September 21, 2017

The Consortium of Aquatic Science Societies (CASS) would like to urge your subcommittee not to adopt a policy rider that would allow the federal government to exempt the administration’s proposed repeal of the Clean Water Rule from the Administrative Procedures Act. The repeal of Clean Water protections requires a meaningful opportunity for stakeholders to engage in the process to ensure the best available science is considered. At a minimum, the public should have the opportunity to comment on this critically important issue.

The repeal of the Clean Water Rule poses a significant threat to the integrity and security of our drinking water, public health, fisheries, and wildlife habitat while significantly increasing the risks and costs associated with flood and storm damage. 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 commercially and recreationally valuable wildlife, fish, and waterfowl to feed, nest, breed, spawn, and rear their young. Our nation’s wetlands cover a small proportion of our landscapes (<6% of the lower 48 states), yet they contribute many times their proportional share in services to human well-being.
Attached please find our recent press release opposing the repeal of the Clean Water Rule. This document highlights our support for a rule that conserves our nation’s critical headwater streams, shields communities from flooding, supplies drinking water to one in three Americans, and provides essential fish and wildlife habitat.

CASS is comprised of nine professional societies representing almost 20,000 individuals with diverse knowledge of the aquatic sciences. Our members work in the private sector, academia, non-governmental organizations, and various tribal, local, 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. CASS supports the development and use of the best available science to sustainably manage our freshwater, estuarine, coastal, and ocean resources to the benefit of the U.S. economy, environment, and public health and safety.

Thank you for the opportunity to share our perspective on the importance of ensuring the public has the opportunity to weigh-in on the repeal of the Clean Water Rule.

Sincerely,

The American Fisheries Society
Association for the Sciences of Limnology and Oceanography
Coastal and Estuarine Research Federation
Freshwater Mollusk Conservation Society
International Association for Great Lakes Research
North American Lake Management Society
Phycological Society of America
Society for Freshwater Science
Society of Wetland Scientists

Enclosures (1)