



Consortium of  
Aquatic Science Societies

August 3, 2017

The Honorable Scott Pruitt  
Administrator  
U.S. Environmental Protection Agency  
Office of Policy Regulatory Reform  
Mail Code 1803A  
1200 Pennsylvania Ave NW  
Washington, DC 20460

The Honorable Douglas W. Lamont  
Senior Official Performing the Duties of the  
Assistant Secretary of the Army for Civil  
Works  
Office of the Assistant Secretary  
of the Army for Civil Works  
Department of the Army  
104 Army Pentagon  
Washington, DC 20310-010

Dear Administrator Pruitt and Deputy Assistant Secretary Lamont:

We are writing on behalf of our 20,000 members to urge the EPA and US Army Corps of Engineers to extend the public comment period for the proposed rule that seeks to rescind the 2015 Clean Water Rule (80 FR 37054). We request at least a six month comment period, the same time period your agencies provided for comment on the 2015 Clean Water Rule.

The planned 30-day comment period is an inadequate amount of time for stakeholders to engage meaningfully in the rulemaking process. Further, it minimizes the input of over one million people who participated in the development of the 2015 rule.

EPA and the Army Corps crafted the 2015 rule to clarify longstanding confusion over which water bodies were protected under the Clean Water Act. The agencies held over 400 meetings with a variety of stakeholders, including small business owners, farmers, energy companies, states, counties, municipalities, other federal agencies, sportsmen and conservation groups, and environmental organizations. A rulemaking of this nature with tremendous consequences for the wellbeing of all citizens deserves a transparent, inclusive and meaningful opportunity for public comment.

Many of our members participated the development of an extensive report on the connectivity of wetlands to downstream waters<sup>1</sup> that provides the scientific evidence in support

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<sup>1</sup> U.S. Environmental Protection Agency (USEPA). 2013. Connectivity of Streams and Wetlands to Downstream Waters: A Review and Synthesis of the Scientific Evidence. US Environmental Protection Agency, Washington, D.C. EPA/600/R-11/098B.

of the 2015 rule. We would appreciate a meaningful opportunity to comment on the re-codification of the rule to ensure that the science is appropriately considered in this process.

Wetlands and headwater streams provide vital services that promote human health and safety. Wetlands keep our streams, lakes, and groundwater cleaner by treating urban and agricultural runoff through natural processes. They also provide water during times of drought and absorb runoff and floodwaters, which reduces disaster recovery costs. Wetlands sustain essential habitat for wildlife, fish, and waterfowl to feed, nest, breed, spawn, and rear their young. Our nation's wetlands cover a small portion of our landscapes (<6% of the land area in the lower 48 states) but they play a very significant role in protecting the water that we all depend on.

Considering the critical functions of our nation's wetlands and headwater streams, the far-reaching implications on aquatic species and their habitat from repealing the rule, and the robust public participation in developing the 2015 rule, we urge EPA and the Army Corps to extend the comment period so stakeholders can understand the concerns that remain and continue to contribute in a useful way.

The Consortium of Aquatic Science Societies (CASS) is comprised of nine professional societies representing almost 20,000 individuals with diverse knowledge of the aquatic sciences. Those members work in the private sector, academia, non-governmental organizations, and various tribal, state, and federal agencies. CASS represents professional scientists and managers who combine deep subject matter expertise, a commitment to independent objectivity, and the critical review of environmental information, along with a passion for the natural places and resources that form the foundation of American greatness. With a shortened comment period, little time is provided for them to voice their opinions about a rulemaking that greatly affects the water, habitat and aquatic species they have dedicated their lives to studying, managing and protecting.

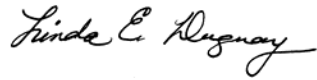
Sincerely,

Consortium of Aquatic Science Societies



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Joseph Margraf  
President  
American Fisheries Society



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Linda Duguay  
President  
Association for the Sciences of Limnology and Oceanography



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Robert R. Twilley  
President  
Coastal and Estuarine Research Federation



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Heidi Dunn  
President  
Freshwater Mollusk Conservation Society



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Erin Dunlop  
President  
International Association for Great Lakes Research



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Frank Wilhelm  
President  
North American Lake Management Society



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Tim Nelson  
President  
Phycological Society of America



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Colden Baxter  
President  
Society for Freshwater Science



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Arnold van der Valk  
President  
Society of Wetland Scientists