



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
EMAIL TO: Docket_OEI@epa.gov

RE: Docket ID No. EPA-HQ-OA-2013-0582: "Connectivity of Streams and Wetlands to Downstream Waters"

Dear SAB Review Panel:

On Behalf of the River Management Society, I urge you to finalize the Science Advisory Board (SAB) report on stream connectivity. The River Management Society is a professional organization that supports river managers and advocates for use of science and best management practices in managing river resources. Our members are located across all 50 states and Canada.

The SAB report accurately captures the functions of streams and wetlands, and highlights their significant interconnectivity to larger downstream watersheds. The report's sound science and significant conclusions leave no doubt that clean water protections, previously in place and fully intended under the original law, must be restored so current and future generations can benefit from these precious natural resources.

The current situation has unreasonably complicated the professional work of our members. In addition to the problems created by the Supreme Court decisions and current EPA and Corps of Engineers policy, the situation is further complicated by a myriad of individual state laws that fail to recognize the connections within our river systems. Recognizing that ground water, intermittent, ephemeral streams and wetlands are most often connected to perennial streams is a great place to start. The presumption that these components are not connected makes it hard for our professional members to pursue water quality violations within their jurisdiction and makes it more difficult for them to provide professional review and comment on upstream activities.

Our organization supports the SAB report. We recommend the SAB consider comments provided by the State of Alaska concerning Alaska specific literature that is not included in the current draft. We encourage the SAB to finalize the report quickly, and recommend the EPA And Corps of Engineers utilize the report to move forward with rulemaking that restores key CWA protections to vulnerable streams, wetlands, and water bodies.

Sincerely,
Dennis Willis
President
River Management Society