EPA-HQ-OA-2013-0582

Dear Dr. Armitage:

As organizations representing millions of hunters, anglers, conservationists, biologists and resource managers nationwide, we believe that science is the appropriate starting point for management of our natural resources. We commend the Environmental Protection Agency (EPA) for its rigorous assessment of the best available science documenting the chemical, physical and biological connectivity of wetlands and headwater streams to downstream waters. We appreciate this effort because clean water supports fish and wildlife habitat and hunting and fishing opportunities nationwide. We ask that you consider the following comments during the Science Advisory Board's peer review of the assessment. These comments reflect the priorities of many of America's 47 million hunters and anglers.

EPA's new draft report, *Connectivity of Streams and Wetlands to Downstream Waters: A Review and Synthesis of the Scientific Evidence*, is a comprehensive synthesis of more than 1,000 peer-reviewed publications of the best available science on wetlands and headwater streams. It fairly documents the connectivity of wetlands and streams to downstream waters and will inform future decisions about restoring Clean Water Act protections.

We are encouraged that the draft report recognizes that "the watershed scale is the appropriate context" for assessing connectivity and that "to understand the health, behavior, and sustainability of downstream waters, the effects of small water bodies in a watershed need to be considered in aggregate." Using a watershed-based approach that aggregates the ecological impacts of individual water bodies will lead to better management of the resource and improved water quality in downstream rivers, lakes and bays.

We are also pleased to see the report's discussion of what it calls unidirectional wetlands. The report concludes that unidirectional wetlands "provide numerous functions that can benefit downstream water quality and integrity" despite the complication that "for certain functions (e.g., sediment removal and water storage), downstream effects arise from wetland isolation, rather than connectivity." The draft report does not draw general conclusions about the connectivity of unidirectional wetlands to downstream waters but does say that such evaluations could be done on a case-by-case basis. We ask that the final report include additional clarity on whether the connectivity of unidirectional wetlands can be assessed on a regional or watershed basis. Such an analysis will be especially helpful for sportsmen in, for example, the Prairie Pothole Region of the Dakotas. This region, which stretches into Canada, is home to 50-70 percent of all North American ducks. We are losing wetlands in this region at an alarming rate and, with them, the valuable habitat and sporting opportunities they provide.

The draft report confirms scientifically what sportsmen and women know from experience: wetlands and headwater streams serve a vital function for the quality of downstream aquatic resources, both individually and collectively. Yet management of wetlands and headwater streams has been in limbo for more than a decade due to two Supreme Court cases that left jurisdiction under the Clean water Act ambiguous. This uncertainty has put some of the most important sources of clean water, habitat, and hunting and fishing opportunities at risk. These wetlands and headwater streams filter pollutants from iconic fishing grounds in the Chesapeake Bay, absorb floodwaters in the Mississippi River Basin and support a range of fish and wildlife species as well as sportsmen's ability to access high-quality hunting and fishing opportunities nationwide.

Hunting and fishing are major economic drivers in this country, generating \$200 billion in total economic activity each year, supporting over 1.5 million jobs and breathing life into rural communities. However, sportsmen and their associated economic benefits depend on clean water. We look forward to the Clean Water Act rulemaking, which has the potential to restore protections to many of our nation's most vulnerable and important waters. Science must guide this rule, and we view EPA's draft science report and peer review process as critical components underpinning this and other future decisions about how we as a nation can best manage our waters.

Thank you for considering our comments for inclusion in the final report.

Sincerely,

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