



Statement of Jimmy Hague
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To the Panel for the Review of the U.S. Environmental Protection Agency's Report:
*Connectivity of Streams and Wetlands to Downstream Waters: A Review and
Synthesis of the Scientific Evidence*

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Chairwoman Rodewald and members of the panel, thank you for the opportunity to address you on this issue of utmost importance to the sportsmen's community and comment on the Environmental Protection Agency's (EPA) report *Connectivity of Streams and Wetlands to Downstream Waters: A Review and Synthesis of the Scientific Evidence*.

I am Jimmy Hague, Director of the Center for Water Resources at the Theodore Roosevelt Conservation Partnership (TRCP). The TRCP is a coalition of more than 30 organizations, some of which are represented here today, dedicated to strengthening the laws, policies, and practices affecting fish and wildlife conservation. Inspired by the legacy of Theodore Roosevelt, we work every day to guarantee all Americans quality places to hunt and fish.

Each year, 47 million Americans head into the field to hunt or fish. The money sportsmen spend in pursuit of their passion supports everything from major manufacturing industries to small businesses in communities across the country. The economic benefits of hunting and angling – which total \$200 billion a year – are especially pronounced in rural areas, where money brought in during the hunting season can be enough to keep small businesses operational for the whole year. Through fees and excise taxes on sporting equipment, sportsmen also pay hundreds of millions of dollars each year for wildlife management, habitat conservation, and public access.

The TRCP has been involved in debates over the jurisdiction of the Clean Water Act for years because these economic and conservation benefits - plus over a million American jobs - all depend on clean water and productive wetlands.

However, hunting and fishing are not merely an irreplaceable component of our economy. They are a heritage we cherish and want to pass on to our children. As streams are lost to pollution and wetlands drained, fish, wildlife and sporting access are lost along with them. The Clean Water Act is the best tool we have to protect the quality of our water resources, and its jurisdiction needs to be clear to work effectively.

The TRCP was pleased to see the EPA produce the *Connectivity* report synthesizing more than 1,000 peer-reviewed publications of the best available science on wetlands and headwater streams in preparation for a rulemaking on Clean Water Act jurisdiction. Several of TRCP's partner organizations, including Ducks Unlimited, Trout Unlimited, Izaak Walton League of America and The Wildlife Society, submitted detailed comments to the Science Advisory Board (SAB), and I commend those comments to you because these organizations contain some of the

foremost wetlands and streams scientists in the world. However, today I will restrict my comments and recommendations to the consensus views contained in a letter to the SAB from 16 of the nation's leading sportsmen organizations:

- 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

Our letter contained two comments and suggested one area for further analysis in the final report.

First, we agree with the draft *Connectivity* report that the watershed scale is the appropriate context for assessing connectivity. Using this fundamental ecological unit will lead to better management of the resource because it can account for the myriad factors affecting our water quality.

Second, we commend the draft *Connectivity* report for recognizing the importance of aggregating the effects of small water bodies in a watershed. This approach is critical to determining connectivity of some of the waters most important to sportsmen.

Take, for example, the Prairie Pothole Region of the Dakotas. This area, stretching into Canada, is home to as many as 70 percent of all the ducks in North America. Taken individually, a single pothole may have little impact on downstream waters. But taken as a class, they act as important water sinks and pollutant traps. Therefore, the wholesale draining or filling of the Prairie Pothole Region will impair water quality downstream. It will also irreparably harm waterfowl habitat, America's duck hunters and part of the \$200 billion sportsmen economy I described earlier.

This leads me to our recommendation for the panel. The draft report does not draw general conclusions about the connectivity of unidirectional wetlands 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 the connectivity of unidirectional wetlands. Even if their connectivity cannot be assessed on a categorical basis, there is sufficient evidence to assess it at a regional or watershed level in some cases, such as the Prairie Pothole Region. Such analysis will strengthen the report and make the subsequent rulemaking this report will inform more useful.

Thank you for the opportunity to comment and for your service on this panel. I look forward to reviewing your results.